

Rampion 2 Wind Farm Category 8: Examination Documents Applicant's Response to Arun District Council's Deadline 1 Submissions Date: March 2024 Rev A

Application Reference: 8.44
Pursuant to: The Infrastructure Planning (Examination
Procedure) Rules 2010, Rule 8(1)(c)(i)
Ecodoc number: 005118960-01



Document revisions

Revision	Date	Status/reason for issue	Author	Checked by	Approved by
A	20/03/2024	Issue for Deadline 2	WSP	RED	RED

Contents

1.	Introduction	5
2.	Applicant's Response to Arun District Council's Deadline 1 Submissions	7
3.	References	66

Tables

Table 2-1:	Applicant's Response to Arun District Council Local Impact Report	7
------------	---	---

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 Arun District Council'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 Local Authorities and has been submitted for Examination Deadline 2.

1.3 Structure of the Applicant's Responses

- 1.3.1 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 Arun District Council's Local Impact Report and Written Representation and has been submitted for Examination Deadline 2.
- Local Authorities (including both host and neighbouring authorities):

- ▶ Arun District Council (this document: 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 (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 Arun District Council. Each response is identified in the relevant table:

- Arun District Council's Local Impact Report: **Table 2-1**; and
- Arun District Council's Local Written Representation: **Table 2-2**.

2. Applicant's Response to Arun District Council's Local Impact Report and Written Representation

Table 2-1 Applicant's Response to Arun District Council's Local Impact Report [REP1-031]

Ref	Local Impact Report Comment	Applicant's Response
1. INTRODUCTION		
1.1 to 1.5	Background	The Applicant has no further comments on these paragraphs of Arun District Council's Local Impact Report.
1.1	Rampion Extension Development Limited (the 'Applicant') has submitted an application for a Development Consent Order (DCO) to construct, operate (including maintenance) and decommission an offshore wind farm, located approximately 13km off the Sussex Coast. This is known as Rampion 2 Offshore Wind Farm and herein referred to as the 'Project'.	
1.2	This is the Local Impact Report from Arun District Council (ADC), which sets out the likely impacts of the Project within the administrative area of ADC, beyond the South Downs National Park. ADC is a host authority for the Project, with landfall within the parish of Climping (also known as Clymping) and buried onshore cables proposed north and east through the District. Purpose, Scope and Terms of Reference of the Local Impact Report.	
	Purpose, Scope and Terms of Reference of the Local Impact Report	
1.3	This Local Impact Report has been prepared with due consideration of Advice Note 1 ¹ from the Planning Inspectorate. This Advice Note refers to the Planning Act 2008 and states that: 'The sole definition of an LIR is given in s60(3) of the Act as 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'. The content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition.'	
1.4	ADC is the planning authority for Arun, apart from the area of Arun within the South Downs National Park, which falls under the planning responsibility of the South Downs National Park Authority (SDNPA). However, the SDNPA refer to advice from the Environmental Health Department at ADC. The SDNPA has a duty to work in partnership with all local authorities and, as such, with ADC. In addition, West Sussex County Council is the highways authority, education authority and Lead Local Flood Authority that covers Arun. This Local Impact Report therefore focuses on subject and geographical areas which ADC has primary planning responsibility.	
1.5	This Local Impact Report does not replicate the Environmental Statement (ES) submitted with the application for the Project, but instead seeks to draw together local knowledge and evidence of issues within the administrative area of Arun beyond the South Downs National Park that can be robustly reported to the Examining Authority. The likely impacts are presented as either positive, neutral or negative effects during construction and operation, where relevant. However, as set out in the Advice Note, it is for the Examining Authority to conduct a balancing exercise of the likely impacts.	

Ref	Local Impact Report Comment	Applicant's Response
	<p>¹ Planning Inspectorate (2012) "Advice Note One: Local Impact Reports". Available at [https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-one-local-impact-reports/] Accessed 4 December 2023</p>	
1.6	<p>1.6 Having reviewed the documentation submitted with the application for the DCO, ADC broadly agrees with the results of the assessments and the adequacy of mitigation for the archaeological, geoarchaeological and palaeo-environmental potential within the District beyond the South Downs National Park. Given this, archaeology is not considered further in this Local Impact Report.</p>	<p>The Applicant welcomes Arun District Council's broad agreement with the assessments and the adequacy of mitigation for the archaeological, geoarchaeological and palaeo-environmental potential within the Arun District beyond the South Downs National Park.</p>
1.7 to 1.10	<p>1.7 In addition to identifying key local issues and impacts, this Local Impact Report provides ADC's appraisal of the Projects compliance with local policy. However, in line with Advice Note 1, an appraisal has not been undertaken in relation to National Policy Statements (NPS).</p> <p>1.8 This Local Impact Report builds upon the Relevant Representation and the initial Principal Areas of Disagreement Statement submitted by ADC to the Examining Authority in November 2023.</p> <p>Overview of the Project</p> <p>1.9 The key offshore elements of the Project will be as follows:</p> <ul style="list-style-type: none"> • up to 90 offshore wind turbine generators and associated foundations; • blade tip of the wind turbine generators (WTG) will be up to 325m above Lowest Astronomical Tide and will have a 22m minimum air gap above Mean High Water Springs; • inter-array cables connecting the WTG to up to three offshore substations; • up to two offshore interconnector export cables between the offshore substations; • up to four offshore export cables each in its own trench, will be buried under the seabed within the final cable corridor; and • the export cable circuits will be High Voltage Alternating Current, with a voltage of up to 275kV. <p>1.10 The key onshore elements of the Project will be as follows:</p> <ul style="list-style-type: none"> • a single landfall site near Climping, Arun District, connecting offshore and onshore cables using Horizontal Directional Drilling (HDD) installation techniques; • buried onshore cables in a single corridor for the maximum route length of up to 38.8km using: <ul style="list-style-type: none"> ▶ trenching and backfilling installation techniques; and ▶ trenchless and open cut crossings. • a new onshore substation, proposed near Cowfold, Horsham District, which will connect to an extension to the existing National Grid Bolney substation, Mid Sussex, via buried onshore cables; and extension to and additional infrastructure at the existing National Grid Bolney substation, Mid Sussex District to connect Rampion 2 to the national grid electrical network. 	<p>The Applicant has provided a response to Arun District Council's Relevant Representation [RR-033] in Table 2.1 of Deadline 1 Submission – 8.24 Applicant's Responses to Relevant Representations [REP1-017] and has no further comments on these paragraphs of Arun District Council's Local Impact Report.</p>
	<p>2. Overview of the District and Key Challenges</p>	
2.1 to 2.2	<p>Description of the District and Key Challenges</p>	<p>The Applicant has no further comments on these paragraphs of Arun District Council's Local Impact Report.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>2.1 The District is located on the South Coast and approximately half of the former Arun planning authority area is now within the South Downs National Park.</p>	
	<p>2.2 The main urban areas are on the coast, with centres of population in Littlehampton, Bognor Regis and Arundel. The coastal towns are also the main employment and service areas, with Bognor Regis also supporting a campus of the University of Chichester. Beyond these towns is largely rural with scattered villages and hamlets.</p>	
2.3	<p>2.3 The key environmental sensitivities within and immediately surrounding the DCO Limits of the Project within the District are shown in Figures 1a, 1b and 2. Notably this includes:</p> <ul style="list-style-type: none"> • Scheduled monuments: Littlehampton Fort and Medieval Earthworks E and SE of St Mary's Church, listed buildings and Conservation Areas; • Site of Special Scientific Interest (SSSI): Climping Beach; • Local Wildlife Sites: Littlehampton Golf Course and Atherington Beach; and • Local Nature Reserve: West Beach. 	<p>The Applicant has no further comments on these paragraphs of Arun District Council's Local Impact Report.</p>
2.4	<p>2.4 The key challenges currently facing the District include:</p> <ul style="list-style-type: none"> • Housing: as with many local authorities, Arun faces challenges in housing supply and deliverable housing sites; • Education: educational achievement in the District is relatively low. The 2021 Census indicates that 25.4% of the District's population has achieved tertiary qualifications, compared to a national average of 33.9%²; • Employment: Arun's Economic Profile 2020-2025 found that in 2019, employment rates were generally lower (74.5%) than the West Sussex County average (80.4%). The employment rate is variable indicating a high level of insecure employment in Arun, most likely associated with the seasonal tourism industry. The occupational profile indicates to a low skill, low wage labour market profile within Arun³; • Deprivation: 2021 Census data indicate that Arun is the second most deprived area in Sussex⁴. Specifically, deprivation is associated with education and barriers to housing. Arun is the 66th most deprived local authority in England for barriers to housing and 89th for education⁵; and <p>Biodiversity: preserving and enhancing biodiversity is a key focus within Arun. Within the Biodiversity Net Gain Evidence Study⁶, several priority habitats are considered to be at risk by the Sussex Local Nature Partnership due to declines in extent, condition and distribution. These include: coastal vegetated shingle; lowland fen; reedbed; lowland heathland; intertidal mudflats; lowland meadows; and lowland calcareous grassland.</p> <p>² Office for National Statistics (2022) "2021 Census data". (Edition: June 2022). UK Data Service. Available at [https://www.ons.gov.uk/census] Accessed 4 December 2023</p> <p>³ Arun District Council (2019) "Arun Economic Profile 2020-2025". Available at [https://www.arun.gov.uk/economic-strategy/] Accessed 30 November 2023</p> <p>⁴ Office for National Statistics (2022) "2021 Census data". (Edition: June 2022). UK Data Service. Available at [https://www.ons.gov.uk/census] Accessed 30 November 2023</p> <p>⁵ UK Government (2019) "English Indices of Deprivation". Available at [https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019] Accessed 30 November 2023</p>	<p>The Applicant has no further comments on these paragraphs of Arun District Council's Local Impact Report.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>⁶ Arun District Council (2022) "Arun District Council Biodiversity Net Gain (BNG) Evidence Study". Available at https://www.arun.gov.uk/download.cfm?doc=docm93jjim4n19224.pdf&ver=24187 Accessed 1 December 2023</p>	
2.5	<p>Strategic Site Allocations</p> <p>2.5 The adopted Local Plan⁷ sets out the requirement for at least 20,000 new homes over the plan period to 2031; an equivalent of 1,000 dwellings per annum. A significant proportion of the housing land supply is proposed from strategic site allocations.</p> <p>⁷ Arun District Council (2018) "Arun Local Plan 2011-2031". Available at [arun.gov.uk/adopted-local-plan/] Accessed 4 December 2023</p>	<p>The Applicant has no further comments on this paragraph of Arun District Council's Local Impact Report.</p>
2.6	<p>2.6 As shown on Figures 1a and 2, strategic site allocations within the vicinity of the Project include Climping and Littlehampton – West Bank for approximately 300 and 1,000 dwellings, respectively, as set out in Policy H SP1 of the adopted Local Plan.</p>	<p>The allocation policies are referenced in Arun District Council's Local Impact Report are referenced in paragraph 4.7.117, 4.7.150 - 4.7.151 and in Appendix B of the Planning Statement [APP-036].</p>
2.7	<p>2.7 A reserved matters application (CM/48/21/RES) has been submitted for Climping (at Land to the West of Church Lane South of Horsemere Green Lane) and a decision is currently awaited at the time this report was prepared. This is for:</p> <p><i>'Approval of reserved matters following the grant of CM/1/17/OUT for the erection of 300 No dwellings & a building within use class E, together with public open space, LAPs, LEAP & ancillary works, including car parking & drainage arrangements, with access off Church Lane & Horsemere Green Lane'.</i></p>	<p>As noted in paragraphs 4.7.151 of the Planning Statement [APP-036], the Applicant has taken into account the allocation and the extant outline permission for the site (CM/1/17/OUT) and the Proposed Development has been designed to not preclude the allocation from coming forward. It is noted that CM/48/21/RES was granted approval on 15 December 2023, after submission of the DCO Application.</p>
2.8	<p>2.8 The DCO Limits of the Project extend along the eastern boundary of Land to the West of Church Lane South of Horsemere Green Lane, with Work No. 13 relating to temporary construction access extending marginally onto the edge of this site.</p>	<p>The construction temporary access within the proposed DCO Order Limits under Works No 13 in the Onshore Works Plans [PEPD-005] takes into account the potential for delivery of the site now approved under reserved matters application CM/48/21/RES and does not preclude the permitted site from coming forward.</p>
2.9	<p>2.9 Whilst at this stage, no planning application has been submitted for Littlehampton - West Bank, this site forms a significant part of the regeneration plans for Littlehampton. As shown in Figure 1, the DCO Limits for the onshore cable corridor extends through the western part of the Littlehampton – West Bank strategic allocation, which is discussed in Section 5.</p>	<p>The allocation policies are referenced in Arun District Council's Local Impact Report are referenced in paragraph 4.7.117, 4.7.150 - 4.7.151 and in Appendix B of the Planning Statement [APP-036].</p>
2.10	<p>Climate Change and Renewable Energy</p> <p>2.10 On 15 January 2020, ADC declared a 'Climate Emergency' and pledged to be carbon neutral by 2030⁸. Since this was declared, ADC has implemented a range of strategies and produced a Carbon Neutral Strategy⁹, which details carbon reduction targets, sets out emissions baselines and high-level actions.</p> <p>⁸ Arun District Council (2023) "Climate Change". Available at [https://www.arun.gov.uk/climate-change]. Accessed on 30 November 2023.</p> <p>⁹ Arun District Council (2023) "Carbon neutral strategy". Available at [https://www.arun.gov.uk/carbon-neutral-strategy]. Accessed on 30 November 2023.</p>	<p>The Applicant acknowledges ADC's declaration of a climate emergency, and considers that the provision of significant new renewable energy projects, such as the Proposed Scheme, is a critical part of achieving Net Zero and is consistent with the Carbon Neutral Strategy</p>

Ref	Local Impact Report Comment	Applicant's Response
2.11	2.11 In addition, in the adopted Local Plan, there is specific reference to renewable energy within Policy ECC DM1. This policy states that ADC will support renewable energy development, subject to policy specific criteria. Furthermore, this policy states that ADC expects renewable development schemes within the District to contribute positively to the social, economic and environmental development and the overall regeneration of Arun.	The Applicant considers that the Proposed Scheme comprises renewable energy development and, as set out in Part 4.7 of the Planning Statement [APP-036] , is consistent with the objectives of this policy.
2.12	2.12 Given the above, ADC acknowledges the benefits of the renewable energy in contributing to the UK's national target of net zero by 2050 and to responding to climate change. Energy from the Project would, however, be to the national grid, rather than for local use within Arun.	The Applicant agrees with Arun District Council over the role that renewable energy will play in contributing to the UK's national target of net zero by 2050 and responding to climate change. There is no planning policy requirement for nationally significant renewable energy schemes to only contribute to meeting demand in the local area and in fact such an approach would not be an efficient use of the renewable energy generated by the Proposed Scheme.
3. Local Policy		
3.1	<p>3.1 ADC's statutory development plan comprises a suite of documents, including:</p> <ul style="list-style-type: none"> • the Arun Local Plan 2011 – 2031; • 'made' Neighbourhood Plans; • the West Sussex Waste Local Plan 2014¹⁰; and • the Joint Minerals Local Plan 2018 and the Soft Sand Review¹¹. 	The Applicant agrees that the Development Plan for Arun is comprised of the documents identified by the Council's Local impact Report (with the Neighbourhood Plans only applying to specific areas of the Arun District Council area). These are referenced in paragraph 3.4.8 and 3.4.19 and Appendix B of the Planning Statement [APP-036] with Section 4.7 including references to policies in the planning assessment where relevant. See response in Reference 3.3 .
<p>¹⁰ West Sussex Council (2021) "Waste Local Plan". Available at [https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/waste-local-plan/] Accessed 4 December 2023</p> <p>¹¹ West Sussex Council (2023) "Joint Minerals Local Plan 2018" and "Soft Sand Review". Available at [https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/joint-minerals-local-plan/] Accessed 4 December 2023</p>		
3.2	<p>Arun Local Plan 2011 – 2031</p> <p>3.2 The Local Plan, which was adopted in 2018, covers the period 2011-2031 for the area of Arun. A summary of the key adopted policies that are considered relevant to the subject areas within Arun beyond the South Downs National Park and under the primary planning responsibility of ADC are summarised in Sections 5 to 9.</p>	The role of the Arun Local Plan as part of the Development Plan for Arun District Council is recognised by the Applicant.
3.3	<p>Made Neighbourhood Plans</p> <p>3.3 Beyond the South Downs National Park, the DCO Limits of the Project extends through four different areas where Neighbourhood Plans have been 'made'. These include:</p> <ul style="list-style-type: none"> • Clymping Neighbourhood Plan 2015 - 2030 (2016)¹²; • Littlehampton Neighbourhood Plan 2014 – 2029 (2014)¹³ • Lynmister & Crossbush Neighbourhood Plan 2020 – 2031 (2022)¹⁴; and • Angmering Neighbourhood Plan 2014 – 2029 (2015)¹⁵ 	<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 NSIPs is different, with the 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 Local Impact Reports' submitted to the Examination as well as any 'important and relevant' matters.</p>
<p>¹² Clymping Parish Council (2015) "Clymping Neighbourhood Plan 2015-2030". Available at [arun.gov.uk/made-plans] Accessed 4 December 2023</p>		
<p>To the extent that they are important and relevant matters in the determination of an NSIP application, the Angmering Neighbourhood Plan, Clymping Neighbourhood Plan</p>		

Ref	Local Impact Report Comment	Applicant's Response
	<p>¹³ Littlehampton Town Council (2014) "Littlehampton Neighbourhood Plan 2014-2029". Available at [arun.gov.uk/made-plans] Accessed 4 December 2023</p> <p>¹⁴ Lyminster and Crossbush Parish Council (2022) "Lyminster and Crossbush Neighbourhood Development Plan 2020-2031". Available at [arun.gov.uk/made-plans] Accessed 4 December 2023</p> <p>¹⁵ Angmering Parish Council (2015) "Angmering Neighbourhood Plan 2014-2029". Available at [arun.gov.uk/made-plans] Accessed 4 December 2023</p>	<p>and Littlehampton Neighbourhood Plan are referenced in paragraph 3.4.8 Appendix B of the Planning Statement [APP-036] with Section 4.7 including references to policies where relevant.</p> <p>The proposed DCO Order Limits does include some elements the onshore cable corridor that lie within the Lyminster & Crossbush Neighbourhood Plan Area. Whilst the policies of the Lyminster & Crossbush Neighbourhood Plan are not directly considered within the Planning Statement [APP-036], the Applicant is aware that Arun District Council's the Local Impact Report does not identify any conflicts with the Neighbourhood Plan. The Applicant has also reviewed the policies of the Plan and considers that the Proposed Scheme is consistent with the principles of sustainable development set out in the Plan, which also seeks to encourage Low Carbon Energy subject to the criteria of Policy EH5.</p>
3.4	<p>3.4 Where District-wide impacts are discussed in this Local Impact Report such as in relation to landscape, biodiversity and socio-economic considerations, reference is made to the policies within the adopted Local Plan rather than in relation to policies of the 'made' Neighbourhood Plans. However, policies of the 'made' Neighbourhood Plans are referenced where they are considered specifically relevant to Climping Compound or locally important non-designated heritage assets that could be significantly affected by the Project.</p>	<p>The Applicant has no further comments on this paragraph of Arun District Council's Local Impact Report.</p>
3.5	<p>Arun Local Plan Update 2023 – 2041</p> <p>3.5 The adopted Local Plan is currently being updated as it is more than 5 years old. Prior to commencing Regulation 18 Issues & Options in Spring 2024, a Direction of Travel (2023)¹⁶ has been published. This sets out ADC's vision and objectives, together with the direction of travel for emerging new policy options under the following themes:</p> <ul style="list-style-type: none"> • Climate Change; • Environmental Life Support Network; • Homes in the Right Places; • Economy, Health & Wellbeing and Telecommunications & Digital; • Infrastructure; • Placemaking, Heritage and Culture; and • Infrastructure to Support Our Needs. 	<p>The Planning Statement [APP-036] did not reference the emerging Local Plan update as it was not sufficiently advanced at the time of DCO Application submission in August 2023. Although there has been some further development of the emerging Local Plan this is still not in a sufficiently advanced stage to be considered further by the Applicant at this stage.</p>
	<p>¹⁶ Arun District Council (2023) "Draft Direction of Travel Document". Available at [https://www.arun.gov.uk/arun-local-plan-update-2023-2041] Accessed 4 December 2023</p>	
<p>4. General</p>		
4.1 to 4.3	<p>Alternatives</p> <p>4.1 As part of the statutory consultation process, ADC advised that it needs to be satisfied that the chosen route is the most favourable based on evidence and justification. In particular, ADC noted that this would need to include, but not be limited to, consideration of ecological designated sites.</p> <p>4.2 Chapter 3 of the ES details the alternatives considered by the Applicant. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations 2017')</p>	<p>Chapter 3: Alternatives, Volume 2 of the Environmental Statement (ES) [APP-044] describes the alternatives studied by the Applicant and a comparison of their environmental effects across the project as a whole. This includes the alternatives considered and consulted on prior to the DCO Application submission in August 2023. As described in Chapter 3: Alternatives, Volume 2 of the ES [APP-044], the Proposed Development has been developed through a multi-disciplinary design process including environment, engineering, landowner and cost considerations. The</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>require the ES to include a 'a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment' (regulation 14(2)(d))' (ADC emphasis).</p> <p>4.3 In addition, the NPS for Energy (EN-1) (2011a) and the revisions to the NPS due to come into force in early 2024) require an Applicant to 'present the main alternatives considered as part of the Proposed Development and to demonstrate consideration of environmental, social and economic effects including, where relevant, technical and commercial feasibility' (ADC emphasis).</p>	<p>Applicant has identified the preferred onshore cable route based on evidence and justification and has sought to avoid, reduce or minimise the effects through the design process and also by identifying and securing embedded environmental measures. It is acknowledged that some residual effects remain.</p>
4.4 to 4.6	<p>Route Options and Selection</p> <p>4.4 The assessment of alternatives identifies that the landfall at Climping was selected prior to the scoping exercise undertaken, however, did not consider the impact on the Climping Beach SSSI in its decision for selecting it ahead of the five alternatives (paragraph 3.4.23 of Chapter 3 of the ES).</p> <p>4.5 Within the examples of what constitutes a 'soft' constraint as part of the Applicant's constraints mapping exercise, the following is noted: 'some designated sites for biodiversity such as Ancient Woodland and National Nature Reserves'. SSSI are not specifically identified as a 'soft' constraint, nor is it evidenced that the Climping Beach SSSI was considered at this stage. Despite this, Chapter 3 of the ES states that Climping was chosen, in part, due to 'the limited number of statutory designations at the coast and immediately inland in association with the Climping landfall'.</p> <p>4.6 Only subsequent to the above it is apparent that consideration was given to 'avoidance of the Climping Beach SSSI at the eastern part of the landfall' ahead of the first statutory consultation exercise (paragraph 3.5.8 of Chapter 3 of the ES), when a decision had already been made to locate the onshore cable corridor within its vicinity. ADC do not consider the justification and evidence for choosing Climping as the landfall location sufficient with regard to environmental impacts.</p>	<p>The selection of the landfall location is summarised in paragraphs 3.4.1 to 3.4.24 of Chapter 3: Alternatives, Volume 2 of the Environmental Statement (ES) [APP-044]. The Applicant clarifies that where the chapter refers to the "limited number" of statutory designations at the chosen landfall location, this is stated in comparison to the other options and does not discount the presence of the Climping Beach Site of Special Scientific Interest (SSSI). The options west of the landfall location at Climping (see Figure 3.4 of Chapter 3: Alternatives, Volume 3 of the ES [APP-075]) include a number of designations including the Solent and Dorset Special Protection Area (SPA), the Pagham Harbour Ramsar and SSSI, the Bracklesham Bay SSSI and Solent Maritime Special Area of Conservation (SAC). The Applicant notes that, although the landfall options considered to the east (Brooklands and Tide Mills) also had fewer designations in proximity, they were not feasible landfall options for the reasons stated in the chapter.</p> <p>Following scoping in 2020 and prior to the first statutory consultation in July 2021, the Scoping Boundary was refined to avoid the Climping Beach SSSI as part of the landfall location as reported in 3.5.8 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044]. Following the first statutory consultation in July 2021, further detailed review and engagement with stakeholders including the Environment Agency identified necessary design refinements. A second landfall location further north-east was identified as an alternative following information provided by the Environment Agency on the likely future coastal erosion. The Applicant's post-hearing submission of Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1, Appendix 6 – Further Information for Action Point 7 – Horizontal Directional Drilling at Climping Beach [REP1-025] provides further information with regards the considerations for the landfall options at paragraphs 1.3.4 to 1.3.7 and the design work required.</p> <p>The landfall options are shown on the Onshore Works Plans [PEPD-005] as Works No.8. To facilitate the second landfall option, the proposed DCO Order Limits were widened to the east. All works areas shown within the Climping Beach SSSI have been designed to avoid impacts on the SSSI by limiting works to underground connection works. This is provided for by Works No.6 and Works No.7 shown on Sheet 01 (including 01a and 01b) on the Onshore Works Plans [PEPD-005] and secured in the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission) under Schedule 1 Authorised Development. The Applicant refers to the response to Arun District Council's comment under reference 4.8 below for further information.</p>

Ref	Local Impact Report Comment	Applicant's Response
4.7	<p>Construction Compound 4.7 Insufficient evidence of reasonable alternative locations (taking account environmental effects) has been given for Climping Compound. Main reasons for the selection of this location next to a residential area and tourist/community assets have also not been given. Further details on the likely effects are outlined below.</p>	<p>The horizontal directional drilling (HDD) compound options have been located well away from the Climping Beach SSSI, in part to avoid indirect effects associated with dust creation, noise and light spill. The distances, in excess of 170m, ensure that these indirect effects can be controlled effectively avoiding any effect on the SSSI. The HDD ensures that there will be no surface works within the Climping Beach SSSI, with all construction activity restricted to pedestrian access to monitor the path of the drill. This is controlled through commitment C-112 (see the Outline Code of Construction Practice [PEPD-033] for further details) and secured via Requirement 22 of the Draft DCO [PEPD-009]. Although there is a risk of drilling fluids breaking to the surface and remedial action being required, the risk is assessed as low (see Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES [APP-063]) given the measures described in the Outline Construction Method Statement [APP-255] which is secured via requirement 23 within the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The Applicant requires three temporary construction compounds (TCC's) as bases to support the construction of the onshore cable corridor to reduce the distance travelled between the compounds and cable work sites, and another two to support the onshore substation works. This includes for logistics, preparing materials, equipment maintenance, project management and to support mitigation works. Compounds must have sufficient space for the required purposes, be close to major roads, be outside of protected areas, be near the onshore cable corridor and key construction activities, and be on level clear ground. The maximum assessment assumptions and parameters for the five temporary construction compounds are outlined in Table 4-22 within Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045].</p> <p>An outline of requirement and description of uses for the TCCs is given in the Statement of Reasons [APP-021] (Paragraph 6.10 onwards) which states <i>"Temporary Construction Compounds will comprise of a hardstanding and a perimeter fence and will be used for the storage of plant and machinery and the stockpiling of materials, as well as for the provision of site management offices, parking, and welfare facilities for construction personnel (kitchen facilities, storerooms, toilets) in accordance with Health and Safety and Construction Design and Management Regulations"</i>.</p> <p>The TCCs have been located strategically to each serve a section of onshore cable route during construction. A TCC is best located near to a trunk road for ease of transport links, outside of designated areas, of sufficient size to fulfil its purpose and on flat land where possible to reduce the need for cut/fill.</p> <p>The Climping Construction Compound is located in close proximity and linked to the onshore cable construction corridor to the east, it is also in close proximity to support the landfall works. The Applicant considered an alternative compound site at Climping to the west of Church Lane prior to consultation but this was rejected due to the area overlapping with an approved Outline Application CM/1/17/OUT for the erection of up to 300 dwellings and ancillary development (for more information please see Table 3-1 in Appendix 5.4 Cumulative effects assessment, Volume 4 of the ES [APP-128]). Other alternatives were considered in the area but the extent of Flood Zone 2 and 3 in the area precluded these options in favour of the chosen site.</p>

Ref	Local Impact Report Comment	Applicant's Response
4.8 to 4.9	<p>Adequacy of the DCO Application, Actions and Commitments</p> <p>4.8 Given the above, it is considered that the Applicant has not sufficiently justified the location of the landfall at Climping. ADC subsequently request further information be provided regarding the justification to choosing Climping as the landfall location. Notwithstanding this, it is acknowledged that C-112 within the Commitments Register is as follows: <i>'No ground-breaking activity or use of wheeled or tracked vehicles will take place south of the seawall (above mean high water springs) within Climping Beach Site of Special Scientific interest (SSSI) or Littlehampton Golf Course and Atherington Beach Local Wildlife Site (LWS) unless remedial action is required. Any predicted activity will be restricted to foot access for the purpose of surveying and monitoring of the progress of the horizontal directional drill (HDD).'</i></p> <p>4.9 Whilst this is welcomed as a commitment, consideration should be given to the mitigation hierarchy and avoidance of HDD beneath the western part of Climping Beach SSSI. Furthermore, Section 7 below identifies that further information needed so that the effects can be fully understood.</p>	<p>The Applicant welcomes Arun District Council's acknowledgment of Commitment C-112 in the Commitments Register [REP1-015] which provides further clarity on the limiting of activity within Climping Beach SSSI. This is secured within the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission) under Requirement 23 (2) (b).</p> <p>The response in References 4.4 to 4.6 addresses the Climping Beach Site of Special Scientific Interest avoidance made under reference 4.9.</p>
4.10	<p>Climping Construction Compound</p> <p>4.10 A temporary construction compound (Work No.10) and a temporary soil storage area (Work No. 11) are proposed near the small village of Climping, as illustrated on Figure 2. This, together with associated construction traffic would be close to residential areas, community facilities (school and village hall), tourist assets, listed buildings and scheduled monuments, which are discussed further in the sections below.</p>	<p>The Applicant has no further comments on this paragraph of Arun District Council's Local Impact Report.</p>
4.11	<p>4.11 Climping Compound is also located immediately adjoining a strategic housing allocation, where a reserved matters application is currently being considered by ADC. Should this be approved, it is of the view of ADC that the residential development is likely to coincide with the use of Climping Compound given that should the Project be granted consent, the Project would commence later in 2025 and the compound likely to be in use for approximately 3.5 years.</p>	<p>The 300 house development project referenced was included as part of the cumulative effects assessment within the ES where relevant (Chapter 6: Coastal processes, Volume 2 [APP-047] to Chapter 29: Climate change, Volume 2 of the ES [APP-070]), this development is referred to as ID13 (CM/48/21/RES) for the reserved matters application to the original application included as ID14 (CM/1/17/OUT).</p>
4.12	<p>4.12 Whilst Climping Compound is referenced in the draft DCO only as a 'temporary construction compounds', Chapter 4 of the ES refers to Climping Compound as approximately covering 6.13ha and Chapter 18 of the ES indicates Climping Compound as containing welfare facilities/offices, parking, construction plant and storage of materials and equipment (up to 7m high) and a concrete batching plant up to 20m high. For greater certainty of the use of Climping Compound, a description (comparable detail to other Work No. descriptions in the draft DCO) of its use is sought in the draft DCO or another document so that there is a commitment to comply with the description. Furthermore, approval should be sought from ADC for the exact positioning of the 7 batching plant and soil/aggregate stockpiles and be placed as far away as possible from residents/other sensitive receptors. Whilst temporary concrete batching plants do not fall under the environmental permitting regulations, good practice should follow all applicable sections of the Process Guidance Note PG 3/01(12).</p>	<p>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. However, the Applicant considers the requirement to submit further detail as part of the stage specific CoCP with regards the exact position of the batching plant is not a matter requiring approval. The position of the soil storage is defined by Works No. 11 shown on the Onshore Works Plans [PEPD-005] sheet number 02.</p>
4.13	<p>4.13 ADC has raised concerns and sought justification regarding the size and location of Climping Compound given the likely effects, as set out below. Firmer commitments to mitigation measures specific to Climping Compound are also sought, including appropriate landscaping/boundary treatments, a Communications Construction Plan, a Dust Management Plan and stage specific management plans, particularly given the potential for dust, noise and visual</p>	<p>The Applicant refers to the response provided to Reference 4.7 for the location and uses for which the space is required. The Applicant will update the Outline Code of Construction Practice [PEPD-033] at Deadline 3 to make it clear that Construction Communications Plans will cover the compound. The Applicant will provide further detail including the topic management plans in the stage specific Code of Construction</p>

Ref	Local Impact Report Comment	Applicant's Response
	effects. The Dust Management Plan should take into account emissions of off-road construction vehicles, NOx and particulate matter.	Practice, in accordance with Outline CoCP. as secured by Draft Development Consent Order [PEPD-009] Requirement 22.
4.14	<p>Private Water Supplies</p> <p>4.14 ADC consider that the Applicant has reasonably taken the public register of private water supplies and has identified wells that have the potential to be detrimentally affected by the onshore cable corridor and compounds. However, it is possible that not all private water supplies are listed in the public register and therefore further consideration should be given to investigating potential locations.</p>	<p>The Applicant is grateful to Arun District Council (ADC) and other local authorities for their help in identifying registered private water supplies (PWSs) in their areas. However, the Applicant was aware that the local authority datasets may not necessarily capture all PWSs, so as noted in paragraph 26.6.70 of Chapter 26: Water environment, Volume 2 of the Environmental Statement (ES) [APP-067], the Applicant also sought to identify potential other PWSs in the area with reference to the location of 'wells' on Ordnance Survey 1:25000 mapping. As part of the precautionary assessment approach these too have been included in the assessment.</p> <p>In addition, any additional PWSs identified in the close vicinity of the Proposed Development post-consent will be considered for inclusion in the PWS water quality monitoring programme implemented by environmental measure C-253 in Table 26-20 of Environment Statement Chapter 26: Water environment, Volume 2 of the ES [APP-067] and also the Outline Code of Construction Practice [PEPD-033] secured through Requirement 22 of the Draft Consent Order [PEPD-009].</p>
4.15	<p>4.15 Although a setback area has been provided around each of these wells, some supplies are very close, within 300m of the works. The Applicant has highlighted monitoring (C-253 of the Commitments Register) to be carried out in each case. This should be for both microbiological and chemical parameters. The Environmental Health Department at ADC seeks the proposed long-term monitoring of these sites, which should be agreed with the Department.</p>	<p>Paragraph 26.3.20 of Chapter 26: Water environment, Volume 2 of the Environmental Statement (ES) [APP-067] outlines that Environment Agency default (50 m and 250 m) source protection zones (SPZs) have been adopted for private water supplies (PWSs) and incorporated into Appendix 26.1: Detailed water environment information report, Volume 4 of the ES [APP-215] and Figure 26.6, Volume 3 of the ES [APP-118] accordingly. Table 26-7 of Chapter 26: Water environment, Volume 2 of the ES [APP-067] confirms that there are no activities within any default SPZ1 for PWSs, whilst activities in SPZ2 have also been limited along sections of the onshore cable corridor.</p> <p>In addition, Table 26-20 of Chapter 26: Water environment, Volume 2 of the ES [APP-067] and also the Commitments Register [REP1-015] identify the provision of specific embedded environmental measures (C-78 and C-253) and other measures (e.g. C-33, C-76, C-246, C-250 and C-251) secured through the Outline Code of Construction Practice [PEPD-033] via Requirement 22 of the Draft Development Consent Order (DCO) [PEPD-009] in order to minimise the potential for effects on PWSs from the Proposed Development. Measure C-253 for instance allows for a water quality monitoring programme at PWSs <i>“for an appropriate period prior to, during and post construction of the cable route. Further details of the monitoring regime will be discussed and agreed with ADC at the post DCO stage”</i>. These discussions will include sampling locations, analytical suites and period of monitoring, as requested by Arun District Council.</p>
5. Socio-economics, economics and tourism		
5.1	<p>Local Planning Policies</p> <p>5.1 The following policies within the adopted Local Plan are considered relevant to the socio-economic aspects of the Project within the District (beyond the South Downs National Park):</p>	<p>These policies are referenced in the legislation and policy context (Section 3.4) and planning assessment (Section 4.7) of the Planning Statement [APP-036] and within Appendix B. The socio-economic assessment ES has referenced local policy as</p>

Ref	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> • Policy SKILLS SP1 encourages proposals that raise skills levels and employability; • Policy ECC DM1 supports renewable energy development provided that schemes contribute to the social, economic and environmental development and overall regeneration of the District; • Policy TOU SP1 encourages sustainable tourism development providing it protects as well as promotes the District's main tourism assets including the coast, rivers and estuaries; and • Policy H SP1 states the aim to deliver 20,000 new homes in the District within the plan period (2011-2031). The Local Plan allocates a number of Strategic Site Allocations which will provide an "important contribution" to meeting this housing need including Policy H SP2b, SD4. 	<p>relevant to the topic see Table 17-4 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058].</p>
5.2	<p>5.2 The policy within the following 'made' Neighbourhood Plan is considered relevant to Climping Compound:</p> <ul style="list-style-type: none"> • Policy CPN 1 of the Clymping Neighbourhood Plan seeks to protect community facilities. Proposals that will result in the loss or significant reduction in the scale and value of a community facility will not normally be permitted. 	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
5.3	<p>5.3 The Project has the potential to align with the adopted policies around skills and employability. It is likely to be at odds in terms of protecting tourism assets including the coast.</p>	<p>The assessment within Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] explores the impact on tourism and finds that overall, when all influencing factors are considered, the effect of the Proposed Development on the volume and value of tourism across Sussex is expected to be negligible. While there may be some people with negative perceptions of offshore wind farms who may be deterred from visiting, these are likely to be small in number and could be offset by those who are more likely to visit the area due to the development of offshore wind. For example, those visiting the existing Rampion visitor centre or those going on boat trips to the offshore infrastructure of Rampion 2.</p> <p>In addition to this, the Applicant has included a number of commitments specifically included to maximise the benefits of all project phases (construction, operation, and decommissioning) on the local economy and the local employment benefits:</p> <ul style="list-style-type: none"> • C-34 RED will identify opportunities for companies based or operating in the region to access supply chain for the Proposed Development. • C-35 RED will work with local partners and seek to maximise the ability of local people to access employment. <p>Both Commitments C-34 and C35 in the Commitments Register [REP1-015] are secured through the Outline Skills and Employment Strategy [PEPD-037] via Requirement 33 of the Draft Development Consent Order [PEPD-009].</p> <p>To further facilitate these commitments, the Applicant has developed an Outline Skills and Employment Strategy [PEPD-037]. The strategy sets out the approach that will be adopted by the Applicant, with the aim of promoting skills and employment opportunities for local economic benefit within the Sussex area. Based on engagement undertaken to date, a key ambition of the Applicant is to focus on providing sustainable careers, rather than just jobs.</p>

Ref	Local Impact Report Comment	Applicant's Response
5.4	<p>Key Local Issues and Likely Impacts <i>Skills and Employment</i> 5.4 Arun's Economic Profile 2020-2025 found that in 2019, employment rates were generally lower (74.5%) than the West Sussex County average (80.4%)¹⁷. The Project has the potential to support jobs in Arun during both the construction, operation and maintenance phases.</p> <p>¹⁷ Arun District Council (2019) "Arun Economic Profile 2020-2025". Available at [https://www.arun.gov.uk/economic-strategy/] Accessed 30 November 2023</p>	<p>The most recent Annual Population Survey data (Office for National Statistics, 2023) shows that in the period from October 2022 to September 2023 the employment rate in Arun was 85.5%. This is considerably higher than the national employment rate (75.7%). The Applicant agrees that Rampion 2 has the potential to support jobs in Arun during the construction, operation and maintenance phases and further commentary on these jobs is provided in responses to References 5.6 to 5.7, and 5.9 to 5.10 below.</p>
5.5	<p><i>Construction</i> 5.5 In Chapter 17 of the ES (at paragraph 17.9.4) estimates that the Project will support a total of 80 FTE jobs per annum¹⁸ within the Sussex study area¹⁹. This estimate is derived using the anticipated proportion of supply chain expenditure retained by businesses located within Sussex – this is estimated at 1.0% of total construction costs. The low levels of retained expenditure in Sussex are attributed to the fact that there are no Tier-1 major plant suppliers (e.g. WTG or foundations) nor an established supply chain cluster in Sussex.</p> <p>¹⁸ Including Direct, Tier 1 and Indirect FTEs ¹⁹ Defined within the ES as the county of East Sussex, county of West Sussex and the Brighton and Hove Unitary Authority.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
5.6	<p>5.6 The ES does not attempt to estimate construction employment effects at the District level. This means that no estimation of the impact of the Project on employment in the District has been undertaken.</p>	<p>The Applicant notes that a district level assessment of economic impacts would be less robust due to the high level of uncertainty associated with smaller impact areas. This is due to the fact that there is a lack of detailed information on procurement and recruitment at this stage of the project development process.</p>
5.7	<p>5.7 It is estimated herein that the Project would support 5 FTE jobs per annum within the District during the construction period (6% of the Sussex employment impact). This estimate is calculated based on the proportion of employment in the manufacturing, construction, transportation and professional services industries in Arun compared to the Sussex study area²⁰. This represents a 0.01% increase in overall employment in Arun over the four-year temporary construction period, thus is deemed a neutral effect.</p> <p>²⁰ Sussex defined as per the ES as the county of West Sussex, county of East Sussex and the Brighton and Hove Unitary Authority.</p>	<p>As noted above estimating district level employment adds another level of uncertainty to the level of impacts. If one significant supplier is located in Arun then employment impacts are likely to exceed 5 FTE per annum. Due to the development phase of the project the specific contracts and procurement details cannot be provided by the Applicant.</p>
5.8	<p>5.8 Where the onshore cable route passes through agricultural land, this would lead to the degradation of land in terms of productivity during construction and until the land has been reinstated and agricultural use reestablished. This would lead to a localised negative economic impact on agriculture during construction. ADC therefore seeks for the cable route to be located as close as possible to the field boundaries to minimise disruption to agricultural activity.</p>	<p>The cable corridor has been designed to follow field boundaries as far as practicable, in accordance with Commitment C-67 (Commitments Register [REP1-015] secured through The Authorised Development Work No's 7, 8, 9, 10 of the Draft Development Consent Order [PEPD-009]) with Work No's 8 and 9 specifically related to the landfall connection works and onshore cable installation works respectively.</p>
5.9	<p><i>Operation and Maintenance</i> 5.9 In Chapter 17 of the ES (at paragraph 17.10.4) estimates that the Project will support a total of 100- 110 FTE jobs²¹ per annum within the Sussex study area. This is based on estimates of the anticipated number of FTEs required to operate and maintain the wind farm.</p> <p>²¹ Including Direct and Indirect/Supply Chain FTEs</p>	<p>A significant proportion of the jobs in the operational phase will be based in the Operation and Maintenance base.</p>

Ref	Local Impact Report Comment	Applicant's Response
5.10	<p>5.10 As per the construction phase, the ES does not attempt to estimate employment effects at the District level. It is estimated herein that the Project would support 7-8 FTE jobs in the District based on the proportion of total employment in Arun compared to the Sussex study area. This is considered a generous assessment given that no operational activity is anticipated in Arun. This represents a neutral effect (0.02% increase) on total employment for the District.</p>	<p>Under the EIA methodology an increase in employment is be considered as a negligible beneficial effect rather than a neutral effect. A neutral effect would see zero job creation and zero job reduction.</p> <p>The applicant anticipates 40-50 FTE per annum to be based at the O&M port. It is likely that the existing facilities at Newhaven Port will be used (and expanded where necessary). The rest of the operational phase employment impact will be linked to operational phase supply chain expenditure and there is therefore greater uncertainty about the location of these jobs, which will be influenced by where suppliers are based. Nevertheless a higher proportion of these supply chain jobs are also likely to be linked to the location of the O&M base, especially with regard to roles such as cleaning and security.</p>
5.11	<p><i>Tourism and Tourism Assets</i></p> <p>5.11 Tourism and the visitor economy is vital to the Arun District being one of its major industries. The District sees 3.9m annual visits, generating £374m²² and around 5,000 jobs. In 2019, Arun was the fifth largest visitor economy in Sussex and had the highest proportion of tourism employment of all Sussex districts²³. The market town of Arundel and the seaside towns of Bognor Regis and Littlehampton provide a variety of coastal and rural tourist attractions.</p> <p>²² Economic Impact of Tourism in the Arun District (2022), Destination Research ²³ Economic Impact of Tourism in the Arun District (2019), Destination Research</p>	<p>This information is useful context. The importance of the tourism economy led to the Applicant placing a high level of sensitivity on the tourism receptor. The evidence base points to there being no clear evidence that the overall volume and value of tourism in Arun would be negatively affected by the construction, operation and decommissioning of Rampion 2.</p>
5.12	<p>5.12 The proportion of employment in accommodation and food services provides a proxy for employment within the tourism industry. Arun has the 4th highest proportion of employment in the accommodation and food services sector out of 64 local authority districts in the South East at 11.8%²⁴ or 6,000 jobs. This is higher than the average for West Sussex (8.4%) and the average across the South East (7.4%).</p> <p>²⁴ BRES Data (2022), ONS (most recently available dataset)</p>	<p>The Applicant notes that tourism is a key sector along the Sussex coast and within the South Downs National Park (SDNP). Arun is one of the Sussex coastal districts that has a strong tourism sector with a high proportion of employment, as is highlighted in the employment data presented by Arun District Council in the Local Impact Report. Due to the high level of importance of tourism across the study area (in particular the SDNP and coastal districts) the sensitivity of the volume and value of tourism was assessed as high.</p>
5.13	<p>5.13 Some areas of Arun are particularly reliant on tourism and hence are significantly more sensitive to negative impacts on tourism as a result of the Project. Figure 3 shows the proportion of employment in accommodation and food services at the Middle Layer Super Output Area (MSOA) level. The proportion of employment in accommodation and food services is significantly concentrated in some areas, with up to 35% of employment within this sector. A number of towns and villages along the coast are particularly sensitive to impacts on tourism, for example Bognor Regis and Pagham, which have over a quarter of their employment within the accommodation and food services sector.</p>	<p>Businesses in the accommodation and food sector within towns with a strong tourism offer are often particularly reliant on visitors for a large proportion of their trade. Whilst it may be a concern that perceptions of the coast could be altered by the addition of Rampion 2 to the seascape, the evidence in the Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] suggests this has not been experienced in other parts of the UK where offshore wind farms have been developed. There is also no evidence that tourism employment was affected by the construction or operation of Rampion 1. Therefore, based on the available evidence, and consideration of other factors such as</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>the nature of the tourism offer and the characteristics of visitors, the Applicant does not anticipate that the tourism economy (including hotspot areas) would be negatively impacted by the Rampion 2.</p> <p>As noted above, the assessment within Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] recognises the high level of sensitivity of tourism across many areas of Sussex (in particular seaside towns and the South Downs National Park).</p>
5.14	5.14 Given this context, the District has a great reliance on the tourism sector and a very high level of sensitivity to change, much higher than other areas potentially affected by the Project. Adverse effects on the tourism sector have the potential to have significant negative consequences for economic well-being of residents.	Please see above response Reference 5.13 .
5.15	5.15 ADC has concerns regarding negative effects from the construction and operation of the Project on the tourism economy and tourism assets, including displaced tourism from Arun, as explored below.	Noted, the Applicant provides responses to particular points below.
5.16	<p><i>Construction</i></p> <p>5.16 Construction of the Project will directly impact Arun. Offshore construction will create visual effects, as described in Section 6. Landfall is located on Climping beach, west of Littlehampton. The onshore cable route connecting the windfarm to the national grid will then travel from Climping north eastwards through Arun to Bolney substation.</p>	Noted, the Applicant has no further comments on this matter at this time.
5.17	5.17 Chapter 17 of the ES (at paragraphs 17.9.35, 17.9.39, 17.9.42) states that there will be a negligible effect on the volume and value of tourism at the Sussex level, for specific coastal towns, and along the onshore cable corridor. The evidence base used to inform the ES conclusions was primarily formed of a literature review on the impact of wind farms on tourism. The majority of studies are ex ante which the ES (Appendix 17.3, paragraph 1.4.4) acknowledges ' <i>lead to a high level of uncertainty about the scale of potential impacts, particularly as the evidence base is mixed and findings vary across studies</i> '.	<p>It is noted that the vast majority of studies used to inform the assessment within Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] are ex ante. However there is another research base of ex post evidence which provides data which is less subject to issues of bias. This is generally much more robust and therefore has greater weight in the assessment.</p> <p>For instance, several research studies have analysed employment trends in areas where offshore wind has been developed in the UK as well as ex post survey based research conducted by Government organisations such as Fáilte Ireland. In a 2021 Fáilte Ireland study (Fáilte Ireland, 2021) sixteen popular and long-established tourist sites around Ireland were chosen as the study areas. The sites were chosen to represent situations where development is visible from those locations (10 locations) – or on the route there (6 locations). The key finding in relation to the perception of Arklow Bank Offshore Wind Farm from Brittas Bay (the wind farm sits less than 15km from Brittas Bay) was that no respondents mentioned any developments standing out at Brittas Bay itself or any changes to be made, however 18% of respondents mentioned wind turbines on the way to the study location. Generally, the findings suggest that the visibility of large infrastructure projects had negligible effects on the viewer's enjoyment of the landscape and are therefore unlikely to have any impact on the volume and value of tourism.</p> <p>There is no ex post evidence that points to negative impacts on tourism economies.</p> <p>In addition, the Governments public attitudes tracker (Department for Energy Security and Net Zero, 2023a) shows growing awareness about the climate change issue and</p>

Ref	Local Impact Report Comment	Applicant's Response
5.18	<p>5.18 Furthermore, Chapter 17 of the ES states that 'ex-post research suggests that even where there have been negative effects, these often occur in the form of displaced tourism with visitors diverting to neighbouring areas instead'. Whilst this may suggest a neutral effect at the Sussex level, it suggests that areas directly affected by construction such as Arun will at least experience temporary negative effects which are amplified given the reliance on tourism.</p>	<p>growing acceptance of renewable energy and in particular offshore wind, particularly when compared the attitudes of 65+ year olds compared to 10+ years ago when the perceptions study first began. This suggests that visitors sensitivity to and acceptance of offshore wind farm may have followed a similar trend and changed over time as the public become less sensitive to and have greater acceptance of offshore wind development in the UK.</p> <p>The areas neighbouring Arun will be subject to similar visual impacts and so it is not anticipated that Rampion 2 will cause a displacement of the volume and value of tourism in Arun.</p>
5.19	<p>5.19 The ES identifies 28 tourism assets close (500m) to the onshore cable corridor which it acknowledges may potentially be impacted by the construction works. A large proportion of these tourism assets are located in Arun²⁵ (11 out of the 28 identified or approximately 40%), meaning a substantial number of the negative impacts are concentrated within the District, despite the ES identifying a negligible effect at the Sussex level. The 11 tourism assets located within the District are:</p> <ul style="list-style-type: none"> • Climping beach and car park; • Climping Beach Café; • The cheese making workshop • Brookside caravan park; • Cuckoo Camp; • Loanian villas; • Lyminster nursery caravans; • 2 Radar Cottages; Amanda Hopkinson Wedding planner; • Decoy Ponds / Let's Retreat; and • Norfolk House. 	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
5.20	<p>5.20 In addition to the tourism assets listed above, a large number of Public Right of Ways (PRoW) and cycle routes will be impacted during the construction period which could reduce visitor numbers further. The ES states that the landfall, onshore cable corridor and substation (the latter beyond the District) will potentially impact up to 154 PRoW. Of these, 37 PRoW were identified as highly sensitive "key PRoW" due to attributes such as high levels of usage²⁶. 28 of the 37 key PRoW are located within Arun District (inclusive of those located within the South Downs National Park) reflecting the disproportionate impact that Arun will experience.</p> <p>²⁶ Rampion 2 Wind Farm ES Volume 4, Appendix 17.3: Socio-economic technical baseline, Aug 2023, Table 1-19</p>	<p>The Institute of Public Rights of Way and Access Management (IPROW, 2020) published its best practice guidance for assessing development impacts upon outdoor access and recreation. The approach in this assessment has been consistent with IPROW's guidance.</p> <p>The assessment of potential impact on receptors has been conducted through:</p> <ul style="list-style-type: none"> • consideration of the strategic importance of individual recreation resources, with reference to published plans, policies and strategies; • examination of the characteristics of the recreation assets and their users, and analysis of the dependency of users on a particular resource; • consideration of the geographical position of the resource, for example, the local paths network; and • review of the expected scale, construction methods and timetable for onshore infrastructure in relation to particular resources.

Ref	Local Impact Report Comment	Applicant's Response
5.21	<p>5.21 Beyond this, other tourism assets have not been included within the list identified in the ES. These include:</p> <ul style="list-style-type: none"> • Bailiffscourt Hotel, Restaurant & Spa; • The Black Horse Climping - Opening Spring 2024; • The Barn by the Beach, Climping; • The Captain's Cottage Climping; • The Arundel Gardener, including Coffee Stop; • Woodpecker Camping Field and The Piglets Holiday Accommodation; • The Oystercatcher Pub & Restaurant; • Jaybelle Grange Holiday Lodges; • Shots – Target Range; • Ryebank Corner Glamping Campsite; • Leaside B&B; • Amberley Court B&B; • Church Farm Hub (Cuckoo Farm), Climping; • Climping Historic Church; • The Flying Fortress, Children's Activity Centre; • Ford Airfield Car Boot and Sunday Market; • Serving Thyme, Horticultural Nursery; • Edgecumbes Tea & Coffee Roastery; • Ship & Anchor Marina Campsite and Pub / Restaurant; • Brooklands Barn Retreat; • Six Bells Pub; 	<p>The Applicant notes that the majority of the Public Rights of Way (PRoW) identified as highly sensitive are located in Arun. This is mainly because of the higher levels of usage of PRoW in Arun compared to other areas where the onshore infrastructure is proposed to be located. Whilst it is recognised that PRoW in Arun may generally have a higher level of sensitivity this does not necessarily mean the impact on individual PRoW will be higher than other areas as this also depends on the magnitude of impact, which is assessed on the basis of anticipated change to existing patterns and level of use of recreational resources.</p> <p>Section 5.2 of the Outline Public Rights of Way Management Plan [APP-230] outlines commitments (C-18, C-32, C-161, C162, and C-202) within the Commitments Register [APP-254] (updated at Deadline 1) which have been incorporated into the management of PRoWs which are impacted by the onshore elements of the Proposed Development.</p> <p>Details of the proposed PRoW temporary closures and PRoW diversions are provided in the Access, rights of way and streets plan [APP-012].</p> <p>The provision of a Public Rights of Way Management Plan to be submitted to and approved by the highway authority in consultation with the relevant planning authority is secured via Requirement 20 in the Draft Development Consent Order [PEPD-009].</p> <p>Noted, the Applicant has no further comments on this matter at this time.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> • Littlehampton Caravan Club site; • Stable Cottage Holiday Let, Lyminster; • Lyminster historic church; • Fox Wood Campsite; • Selden Barns; • Long Furlong Barn Wedding Venue; • Wild Heart Hill Campsite; and • Other local tourist accommodation such as Airbnb and Vrbo lets. 	
5.22	5.22 Despite not being located within the 500m buffer it is possible that these assets will be negatively impacted by lower footfall within the District.	The assessment within Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] considers how Rampion 2 is anticipated to impact on existing patterns and level of use of recreational resources.
5.23	5.23 ADC is of the view that the volume and value of tourism within the District would be reduced during the construction period – a negative effect for the local economy. As previously discussed, Arun District is particularly sensitive to these negative effects as its economy is heavily reliant on tourism. Tourism assets within the District would see significant negative visual and landscape effects (see Section 6), which are highly likely to deter visitors during the construction period. One of the main attractions of the area is its natural beauty, for example, the undeveloped Climping beach and rural stretch of land between Littlehampton and Middleton-on-Sea. The quiet, undeveloped character of the Climping area makes the tourism industry particularly sensitive to negative impacts to views or landscapes.	There is no evidence to suggest that Rampion 2 is likely to deter visitors during the construction period. In terms of the impact of offshore infrastructure the evidence considered by the Applicant suggests that the vast majority of visitors activities will be unaffected by the addition of Rampion 2 to the seascape and will continue their visit regardless. In terms of onshore infrastructure, no significant effects are assessed on tourism assets in the onshore Study Area. Climping Beach is publicly accessible either along the shore, via Public Rights of Way (PRoW) or from the ticketed, privately owned car park at Atherington. The beach will be crossed by trenchless crossing (Horizontal Directional Drill (HDD)) and so there will be no direct interruption to access during the works. However, there will be some impact on amenity during construction. Visitors will continue to be able to use Climping beach and the rural stretch of land between Littlehampton and Middleton-on-Sea. The coastal towns in Arun will not be directly impacted by onshore infrastructure. No significant effects are assessed on tourism assets in the onshore Study Area as outlined in Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] .
5.24	5.24 Negative local noise effects (see Section 8) will also contribute to the deterrence of visitors during the construction period who are attracted to the area by its peaceful, rural setting.	Paragraph 17.9.41 (2 nd bullet) within Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] states <i>'Noise and vibration: High levels of noise and vibration have potential to disturb visitors to the extent that they no longer choose to visit an area/visitor asset which is subject to high levels of noise disturbance. This is especially true in tranquil areas such as is found in the SDNP. This impact would be highly localised, for example should visitor accommodation be located in close proximity to construction works subject to significant noise and vibration impacts there would be potential impacts on the number of customers that accommodation receives over the duration of the works. However, no significant residual effects are found in the assessment of noise and vibration detailed in Chapter 21: Noise and vibration, Volume 2 of the ES (Document Reference: 6.2.21) and as a consequence the impact on visitors' volume and value from noise and vibration disturbance is predicted to be negligible'</i> .
5.25	5.25 Increased traffic as a result of construction in the local area may also cause disruption to the visitor experience or deter visitors from particular visitor assets which are heavily impacted by congestion.	Paragraph 17.9.41 (3 rd bullet) within Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] states <i>'Transport: High levels of traffic could cause disruption to the visitor experience of an area or in some cases causes avoidance by visitors of a particular visitor asset which is heavily impacted by high levels of traffic congestion.'</i>

Ref	Local Impact Report Comment	Applicant's Response
5.26	<p><i>Operation and maintenance</i></p> <p>5.26 During operation, the Project is considered to have permanent negative visual impacts on the views from a number of locations in Arun most notably along the coastline at Bognor Regis seafront promenade, Climping beach and Littlehampton seafront promenade, as reported in Chapter 15 of the ES. These locations, which are identified in Chapter 15 of the ES as having a medium to high sensitivity, are important visitor/tourist locations for Arun – and as a result employment for residents – as well as having resident amenity. As previously evidenced, certain areas of Arun, including Bognor Regis, are particularly reliant on the visitor economy as it makes up a substantial proportion of their total employment. This reliance on tourism makes Arun particularly sensitive to negative visual effects.</p>	<p>Disruption has been minimised through the production of the Outline Construction Traffic Management Plan (CTMP) [REP1-010] which has been updated at the Deadline 1 submission. Stage specific CTMPs (including a stage specific CTMP for the works at Climping Beach) are required to be submitted in accordance with Requirement 24 of the Draft Development Consent Order [PEPD-009] and will be produced by the appointed Contractor(s) following the grant of the Development Consent Order (DCO) and prior to the relevant stage of construction. This will be produced in accordance with the Outline CTMP [REP1-010] for approval of the relevant highway authority, prior to the commencement of that stage of works.</p> <p>The likely significant transport effects of the construction phase of the Proposed Development including temporary construction compounds and trenchless crossing compounds have been assessed within Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] and Chapter 32: ES Addendum of the ES [REP1-006] submitted at the Deadline 1 submission. With the implementation of embedded environmental measures (as described in the Outline CTMP [REP1-010]), no significant transport effects have been identified in relation to identified sensitive receptors within Climping.</p> <p>Chapter 32: ES Addendum [REP1-006] submitted at Deadline 1 has identified significant effects related to transport on Michelgrove Lane within Arun District however these significant effects are limited to peak construction and on a route which is unlikely to be used by a significant volume of visitors to the Arun District.</p>
5.27	<p>5.27 The photomontages below in Figure 6 and Figure 7 (sourced from Chapter 15 of the ES) illustrate the negative visual effects of the WTG on views from the Bognor Regis seafront and Climping beach. As discussed in Section 6, the WTG are considerably larger than those of Rampion 1, with a blade tip height up to 185m greater than the Rampion 1 WTG. The detrimental impact of the WTGs on seascape in the District is likely to reduce the volume and value of tourism within Arun throughout the operational period, thus having the potential for a long-term negative effect on the local economy which is particularly sensitive to negative impacts on tourism. Whilst it is recognised that the evidence is mixed in terms of ex-post evaluation for other areas (as per the ES), the scale of the WTGs and the acknowledged negative visual impact is considered to be particularly prominent in Arun and likely to have a more discernible negative effect</p>	<p>Please see above response Reference 5.17 above and Reference 5.27 below.</p> <p>The Applicant acknowledges that the scale of turbines under the maximum design scenario are larger than the existing Rampion 1 and the layout means that the Arun coast is closer to the proposed Rampion 2 turbines than Rampion and as a result the visual impacts on Arun are higher than from Rampion 1.</p> <p>The ex-post evaluation evidence is not mixed as there is no ex post evidence to suggest that offshore wind development has had any negative impact on tourism economies in the UK. All of the ex post evidence reviewed by the assessors suggests there are likely to be negligible effects on the volume and value of tourism on local tourism economies.</p> <p>The visual effects of Rampion 2 wind turbine generators (WTGs) are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the</p>

Ref	Local Impact Report Comment	Applicant's Response
5.28	<p><i>Community Disruption</i></p> <p>5.28 A number of the tourism assets listed above are equally assets to the local community, for example Climping beach and Climping Beach Café. Furthermore, Climping Village Hall and playing fields and Clymping Church of England Primary School would be near Climping Compound. This means that the negative effects to these assets during the construction period would also affect the local community, reducing amenity for residents in the area.</p>	<p>ES [APP-056]. The Applicant notes that significant effects on views experienced by people have been identified at a number of representative viewpoints from settlements and seafronts along this section of the Arun coastline. The array area is located approximately 14 km from the closest point of the Arun coastline. Design principles are described in Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056], which sets out how the design evolution has resulted in changes and embedded environmental measures to help mitigate the visual effects of the Proposed Development, in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, its spread and quantity of wind turbine generators (WTGs) within it. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. For the reasons stated above the need to retain flexibility of WTG numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario is necessary.</p> <p>Volume 2 of the ES [APP-042–APP-072] has assessed the effects of the Climping compound during the construction phase. Though impacts will arise, there are no significant effects arising from noise, dust, ecology, settlement/residential areas, Public Rights of Way access 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 Outline Public Rights of Way Management Plan (PRoWMP) [APP-230]. The Applicant acknowledges that there will be significant landscape and visual effects associated with the presence of the Climping compound on the local landscape character including views from the Climping Caravan Site. These will be temporary and limited by retention of the perimeter vegetation along the A259. Where removal is required (as per the Vegetation Retention Plan–Appendix B of the Outline CoCP [PEPD-033]), this will be temporary as per the commitment to reinstatement in the Outline Landscape and Ecology Management Plan (LEMP) [APP-232] is considered. Each of the above plans will be subject to submission of stage specific details for approval (including the stage specific CoCP and stage specific LEMP to Arun District Council who will also be consulted on the stage specific CTMP and stage specific PRoWMP (for approval by West Sussex County Council)). This is as per the Draft Development Consent Order (DCO) [PEPD-009] Requirements 22, 12, 24 and 20 respectively.</p> <p>The assessment within Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] explores the effect of the Proposed Development on onshore recreation activity, employment, gross value added, and value of the tourism economy and finds that overall, when all influencing factors are considered, the effect of the Proposed Development on the volume and value of tourism across Sussex is expected to be negligible across employment, gross value added, volume and value of the tourism economy, access to and enjoyment of onshore recreation activity, which is considered not significant in EIA terms.</p>
5.29	<p>5.29 In addition, temporary road closures and/or diversions during the construction period would cause further disruption for residents of Arun.</p>	<p>Please see response below Reference 5.30.</p>

Ref	Local Impact Report Comment	Applicant's Response
5.30	5.30 It is ADC's view that the construction of the Project will cause localised negative effects in terms of disruption to local communities such as Climping.	<p>Disruption has been minimised through the production of the Outline Construction Traffic Management Plan (CTMP) [REP1-010] which has been updated at the Deadline 1 submission. Stage specific CTMPs (including a stage specific CTMP for the works at Climping Beach) are required to be submitted in accordance with Requirement 24 of the Draft Development Consent Order [PEPD-009] and will be produced by the appointed Contractor(s) following the grant of the Development Consent Order (DCO) and prior to the relevant stage of construction. This will be produced in accordance with the Outline CTMP [REP1-010] for approval of the relevant highway authority, prior to the commencement of that stage of works.</p> <p>The likely significant transport effects of the construction phase of the Proposed Development including temporary construction compounds and trenchless crossing compounds have been assessed within Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] and Chapter 32: ES Addendum of the ES [REP1-006] submitted at the Deadline 1 submission. With the implementation of embedded environmental measures (as described in the Outline CTMP [REP1-010]), no significant transport effects have been identified in relation to identified sensitive receptors within Climping.</p>
5.31 5.33	<p>to Strategic Housing Allocation</p> <p>5.31 The onshore cable corridor transects through one of the strategic housing allocations (Policy H SP2b, SD4: Littlehampton – West Bank) identified in the adopted Local Plan. The allocation is for circa 1,000 residential dwellings that will be key to supporting future regeneration of the town and the Littlehampton Economic Growth Area.</p> <p>5.32 ADC has significant concerns that the onshore cable corridor would sterilise the western part of the allocation and impede the ability to bring forward this site for housing.</p> <p>5.33 Arun faces a significant challenge in ensuring there is enough good quality and affordable housing available for its residents and is required to meet its housing needs targets. Should allocation SD 4, or part thereof, become sterilized as a result of the Project and thus no longer be able to be brought forward for circa 1,000 residential dwellings, this will further increase pressures on housing supply in the District. Alternative housing sites would need to be identified and allocated. This presents a potential negative effect on Arun.</p>	<p>The onshore cable route includes a trenchless crossing of a section of the allocated land as outlined in Appendix A Crossing Schedule of the Outline Code of Construction Practice (CoCP) [PEPD-033] secured via Requirement 22 of the Draft Development Consent Order [PEPD-009].</p> <p>This site has been considered within paragraph 4.7.150 of the Planning Statement [APP-036] which states that '<i>The Proposed Development has been designed to take into account the allocation and approved outline application for the site (Arun District Council application ref: CM/1/17/OUT), which identifies a new access off the A259, and the Proposed Development will not preclude the allocation coming forward</i>'.</p> <p>Therefore there will be no negative effects on the supply of housing in Arun.</p>
5.34	<p>Fishing Industry</p> <p>5.34 Arun has a small but locally significant fishing industry. Littlehampton, located at the mouth of the River Arun, has a harbour with small-scale fishing operations.</p>	<p>The Applicant notes that a number of registered vessels that fish within the Rampion 2 commercial fisheries Study Area of ICES rectangle 30E9 are based out of Littlehampton. Landings statistics sourced from the Marine Management Organisation (MMO) indicate that between 2018 and 2022 an average of 74 tonnes of landings were made into Littlehampton each year, with the majority of landings comprising whelk and cuttlefish. The commercial fisheries baseline and impact assessment (Chapter 10: Commercial Fisheries, Volume 2 of the ES [APP-051] and Appendix 10.1: Commercial Fisheries Technical Baseline Report, Volume 4 of the ES [APP-146]) takes account of the inshore fleet operating from Littlehampton.</p>
5.35	<p>5.35 Sussex Inshore Fisheries and Conservation Authority's (IFCA) states²⁷ that '<i>developments such as offshore wind farms, should not compromise the Authority's ability to maintain and promote sustainable fisheries and protection of the marine environment</i>'</p>	<p>The Applicant is committed to supporting a sustainable fishing industry. The Applicant has developed an Outline Fisheries Liaison and Coexistence Plan [REP1-013] (updated at Deadline 1 and secured in condition 11 (g) of Schedule 11 and 12 of the</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>²⁷ https://secure.toolkitfiles.co.uk/clients/34087/sitedata/files/Authority_Reports/Planning-Policy-Statements.pdf</p>	<p>Draft Development Consent Order [PEPD-009] that sets out measures to enable the co-existence of sustainable fishing and offshore wind farm development.</p>
5.36	<p>5.36 The ES provides an assessment of the potential impacts to the fishing industry. This assesses a range of potential impacts during the construction and operational and maintenance phases such as reductions in access to established fishing grounds, increased pressure on adjacent grounds and disturbance of commercially important fish and shellfish resources.</p>	<p>Noted by the Applicant. The results of the commercial fisheries assessment are presented in Chapter 10: Commercial Fisheries, Volume 2 of the ES [APP-051].</p>
5.37	<p>5.37 The ES assesses the impact at the fisheries level, identifying UK and international fleet impacts. It is likely that Arun-based fisheries would be amongst those impacted. ADC welcome the Applicant's commitment to ongoing liaison with fishing fleets and issue of notifications to the fishing community to provide advanced warning of Project's activities and associated Safety Zones (Commitments C47, C-92, C-93 in the Commitments Register).</p>	<p>The Applicant confirms that the commercial fisheries baseline and impact assessment (Chapter 10: Commercial Fisheries, Volume 2 of the ES [APP-051] and Appendix 10.1: Commercial Fisheries Technical Baseline Report, Volume 4 of the ES [APP-146]) takes account of the inshore fleet operating from Littlehampton. A range of commitments to mitigation are presented within Section 10.7 of Chapter 10: Commercial Fisheries, Volume 2 of the ES [APP-051], and these are further re-stated in the Outline Fisheries Liaison and Coexistence Plan [REP1-013] (updated at Deadline 1 and secured in condition 11 (g) of Schedule 11 and 12 of the Draft Development Consent Order [PEPD-009]) that sets out measures to enable the co-existence of sustainable fishing and offshore wind farm development, and which will be finalised post-consent following engagement with the fishing industry.</p>
5.38	<p><i>Adequacy of the DCO Application, Actions and Commitments</i> 5.38 Whilst a Sussex level estimate of job creation has been undertaken in the ES, it has not been assessed at the District level within the administrative area of Arun. An indicative estimate of the proportion of job creation likely to take place in Arun has been provided above, however, the Applicant should undertake a full assessment of employment effects at the District level to inform developing skills and employment opportunities within the District.</p>	<p>Although the assessors agree that providing impacts at a lower spatial scale would be a useful output of the economic impact assessment, conducting the economic impact assessment at more local level would be subject to unacceptably large margins of error due to the uncertainty over which businesses and residents would access economic opportunities. Therefore a larger Study Area was used. This approach was confirmed through the EIA scoping and subsequent consultations with local stakeholders.</p>
5.39	<p>5.39 Low levels of supply chain expenditure are expected to be retained within Sussex. This contributes to concerns regarding the Outline Skills and Employment Strategy which provides very limited detail and does not list ADC as a consultee. More detail should be provided on the strategy and benefits for ADC, including linking to long term investments in local opportunities for apprenticeships and education institutes in Arun such as the University of Chichester Bognor Regis Campus. Objectives need to include support for local Small Medium Enterprises (SMEs) and opportunities for SMEs to access the supply chain including potentially supply chain managers. Measures should be secured through the Outline Code of Construction Practice (CoCP). In addition, ADC should be sought as a consultee for the development of the Skills and Employment Strategy. The Supply Chain Plan similarly requires definition and commitment. ADC expect this Plan to be secured through the CoCP.</p>	<p>The original outline Skills & Employment Strategy (oSES) [APP – 256] was intentionally high-level and has since been updated at Procedural Deadline A [PEPD-037]. The Applicant was not in a position to document concrete commitments without further consultation with key skills & employment stakeholder organisations in Sussex. The first tranche of consultation took place between July and October 2023, the results of which have fed into the second iteration of the oSES [PEPD-037], submitted to the Examining Authority (ExA) in January 2024.</p> <p>This latest version of the oSES [PEPD-037] includes seven additional key skills & employment stakeholder organisations, including Arun District Council and the University of Chichester, alongside Horsham and Adur & Worthing Councils, other educational institutions and Gatwick Airport. Following this series of consultation meetings and the examination itself, the Applicant will produce a further iteration of the Skills & Employment Strategy and ultimately produce the final SES which will outline key objectives, initiatives and activities, which will also include greater detail on timelines, monitoring and commitments. These are likely to include details regarding an apprenticeship scheme and engagement with educational institutions. The oSES is secured through Requirement 33 of the Draft Development Consent Order [PEPD-009].</p>

Ref	Local Impact Report Comment	Applicant's Response
5.40	5.40 ADC has concerns regarding adverse effects on tourism and tourism assets, including displacement of tourism from Arun. The current list of tourism assets is not considered complete. It is acknowledged that C-33 in the Commitments Register seeks to minimise impact but does not necessarily mean that negative impacts will not occur.	<p>Supporting existing local business is integral to the ultimate delivery of skills and employment objectives which will be set out in the final SES. The oSES [PEPD-037] already documents the intended industry leadership in this area in para 2.3.3, which sets out two related initiatives:</p> <ol style="list-style-type: none"> 1. Encouraging and supporting growth and employment in local supply chain companies; and 2. Increasing visibility of local Small and Medium-sized Enterprises (SMEs) within the employment market. <p>The Applicant will continue engaging with local authorities and education institutions on further iterations of the oSES and the subsequent delivery of the strategy post consent. The final SES and delivery of the obligations within it will be discharged under Requirement 33 of the Draft Development Consent Order [PEPD-009] which has been updated at Deadline 2.</p> <p>The Applicant will develop supply chain commitments in the relevant document which would be secured through the Contract for Difference from DESNZ.</p> <p>As noted in response to previous points regarding tourism impacts the assessment within Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] concluded that there will be no significant effects on the volume and value of tourism in Sussex. The tourism assets within the onshore study listed in the assessment include tourism assets within the onshore Study Area which included:</p> <ul style="list-style-type: none"> • 1 beach; • 5 cafes and pubs; • 8 caravan parks / campsites; • 11 other visitor accommodation; and • 3 other assets including workshops, wedding venue equestrian venue. <p>Within Arun District the following assets are identified in the onshore study area (within 500m of the onshore DCO limits):</p> <ul style="list-style-type: none"> • Climping beach and car park (Climping, Atherington, Littlehampton BN17 5RN); • Climping Beach Café (Climping, Atherington, Littlehampton BN17 5RN); • The cheese making workshop (Perry Barn, Poling St, Poling, Arundel BN18 9PS); • Brookside caravan park (Lyminster Rd, Lyminster, Wick, Littlehampton BN17 7QE); • Cuckoo Camp (Church Farm House, Church Ln, Littlehampton BN17 5RR); • Ionian Villas (1885 Horsemere Green Ln, Littlehampton BN17 5QX); • Lyminster Nursery Caravans (Lyminster nursery, Littlehampton BN17 7QF); • 2 radar cottages (Poling St, Poling, Arundel BN18 9PS); • Decoy Punds (The Decoy, Decoy Ln, Arundel BN18 9QA); and • Let's retreat (Decoy Ln, Arundel BN18 9QA). <p>The Applicant will consider any other assets highlighted by Arun District Council.</p>

Ref	Local Impact Report Comment	Applicant's Response
5.41	<p>5.41 To help to mitigate against the long-term negative effects to tourism that Arun are likely to experience, consideration should be given to a visitor centre in Arun to act as a tourist attraction, engaging visitors with the Project similarly to the centre established as part of Rampion 1 in Brighton. As a part of this the centre could offer boat trips to visit the windfarm. The Look & Sea Visitor Centre at 63-65 Surrey Street, Littlehampton (also hosting the Harbour Lights Café) provides an opportunity location for such a proposal and has direct access to a slipway for boat trips. Due consideration should be given to this by the Applicant as part of the mitigation strategy.</p>	<p>Local evidence from the tourism sector ONS employment data pre, during and post construction of Rampion 1 is presented in Chapter 17: Socio-economics, Volume 2 of the ES [APP-058]. As noted in the assessment this shows continued growth of the sector across Sussex when comparing pre construction to post construction (pre Covid-19 pandemic).</p> <p>Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] details relevant studies and evidence from offshore wind farms in the UK which shows that there has been no evidence of overall negative impact on the tourism economy from the development of offshore wind farms in the UK and there are a number of UK offshore wind farms which are operational that are less than 25km from shore (including Westermost Rough, Humber Gateway, Lincs, Thanet, Kentish Flats Extension, Gwynt y Mor and Rampion 1). This evidence included analysis of tourism employment numbers for Rampion 1 which showed higher levels of tourism and employment across Sussex coastal seaside towns over the period in which Rampion 1 was operational compared to before Rampion 1 began construction.</p> <p>The assessment of the impact on the volume and value of tourism detailed in Sections 17.9, 17.10 and 17.11 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] considered the changing public perceptions of offshore wind as evidenced by the UK Governments Public Attitudes Tracker. The assessment within explores the impact on tourism and finds that overall, when all influencing factors are considered, the effect of the Proposed Development on the volume and value of tourism across Sussex is expected to be negligible. While there may be some people with negative perceptions of offshore wind farms who may be deterred from visiting, these are likely to be small in number and could be offset by those who are more likely to visit the area due to the development of offshore wind (see paragraph 17.9.27 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058]). For example, those visiting the existing Rampion visitor centre or those going on boat trips to the offshore infrastructure of Rampion 2.</p> <p>Therefore, there is no mitigation required, it is too early for The Applicant to commit to a Rampion 2 Visitor Centre and such an initiative would be distinct from the DCO.</p> <p>The Applicant would not offer boat trips to the wind farm as such services can be provided by existing charter boat businesses and the Applicant does not wish to compete with or reduce that local business offering. The Applicant is aware of multiple organisations offering boat trips to Rampion 1 and uses these providers regularly to facilitate stakeholder visits to the wind farm.</p>
5.42	<p>5.42 ADC request further information on what impact the Project is likely to have on the strategic housing allocation at Littlehampton – West Bank, including any sterilisation of land and the effect on housing delivery within Arun.</p>	<p>Please see above responses Reference 5.31 to 5.33.</p>
5.43	<p>5.43 Overall, ADC is of the opinion that the District will not significantly benefit from the Project, rather the area will experience disruption and negative or neutral effects. Job creation is likely to be neutral based on current estimates and any benefit likely to be outweighed by harm to the local tourism industry, impact to housing supply and local community disruption.</p>	<p>The assessment in Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] demonstrates that there would not be a significant effect on the tourism economy. This assessment draws on detailed evidence presented in Appendix 17.3: Socio-economics technical baseline, Volume 4 of the ES [APP-165]. Overall, this</p>

Ref	Local Impact Report Comment	Applicant's Response
5.44	<p>5.44 ADC request further information on the Community Benefits Package and commitments to be made to ADC for the Community Benefits Package to adequately compensate and offset adverse effects within the District that cannot be otherwise mitigated. There are concerns regarding the mechanism by which the Community Benefits Package is secured and the criteria/funds involved which are not referenced within the draft DCO. There are a range of potentially suitable tourism partnership mechanisms for distributing funds from the Community Benefits Package such as Experience West Sussex and Sussex by the Sea as well as direct development as per the suggestion above.</p>	<p>shows that offshore wind farm developments generate very limited, or no negative impacts on visitor numbers or expenditure during the construction and operational phases.</p> <p>As outlined above in response to Reference 5.31 to 5.33 there no negative effects anticipated on the supply of housing in Arun.</p>
6. LANDSCAPE, VISUAL AND SEASCAPE		
6.1	<p>Local Planning Policies</p> <p>6.1 The following policies within the adopted Local Plan are considered relevant to the landscape and visual aspects of the Project within the District (beyond the South Downs National Park):</p> <ul style="list-style-type: none"> • Policy LAN DM1 seeks development to respect the particular characteristics and natural features of the landscape character areas and, wherever possible, to reinforce or repair the character of those areas; • Policy C SP1 relating to where new development in the countryside, early consideration will need to be given to landscape enhancement; and • Policy ECC DM1 relating to renewable energy development seeks the location and design to minimise adverse impacts on the landscape and to take into account ADC's landscape assessment and sensitivity studies. 	<p>These policies are referenced in the planning assessment outlined in Section 4.7 of the Planning Statement [APP-036] and within Appendix B. The assessments set out in the Environmental Statement (ES) have referenced local policy as relevant to the topic. Table 18-4 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] sets out the key local planning policies with regards to landscape and visual impacts.</p>
6.2	<p>6.2 Once the vegetation and landscape elements have re-established, the Project is considered over the long term to be compliant with Policy LAN DM1. However, owing to the lack of commitment to landscape enhancement within the District and the effects of the WTG on the coastline, the Project does not accord with the overall aims of the other policies identified above.</p>	<p>The effects on landscape character are reported in Chapter 18 Landscape and Visual Impact Assessment, Volume 2 of the ES [APP-059] and are all restricted to the construction phase. In this respect, the landscape character of the South Downs National Park will be conserved and the onshore cable will be underground.</p> <p>Paragraph 2.6.6 Outline Landscape and Ecology Management Plan (LEMP) [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>

Ref	Local Impact Report Comment	Applicant's Response
6.3	<p>Key Local Issues and Likely Impacts</p> <p>6.3 As set out in the adopted Local Plan, the landscape character of the area within Arun varies between the low coastline, open agricultural landscape and the backdrop provided by the scarp slope of the South Downs National Park. Approximately 50% of Arun is within the South Downs National Park, which is a statutorily protected landscape, recognised by Government to be of the very highest quality.</p>	<p>The Applicant will continue to engage with South Downs National Park Authority (SDNPA) on potential compensation and enhancement opportunities within the National Park.</p> <p>Noted, the Applicant has no further comments on this matter at this time.</p>
6.4	<p>6.4 The area within Arun beyond the South Downs National Park is generally low lying with views across a flat open landscape. The countryside between urban settlements and villages are valued parts of the landscape with 'Climping Gap' one of the few remaining stretches of open, undeveloped coastline. The coastal plain exhibits a high level of landscape and visual sensitivity. Climping Gap, whilst not a nationally designated landscape, is a protected landscape within the adopted Local Plan.</p>	<p>Noted, the Applicant has taken account of the 'Climping Gap' in the LVIA and has no further comments on this matter at this time.</p>
6.5	<p>Landscape and Visual</p> <p>6.5 Owing to the prevailing landscape character and the topography being flat with no significant changes in elevation, together with the proximity of the Project to residential areas, the principal concerns and effects are considered to relate to the construction activities, as follows:</p> <ul style="list-style-type: none"> significant negative visual (amenity) effects on residents and settlements (such as on Climping village and Climping Caravan Park; the latter a semi-retirement park for over 50's), together with from transport routes and visitor attractions (Climping beach, Climping Camp Site, PRow and Sustrans Cycle Route) in relation to the landfall construction compound (Work No. 8), cable installation works (Work No.9) and Climping Compound (Work No.10); significant negative landscape and character effects, such as on the Climping Lower Coastal Plain, Lower Arun and Middle Valley Floors and Lyminster-Angmering Coastal Plain from the construction works, as acknowledged as in Chapter 18; and negative effects on landscape elements from the loss and disturbance of vegetation (such as trees, scrub and hedgerows) during and beyond the construction works for a significant duration, until the vegetation thrives and becomes established. All restoration of land to its prior use, former condition and same habitat type (principally agricultural) would have a neutral effect in the long-term. However, there is an opportunity for a positive effect in the long term if the reinstatement enhances habitat. 	<p>Noted, the Applicant agrees there will be significant negative landscape and visual effects during the construction period as assessed in Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] and reported in detail in Appendix 18.2: Viewpoint analysis, Volume 4 of the ES [APP-168], Appendix 18.3: Landscape assessment, Volume 4 of the ES [APP-169], and Appendix 18.4: Visual assessment, Volume 4 of the ES [APP-170].</p> <p>Beyond the construction period replacement planting will become established by year 5 and associated effects within this period will be of short duration and variable in nature in different locations as described in the LVIA. The short duration is defined by the terms of the methodology set out in Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the ES [APP-167]. Please also see Applicants response to Reference 6.15.</p> <p>Restoration and planting are secured in the Outline Code of Construction Practice (CoCP) [PEPD-033] and the Outline Landscape and Ecology Management Plan [APP-232]. This document is being updated for submission at Deadline 3. 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).</p> <p>The Applicant will continue to engage with South Downs National Park Authority (SDNPA) on potential compensation and enhancement opportunities within the National Park.</p>
6.6	<p>6.6 Given the location and substantial size of the Climping Compound in proximity to the village of Climping, individual properties and the village hall and playing field, together with the likely nature of the uses within the compound (such as welfare cabins, a concrete batching plant up to 20m in height and materials and equipment up to 7m high, it is of the view that the visual effects would be</p>	<p>Noted, the Applicant agrees there will be significant negative landscape and visual effects related to the Climping Construction Compound, during the construction period as assessed in Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] and reported in detail in Appendix 18.2: Viewpoint analysis, Volume 4 of</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>significant. ADC concerns relate to the spatial presence as the compound would be visible from different vantage points and the visual dimension of openness as it is not only people in the immediate surroundings that might see but also the wider environ.</p>	<p>the ES [APP-168], Appendix 18.3: Landscape assessment, Volume 4 of the ES [APP-169], and Appendix 18.4: Visual assessment, Volume 4 of the ES [APP-170].</p> <p>In terms of 'openness' it should be noted that the site of the Climping Construction Compound is well screened by existing vegetation along Church Land and part of the A259 (including cycle routes and the Arun Way overlapping with these routes), largely enclosing views from the south, west and north.</p>
6.7	<p>6.7 It is noted that the level of effect reported in Chapter 18 of the ES on settlements of Climping and Atherington, Littlehampton, Lyminster and Poling is identified as 'Moderate to Minor' during construction works, which are identified in the assessment as not significant. Based on the information provided, ADC disagrees that it can be concluded that there will be 'no significant effects on the views and visual amenity of settlements' during the construction, which is reported in Chapter 18 of the ES.</p>	<p>The settlement assessment is detailed further in Appendix 18.4: Visual assessment, Volume 4 of the ES [APP-170] and takes account of intervening screening from successive layers of vegetation and non-residential built form around the periphery of these settlements that will screen or partly screen the onshore elements of the Proposed Development. The nature of this screening has been observed on site and is illustrated in Figures 18.8a-d, Volume 3 of the ES [APP-098]. Significant visual effects are identified in respect of two individual properties at Lyminster and also at the Climping Caravan Park in Appendix 18.5: Residential visual amenity assessment, Volume 4 of the ES [APP-171].</p>
6.8	<p>Seascape</p> <p>6.8 ADC recognise that the WTG would inevitably result in changes to seascape character and views. Nevertheless, owing to the height, extent and relative proximity to the coastline, the principal concerns and effects are considered to relate to the operational of the Project, as follows:</p> <ul style="list-style-type: none"> significant negative effects on views along the coastline at Bognor Regis seafront promenade, Climping beach and Littlehampton seafront promenade during operation, as acknowledged in Chapter 15 of the ES. 	<p>The seascape and visual effects of Rampion 2 wind turbine generators (WTGs) are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. The Applicant notes that significant effects on views experienced by people living and visiting West Sussex have been identified at a number of representative viewpoints along the West Sussex coastline including from Bognor Regis, Climping Beach and Littlehampton sea front. The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of seascape, landscape and visual impact assessment (SLVIA) specific design principles (Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived seascape qualities and views, focusing particularly on the South Downs National Park (SDNP). Opportunities to reduce effects through further design principles specific to West Sussex are limited by the technical, economic and functional requirements of the Proposed Development to produce renewable energy, as well as other environmental factors as presented in the final array area extent in the Offshore Works Plan [PEPD-004]. The refinement process for the offshore array site selection considered has been presented in Section 3.2 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044]. The Applicant's Deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037] also provides further commentary on these SLVIA specific design principles.</p>
6.9	<p>6.9 It is acknowledged that the spatial extent of the WTG has been reduced during consultation and the design process. However, the extent and scale would be much greater than Rampion 1. The Non-Technical Summary for the ES reports that for the 116 WTG of Rampion 1, the WTG have a 140m blade tip height, whilst the WTG for the Project are up to a height of 325m when measured from Lowest Astronomical Tide to the tip of the vertical blade. This is a considerable difference in height. These WTG would have significant visual effects on the views from the coastline at Bognor Regis seafront promenade, Climping beach and Littlehampton seafront promenade, as reported in</p>	<p>The Applicant notes that Arun District Council are correct in the assertion that Rampion 1 consists of 116 wind turbine generators (WTGs) of 140m blade tip height and that the WTGs for Rampion 2 are up to a height of 325m to blade tip. The seascape and visual effects of Rampion 2 WTGs are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. The Applicant notes that significant effects on views experienced by people living and visiting West Sussex have been identified at a number of representative viewpoints along the West Sussex coastline including from Bognor Regis, Climping Beach and Littlehampton sea front</p>

Ref	Local Impact Report Comment	Applicant's Response
	Chapter 15 of the ES. These locations, which are identified in Chapter 15 of the ES as having a medium to high sensitivity, are visitor/tourist locations.	and that these significant effects result from the combination of the medium to high sensitivity of receptors and the medium-high to high magnitude of change arising principally from the apparent scale and western lateral spread of WTGs in the field of view out to sea. As noted above in response to Reference 6.8 , opportunities to reduce effects through further design principles specific to West Sussex are limited by the technical, economic and functional requirements of the Proposed Development to produce renewable energy, as well as other environmental factors as presented in the final array area extent in the Offshore Works Plan [PEPD-004] . The refinement process for the offshore array site selection considered has been presented in Section 3.2 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044] and the Applicant's Deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037] provides further commentary on the SLVIA specific design principles.
6.10	<p>Adequacy of the DCO Application, Actions and Commitments</p> <p>6.10 Whilst some of the viewpoints for the landscape and visual assessment were agreed with ADC, this was prior to details being available for the landfall construction compound (Work No.8), trenchless crossing compounds as part of the cable installation (Work No. 9) and Climping Compound (Work No.10). The coverage of viewpoints and photomontages within these areas is not considered to be sufficient given the scale, nature and potential for significant visual effects of the Project. ADC therefore seeks additional viewpoints (locations to be agreed with ADC) to be assessed. This would enable the likely significance and extent of effects, including on settlements, to be fully understood and, where necessary, adequately mitigated for the duration of the construction works.</p>	<p>There are four LVIA viewpoints within the area between the coastline / landfall and the Climping Construction Compound (Viewpoint: A (Figure 18.19, Volume 3 of the ES [APP 099]) Viewpoint B (Figure 18.20, Volume 3 of the ES [APP 099]), Viewpoint B1 (Figure 18.21, Volume 3 of the ES [APP 099]), and Viewpoint Q (Figure 18.60, Volume 3 of the ES [APP 102]). This compares with other similar assessments where only limited contextual photos are provided of the proposed cable corridor route (e.g. Awl-y-mor and Rampion 1). The assessment has been conducted in the field by chartered landscape architects and a selection of the viewpoints are provided to illustrate the range of effects likely to result from the onshore elements of the Proposed Development in accordance with the methodology.</p> <p>Additional viewpoint requests were previously accommodated following the first Statutory Consultation Exercise (July- September 2021) near Lyminster and Poling (see Section 18.3 within Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059]).</p>
6.11	6.11 In Chapter 18 of the ES, reference is made to a temporary onshore cable corridor up to 40m in width and a permanent infrastructure corridor width up to 25m (or wider at trenchless crossing locations). It is unclear what the surface treatment requirements would within the permanent infrastructure corridor and any requirements for easements in these areas. Details are therefore sought to understand the impact on reinstatement.	The commitment to reinstatement along the infrastructure corridor is set out in Section 4 of the Outline Landscape and Ecology Management Plan (LEMP) [APP-232] . This accounts for easement requirements for example Annex A of the Outline LEMP [APP-232] details the species selection and location of planting to allow for hedgerow reinstatement to comply with the planting and management wayleaves for underground electrical cables. Otherwise, the surface treatments would be reinstated to match existing as set out in Section 4 of the Outline LEMP [APP-232] which is secured through Requirement 12 of the Draft Development Consent Order [PEPD-009] .
6.12	6.12 It is acknowledged that in C-196 of the Commitments Register that a stage specific Landscape and Ecological Management Plan (LEMP) would be developed. This would be secured through Requirement 12 of the DCO, which would require submission of a stage specific LEMP to, and approval by, the relevant planning authority in advance of that stage commencing. It is therefore important that the programme of works secured through Requirement 10 of the DCO clearly defines 33 the stages, phasing and associated timings of works within the District. With regard to reinstatement, the stages and, thus stage specific LEMP should include covering the landfall construction compound (Work No.8), the onshore cable corridor (Work No. 9) and Climping Compound (Work No.10).	Requirement 10 of the Draft Development Consent Order (DCO) [PEPD-009] (updated at Deadline 2) secures the submission of a programme showing the different stages comprising the Proposed Development and in respect of which other requirements may be discharged. The programme for the works and their phasing would be detailed in the stage specific Code of Construction Practice for the relevant stage secured through Requirement 22 of the Draft DCO [PEPD-009] , which has been updated at Deadline 2.

Ref	Local Impact Report Comment	Applicant's Response
6.13	<p>6.13 Commitment C-196 of the Commitments Register refers to 'attention will also be given to maintaining levels and types of vegetation and landscape patterns', however, ADC seeks that the commitment to the staged reinstatement also includes for enhancement to a higher quality and species diversity, particularly in relation to trees and hedgerows of boundary/field treatments. As well as species selection and reinstatement taking account of climate resilience, there should also be a commitment to the selection of species diversity in consideration of emerging threats from pests and diseases, such as Ash die-back which is prevalent in the District.</p>	<p>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 and approval. The delivery of these documents is secured through Requirements 12 and 13 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>A list of native plant species is provided in Table 2-1 of the Outline Landscape and Ecology Management Plan (LEMP) [APP-232]. Paragraph 2.6.6 states "<i>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:</i></p> <ul style="list-style-type: none"> • <i>Ecological objectives for habitat creation and enhanced biodiversity;</i> • <i>Landscape objectives to support the landscape design principles for amenity, screening and enhanced landscape character; and</i> • <i>Provide reasonable climate change resilience according to their location within the detailed landscape plan."</i> <p>The wide range of mitigation measures proposed and set out in the Outline Code of Construction Practice (CoCP) [PEPD-033], the Commitments Register [REP1-015] (updated at Deadline 1) and the Outline Landscape and Ecology Management Plan (LEMP) [APP-232] have been selected to be resilient to climate change and appropriate to the landscape typology.</p> <p>Commitment C-107 (Commitments Register [REP1-015]) included within the Outline Code of Construction Practice (CoCP) [PEPD-033] states that '<i>Tried and tested invasive species control and biosecurity measures will be used to avoid the spread of infested materials</i>' and is secured via Requirement 22 within the Draft Development Consent Order (DCO) [PEPD-033].</p> <p>A commitment to delivering BNG of at least 10% has also been made by the Applicant and it is noted this is not mandatory for Nationally Significant Infrastructure Projects until April 2025 this is secured by Requirement 14 within the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
6.14	<p>6.14 Given the likely significant landscape and visual effects within the District, it is requested that the details of the boundary treatment and programme of landscaping works of the construction compounds; particularly the landfall construction compound (Work No.8) and Climping Compound (Work No.10) are submitted to and agreed with ADC. A mechanism for securing this is sought. Boundary treatment should include maximising opportunities for advanced planting of new native trees (feathered trees rather than whips) to soften and filter views, as well as for biodiversity enhancement.</p>	<p>The nature of the landfall temporary construction compound (Climping Compound) within an open arable field negates the requirement for short-term planting. Other measures such as perimeter fencing and programming of plant within this area will prove as more effective mitigation, prior to the reinstatement of the area to an arable field, retaining 'openness' in this area. The Climping construction compound will retain and preserve perimeter trees / vegetation, subject to visibility splay requirements.</p> <p>The Outline Landscape and Ecology Management Plan [APP-232] is being updated for submission at Deadline 3 with further details on reinstatement and planting for construction compounds. 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</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>documents is secured through Requirements 12 and 13 of the Draft Development Consent Order [PEPD-009] which has been updated at Deadline 2.</p> <p>Requirement 10 of the Draft Development Consent Order [PEPD-009] secures the submission of a programme showing the different stages comprising the Project and in respect of which other requirements may be discharged. The programme for the works and their phasing would be detailed in the stage specific Code of Construction Practice for the relevant stage secured through requirement 22 of the Draft Development Consent Order [PEPD-009], which has been updated at Deadline 2.</p>
6.15	<p>6.15 ADC encourages a phased approach is taken to the restoration to enable land to be reinstated at the earliest possible opportunity. Commitment C-19 in the Commitments Register suggests that the onshore cable corridor would be constructed in sections at regular intervals (typically 600m to 1,000m) and the reinstatement process commenced as soon as practicable. However, there is currently no mechanism to guarantee that this would be achievable based on the information provided. Furthermore, C-103 refers to 'areas of temporary habitat loss will begin reinstatement within 2 years of the loss, other than at the temporary construction compounds, cable joint bays, some haul roads, some construction access roads, landfall and substation location where activities may take longer to complete'. However, ADC request that there is the commitment and an appropriate securing mechanism for reinstatement within the first planting season following completion of the construction works and backfilling within the section, rather than within two years, as currently defined within C-103.</p>	<p>The final construction programme will be determined during the detailed design phase post-consent. Whilst the outlined timeline for the total construction of the cable route is 3.5-4 years, the actual construction activities on the cable corridor near the Land Interest 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 cable route will be developed.</p> <p>Requirement 10 of the Draft Development Consent Order [PEPD-009] secures the submission of a programme showing the different stages comprising the Project and in respect of which other requirements may be discharged. The programme for the works and their phasing would be detailed in the stage specific Code of Construction Practice for the relevant stage secured through requirement 22 of the Draft Development Consent Order [PEPD-009], which has been updated at Deadline 2.</p> <p>Further detail will also 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].</p>
6.16	<p>6.16 ADC would welcome further engagement with the Applicant on the layout of the WTG and the development of design principles (C-61 of the Commitments Register), which is currently not defined. However, ADC is of the opinion that the significant effects of the WTG, as identified in the ES, cannot be mitigated for and are of such a significance that warrants compensation in the form of a Community Benefits Package, as discussed in Section 5.</p>	<p>Design principles specific to Rampion 2 have shaped the design and spatial extent of the proposed DCO Order Limits (array area). The Applicant explored the potential impacts of the array area boundary in respect of these principles and embedded them within the design of the Proposed Development after the Section 42 consultation (2021) and through the definition of the proposed DCO Order Limits, which responds to these combined principles. The Applicant will continue to engage with Arun District Council on matters regarding seascape landscape and visual impacts including the development of design principles (C-61 of the Commitments Register [REP1-015]). The Applicant agrees that it is unlikely to be possible to avoid (mitigate) significant effects of the Rampion 2 array area on views experienced from the Arun District coastline (such as from Bognor Regis, Climping Beach and Littlehampton sea front).</p> <p>The Applicant considers that the visual effects of the Proposed Development are outweighed by the significant scheme benefits, expressed in the Planning Statement [APP-036], and thus compensation is not required to make the proposal acceptable in planning terms.</p> <p>Please see above response Reference 5.44 with respect to community benefits.</p>

Ref	Local Impact Report Comment	Applicant's Response
7. TERRESTRIAL AND MARINE ECOLOGY		
7.1	<p>Local Planning Policies 7.1 The following policies within the adopted Local Plan are considered relevant to the biodiversity aspects of the Project within the District (beyond the South Downs National Park).</p>	Noted, the Applicant has no further comments on this matter at this time.
7.2	<p>7.2 The adopted Local Plan seeks the protection and enhancement of biodiversity and the protection of trees. The policies also include protection of designated European, national and local status sites. The relevant policies include:</p> <ul style="list-style-type: none"> • Policy ENV SP1, which seeks the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. Where possible, new areas for habitats and species are encouraged. The Project is on or within proximity to several sites listed in Policy ENV SP1, including: <ul style="list-style-type: none"> o Special Area of Conservation (SAC): Arun Valley (Site Code UK0030366); o SSSI: Climping Beach (Site Code 1000225); o Special Protection Area (SPA) Arun Valley (Site Code UK9020281); and o Local Nature Reserves: Littlehampton Golf Course and Atherington Beach, Littlehampton. • Policy ENV DM3 covers Biodiversity Opportunity Areas (BOA). Much of the onshore cable corridor within Arun fall within existing BOA. Within BOA, development shall minimise disturbance, retain and sympathetically incorporate locally valued and important habitats. Where there is a habitat loss, mitigation measures shall be agreed with ADC; and • Policy ENV DM5 seeks biodiversity net gain as part of the development process. Due regard for protected species is required and consideration of any impacts that will affect the species directly or indirectly, whether within the site or in an area outside of the site. 	<p>The Applicant notes the policies of Arun District. With regards policy ENV SP1, the Applicant confirms that the Arun Valley Special Area of Conservation (SAC) is circa 4.8km from the proposed DCO Order Limits, whilst both Climping Beach Site of Special Scientific Interest (SSSI) and Littlehampton Golf Course and Atherington Beach Local Wildlife Site (LWS) are both potentially crossed by the transmission cables (by horizontal directional drill).</p> <p>The Applicant is aware of the Biodiversity Opportunity Areas (BOA) and has followed the mitigation hierarchy to minimise losses and design appropriate mitigation measures (see below for description of adherence to the mitigation hierarchy). The Applicant has also made a commitment to delivering at least 10% Biodiversity Net Gain (BNG) despite it not being mandatory for Development Consent Order projects until April 2025 (see commitment C-104 of the Commitments Register [REP1-015] updated at Deadline 1 submission secured via Requirement 14 of the Draft Development Consent Order [PEPD-009]). The design of the Proposed Development 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 BNG. Below is a description of how the mitigation hierarchy has been applied at each stage.</p> <p>Avoidance measures have evolved through the design process and are demonstrated by both the shape and location of the proposed DCO Order Limits (for example where possible it has been drawn to exclude various ecological features including areas of ancient woodland and areas of Priority Habitat) and through the Vegetation Retention Plan that is appended to the Outline Code of Construction Practice [PEPD-033] which is secured through Requirement 22 of the Draft Development Consent Order [PEPD-009]. Further measures of avoidance include those that describe construction scheduling such as commitments C-21 (avoidance of active nests of reeding birds during vegetation clearance), C-112 and C-114 (avoidance of physical effects within Site of Special Scientific Interest (SSSI) and Local Wildlife Site (LWS)), C-117 (avoidance of disturbing activity during the coldest winter months), C-174 (avoidance of veteran trees), C-203 (avoidance of disturbance / damage to active nests of ground nesting birds) and C-215 (avoidance of disturbing activities close to occupied barn owl boxes). These commitments are secured in the Outline Code of Construction Practice [PEPD-033] and Outline Construction Method Statement [APP-255] which are secured through Requirements 22 and 23 respectively of the Draft Development Consent Order [PEPD-009].</p> <p>Embedded environmental measures in the Commitments Register [REP1-015] (updated at the Deadline 1 submission) include the following commitments secured in the Outline Code of Construction Practice [PEPD-033] and Outline Construction</p>

Ref	Local Impact Report Comment	Applicant's Response
7.3	7.3 The protected species surveys and mitigation proposed is compliant with the policies above. Whilst biodiversity net gain is proposed for the Project as a whole, biodiversity net gain has not	<p>Method Statement [APP-255] which are secured through Requirements 22 and 23 respectively of the Draft Development Consent Order [PEPD-009]:</p> <ul style="list-style-type: none"> the specification of trenchless techniques to cross main rivers, SSSI, LWS and ancient woodland (commitments C-112, C-114 and C-216); the implementation of wildlife sensitive lighting design (commitment C-105); implementation of speed restrictions to avoid collisions with wildlife (commitment C-106); implementation of biosecurity measures (commitment C-107); measures to minimise disruption to watercourses and maintain fish passage (commitments C-64, C-205 and C-229); reinstatement of temporary habitat loss within two years (commitment C-103); measures to reduce hedgerow loss (commitment C-115 and C-224); imposition of stand-off distances to watercourses (commitment C-135); reduction in woodland loss (commitment C-204); and pre-construction survey programme to implement appropriate mitigation based on latest distribution (commitments C-203, C-209, C-210, C-211, C-214 and C-232). <p>The Outline Landscape and Ecological Management Plan (LEMP) [APP-232] which is secured through Requirement 12 of the Draft Development Consent Order [PEPD-009] also describes mitigation and compensation measures at the onshore substation site and grid connection point in terms of providing advanced planting to maintain connectivity and buffer disturbance and compensation in the form of habitat creation (it is noted that these are outside of Arun District but are included here in demonstration of the mitigation hierarchy).</p> <p>The measures summarised above will be delivered alongside a Biodiversity Net Gain strategy (commitment C-104) which is detailed in Appendix 22.15: Biodiversity Net Gain Information, Volume 2 of the ES [APP-193] and is secured through Requirement 14 of the Draft Development Consent Order [PEPD-009]. This allows for enhancement and biodiversity net gain (BNG) to be delivered on land within affected districts. The habitats delivered at the onshore substation and reinstatement at areas of temporary habitat loss will be included within the BNG calculations as per Department for Environment, Food and Rural Affairs (Defra) guidance 'What you can count towards a development's biodiversity net gain' (Defra, 2023). Regardless, there will remain a shortfall to reach a position of 'no net loss'. Therefore, this shortfall (alongside BNG) is to be delivered through the process described in Appendix 22.15: Biodiversity Net Gain Information, Volume 2 of the ES [APP-193].</p> <p>Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the Environmental Statement (ES) [APP-193] provides an overview of Biodiversity Net Gain (BNG) across the Proposed Development. It identifies an overall shortfall based on a realistic worst-</p>

Ref	Local Impact Report Comment	Applicant's Response
	been demonstrated within the District. Given this, the Project is not considered compliant with Policy ENV DM5.	case scenario. However, it is acknowledged that the delivery of the Proposed Development will be in stages and that individual stages will have their own BNG calculations completed based on the detailed design that comes forward. At this stage biodiversity units have not been identified for purchase, however, Requirement 14 of the Draft Development Consent Order [PEPD-009] secures the delivery. This requirement secures Arun District Council's approval of the delivery of the biodiversity units which will include their location.
7.4	<p>Key Local Issues and Likely Impacts <i>Climping Site of Scientific Interest and Arun Valley Special Protection Area Impact Risk Zone</i> 7.4 Climping beach is home to rare habitats and species. The SSSI is a stretch of coast with a vegetated shingle beach, behind which is a sand dune system. The intertidal zone supports important populations of wintering birds. The numbers of wintering sanderling are of European significance.</p>	The Applicant has no further comments on this matter at this time. Climping Beach SSSI and its cited features are assessed within Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063].
7.5	7.5 Vegetated shingle beaches are a nationally uncommon habitat. The beach at Climping is broad in the west but narrows to the east. Plant communities are mainly restricted to sheltered areas behind the main shingle bank and include yellow horned poppy <i>Gaucium flavum</i> , sea dale <i>Crambe maritima</i> , sea beet <i>Beta vulgaris</i> , curled dock <i>Rumex crispus</i> and sea holly <i>Eryngium maritimum</i> . Scrub of tamarisk <i>Tamarix gallica</i> and hawthorn <i>Crataegus monogyna</i> has developed in a few places behind the shingle.	The Applicant has no further comments on this matter at this time. Climping Beach SSSI and its cited features are assessed within Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063].
7.6	7.6 Notable and rare invertebrates include Large sharp-tailed bee - <i>Coelioxys conidia</i> , Coast leaf-cutter bee - <i>Megachile maritima</i> , Red banded-sand wasp - <i>Ammophila sabulosa</i> , Grey bush cricket - <i>Platycleis albopunctatubut</i> , and the moth <i>Platytes alpinella</i> .	The Applicant has no further comments on this matter at this time. Climping Beach SSSI and its cited features are assessed within Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063].
7.7	7.7 Sand dunes are fragile systems, susceptible to erosion and often unstable. Stabilised parts of these dunes are dominated by marram-grass <i>Ammophila arenaria</i> . Other plants which are present include dune fescue grass <i>Vulpia membranacea</i> , red fescue grass <i>Festuca rubra</i> , sand catchfly <i>Silene conica</i> , sand sedge <i>Carex arenaria</i> , viper's bugloss <i>Echium vulgare</i> and a locally uncommon plant, Nottingham catchfly <i>Silene nutans</i> .	The Applicant has no further comments on this matter at this time. Climping Beach SSSI and its cited features are assessed within Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063].
7.8	7.8 The intertidal zone consists of soft muds and sands which support large populations of marine invertebrates. The invertebrates are an important food source for wintering birds. Up to 300 Sanderling have been recorded from this site in winter; a figure which represents 1% of the West European population of this bird which breeds in the high Arctic but flies south to winter on sandy coasts and estuaries. Other wintering birds include grey plover and oystercatcher.	The Applicant has no further comments on this matter at this time. Climping Beach SSSI and its cited features are assessed within Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063].
7.9	7.9 The adopted Local Plan reports that the Impact Risk Zone for the Arun Valley SPA covers areas in the foraging distance of Bewick's Swans, which include a wide area within the District, as shown in Figure 3.	The Applicant has no further comments on this matter at this time. The Arun Valley SPA and its designated features are assessed within Chapter 22 Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063] and the Report to Inform Appropriate Assessment [APP-038] .
7.10	7.10 The following construction activities of the Project have the potential to affect ecological sites and Impact Risk Zone identified above: <ul style="list-style-type: none"> Landfall and onshore cable route – damage and disturbance of Climping Beach SSSI potentially because of indirect effects of HDD under the beach; and 	The Applicant does not expect any effects on the habitats or invertebrates using the sand dunes associated with works at the landfall. The closest proposed above ground works where construction activity is to take place (Works No. 8 within the Onshore Works Plans [PEPD-005]) is in excess of 175 m from the boundary of the Climping Site of Special Scientific interest (SSSI). All works in closer proximity (including beneath the Climping SSSI) are proposed to be either underground (i.e. the Horizontal

Ref	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> onshore cable route and compounds – damage and disturbance to habitats from construction activities associated with the onshore cable route and compounds (Climping Compound and landfall compounds) within the Impact Risk Zone of the Arun Valley SPA that is used by foraging Bewick's Swans. Loss of habitat within the Impact Risk Zone, which is regularly used by foraging Bewick's Swans (i.e. is functionally linked to the SPA), could have a significant effect on the SPA. 	<p>Directional Drill (HDD)) secured through Works Nos. 6 and 7 of the Draft Development Consent Order [PEPD-009] or pedestrian traffic only (e.g. monitoring of the drill head path) restricted by the Outline Construction Method Statement [APP-255], secured through Requirement 23 of the Draft Development Consent Order [PEPD-009]. Under all normal circumstances, indirect effects on the SSSI such as dust deposition and pollutant losses can be effectively managed through the Outline Code of Construction Practice [PEPD-033] (including for example commitments C 24, C-77, C-105, C-107, C-143, C-149 and C-207) secured through Requirement 22 within the Draft Development Consent Order [PEPD-009].</p> <p>Only in the event of an unforeseen break-out of drilling fluid to the surface within the SSSI would any effects on habitats and the invertebrates they support be realised. Given the design and ways of working described in the Outline Construction Method Statement [APP-255] and Outline Code of Construction Practice [PEPD-033], the risk of this occurring is very low and does not form part of the realistic worst case scenario assessed within Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063].</p> <p>Bewick's swans were not recorded (see Appendix 22.14: Onshore winter bird report, Volume 4 of the Environmental Statement [APP-192] within or close to the proposed DCO Order Limits and historical data from the Sussex Ornithological Society shows that they regularly occur well away from the proposed DCO Order Limits (around Burpham and Wepham) and can therefore be discounted.</p>
7.11	<p><i>Terrestrial Biodiversity Net Gain</i></p> <p>7.11 The onshore cable corridor runs through BOA and part of the Arun River Valley which contains priority habitats including coastal flood plain and grazing Marsh, mudflats, deciduous woodland and good quality semi-improved grassland. As a result of construction activities, areas of habitats would be temporarily lost or degraded, leading to habitat fragmentation.</p>	<p>The Applicant agrees with Arun District Council's summary and notes that construction works are not proposed within either mudflats (crossed trenchlessly at the River Arun crossing) or good quality semi-improved grassland (not identified within the draft Order Limits) within the Arun District.</p>
7.12	<p>7.12 A few important species are present including Bewick Swans, bats, hazel dormice, water voles, badgers, reptiles and a variety of coastal and woodland birds.</p>	<p>The Applicant agrees with the summary of species occurring in Arun District and addresses each of these within Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063].</p>
7.13	<p>7.13 Owing to the terrestrial ecology on or within proximity to the Project, the following principal concerns and effects relate to construction activities and once operational:</p> <ul style="list-style-type: none"> risk to protected species such as dormice and commuting/foraging bats from habitat fragmentation and disturbance from noise, vibration and lighting; and lack of biodiversity net gain and habitat enhancement within the District (see below). 	<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 water courses 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 (CoCP) [PEPD-033]; mitigation outlined in the Outline CoCP [PEPD-033] is secured through Requirement 22 of the Draft Development Consent Order (DCO) [PEPD-009].</p> <p>It is also necessary to consider that onshore cable duct installation happens in discrete sections and therefore, not all potential temporary habitat loss is occurring at the same time. As such, it is likely that some areas will have been reinstated prior to the loss of habitats occurring later on. In addition, prior to and during the onshore construction</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>period 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 (ES) [APP-193] and Requirement 14 of the Draft DCO [PEPD-009]) means that more habitat being positively managed for biodiversity will be being created in the general area prior to and during losses occurring to facilitate cable delivery.</p> <p>Between Climping Beach and the A259, no linking habitats (e.g. woodland, scrub, hedgerows, watercourses, ditches etc.) will be temporarily or permanently lost to the Proposed Development, with all temporary habitat loss restricted to arable fields other than typical vegetation management at access points to the highway (outlined in Appendix B Vegetation Retention Plans of the Outline Code of Construction Practice [PEPD-033]) and secured through Requirement 22 of the Draft DCO [PEPD-009]</p> <p>Between the A259 and the River Arun, three crossings of linear features are made by the onshore cable installation works and two further hedgerows will be affected by access routes. The works at the access routes will create gaps of 10m and 6m respectively, the approach to notching is outlined in Appendix B Vegetation Retention Plans of the Outline Code of Construction Practice [PEPD-033]. These are in keeping with existing gaps in the network in this area for access or due to some hedgerows being defunct. Of the three crossings the creation of temporary gaps in vegetation will result in some temporary fragmentation however, two of these are scrub fringing wet ditches and therefore some form of connectivity is always maintained by the ditch itself. The other hedgerow is defunct with large existing gaps. The River Arun, fringing woodland and a variety of other hedgerows, tree lines, scrub and woodland belts retain the opportunity for species to navigate the area in an east west and north south axis.</p> <p>North of the River Arun, through to Poling Street the effects of temporary losses of hedgerows and ditch side vegetation are not considered by the Applicant to be a major barrier to movement as there exists in all locations other strong features acting as wildlife corridors including the railway (which includes a site managed by Network Rail for wildlife, overlapped marginally (crossed by trenchless crossing methods) but largely adjacent to the proposed DCO Order Limits), the Black Ditch and a network of other hedgerows and tree lines. As the majority of habitat losses are small (e.g. notching at 6m or 14m (1 x 6m gap, plus up to 4 x 2m gaps)), the potential for this to deter movements by mobile species is low (e.g. bats and birds will cross existing features of similar widths).</p> <p>Where the onshore cable route crosses Poling Street south of the A27, two belts of woodland will be subject to habitat loss. Although both of these will be crossed by trenchless crossing methods, a haul road will be required (outlined in Appendix B Vegetation Retention Plans of the Outline Code of Construction Practice [PEPD-033]). Given that canopy trees will remain either side of the gaps (6m), mobile species are still expected to be able to maintain movement through these areas.</p> <p>North of the A27 to the Michelgrove Lane, losses will occur to up to seven hedgerows (dependent on route chosen to cross Michelgrove), a set of parallel tree lines and a</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>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, the number of linear features is 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 methods and will therefore, be retained. HDD compounds are located with sufficient flexibility to ensure retained habitats are not compromised (e.g. encroachment into root protection areas).</p> <p>The Applicant has not specified the location of all compensation or enhancements (delivered as BNG) at this stage. This is because the need will be determined by the detailed design (e.g. the application is for up to four cables, however solutions using either two or three cables may be possible). Currently consideration has been of the realistic worst case scenario as described in Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193] which provides for the delivery of biodiversity units within Arun District. Further, it prioritises working with affected parties to deliver habitat enhancements and habitat creation on or close to the proposed DCO Order Limits.</p>
7.14	7.14 The effects on badgers, great crested newts, water vole and reptiles have been rated as low and not significant. Great crested newts and water voles are recorded around Climping and Atherington area. Licences may be required if the works impact on ponds and ditches in this area.	The Applicant effects on badgers, great crested newts, water vole and reptiles have been assessed in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063] which also outlines that the Proposed Development would apply to join the West Sussex district level licence scheme. Although no breeding ponds would be lost to construction, terrestrial habitats that may be used by great crested newts will be temporarily or permanently lost.
7.15	7.15 As reported in Chapter 22 of the ES, the Project in its entirety would deliver terrestrial biodiversity net gain of at least 10% to offset land cover change (habitat loss) and fragmentation (reduction of connectivity). ADC is supportive of achieving net gain for the Project and this is a policy requirement of the adopted Local Plan. However, ADC has concerns regarding the proposals and details provided for terrestrial biodiversity net gain, including the lack of ecological enhancements and net gain specifically in the District, which are outlined below.	Requirement 14 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission) ensures that the relevant planning authority in consultation with the statutory nature conservation body (Natural England) needs to approve the delivery of biodiversity units for each stage of the Proposed Development. Therefore, those stages that occur within Arun District will need to be approved by Arun District Council, thereby giving a secured mechanism for the delivery of Biodiversity Net Gain in accordance with Appendix 22.15 Biodiversity Net Gain Information , Volume 4 of the Environmental Statement [APP-193] as per Requirement 14 of the Draft Development Consent Order [PEPD-009] .
7.16	<i>Marine Biodiversity Net Gain.</i> 7.16 Marine net gain has not been considered. The Environment Act 2021 recommends that marine net gain to be assessed as part of national infrastructure projects, although it is acknowledged that this is not mandatory. Recent Government consultation in response to marine net gain was undertaken and the results published showed broad support for marine net gain.	Whilst Marine Net Gain is not currently mandated in the same way as onshore (terrestrial) Biodiversity Net Gain, in recognition of the principles set out in the National Policy Statement (NPS) EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023b) (published in November 2023) which took effect in January 2024, and is a relevant consideration in the decision-making process, the Applicant is currently exploring opportunities to partner with organisations who are able to deliver marine benefits in the region.

Ref	Local Impact Report Comment	Applicant's Response
7.17	7.17 The Project could provide marine net gain via a contribution to the Sussex Kelp Recovery Project (Help Our Kelp). This restoration project was formed in 2021 after the Sussex Nearshore Trawling Byelaw was introduced. This protects the seabed from fishing activities and stretches from Brighton towards Selsey. The project is a collaboration of local and national organisations to provide protection for and help regenerate the kelp beds in the Sussex bay. ADC is actively engaging with the project to help restore these kelp beds off our coast.	See response in Reference 7.16 above.
7.18	7.18 The offshore cable route avoids the marine Conservation Areas and the most valuable marine habitats. This may reduce potential impacts to marine ecosystems.	The Applicant welcomes Arun District Council's commentary on the mitigation proposed for the offshore cable route to help reduce potential impacts on marine ecosystems.
7.19	<p><i>Adequacy of the DCO Application, Actions and Commitments</i></p> 7.19 Whilst surveys of habitats and species have been provided with regard to terrestrial habitats and species, the results have not been summarised at District level. The local effects on terrestrial ecology specifically within the District are therefore difficult to ascertain. It is, however, welcomed that an Ecological Clerk of Works will work in conjunction with the contractors to ensure compliance with relevant wildlife legislation, agreed mitigation and best practice.	The Applicant notes this comment. The assessment has been undertaken at the scale of the Proposed Development, although individual survey reports do provide information that is location specific. The Applicant is happy to discuss any particular points of interest with Arun District Council.
7.20	7.20 Pre-construction surveys for protected species are committed to within the Commitments Register and Outline CoCP. Further details on the timing these surveys are requested to be provided to ADC. The presence of any European protected species will require a licence from Natural England to disturb them or their habitat. This will also require approval by ADC.	The Applicant notes this comment. Details of the timing of surveys cannot be provided at this juncture as it will depend on considerations post-consent (e.g. start of construction programme, access requests etc.), however all surveys will be undertaken in the seasonal windows described in relevant guidance.
7.21	7.21 Whilst a biodiversity net gain assessment has been completed for the Project as a whole, there is a lack of biodiversity net gain assessment at the District level. Biodiversity net gain should be delivered within the District. It is also integral that this is then secured through appropriate means directly with ADC.	Please see responses in References 7.13 and 7.15 .
7.22	7.22 Chapter 22 of the ES states that biodiversity net gain will be delivered on and off-site, with the focus of habitat creation around the proposed substation at Oakendene, which is outside of the District. The remainder of the habitats are proposed to be reinstated to current condition only. There is also a reliance of delivery of net gain off-site. As a result, the Project is currently not proposing new or enhanced habitat creation within the District.	Please see the response in Reference 7.15 . There is a clear mechanism to secure the delivery of biodiversity net gain (BNG) within Arun District through the need for Arun District Council's approval of relevant stage specific Biodiversity Net Gain Plans. Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the Environmental Statement [APP-193] is also structured to ensure that where opportunities exist on the landholdings of those affected (including within the proposed DCO Order Limits) these will be prioritised. Biodiversity net gain is secured through requirement 14 of the Draft Development Consent Order [PEPD-009] .
7.23	7.23 ADC seeks the delivery of biodiversity net gain and ecological enhancements within the District in accordance with the biodiversity gain hierarchy where on site biodiversity gains should be considered first followed by registered offsite biodiversity gains and – as a last resort – biodiversity credits. Without biodiversity net gain, the Project is not compliant with ADC's policies.	The Applicant notes this comment and is committed to delivering biodiversity net gain (see Appendix 22.15 Biodiversity Net Gain Information [APP-193]).
7.24	7.24 There is an assumption in the ES that destroyed, damaged or disturbed hedgerows will be ecologically functioning features again in a period of three to seven years from the start of construction. This is considered to be optimistic and is dependent on good growing conditions in all years. Given the varying 'quality' of growing seasons experienced in West Sussex in recent years a longer period to achieve ecological functionality may well be required. Owing to this, ADC seeks advanced planting. Furthermore, as above in Section 6, ADC seeks a commitment for	<p>Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063] at paragraphs 22.9.107 and 22.9.111 suggest that reinstatement will be suitably established within 10 years.</p> <p>Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193] allows for 70% of units required (at each stage) to be secured prior to commencement</p>

Ref	Local Impact Report Comment	Applicant's Response
	reinstatement of the temporary habitat loss within the first planting season rather than within two years of the loss.	of construction. Therefore, advanced planting will occur for hedgerows, although it is noted that the locations of these hedgerows will not be known until post-consent.
7.25	7.25 Stage specific LEMP will be developed to ensure all reinstated habitats are effectively established (C-199 of the Commitments Register). For effective restoration, habitats will be subject to appropriate maintenance, management (including adaptive management) and monitoring for ten years (measured from the time of planting/seeding in each discrete location). Further details on the monitoring plan and reporting mechanisms are required for biodiversity net gain. Where habitats are included in the biodiversity net gain commitments for ADC, a maintenance and monitoring plan for 30 years and a legal agreement with ADC is required.	An update to the Outline Landscape and Ecology Management Plan [APP-232] (secured via Requirement 12 of the Draft Development Consent Order [PEPD-009] will be provided at Deadline 3 that will provide further detail on monitoring and adaptive management.
7.26	<p>7.26 The following actions are sought:</p> <ul style="list-style-type: none"> • invertebrate survey of Climping Beach SSSI and an assessment of indirect effects (e.g. noise/vibration) owing to the presence of rare species and potential HDD beneath; • assessment of biodiversity net gain at District level, including a metric assessment and net gain plan; • consideration of marine biodiversity net gain; and • a maintenance and monitoring plan of biodiversity net gain within the District to be agreed and secured with ADC through appropriate means. 	<p>The Applicant does not believe invertebrate surveys at Climping Beach SSSI are necessary given that the closest onshore above ground construction works are in excess of 170m from the boundary. Indirect effects would not be expected to occur to the SSSI at this distance and the depth of the drill profile would also ensure the indirect effect of vibration would be negligible.</p> <p>Biodiversity Net Gain has been calculated at the level of the Proposed Development to provide an understanding of the level of off-site commitment necessary to reach a point of both no net loss and biodiversity net gain. Calculations will be undertaken at a more local level during the detailed design phase as they will be done for each individual development stage (as secured through Requirement 14 of the Draft Development Consent Order [PEPD-009]). Arun District Council will at this stage be required to approve the strategy in consultation with Natural England, thereby giving confidence on the delivery of biodiversity net gain.</p> <p>Whilst Marine Net Gain is not currently mandated in the same way as onshore (terrestrial) biodiversity net gain, in recognition of the principles set out in the NPS EN-1 (DESNZ, 2023b) that came into force in 2024, the Applicant is currently exploring opportunities to partner with organisations who are able to deliver marine benefits in the region.</p> <p>A maintenance and monitoring plan will be agreed with Arun District Council as part of the strategy secured through Requirement 14 of the Draft Development Consent Order [PEPD-009] described above.</p>
8. NOISE AND VIBRATION		
8.1	<p>Local Planning Policies</p> <p>8.1 The following policies within the adopted Local Plan are considered relevant to the noise and vibration aspects of the Project within the District (beyond the South Downs National Park):</p> <ul style="list-style-type: none"> • Policy QE DM1 seeks developers proposing new noise generating development to gain advice to determine the level of noise assessment required and for the proposals to be supported by evidence that there are no suitable alternative locations for the development; • Policy QE SP1 require that developments do not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District; 	<p>These policies are all included within Appendix B within the Planning Statement [APP-036]. Policies QE DM1 and ECC DM1 are referenced in Section 4.7 of the Planning Statement [APP-036] and Table 21-4 of Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018] which sets out the key local planning policies with regards to noise and vibration impacts. Although policies QE SP1 and D DM1 are not explicitly referenced within Section 4.7 the Planning Statement [APP-036] or Table 21-4 of Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018] as noted in Reference 8.3 below Arun District Council have confirmed that the Proposed Development would be in accordance with the requirements of these policies.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> Policy ECC DM1 relating to renewable energy development seeks the location and design to minimise adverse impacts, including on noise; and Policy D DM1 seeks proposals to have a minimal impact to users and occupiers of nearby property and land, including avoiding unacceptable noise and disturbance. 	
8.2	<p>8.2 The following is also of relevance to noise and vibration:</p> <ul style="list-style-type: none"> Planning Noise Advice Document: Sussex (2023)²⁸. <p>²⁸ Planning Noise Advice Document: Sussex (November 2023): https://www.adur-worthing.gov.uk/media/Media,121802,smxx.pdf</p>	<p>The 2021 version of the Planning Noise Advice Document is referenced in the planning assessment outlined in Section 4.7 of the Planning Statement [APP-036] and within Appendix B. The assessments set out in the Environmental Statement (ES) have referenced this advice note in Table 21-3 of Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018] which sets out the key local planning policies with regards to noise and vibration impacts. The 2023 version of the Planning Noise Advice Document is not materially different to the 2021 version in consideration of the Proposed Development.</p>
8.3	<p>8.3 On review of Chapter 21 of the ES, it is demonstrated that the Project would be in accordance with the above-mentioned policy requirements.</p>	<p>The Applicant welcomes Arun District Council's assertion that Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] would be in accordance with outlined policy requirements.</p>
8.4	<p>Key Local Issues and Likely Impacts</p> <p>8.4 It is recognised that noise exposure can impact upon quality of life and give rise to adverse health effects. Tranquil spaces, often located within the more rural parts of the District play a multi-functional role as part of the District's green infrastructure network. One of the most common causes of noise pollution is from traffic.</p>	<p>The assessment of temporary noise effects from construction road traffic noise is provided in Paragraphs 21.9.67 to 21.9.79 within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement (ES) [PEPD-018] and Section 4 within chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] (submitted at Deadline 1). Taking into account the embedded environmental measures to minimise the disturbance to noise sensitive receptors such as Commitments C-22 (core working hours) and C-33 (adoption of the Outline Code of Construction Practice (CoCP) [PEPD-033]) secured via Requirement 22 of the Draft DCO [PEPD-009] (updated for the Deadline 2 submission) the assessment concludes that there are no significant effects relating to construction road traffic noise.</p> <p>Chapter 28: Population and human health, Volume 2 of the ES [APP-069] and Appendix 28.1: Human health baseline, Volume 4 of the ES [APP-219] assessed the potential impacts for population and human health. The sensitive receptors included within this assessment remain consistent with those identified within the other aspect chapter (such as Noise) and a further exercise was undertaken to identify specific vulnerable receptors. The assessment concluded that the magnitude of impact on human health from potential changes to air quality, noise and vibration exposure, transport nature and flow rate, visual amenity, access to opportunities for physical activity, and socio-economic factors as a result of the Proposed Development is negligible, which is not significant in EIA terms.</p>
8.5	<p>Noise</p> <p>8.5 Significant levels of construction noise and vibration are likely to occur at some sensitive receptors during the construction period. The construction period is noted to be approximately 3.5 to four years, with construction works delivered in stages. It is noted from Chapter 21 of the ES that with respect to HDD, in particular, there is potential for prolonged exposure of sensitive receptors to</p>	<p>Although the construction phase is anticipated to 3.5 years, and this was considered within Chapter 21: Noise and Vibration, Volume 2 of the Environmental Statement (ES) [PEPD-018] (paragraph 21.9.3), the worst-case durations of construction noise are not. The worst case assumes that many activities are undertaken simultaneously that is unlikely to be the case for the majority of the time, if it happens at all. Where thresholds of significance are potentially exceeded by the works, but the duration that</p>

Ref	Local Impact Report Comment	Applicant's Response
	noisy drilling and ancillary works, 24 hours per day over consecutive, often multiple days. Robust control measures will need to be secured to minimise the effects on residents/communities.	the receptor will be exposed to the noise is less than a month, this is below the temporal threshold and not significant. With regard to HDD, the predictions for noise include assessment of the night time activities, the nature of which also includes the use of mud pumps, running to prevent tunnel collapse, and generators for power and lighting. These items of plant will be screened to minimise off-site noise at night. Further assessment will be provided once methodologies and programmes are fixed, as part of the Noise and Vibration Plan review and submission process in accordance with Commitment C-263 within the Commitment Register [REP1-015] , secured through, Requirement 22 Code of construction practice (5) (h) of Schedule 1, Part 3 of the Draft Development Consent Order [PEPD-009] .
8.6	8.6 BS 5228-1:2009 + A1:2014 and “the ABC method” seek to protect sensitive receptors whilst acknowledging the inherent noise associated with construction activities. The trigger values set out in Chapter 21 of the ES replicate Table E.2 of BS5228, in particular, for the 08:00 – 18:00 time period. However, the proposed construction hours are stated as 07:00 – 19:00 hours where for the shoulder hours are (07:00 – 08:00 and 18:00 – 19:00) Table E.2 BS 5228-1:2009 + A1:2014 suggests a trigger value of 70dB LAeq, T therefore the trigger values do not fully accord with this guidance.	<p>Working hours are stated in Section 4 of Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045] and are outlined in Section 4.4 of the Outline Code of Construction Practice [PEPD-033]. Following receipt of Relevant Representations and information shared at Issue Specific Hearing 1, commitment C-22 within the Commitments Register [REP1-015] has been updated at the Deadline 1 submission to the following:</p> <p><i>‘Core working hours for construction of the onshore components 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 COCP, where extended and continuous periods of construction are required.</i></p> <p><i>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. Such activities shall not include use of heavy plant or activity resulting in impacts, ground breaking or earthworks.</i></p> <p>This has been updated in the Outline Construction Traffic Management Plan [REP1-010] for the Deadline 1 submission and will be updated in the Outline Code of Construction Practice [PEPD-033] for the next submission of this document.(secured via Requirement 24 and 22 respectively within the Draft Development Consent Order [PEPD-009] which has been updated at Deadline 2).</p> <p>BS5228 Annex E, Table E.1 states that Daytime hours are “<i>Daytime (07.00–19.00) and Saturdays (07.00–13.00)</i>” which includes the proposed shoulder hours of 07:00 to 08:00 and 18:00 to 19:00. Therefore, the Daytime trigger values are considered by the Applicant as being appropriate.</p>
8.7	8.7 The principal concern with respect to the construction works are around the landfall and trenchless crossings where continuous working may be required for HDD. Although Chapter 21 of the ES advises that the duration of HDD will not be known until exploratory ground conditions have been undertaken, it is entirely feasible that a worst-case scenario could arise where noisy HDD works are required to be undertaken for prolonged periods during the night-time. Potentially	Section 5.4 of the Outline Code of Construction Practice (CoCP) [PEPD-033] describes the practical measures and monitoring to be implemented to reduce the impact of onshore noise and vibration during construction. A Noise and Vibration Management Plan will be developed in accordance with the Outline CoCP [PEPD-033] and include best practicable means the Contractor(s) will adopt to

Ref	Local Impact Report Comment	Applicant's Response
	<p>continuous noise intrusion is highly likely to be a contentious issue for residents residing close to the trenchless crossing locations and potentially further afield, subject to meteorological conditions during works.</p>	<p>minimise noise during construction in all areas. Construction plant will be carefully procured to ensure compliance with noise limits quoted in European Commission Directive 2000/14/EC, United Kingdom Statutory Instruments (SI) 2001/1701. Localised screening and temporary barriers will be also be installed in proximity to sensitive receptors. As stated in Table 21-29, Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018], estimated drilling duration is provided for each HDD location, typically trenchless crossings are short term construction activities. For trenchless crossings (such as horizontal directional drill (HDD)), drills will be housed within acoustic cladding and associated acoustic louvres. Mud pumps will be housed in temporary acoustic shrouds. Noise monitoring will be agreed with the relevant planning authority, through Section 61 of the <i>Control of Pollution Act 1974</i> consent, where applicable Commitment C-263 includes the production of a Noise and Vibration Management Plan (NVMP) during detailed design based on the principles in the Outline CoCP [PEPD-033], which is secured by Requirement 22 of the Draft Development Consent Order [PEPD-009].</p>
8.8	<p>8.8 The extent of noise effects during the night-time period is typically driven by impact noise i.e. percussive drilling which has the greatest potential for noise intrusion and sleep awakenings, in addition to any acoustic characteristics of plant and machinery, such features may include tonal features and discernible cyclic on/off conditions. If such characteristics are present the assessment of energy average noise levels are likely to underestimate potential noise impacts because the assessment considers the full duration of the night-time period (23:00 -07:00 hrs) (as presented in Chapter 21 of ES) and not individual noise events which may cause sleep disturbance.</p>	<p>Although piling may occur at night for the offshore turbine foundations, the assessment in section 21.9 within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement (ES) [PEPD-018] determined that the worst-case sound level from offshore piling was 34dB L_{Aeq,T}. Although construction noise has a relaxation over more permanent noise sources in significance criteria, this level is significantly below the thresholds of significance from BS5228 Annex E and would not be significant and is below a level that the WHO suggests would be the level above which the onset of sleep disturbance the World Health Organisation Night Noise Guidelines state: "Considering the scientific evidence on the thresholds of night noise exposure indicated by L_{night,outside} as defined in the Environmental Noise Directive (2002/49/EC), an L_{night,outside} of 40 dB should be the target of the night noise guideline (NNG) to protect the public, including the most vulnerable groups such as children, the chronically ill and the elderly". The Applicant considers that discussion of tonality, impulsivity or intermittency are important factors in the selection of plant and mitigation, but are not part of the methodology when considering the significance, as such elements are not part of the prediction assessment as described in Annexes E and F of BS5228-1:2009+A1:2014.</p>
8.9	<p>8.9 To minimise the extent of night-time noise, Chapter 21 of ES provides for embedded and primary mitigation measures, notably a commitment to undertake trenchless crossings by non-impact methods (C-10 of the Commitment Register) and that HDD work sites, near to sensitive receptors which may exceed target construction noise criteria that operate overnight will be fitted with acoustic mitigation measures (C-26 of the Commitment Register), which should assist in reducing both the absolute noise level and any perceived acoustic characteristics. However, detailed design of such mitigation will need to be addressed in the CoCP along with C-26 of the Commitments Register.</p>	<p>The Outline Code of Construction Practice (CoCP) [PEPD-033] outlines management measures and mitigation proposed at all onshore construction areas to reduce the effects relating to noise and vibration from construction of the Proposed Development, including commitments C-10 and C-26 (Commitments Register [REP1-015]). Stage specific CoCPs to be submitted to and approved by the relevant local planning authority are secured through requirement 22 of the Draft Development Consent Order (DCO) [PEPD-009].</p>
8.10	<p>8.10 There are certain points along the onshore cable corridor and, in particular, trenchless crossings that are very close to noise sensitive receptors. Due to the proximity of works, duration of works and/or type of works (which, as noted above, may include significant noise sources such as HDD which may necessitate 24-hour operation) there are likely to be periods when construction noise levels could cause significant disturbance and exceed "Category A" threshold values during</p>	<p>The comment is acknowledged by the Applicant. The preparation of Noise and Vibration Management Plans (Commitment C-263, Commitments Register [REP1-015]) will account for plant siting and screening. Where the standard mitigation of screening mud pumps and generators is not predicted to adequately control night noise, additional mitigation will be proposed in the Noise and Vibration Management</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>the nighttime period. These include locations near Decoy Wood, Poling, Lyminster, Littlehampton and Climping beach (TC01, TCO1A, TCO2, TC03, TC03a, TCO5, TCO6, TCO7a, TC08, TC09, TC10, TC10A, TC11, TC16, TC17, TC17a, TC19a, TC20, TC21, TC22, TC22a, TC23 and TC24 as set out in Chapter 21 (Table 21-30) of the ES and as shown in the Figures of Chapter 4 of the ES). It is therefore considered that enhanced mitigation may need to be employed to adequately protect residents close to these locations.</p>	<p>Plan included as part of a Stage specific Code of Construction Practices (CoCP) in accordance with the Outline Code of Construction Practice [PEPD-033] which is secured via Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
8.11	<p>8.11 ADC Environmental Health Department has not previously been consulted on the proposed final location and use of Climping Compound. As described in Section 4, there are concerns regarding the substantial size of Climping Compound, covering 6.13ha and limited detailed provided on its use. The draft DCO refers to Work No.10 only as a 'temporary construction compound'. Whilst appreciated a degree of flexibility is required, further detail of Climping Compound, including justification for the substantial size, is sought.</p>	<p>The Applicant notes that the use of the Climping Compound has been consulted on during the statutory consultation process. Please see further response to References 4.7 and 4.13 regarding the compound.</p>
8.12	<p>8.12 There are concerns regarding the lack of representative baseline noise monitoring in the ES for noise sensitive locations in the vicinity of the Climping Compound (Work No.10). Only data for a single location to the south-east of the compound has been presented and these data do not accurately characterise existing baseline noise conditions at nearby noise sensitive receptors, in particular, at:</p> <ul style="list-style-type: none"> • Climping village; • Climping Caravan Park immediately east of Climping Compound; • Climping C of E Primary School; • Climping Village Hall and playing field; • glamping site at Cuckoo Farm; and • land to the West of Church Lane South of Horsemere Green Lane (proposed residential development (Ref CM/48/21/RES) immediately adjacent to the western boundary of Climping Compound). Whilst Chapter 21 of the ES suggests a low certainty of construction overlap, it is of the view of ADC that the residential development is likely to coincide with the use of Climping Compound, should the reserved matters application be approved. 	<p>The Applicant undertook as comprehensive a baseline survey as possible however acknowledges limitations (outlined in Paragraphs 21.5.6 to 21.5.11 within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement (ES) [PEPD-018], updated at the Procedural Deadline A) due to weather conditions and access restrictions ahead of the DCO submission. An updated baseline noise survey has been undertaken since the DCO Application submission with the results reported Appendix 21.1: Baseline sound report, Volume 4 of the ES [PEPD-025] updated and submitted at the Procedural Deadline A submission.</p> <p>Four measurement locations were used for the characterisation of the local area around Climping the levels reported in Appendix 21.1: Baseline sound report, Volume 4 of the ES [PEPD-025] and reflected in the construction noise assessments presented in Table 21-27,28,29, and 30 of Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement (ES) [PEPD-018]. The Applicant considers that this is a comprehensive sample of locations</p>
8.13	<p>8.13 There are concerns regarding the potential effect of Heavy Good Vehicle (HGV) movements on existing quiet residential roads, particularly access to the onshore cable corridor west of Benjamin Gray Drive. Chapter 21 of the ES states that the vehicular numbers for operational and maintenance traffic will be minimal and below threshold values for a change in traffic noise. The concerns raised are not solely related to increases in traffic flows but also the change in composition of traffic and magnitude of noise on dwellings along quiet access roads.</p>	<p>The Benjamin Gray Drive access (A-10) is defined in Table 23-25 within Chapter 23: Transport, Volume 2 of the ES [APP-064] as an operational access only for the onshore cable route. Paragraphs 23.4.21 and 23.4.22 within Chapter 23: Transport, Volume 2 of the ES [APP-064] describe the expected operation and maintenance phase activities which includes periodic testing of the onshore cable involving attendance by up to three light vehicles such as vans in a day at any one location a few times a year. Unscheduled maintenance or emergency repair visits for the onshore cable will typically involve a very small number of vehicles, typically light vans. In exceptional circumstances, equipment may be required to be replaced, then the use of an occasional HGV may be utilised, depending on the nature of the repair.</p> <p>The assessment of temporary noise effects from construction road traffic noise is provided in Paragraphs 21.9.67 to 21.9.79 within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement (ES) [PEPD-018] and Section 4 within chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] (submitted at Deadline 1). Taking into account the embedded environmental measures to minimise the disturbance to noise sensitive receptors such as Commitments C-22 (core working</p>

Ref	Local Impact Report Comment	Applicant's Response
8.14	<p>8.14 The construction works are considered to result in negative local effects, however, to reduce the negative local effects resulting from noise, embedded mitigation measures are proposed within the Commitments Register, which are discussed in the subsequent section. Subject to the further detailed design and appropriate insertion loss performance of any noise mitigation, which will need to be included within a stage specific CoCP and, subject to other regulatory controls (prior consent under Section 61 of the Control Pollution Act 1974) at the most noise sensitive locations, construction works could be reduced to a neutral local effect.</p>	<p>hours) and C-33 (adoption of the Outline Code of Construction Practice (CoCP) [PEPD-033]) secured via Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated for the Deadline 2 submission) the assessment concludes that there are no significant effects relating to construction road traffic noise.</p> <p>Applicant agrees with and welcomes Arun District Councils comment that at the most noise sensitive locations, construction works could be reduced to a neutral local effect.</p> <p>The Outline Code of Construction Practice (CoCP) [PEPD-033] outlines management measures and mitigation proposed at all onshore construction areas to reduce the effects relating to noise and vibration from construction of the Proposed Development, including commitments C-10, C-26, C-160 and C-263. Commitment C-263 for the production of a Noise and Vibration Management Plan (NVMP) during detailed design based on the principles in the Outline CoCP [PEPD-033], detailing best practicable means and location specific mitigation. The NVMP will be based on further assessment on where noisy construction activities, including piling will occur. Additional measures will be considered at these locations, such as mufflers, acoustic shrouds, and temporary noise barriers, where appropriate. Stage specific CoCPs are secured through requirement 22 of the Draft Development Consent Order [PEPD-009].</p>
8.15	<p>8.15 Once the construction works are completed and the Project operational, the likely effects within the District would be limited to offshore wind turbine noise. A number of other aspects, such as operational traffic was agreed to be scoped out of the ES by the Planning Inspectorate.</p>	<p>Applicant agrees with and welcomes Arun District Councils comment that once the construction works are completed and the Project operational, the likely effects within the District would be limited to offshore wind turbine noise. The Applicant also welcomes Arun District Councils acknowledgement that a number of other aspects, such as operational traffic have been agreed to be scoped out by the Planning Inspectorate (for activities or impacts scoped out of the noise and vibration assessment see Table 21-12 within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement (ES) [PEPD-018]).</p>
8.16	<p>8.16 Appendix 21.3 of the ES provides preliminary wind turbine noise predictions based on several 'candidate' turbines including the cumulative impact of Rampion 1. Given that the design and layout of the WTG is not known at this stage, a number of scenarios are modelled. These are considered to represent worst case noise emissions, with receptor locations modelled at the shoreline. A statement is also made that 'the final design of the wind farm is substantially smaller than the scenarios modelled'. The resultant modelling outputs demonstrate that based on the information available at the time of the modelling, operational noise levels are considered to achieve the 35 dB LA90 lower limit, as set out in ETSU-R-97 The Assessment and Rating of Noise from Wind Farms (The Working Group on Noise from Wind Turbines, 1996). However, ADC request that noise modelling is re-run once the Project has progressed to the final turbine types and layout as this may influence the worst case predicted noise levels.</p>	<p>A screening assessment of the operational noise effects of the Proposed Development as a result of the Wind Turbine Generators on residential receptors during the operation and maintenance phase have been assessed in Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018] and Appendix 21.3: Preliminary operational noise predictions, Volume 2 of the ES [APP-178]. The offshore array area is located approximately 13km from the nearest shoreline. This screening assessment concluded that no residential receptors are predicted to incur exceedances above the lower applicable noise limit (35dB LA90) as stated in ETSU-R-97 The Assessment and Rating of Noise from Wind Farms (The Working Group on Noise from Wind Turbines, 1996). Therefore, a detailed noise assessment is not required as it is expected that the Wind Turbine Generators will comply with the noise limits in accordance with ETSU-R-97.</p> <p>Paragraph 1.1.3 within Appendix 21.3: Preliminary operational noise predictions, Volume 2 of the ES [APP-178] states 'As the final number and positions of the turbines were not known at the time of this assessment, a series of worst case models had been developed to predict worst case noise levels at positions along the shoreline.'</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p><i>The final design of the wind farm is substantially smaller than the scenarios modelled for this report. It should be noted that there are no residential receptors directly on the shoreline, so the results presented within this technical note are a worst case scenario with levels at residential receptors likely to be lower. Furthermore, screening attenuation due to topography and buildings has not been accounted for at this stage'.</i></p> <p>The Applicant considers the scenarios modelled represent a worst case as the final design of the wind farm will be substantially smaller than the scenarios modelled.</p>
8.17	8.17 In light of the above and, considering a number of worse case assumptions in the modelling scenarios, the operational noise and vibration effects are considered to be neutral.	The Applicant welcomes Arun District Councils comment that the operational noise and vibration effects are considered to be neutral.
8.18	<p>Vibration</p> <p>8.18 Potential perceptible vibration effects are predicted at properties close to a number of HDD crossings (HDD05-N, HDD05-SW, HDD07-N, HDD07-S, HDD10-S, HDD10-W and HDD11-S in Lyminster, Poling, Hammerpot and Angmering Park, as identified in Chapter 21 (Table 21.36) of the ES) where the Peak Particle Velocity (PPV) threshold for low impact is exceeded by over double at some locations. Whilst only receptors within 100m were assessed, it's likely that properties beyond 100m may also be subject to such effects. Reference is made to C-33 (outline CoCP) of the Commitments Register, however, no further detail has been provided to justify reducing magnitude of change from medium to low.</p>	Levels equivalent to perceptible vibration during drilling are predicted at the external foot of residential buildings. This may or may not be perceptible inside the buildings. The levels are significantly lower than those that could give rise to building damage, and with suitably sufficient communication management to affected properties, the likelihood of complaint would be expected to be minimal. This will be addressed through the Noise and Vibration Management Plans secured by draft DCO [PEPD-009] (updated at Deadline 2) Requirement 22 (5) (h).
8.19	8.19 High risk impacts are identified at a number of locations (Michaelgrove Lane, North Lodge and residence to the north, Spearfield Stud and Livery) from the vibration effects from construction road traffic (note earlier concerns regarding traffic composition on Benjamin Gray Drive). It is noted that any residence within 2m of the irregularity would experience an impact of high magnitude and any residence within 5m of an HGV travelling over an irregularity at 50mph would experience a high impact.	<p>Concerns regarding Benjamin Gray Drive are as the Response to 8.13.</p> <p>The traffic vibration assessment is considered a worst case, as the National Highways standard guidance (Design Manual for Roads and Bridges LA111) is that public highways should not be the source of such vibration. Therefore, while roads are in good repair, no vibration effects are predicted, Mitigation is provided by way of "Highways condition surveys will be undertaken before, during and after the construction phase. Any damage to highways as a result of Rampion 2 construction heavy goods vehicles (HGVs) on the highways will be repaired." This mitigation is provided by Commitment C-160, to be delivered as part of the Outline Construction Traffic Management Plan [REP1-010] secured via Requirement 24 of the Draft Development Consent Order [PEPD-009].</p>
8.20	8.20 The construction works are considered to result in negative local effects. Subject to the further detailed design and appropriate insertion loss performance of any proposed mitigation (commitment C-26 and C-160 of the Commitments Register), which will need to be included within a stage specific CoCP, and where appropriate, subject to other regulatory controls (prior consent under Section 61 of the Control Pollution Act 1974) at the most vibration sensitive locations, construction works could be reduced to a neutral local effect.	Please see above response reference 8.14.
8.21	<p>Adequacy of the DCO Application, Actions and Commitments</p> <p>8.21 There is an expectation that the principles and requirements of BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites' – Part 1: Noise and BS 5228- 2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites' – Part 2: 'Vibration' be implemented in full to reduce the impact on sensitive receptors and this has broadly been adopted within the measures set out in the ES.</p>	The Applicant welcome the comment from Arun District Council that that the principles and requirements of BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites' – Part 1: Noise and BS 5228- 2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites' – Part 2: 'Vibration' have broadly been adopted within the measures set out in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement (ES) [PEPD-018] .

Ref	Local Impact Report Comment	Applicant's Response
8.22	8.22 The preliminary construction noise assessments may require further refinement for the stage specific CoCP in terms of the finalised construction plant and machinery, location and on-times, as set out in the Commitment Register (C-263).	Commitment C-263 in the Commitments Register [REP1-015] (included within the Outline Code of Construction Practice [PEPD-033] and secured through Requirement 22 within the Draft Development Consent Order [PEPD-009]) has been updated for Deadline 1 to state that during detailed design the appointed contractor will review the construction noise assessments and where any significant deviation from the initial sound level predictions is identified, such that levels in excess of the BS5228-1, the Noise and Vibration Management Plan (NVMP) shall identify the necessary mitigation to avoid this. If necessary, a Section 61 application (of the Control of Pollution Act 1974) will be made to the relevant Local Planning Authority.
8.23	8.23 The Commitment Register sets out embedded mitigation measures, principally through commitments C-22 (core working hours), C-26 (best practicable means), C-263 (and revision of construction noise assessments at design stage). The adequacy of such measures is unclear until further refinement of the construction noise predictions is undertaken. Commitment C-263 suggests that the adequacy of the construction noise assessments will be reviewed by contractors to ascertain if there is 'any significant deviation' from the initial sound level predictions. The competency of the contractor to review sound level predictions is questioned and the term 'significant deviation' should be quantified.	<p>Following review of this comment the wording of the commitment C-263 (Commitments Register [REP1-015]) is being amended to provide confirmation that the competency requirements of the person reviewing (and amending) such predictions shall be a 'suitably qualified acoustician' i.e. possessing a recognised qualification in acoustics, being a member of the Institute of Acoustics. The Outline Code of Construction Practice [PEPD-033] will be updated to define these points at Deadline 3.</p> <p>In the context of construction noise, "significant deviation" would be an increase above the threshold of significance, or an increase in duration of what had been assumed to be a short term activity (with levels above the threshold of significance), such that the temporal threshold is exceeded.</p>
8.24	8.24 The absence of proposed noise and vibration monitoring from the Commitment Register is noted and it is anticipated that for the worst-case locations (i.e. close to HDD crossings) that continuous noise and vibration monitoring should be undertaken and secured through the stage specific CoCP.	<p>Paragraph 5.4.15 within the Outline Code of Construction Practice (CoCP) [PEPD-033] states that '<i>Construction noise monitoring may be required if, for example, Section 61 consent is sought, complaints are received, or as required in discussion with the relevant planning authority. The requirement for noise monitoring will be identified by the Contractor(s) based on the confirmed list of plant and equipment and construction programme and a monitoring framework will be provided in the stage specific NVMP</i>'. Paragraph 5.4.17 (Outline (CoCP) [PEPD-033]) states that '<i>Any monitoring regime will be agreed with the relevant planning authority prior to implementation and details included in the stage specific CoCP</i>'.</p> <p>The provision of stage specific Noise and Vibration Management Plans (NVMPs) is outlined in Commitment C-263 in the Commitments Register [REP1-015] (included within the Outline Code of Construction Practice [PEPD-033] and secured through Requirement 22 within the Draft Development Consent Order [PEPD-009]).</p>
8.25	<p>8.25 In terms of construction noise, ADC request that the Outline CoCP is updated to include:</p> <ul style="list-style-type: none"> • commitment to augment the existing baseline noise surveys to include those areas identified where representative baseline noise levels are not provided (Climping village, Climping Caravan Park, Climping C of E Primary School, Climping Village Hall and play area and the glamping site at Cuckoo Farm), together with at the location of the proposed residential development (CM/48/21/RES). Additional locations would need to be agreed with ADC and included in an updated construction noise assessment for stage specific CoCP; • commitment that the stage specific CoCP will be informed by an updated assessment of construction noise effects as and when they are available, to include provide noise modelling 	<p>As detailed above, the Applicant does not consider that baseline monitoring additional to that already undertaken in Climping will provide any further context for the construction noise assessments though the sensitivity of the receptors identified is recognised.</p> <p>The Outline Code of Construction Practice (CoCP) [PEPD-033] provides for the updated assessment in C-263, the Applicant will consider the further information to be provided within the stage specific CoCPs,</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>inputs for construction compound predictions (including concrete batching plant), revised trigger levels for shoulder hours, corrections for uncertainty;</p> <ul style="list-style-type: none"> • commitment construction noise and vibration monitoring will be included in the stage specific CoCP and would be agreed with ADC; • where despite mitigation measures are implemented and residual noise and/or vibration effects are predicted to arise, consideration should be given to the temporary relocation of residents affected by 24-hour drilling as a method of mitigation where HDD (or other noisy working) is scheduled to proceed for 24 hours per day for longer than 48 consecutive hours; • commitment that prior to undertaking any essential night-time working, the timing and duration of such works will be approved with ADC through an agreed process to be included in the CoCP i.e. application to ADC for prior approval under Section 61 of the Control of Pollution Act 1974; and • commitment that core working hours for Climping Compound to be restricted to Monday to Friday 08:00 to 19:00 hours and Saturday 09:00 to 13:00 hours due to longevity of construction period and proximity of sensitive receptors. 	<p>Monitoring will be required at certain times and locations throughout the Project, see 5.4.15 to 5.4.18 of the Outline CoCP [PEPD-033] for further information. Monitoring proposals will be included in the stage specific CoCP (as part of the Noise and Vibration Management Plan) secured under Requirement 22 of the Draft Development Consent Order [PEPD-009].</p> <p>The Applicant has not identified the need for the use of temporary rehoming as a mitigation method as an outcome of the assessment. The conditions that would prevent a property from being habitable during trenchless crossing works (such that temporary rehoming was necessary) are considered by the Applicant to be very unlikely.</p> <p>Noisy work outside of the core hours, not covered specifically by a Noise and Vibration Management Plan will be subject to requirements of the Outline CoCP [PEPD-033] at paragraph 4.4.2. The noise and vibration management plan is secured through Requirement 22 within the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>Please see response above Reference 8.6 with respect to working hours.</p>
8.26	<p>8.26 As detailed in Appendix 21.3 of the ES, further noise modelling of WTG noise is required once the Project has advanced to the finalised wind turbine selection and layout, so that likely noise effects at the shoreline and residential locations can be re-evaluated. Updated noise predictions and assessment of wind farm noise to be submitted and agreed with ADC.</p>	<p>Please see above response Reference 8.16.</p>
<h2>9. HISTORICAL ENVIRONMENT</h2>		
9.1	<p>Local Planning Policies</p> <p>9.1 The following policies within the adopted Local Plan are considered relevant to the historical environment aspects of the Project within the District (beyond the South Downs National Park).</p> <ul style="list-style-type: none"> • Policy HER SP1 seeks to conserve or enhance the historic environment. Designated heritage assets will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance. Non-designated heritage assets and their settings will also need to be conserved and enhanced appropriate to their significance and contribution to the historic environment; • Policy HER DM1 seeks that development affecting statutory listed buildings will be required to preserve or enhance the historic character, qualities and special interest of the buildings and their settings; • Policy HER DM2 regarding the alteration or extension of buildings on the Local list will be expected to relate sensitively to the building or structure and its setting and respect its architectural, landscape or historic interest. Demolition will only be consented where it can be demonstrated that the building or structure cannot be put to a beneficial use or re-use. Replacement structures will need to be of a high-quality design; and • Policy HER DM3 seeks to preserve or enhance the character or appearance of the conservation area. Planning permission or relevant consent will normally be granted for proposals within or affecting the setting of a conservation area, provided that the proposals do not cause harm. 	<p>These policies are referenced in Section 4.7 of the Planning Statement [APP-036] and within Appendix B. The Historic environment assessment ES has referenced local policy as relevant to the topic see Table 25-3 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p>

Ref	Local Impact Report Comment	Applicant's Response
9.2	<p>9.2 The policy within the following 'made' Neighbourhood Plan is considered relevant to identifying non-designated heritage assets that could be significantly affected by the Project:</p> <ul style="list-style-type: none"> Policy 17 of the Littlehampton Neighbourhood Plan identifies properties in Appendix 4 as locally important heritage assets, which of relevance to this Project are 16 Granville Road, 48 - 95 South Terrace. The effects on the significance of these non-designated heritage assets will be taken into account to avoid or minimise conflict with the heritage asset. 	<p>A proportionate approach was undertaken with regards to the scoping in of heritage assets which may be affected by change to their setting. This approach is described in Section 3 of Appendix 25.7: Settings assessment scoping report, Volume 4 of the Environmental Statement (ES) [APP-213]. This identifies those heritage assets most likely to be sensitive to changes in setting resulting from the Proposed Development. The locally listed buildings at 48-95 South Terrace & 16 Granville Road fall within South Terrace Area of Character which lies adjacent to the Littlehampton Seafront Conservation Area, which was scoped into the assessment of effects relating to offshore elements of the Proposed Development, see Appendix 25.7: Settings assessment scoping report, Volume 4 of the ES [APP-213]. The magnitude of change will be of equivalent magnitude to that of the conservation area which the significance of the residual effect is deemed Minor Adverse and Not Significant in EIA terms, with the effect being no greater, if not less, as a result of its local heritage significance.</p>
9.3	<p>9.3 The following is also of relevance to the historical environment:</p> <ul style="list-style-type: none"> Conservation Areas Management Plan (2014)²⁹; and Conservation Areas Supplementary Planning Guidance (2000)³⁰. <p>²⁹ Arun District Council (2014) "Conservation Areas Management Plan Consultation". Available at [https://www.arun.gov.uk/conservation-areas/] Accessed 4 December 2023</p> <p>³⁰ Arun District Council (2000) "Conservation Areas Supplementary Planning Guidance". Available at [https://www.arun.gov.uk/supplementary-planning-documents-spds/] Accessed 4 December 2023</p>	<p>Appendix 25.7: Settings assessment scoping report, Volume 4 of the Environmental Statement (ES) [APP-213] identifies those conservation areas which have been scoped into the assessment, including those listed in the Conservation Areas Management Plan (2014), and where available, the relevant conservation area appraisal documents and the Conservation Areas Supplementary Planning Guidance (2000) have been consulted to support the baseline information and assessment work presented in Appendix 25.8 Onshore heritage asset baseline report, Volume 4 of the ES [APP-214] and Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p>
9.4	<p>9.4 The negative effects of the compounds (landfall compounds near Climping beach (Work No.8), the trenchless crossing compounds within Work No.9 and Climping Compound (Work No.10)) during the construction works would not accord with the above policies with regard to the setting of the affected heritage assets, especially the Grade II listed buildings: Climping Mill, St John's Cottage (NHLE 1027590), Decoy Cottage and Newplace Farmhouse (NHLE 1232882), Church Farmhouse East and Church Farmhouse West (NHLE 1027643), Old Vicarage; and also the Grade I listed St Marys Church, together with the setting of Lyminster Conservation Area.</p>	<p>The onshore works referred to be the ADC fall within the construction phase. All of the heritage assets listed by ADC were scoped into the assessment as identified in Appendix 25.7: Settings assessment scoping report, Volume 4 of the Environmental Statement (ES) [APP-213]. The baseline information supporting the assessment of these heritage assets is provided in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the ES [APP-214].</p> <p>During the construction phase, as a result of change to setting of heritage assets, the assessment in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] identifies:</p> <ul style="list-style-type: none"> a very low magnitude of change resulting in a Minor adverse residual effect which would be Not Significant for the grade II Listed Climping Mill (NHLE 1027639), grade II* Listed Newplace Farmhouse (NHLE 1232882) and Church Farmhouse east and Church Farmhouse west (NHLE 1027643); a low magnitude of change resulting in a Moderate adverse residual effect which would, due to their temporary nature, would be Not Significant for the grade II Listed St John's Cottage (NHLE 1027590), grade II Listed Decoy Cottage (NHLE 1027713), grade I Listed The Parish Church Of St Mary (NHLE 1027640) and Lyminster Conservation Area; and no effect on the Grade II Listed The Old Vicarage (NHLE 1284693) due to intervening distance and screening from construction activities.

Ref	Local Impact Report Comment	Applicant's Response
9.5	9.5 However, when the construction works are completed and the Project operational, the Project would generally comply with the overall aims of the policies in terms of the impact of the significance of the heritage assets and their setting.	These effects would be temporary for the duration of construction phase. The Applicant agrees with Arun District Council's assertion that, once operational, the Proposed Development would comply with the overall aims of the policies in terms of the impact of the significance of heritage assets and their setting.
9.6	<p data-bbox="308 489 902 552">Key Local Issues and Likely Impacts <i>Listed Buildings and Locally Listed Buildings</i></p> <p data-bbox="308 594 1602 720">9.6 There are numerous listed buildings and locally listed buildings within and immediately adjacent to the DCO Limits of the Project, particularly around Climping, Littlehampton and Lyminster. Owing to the heritage assets on or within proximity to the Project, the principal concerns and effects are considered to be in relation to construction activities as set out below.</p>	<p data-bbox="1656 489 2415 520">See the Applicant's response in References 9.2 and 9.4.</p> <p data-bbox="1656 562 2807 688">No direct and permanent effects Listed Buildings and Locally Listed Buildings are identified in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. No significant effects on heritage assets arising from change to setting are identified within Arun District (outside of the South Downs National Park).</p>
9.7	9.7 ADC has concerns regarding the visual effects associated with the temporary trenchless crossing compounds and the landfall compounds near Climping beach. As noted for the Grade II listed Climping Mill, the landfall compound (Work No. 8) near Climping beach will be clearly visible from the asset, as reported in Chapter 25 of the ES. This compound is also close to other listed buildings, such as the Grade II listed buildings at Kent's Farm (NHLE 1027674, NHLE 1233446, NHLE 1233447), Brookpit Manor and Brookpit Cottage. It is also noted that a trenchless crossing compound within the onshore cable corridor (Work No.9) is close to the following Grade II listed buildings: St John's Cottage (NHLE 1027590), Decoy Cottage and Newplace Farmhouse (NHLE 1232882).	<p data-bbox="1656 751 2451 783">See Applicant's response in References 9.2 and 9.4 to 9.6.</p> <p data-bbox="1656 825 2807 930">For further detail relating to the assessment of grade II Listed Climping Mill (NHLE 1027639), see paragraphs 25.9.496 and 25.9.497 in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p> <p data-bbox="1656 961 2807 1056">During the construction phase, as a result of change to setting of heritage assets, the assessment in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] identifies:</p> <ul data-bbox="1700 1066 2807 1308" style="list-style-type: none"> • a very low magnitude of change resulting in a Minor adverse residual effect which would be Not Significant for the grade II listed Brookpits Cottage (NHLE 1276603) and Brookpits Manor (NHLE 1353858); and • a low magnitude of change resulting in a Moderate adverse residual effect which would, due to their temporary nature, would be Not Significant for the grade II Listed Buildings at Kent's Farm (NHLE 1027674, NHLE 1233446, NHLE 1233447). <p data-bbox="1656 1339 2614 1371">These effects arising during the construction phase would be temporary.</p>
9.8	9.8 The location and size of Climping Compound (Work No.10) is such that it would be close to the part of the historic core of Climping, listed buildings and Scheduled Monument. This together with the likely nature of the uses within the compound (such as welfare cabins, a concrete batching plant up to 20m in height) would impact upon the wider setting of the assets and historic core of Climping.	See Applicant's response in References 9.4 to 9.7 .
9.9	9.9 As a result, the construction works would alter the setting of heritage asset, but not the operational stage i.e. this will not harm the understanding of its historic and architectural interests. The construction works would introduce what is identified within Chapter 25 of the ES as 'new visual and audible elements to the asset's setting via the presence of trenchless crossing compounds'. It is acknowledged that these works would be 'temporary' or 'short term' but that for the duration of these works, the effect upon the setting of the heritage assets would be negative.	See Applicant's response in References 9.4 to 9.7 .

Ref	Local Impact Report Comment	Applicant's Response
9.10	<p><i>Conservation Areas and Area of Character</i></p> <p>9.10 Conservation Areas of relevance to this Project have been identified within the District (beyond the South Downs National Park), as follows:</p> <ul style="list-style-type: none"> • Aldwick Bay Conservation Area; • Craigweil House, Aldwick Conservation Area; • Aldwick Road, Bognor Conservation Area; • The Steyne, Bognor Conservation Area; • Littlehampton (River Road) Conservation Area; • Littlehampton (Sea Front) Conservation Area; • Lyminster Conservation Area; and • Poling Conservation Area 	<p>The conservation areas as listed by Arun District Council are scoped into the assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].</p>
9.11	<p>9.11 Both Aldwick Bay and Craigweil House Conservation Areas were developed in the early 20th century as planned estates where the setting includes the coast. The special character derives from the low density layout, the high quality of the buildings in materials and style, and landscaped gardens and verges. It is a very good example of a 1920 —1930's planned Estate.</p>	<p>See Applicant's response in Reference 9.3.</p> <p>The baseline information supporting the assessment of these heritage assets is provided in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the Environmental Statement [APP-214].</p>
9.12	<p>9.12 The Aldwick Road Conservation Area is characterised by early 19th century Victorian and Edwardian terraces that were developed as part of a westward expansion of Bognor Regis. Again, the coast to the south of the Conservation Area forms part of its setting.</p>	<p>The Applicant has no further comment at this time.</p>
9.13	<p>9.13 The Steyne, Bognor Conservation Area is located immediately west of the town centre and is centred on an area developed in the late 18/19th century. It is illustrative of the development of the town as a seaside resort by its founder, Sir Richard Hotham. Within the Conservation Area, there are two areas of open space, each with terraces that front on to them. The terraces are predominantly two/three storeys in height and rendered. Of note is the imposing Royal Norfolk Hotel, dating from the 1840's, which is set back diagonally across the corner of Aldwick Road and West Street, which faces out to the sea. The seascape is a major contributor to the areas setting.</p>	<p>The Applicant has no further comment at this time.</p>
9.14	<p>9.14 The Littlehampton (River Road) Conservation Area is west of Littlehampton town centre and runs parallel to the River Arun. The area covered by the designation was developed in stages during the first half of the 19th century. Buildings were originally occupied by town dignitaries and those who had an interest in the sea and seafaring. Where there were wharfs are now modern buildings, which somewhat separate the Conservation Area from the river, although views are possible from the river front walk.</p>	<p>The Applicant has no further comment at this time.</p>
9.15	<p>9.15 The Littlehampton (Sea Front) Conservation Area contains terraces from a range of periods. Of note are the oldest buildings along South Terrace, which consist of three storey Georgian and Regency properties built in pairs and short rows as part of a longer terrace. These are domestic in scale and as each pair or group was built individually, there is a variety of detail but without the loss of harmony. The Greensward (an area of open space) immediately south of the Conservation Area affords views towards the sea/beach from the majority of the buildings along South Terrace. The regular building line and design represent the architectural intentions of the architects/builders to incorporate visual links of the seascape.</p>	<p>The Applicant has no further comment at this time.</p>
9.16	<p>9.16 Lyminster Conservation Area is a small, attractive rural settlement between Littlehampton and Arundel. It is characterised by buildings of various scale, style, date and materials. There is an</p>	<p>The Applicant has no further comment at this time.</p>

Ref	Local Impact Report Comment	Applicant's Response
	informality of layout enhanced by mature landscaping and verges. Flint walling is also an important feature of the area, including substantial high walling at the eastern end of Church Lane. The setting of the Conservation Area consists of the surrounding rural landscape	
9.17	9.17 Poling Conservation Area is split into two distinct parts, separated by more recent development. The eastern part comprises the medieval core of Poling with the Grade I listed church and the western part consists of an informal arrangement of houses of a traditional appearance set within a lane. The setting of the Conservation Area consists of the surrounding rural landscape.	The Applicant has no further comment at this time.
9.18	9.18 Within the Conservation Areas described above are listed (designated heritage assets) and locally listed buildings (non-designated heritage assets). The Conservation Areas, except for Lyminster, Poling and Littlehampton (River Road), are located on or close to the coast.	The Applicant has no further comment at this time.
9.19	9.19 Construction works would result in a temporary change to the setting of Lyminster Conservation Area. As described in Chapter 25 of the ES, the construction works would introduce 'new visible and audible elements to the immediate proximity of the conservation area, in contrast with the general sense of a rural, agricultural basis for the settlement and individual buildings'. The result would be a negative effect. The construction works would also potentially have a negative effect on the wider setting of the Poling Conservation Area, including the approach from the north, which would pass the construction works. It is acknowledged that the negative effects would be temporary and, as a result, would not permanently harm the setting of the Conservation Area. Consideration should, however, be afforded to the access points and trenchless crossing compounds.	<p>See Applicant's response in reference 9.4. For Poling Conservation Area, the assessment in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] identified a low magnitude of change resulting in a Moderate adverse residual effect, which due to the temporary nature of the change would be Not Significant.</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 limit the potential for indirect effects, wherever possible.</p>
9.20	9.20 As evidenced in Viewpoint 12 from Bognor Regis promenade (Figure 15.37 of the ES), the WTG of the Project from this viewpoint appear more visible and prominent compared to Rampion 1 WTG. It is clear that for both Bognor Regis and Littlehampton (which includes the Aldwick Road, Bognor Conservation Area, The Steyne, Bognor Conservation Area, the Littlehampton (Sea Front) Conservation Area and the South Terrace Area of Character) the WTG would be visible in sea views. This is described in Chapter 25 of the ES as the 'presence of new, clearly modern visual elements in long distance views' or contributing a 'framing to seaward views rather than interruption'. The seascape setting contributes to the interests of these Conservation Areas; this is agreed within the heritage baseline assessment. Of note is the fact that for the Bognor Regis (The Steyne) Conservation Area 'The visual relationship between the seascape to much of the southern extent of the conservation area is the primary contribution of its setting to the area's interests'. Additionally, for Littlehampton (Seafront) Conservation Area, it is thought that 'The seascape setting contributes to the interests of the conservation area'. Having reviewed Chapter 25 of the ES, ADC disagree that the WTG would contribute to the framing a view (of the Littlehampton (Seafront) Conservation Area), but rather result in an interruption, especially when the structures would be permanently on view from the Conservation Areas in views towards the seascape. The WTG, as described above in Section 6 above and in Chapter 15 of the ES, would result in significant negative visual effects on the coastline of the District.	<p>Changes in sea views from heritage assets identified by ADC have been described and considered within the baseline in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the Environmental Statement (ES) [APP-214] and the assessment in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. The assessment considers what contribution those views (as one element of the asset's setting) make to the asset's heritage significance, and how changes in those views affects the overall heritage significance of the asset, as per Historic England guidance (see the approach to the assessment of effects though change to setting provided in Section 25.7 in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]). Whilst visual changes within the setting of these heritage assets have been identified, the assessment concludes no significant residual effects on these heritage assets, in EIA terms.</p>
9.21	<i>Adequacy of the DCO Application, Actions and Commitments</i>	<p>No's 45-47 South Terrace, identified as 6, St Augustine's Road (NHLE 1191074) within Table 5.1, Appendix 25.7: Settings assessment scoping report, Volume 4 of the Environmental Statement (ES) [APP-213], is scoped out of the historic environment assessment.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>9.21 Chapter 25 of the ES identifies listed buildings where the settings could be affected by the Project. However, the ES fails to consider the likely effects of the Project on the setting of the following designated heritage and non-designated heritage assets:</p> <ul style="list-style-type: none"> • listed buildings at No. 45 – 47 South Terrace; • locally listed buildings at No. 4, 8 – 95 South Terrace and 16 Granville Road; and • South Terrace Area of Character. 	<p>A proportionate approach was undertaken with regards to the scoping in of heritage assets which may be affected by change to their setting. This approach is described in Section 3 of Appendix 25.7: Settings assessment scoping report, Volume 4 of the ES [APP-213]. This identifies those heritage assets most likely to be sensitive to changes in setting resulting from the Proposed Development. The South Terrace Area of Character (and the locally listed buildings at 48-95 South Terrace* & 16 Granville Road, which fall within) lies adjacent to the Littlehampton Seafront Conservation Area, which was scoped into the assessment of effects relating to offshore elements of the Proposed Development, see Appendix 25.7: Settings assessment scoping report, Volume 4 of the ES [APP-213]. The magnitude of change will be of equivalent magnitude to that of the conservation area which the significance of the residual effect is deemed Minor Adverse and Not Significant in EIA terms, with the effect being no greater, if not less, as a result of its local heritage significance.</p> <p>*The Applicant assumes the ADC reference to <i>No. 4, 8 – 95 South Terrace</i> relates instead to 48-95 South Terrace, which are the numbered buildings on South Terrace within the Arun District Council list of buildings and structures of character. Please advise if otherwise.</p>
9.22	<p>9.22 An assessment of the likely effects of the Project on the above heritage assets should be undertaken to make sure all the effects on the historic environment are fully understood and mitigated for, where possible.</p>	<p>See Applicant's response in Reference 9.21. The design of the Proposed Development has been an iterative process that has sought to limit the potential for indirect effects, wherever possible.</p> <p>The spatial extent of the Proposed Development array area has been reduced and designed according to a set of design principles (Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056]), which provide embedded environmental measures addressing visual effects. These measures were established in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, its spread and quantity of wind turbine generators within it. Opportunities to reduce effects through further design principles specific to individual heritage assets are limited by the technical, economic and functional requirements of the Proposed Development to produce renewable energy, as well as other environmental factors as presented in the final array area extent in the Offshore Works Plan [PEPD-004].</p> <p>The refinement process for the offshore array site selection considered has been presented in Section 3.2 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044]. The Applicant provided a Seascape, Landscape and Visual Design Principles Clarification Note [REP1-037] (submitted at Deadline 1), which provides further commentary on these design principles.</p>
9.23	<p>9.23 As the duration of Climping Compound, landfall compound and trenchless crossing compounds are expected to be in use for some time, appropriate landscaping/boundary treatments should be implemented to mitigate the effects of the construction activities on the setting of heritage assets (see Section 6 for further details).</p>	<p>Please see response above Reference 6.14.</p>

10. SUMMARY OF MITIGATION, COMPENSATION AND REQUIREMENTS

Ref	Local Impact Report Comment	Applicant's Response
10.1	<p>Mitigation, Monitoring and Compensation</p> <p>10.1 ADC has concerns regarding the lack of commitment and certainty to some mitigation, monitoring and compensation, together with the mechanisms for securing. An overarching concern is that owing to the wording of some mitigation measures in the Commitment Register, it is not definite or certain that the measures would be implemented to mitigate or compensate effects. Firmer commitment is therefore sought to delivering these mitigation measures, such as a Supply Chain Plan and Community Benefits Package. ADC will continue to engage with the Application to make sure appropriate mitigation is provided.</p>	<p>The Commitments Register [REP1-015] (updated at the 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 (e.g. a requirement in Schedule 1 Part 3 of the Draft Development Consent Order (DCO) [PEPD-009]). Where there is an accompanying document such as an outline plan submitted with the DCO Application with which works must be undertaken accordance, this is also referred to under the 'Relevant Application Documents' column. The Applicant has provided an update to the Commitments Register [REP1-015] at Deadline 1 to including further detail e.g. the full reference to DCO requirements and addition of the location of further information within the Application documents.</p> <p>The outline Skills & Employment Strategy (oSES) [PEPD-037] submitted with the DCO Application was intentionally high-level and the Applicant was not in a position to document concrete commitments without further consultation with key skills and employment stakeholder organisations in Sussex. The first tranche of consultation took place between July and October 2023 and included meetings with Science, Technology, Engineering and Maths (STEM) Learning UK and Sussex Chamber of Commerce. The results of this consultation have fed into the second iteration of the oSES [PEPD-037], submitted to the Examining Authority in January 2024.</p> <p>This latest version of the oSES [PEPD-037] includes seven additional key skills & employment stakeholder organisations, including Arun District Council and the Institute of Technology Sussex. Meetings will be held with these stakeholders in early 2024. Tailored education, training and employment initiatives are already documented in para 2.3.3, which will be further developed during the subsequent consultation.</p> <p>Community benefits are not a legal or DCO requirement and are quite distinct from the consenting process, a point reiterated in the UK Government (Department for Energy Security and Net Zero) response to the consultation on Community Benefits for Electricity Transmission Network Infrastructure (December 2023), which stated:</p> <p><i>"The proposals on community benefits for electricity transmission network infrastructure discussed within this document will remain separate to the planning process. It will not be a material consideration in planning decisions, and not secured through those decisions."</i></p> <p>That said, Rampion 2 will be a permanent neighbour in the Sussex community and the Applicant intends to develop and implement a community benefits package of proposals. In the second half of 2024, the Applicant will therefore be consulting key stakeholders and local communities on how a community benefit package could best support Sussex communities. The final package may include a range of initiatives to benefit business, education and residential communities.</p>
10.2	<p>10.2 As described above, ADC is of the opinion that the District will not significantly benefit from the Project, rather the area and local communities will experience disruption and significant negative effects, some of which are unlikely to be mitigated. Where mitigation is not possible, ADC seeks appropriate compensation through a Community Benefits Package (see below).</p>	<p>Please see above response Reference 10.1.</p>

Ref	Local Impact Report Comment	Applicant's Response
10.3	<p>10.3 The adequacy of mitigation, compensation and commitments are described above in Section 4 to Section 9, with a summary of the key points provided below:</p> <ul style="list-style-type: none"> owing to very limited detail given within the Outline Skills and Employment Strategy, ADC seeks the strategy to be developed further in consultation with ADC to develop long term investment opportunities for apprenticeships and local education institutes in Arun, together with measures to support local SMEs and opportunities for SMEs to access the supply chain; the Outline Skills and Employment Strategy refers to a Community Benefits Package, although no details are provided. ADC seeks a firmer commitment to delivering a Community Benefits Package such as that provided for Rampion 1 that includes benefits specific to the local community in Arun. A Community Benefits Package is considered appropriate to adequately compensate for adverse effects that cannot be otherwise mitigated for. Discussions are sought with the Applicant to agree the Community Benefits Package (including the criteria and funding). It is requested that this is secured through the DCO; for the cable route to be located as close as possible to the field boundaries to minimise disruption to agricultural activity; owing to concerns that there is a lack of detail within the Outline CoCP, which would be used to inform the detailed staged CoCP, ADC seek an updated Outline CoCP as the control document. This Outline CoCP should include firmer commitments for supply chain opportunities for local 53 SMEs (see below), baseline noise surveys, updated noise assessments, noise and vibration monitoring and core working hours specific to the use of Climping Compound. Such noise surveys, assessment, mitigation and monitoring should be agreed with ADC; a firmer commitment to developing a Supply Chain Plan, as whilst this is referred to in C-34 of the Commitments Register as exploring opportunities for companies to access the supply chain, this should be secured through the CoCP; commitment to preparing and submitting to ADC for approval a Construction Communications Plan for Climping Compound. Whilst Construction Communication Plans are referenced in the Outline CoCP and Chapter 19 of the ES, it is not referenced specifically in relation to Climping Compound, although other locations are suggested as 'applicable'. ADC request a greater commitment for a Construction Communication Plan to be submitted to ADC for approval prior to the commencement of works associated with Climping Compound; approval should be sought from ADC for the exact positioning of the concrete batching plant and soil/aggregate stockpiles and be placed as far away as possible from residents/other sensitive receptors; owing to concerns regarding the lack of biodiversity enhancement within the District, a firmer commitment to delivering biodiversity net gain specifically within Arun and for this to be demonstrated through a biodiversity net gain assessment at the District level and a maintenance and monitoring plan of biodiversity net gain (to be agreed and secured with ADC via appropriate means). Net gain should be delivered in accordance with the biodiversity hierarchy. ADC also has suggested a contribution to the Sussex Kelp Recovery Project to support marine biodiversity net gain; greater commitment to advanced tree/habitat planting, particularly along boundary/field treatments, and for the staged reinstatement of habitats within the first planting season 	<p>The Applicant refers to responses to References 5.39, 5.44, and 4.13.</p> <p>This latest version of the oSES [PEPD-037] includes seven additional key skills & employment stakeholder organisations, including Arun District Council and the University of Chichester, alongside Horsham and Adur & Worthing Councils, other educational institutions and Gatwick Airport. Following this series of consultation meetings and the examination itself, the Applicant will produce a further iteration of the Skills & Employment Strategy and ultimately produce the final SES which will outline key objectives, initiatives and activities, which will also include greater detail on timelines, monitoring and commitments. These are likely to include details regarding an apprenticeship scheme and engagement with educational institutions. The oSES is secured through Requirement 33 of the Draft Development Consent Order [PEPD-009].</p> <p>Supporting existing local business is integral to the ultimate delivery of skills and employment objectives which will be set out in the final SES. The oSES [PEPD-037] already documents the intended industry leadership in this area in para 2.3.3, which sets out two related initiatives:</p> <ol style="list-style-type: none"> 1. Encouraging and supporting growth and employment in local supply chain companies; and 2. Increasing visibility of local Small and Medium-sized Enterprises (SMEs) within the employment market. <p>The Applicant will continue engaging with local authorities and education institutions on further iterations of the oSES and the subsequent delivery of the strategy post consent. The final SES and delivery of the obligations within it will be discharged under Requirement 33 of the Draft Development Consent Order [PEPD-009] which has been updated at Deadline 2.</p> <p>Community benefits are not a legal or DCO requirement and are quite distinct from the consenting process, a point reiterated in the UK Government (Department for Energy Security and Net Zero) response to the consultation on Community Benefits for Electricity Transmission Network Infrastructure (December 2023), which stated:</p> <p><i>“The proposals on community benefits for electricity transmission network infrastructure discussed within this document will remain separate to the planning process. It will not be a material consideration in planning decisions, and not secured through those decisions.”</i></p> <p>That said, Rampion 2 will be a permanent neighbour in the Sussex community and the Applicant intends to develop and implement a community benefits package of proposals. In the second half of 2024 or in early 2025, the Applicant will therefore be consulting key stakeholders and local communities on how a community benefit package could best support Sussex communities. The final package may include a range of initiatives to benefit business, education and residential communities.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>following completion of the construction works and backfilling within the section, rather than within two years, as currently defined within C-103 of the Commitments Register;</p> <ul style="list-style-type: none"> whilst it is acknowledged that Poling Lane would be crossed by a trenchless crossing method and will not be closed, ADC seeks guarantees that the single access road to Poling Village will remain open at all times. Where this cannot be delivered, adequate mitigation should be in place to ensure public passage to and from Poling village is maintained and is suitable for emergency access purposes; and Lyminster bypass (northern section) is currently under construction and due to open in Autumn 2024. ADC seeks guarantees that the new road surfaces would not be disturbed and be crossed by trenchless crossing techniques. 	<p>Re securing the Supply Chain Plan, The Applicant will develop supply chain commitments in the relevant document which would be secured through the Contract for Difference from DESNZ.</p> <p>The Applicant refers to the response provided to Reference 4.7 for the location and uses for which the space is required. The Applicant will update the Outline Code of Construction Practice [PEPD-033] at Deadline 3 to make it clear that Construction Communications Plans will cover the compound. The Applicant will provide further detail including the topic management plans in the stage specific Code of Construction Practice, in accordance with Outline CoCP. as secured by Draft Development Consent Order [PEPD-009] Requirement 22.</p> <p>The Applicant refers to the response in reference 4.12 for soils and concrete batching locations. With regards the requested information on noise, the Applicant refers to Section 5.4 of the Outline Code of Construction Practice [PEPD-033] with regards to the further information to be provided as part of the stage specific CoCP, as secured by draft DCO [PEPD-009] (submitted at Deadline 2).</p> <p>The Applicant refers to the responses in reference 4.15 and 5.16 with respect to Biodiversity Net Gain and the Sussex Kelp Recover Project and response in reference 6.15 with respect to landscape restoration.</p> <p>Both Poling Street and the under construction Lyminster bypass will be crossing via trenchless crossing (TC-07/07a and TC-06/06a respectively) which is secured through Appendix A Crossing Schedule of the Outline Code of Construction Practice (CoCP) [PEPD-033] and Requirement 22 of the Draft Development Consent Order [PEPD-009].</p>
10.4	<p>DCO and Requirements</p> <p>10.4 In addition to the above, discussions are sought with the Applicant regarding some of the wording within Schedule 1 and the Requirements of the draft DCO to account for the following:</p> <ul style="list-style-type: none"> to provide a description for Work No.10 in Schedule 1 (comparable detail to other Work No. descriptions) of the use of 'temporary construction compounds' or provide in another document where there is a commitment to comply with the description. This would provide greater clarity and certainty of the uses proposed within Climping Compound; with regard to Requirement 10, it will be important that the programme of works secured clearly defines the stages, phasing and associated timings of works within the District so that it is clear to ADC when Requirements will need to be discharged for the stage specific documents, such as the LEMP (Requirement 13) and CoCP (Requirement 22); with regard to Requirement 14, the wording is amended so that the biodiversity net gain strategy for stages that relate to areas within Arun is also submitted to and approved by ADC. ADC requires that this is secured by a S.106 agreement, if appropriate; with regard to Requirement 33, the wording is amended so that the skills and employment strategy is 'agreed with and provided to' the relevant planning authority, which will include ADC; and 	<p>The approach to the description of the construction compounds as Work No. 10 is consistent with the approach adopted in a number of made Development Consent Orders. It is not considered appropriate to provide any further description as it is not possible to predict at this stage exactly what the compound will be required to be used for. However a worst case assessment of the use of the compounds has been undertaken and reported in the Environmental Statement.</p> <p>The purpose of requirement 10 is to secure approval to programme which identifies stages of the onshore works to enable individual requirements to be discharged in relation to individual stages. The detailed phasing and sequencing of works for each stage, or for phases within the stage, will be secured through the Outline Code of Construction Practice [PEPD-033] and the Outline Landscape and Ecology Management Plan [APP-232] for the relevant stage.</p> <p>The biodiversity net gain strategy is secured through requirement 14 of the Draft DCO [PEPD-009] updated at Deadline 2, and it must accord with the information submitted as per Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193], which will be certified pursuant to Article 50. The strategy must be approved by the local planning authority in consultation with the statutory nature conservation body.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> a commitment and a mechanism to secure a Community Benefits Package, which is currently not secured. 	<p>Requirement 33 already requires the employment and skills strategy for each stage to be provided to the relevant planning authority. The Applicant is engaging with the relevant planning authorities in the development of its content.</p> <p>Whilst the Applicant intends to progress a community benefits package, this is outside the consenting process. Following a recent consultation in respect of community benefit funds specifically in connection electricity transmission network infrastructure the Government confirmed that community benefits for electricity transmission network infrastructure discussed would remain separate to the planning process. It was not a material consideration in planning decisions, and not secured through those decisions. Accordingly it is not appropriate for a requirement to be included in the draft DCO to secure such a package</p> <p>Community benefits are not a legal or Development Consent Order (DCO) requirement and are quite distinct from the consenting process, a point reiterated in the UK Government (Department for Energy Security and Net Zero) response to the consultation on Community Benefits for Electricity Transmission Network Infrastructure (December 2023), which stated:</p> <p><i>“The proposals on community benefits for electricity transmission network infrastructure discussed within this document will remain separate to the planning process. It will not be a material consideration in planning decisions, and not secured through those decisions.”</i></p> <p>That said, Rampion 2 will be a permanent neighbour in the Sussex community and the Applicant intends to develop and implement a community benefits package of proposals. In the second half of 2024 or in early 2025, the Applicant will therefore be consulting key stakeholders and local communities on how a community benefit package could best support Sussex communities. The final package may include a range of initiatives to benefit business, education and residential communities</p>
10.5	<p>10.5 Discussions are sought to agree the role of ADC in the discharge of Requirements that relate to the District (beyond the SDNPA), in particular, with regard to stage specific LEMP, detailed/stage specific CoCP, biodiversity net gain strategy and skills and employment strategy. With regard to these stage specific management plans and strategies, ADC request to be a consultee and for ADC to approve these where they relate to the District (beyond the SDNPA) alongside other relevant consultees.</p>	<p>A number of the requirements fall to be discharged by the relevant planning authority, which is defined as the local planning authority for the area in which the stage in respect of which the discharge is sought, is located. Where statutory responsibility for the subject matter of a requirement falls to another body, the relevant planning authority is frequently a consultee. Consequently Arun DC will have a key role in matters pertaining to its administrative area.</p>
10.6	<p>10.6 Owing to the additional expenditure to ADC in relation to the discharging relevant Requirements and S61 applications, ADC seeks to recover the associated costs. ADC would welcome discussions with the Applicant on the recovery of costs.</p>	<p>Provision has been made in Schedule 14 (3) in the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) for a fee to be paid to the discharging authority on each application for discharge akin to an application to discharge a planning condition.</p>

11. SUMMARY

Ref	Local Impact Report Comment	Applicant's Response
11.1	11.1 The purpose of this Local Impact Report has been to outline the likely effects of Rampion 2 Wind Farm at local level on the residents, businesses and the environment within the District of Arun and to briefly evaluate these effects in the context of local planning policy.	The Applicant has no further comment on this paragraph of Arun District Council's Local Impact Report.
11.2	11.2 ADC supports renewable energy generation and carbon reduction objectives to meet climate change commitments, whilst also promoting economic development and locally skilled jobs. ADC has some concerns regarding the negative effects to residents, communities, the local economy and the environment. ADC is of the opinion that the District will not significantly benefit from the Project, rather the area and local communities will experience disruption and significant negative effects, some of which are unlikely to be mitigated. ADC has highlighted where the effects are not considered to be compliant with local policy; these are notably in relation to biodiversity, tourism, historic environment and visual effects within the District during construction and a lesser extent once operational.	<p>Section 5.4 of the Planning Statement [APP-036] summarises the potential environmental, social and economic benefits and the adverse impacts of the Proposed Development drawing on relevant information in line with National Policy Statement (NPS) EN-1 (Department of Energy and Climate Change (DECC), 2011a and Department for Energy Security and Net Zero (DESNZ), 2023b). Section 5.5 of the Planning Statement [APP-036] sets out the planning balance where the potential benefits and impacts of the Proposed Development are weighed up. Although, inevitably, there are adverse impacts associated with the scale and type of infrastructure that forms the Proposed Development, the Applicant considers that the planning balance is firmly in favour of the Proposed Development and the benefits outweigh the adverse impacts. A NPS review document (Statement on the new National Policy Statements for Energy [REP1-031] submitted at Deadline 1 to provide a comparison of significant changes between the draft NPSs of March 2023 against the NPS as subsequently designated by Parliament in January 2024.</p> <p>The project has been subject of multiple rounds of iterative consultation with local people and environmental authorities. This process, and evidence of regard had to consultation responses, is set out in the Consultation Report [APP-027].</p>
11.3	11.3 ADC has sought to identify where further work is considered necessary so that the likely effects can be fully understood at local level. ADC has also requested firmer commitments and appropriate mitigation and compensation to delivering social, economic and environmental benefits that are specific to the District, particularly with regard to biodiversity, education, tourism, employment and skills. Where mitigation is not possible, ADC seeks appropriate compensation through a Community Benefits Package. ADC will continue to engage with the Applicant to secure the actions and commitments required during the Examination period and beyond.	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 EN-1 (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 (HoTs) for Deadline 3.

Table 2-2 Applicant's Response to Arun District Council's Written Representation [REP1-040]

Ref	Written Representation Comment	Applicant's Response
3.1	<p>Comments on Application Submission Documents (Deadline 1)</p> <p>Updated Outline Skills and Employment Strategy</p> <p>Since submitting our Relevant Representation and initial Principal Areas of Disagreement Statement (PADS), together with the preparation of our Local Impact Report, the Applicant has submitted an updated Outline Skills and Employment Strategy (Revision B). Despite this updated Outline Skills and Employment Strategy, the majority of ADC's concerns remain as per the Relevant Representation, PADS and as outlined further in the Local Impact Report.</p> <p>ADC has previously raised concerns regarding the Council not being consulted regarding the development of the Outline Skills and Employment Strategy. The updated submission now acknowledges ADC as a relevant stakeholder and proposes consultation with ADC. ADC is supportive of being a consultee. As part of this consultation, ADC will seek detail on the strategy and benefits for the District to be included within Outline Skills and Employment Strategy, including long-term investments in local opportunities for apprenticeships and educational institutions in Arun.</p> <p>The updated Outline Skills and Employment Strategy remains limited in terms of detail and lacks any specifics on the strategy and benefits for the District. Furthermore, the wording remains non-committal throughout, with language such as 'will seek to', 'suggested activities' and 'suggested for the Applicant to consider'. As set out in previous representations, ADC seeks measures identified in the Outline Skills and Employment Strategy to be secured through the Outline Code of Construction Practice.</p> <p>The Supply Chain initiatives identified in the Outline Skills and Employment Strategy require definition and commitment. ADC expect this to be secured through the Outline Code of Construction Practice.</p> <p>The updated Outline Skills and Employment Strategy also remains non-committal in relation to the Community Benefit Package. As set out in previous representations, ADC seeks a commitment and a securing mechanism established for the Community Benefit Package for Arun to adequately compensate and offset significant adverse effects within the District that cannot be otherwise mitigated.</p> <p>The updated Outline Skills and Employment Strategy includes a Case Study highlighting the success of the Rampion 1 visitor centre in Brighton. As stated in ADC's Local Impact Report, the Applicant should consider the development of a similar visitor centre in Arun, not only for educational purposes, but also to act as a tourist attraction that could offer boat trips to visit the wind farm. The Applicant should consider this as part of their mitigation strategy.</p>	<p>The outline Skills & Employment Strategy (oSES) [APP-256] was intentionally high-level and the Applicant was not in a position to document concrete commitments without further consultation with key skills & employment stakeholder organisations in Sussex. The first tranche of consultation took place between July and October 2023, the results of which have fed into the second iteration of the oSES [PEPD-037], submitted to the Examining Authority (ExA) in January 2024.</p> <p>This latest version of the oSES [PEPD-037] includes seven additional key skills & employment stakeholder organisations, including Arun District Council and the University of Chichester, alongside Horsham and Adur & Worthing Councils, other educational institutions and Gatwick Airport. Following this series of consultation meetings and the examination itself, the Applicant will produce a further iteration of the Skills & Employment Strategy and ultimately produce the final SES which will outline key objectives, initiatives and activities, which will also include greater detail on timelines, monitoring and commitments. These are likely to include details regarding an apprenticeship scheme and engagement with educational institutions. The oSES [PEPD-037] is secured through Requirement 33 of the Draft Development Consent Order [PEPD-009].</p> <p>Supporting existing local business is integral to the ultimate delivery of skills and employment objectives which will be set out in the final SES. The oSES [PEPD-037] already documents the intended industry leadership in this area in para 2.3.3, which sets out two related initiatives:</p> <ol style="list-style-type: none"> 1. Encouraging and supporting growth and employment in local supply chain companies; and 2. Increasing visibility of local Small and Medium-sized Enterprises (SMEs) within the employment market. <p>The Applicant will continue engaging with local authorities and education institutions on further iterations of the oSES [PEPD-037] and the subsequent delivery of the strategy post consent. The final SES and delivery of the obligations within it will be discharged under Requirement 33 of the Draft Development Consent Order [PEPD-009] which has been updated at Deadline 2.</p> <p>Community benefits are not a legal or DCO requirement and are quite distinct from the consenting process, a point reiterated in the UK Government (Department for Energy Security and Net Zero) response to the consultation on Community Benefits for Electricity Transmission Network Infrastructure (December 2023), which stated:</p> <p><i>"The proposals on community benefits for electricity transmission network infrastructure discussed within this document will remain separate to the planning process. It will not be a material consideration in planning decisions, and not secured through those decisions."</i></p> <p>That said, Rampion 2 will be a permanent neighbour in the Sussex community and the Applicant intends to develop and implement a community benefits package of</p>

Ref	Written Representation Comment	Applicant's Response
		<p>proposals. In the second half of 2024 or in early 2025, the Applicant will therefore be consulting key stakeholders and local communities on how a community benefit package could best support Sussex communities. The final package may include a range of initiatives to benefit business, education and residential communities.</p> <p>Local evidence from the tourism sector ONS employment data pre, during and post construction of Rampion 1 is presented in Chapter 17: Socio-economics, Volume 2 of the ES [APP-058]. As noted in the assessment this shows continued growth of the sector across Sussex when comparing pre construction to post construction (pre Covid-19 pandemic).</p> <p>Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] details relevant studies and evidence from offshore wind farms in the UK which shows that there has been no evidence of overall negative impact on the tourism economy from the development of offshore wind farms in the UK and there are a number of UK offshore wind farms which are operational that are less than 25km from shore (including Westermost Rough, Humber Gateway, Lincs, Thanet, Kentish Flats Extension, Gwynt y Mor and Rampion 1). This evidence included analysis of tourism employment numbers for Rampion 1 which showed higher levels of tourism and employment across Sussex coastal seaside towns over the period in which Rampion 1 was operational compared to before Rampion 1 began construction.</p> <p>The assessment of the impact on the volume and value of tourism detailed in Sections 17.9, 17.10 and 17.11 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] considered the changing public perceptions of offshore wind as evidenced by the UK Governments Public Attitudes Tracker. The assessment within explores the impact on tourism and finds that overall, when all influencing factors are considered, the effect of the Proposed Development on the volume and value of tourism across Sussex is expected to be negligible. While there may be some people with negative perceptions of offshore wind farms who may be deterred from visiting, these are likely to be small in number and could be offset by those who are more likely to visit the area due to the development of offshore wind (see paragraph 17.9.27 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058]). For example, those visiting the existing Rampion visitor centre or those going on boat trips to the offshore infrastructure of Rampion 2.</p> <p>Therefore, there is no mitigation required, it is too early for The Applicant to commit to a Rampion 2 Visitor Centre and such an initiative would be distinct from the DCO.</p> <p>The Applicant would not offer boat trips to the wind farm as such services can be provided by existing charter boat businesses and the Applicant does not wish to compete with, or reduce that local business offering. The Applicant is aware of multiple organisations offering boat trips to Rampion 1 and uses these providers regularly to facilitate stakeholder visits to the wind farm.</p>
3.2	Updated Baseline Sound Report	<p>The Applicant welcomes Arun District Council's recognition that the updated Appendix 21.1: Baseline Sound Report, Volume 4 of the ES [PEPD-025] appropriately encompasses the locations highlighted in Arun District Council's Local Impact Report</p>

Ref	Written Representation Comment	Applicant's Response
	<p>The updated Baseline Sound Report now covers the additional noise baseline survey data at locations that were highlighted in the Local Impact Report. Baseline noise levels at these locations have now appropriately been characterised through the inclusion of the following noise monitoring locations: NML05; NML14; NML41; NML31 and NML32.</p>	<p>through the inclusion of the noise monitoring locations (NML05, NML14, NML41, NML31, and NML32).</p>
3.3	<p>Construction Plant List</p> <p>Construction plant data is now included for the construction of the temporary construction compound (internal haul roads). The assumed plant type, number of sources and percentage on-time for each plant type appear to be reasonable.</p>	<p>The Applicant welcomes Arun District Councils acknowledgement that construction plant data is now included for the construction of the temporary construction compound (internal haul roads) (Appendix 21.2: Construction plant list, Volume 4 of the ES [PEPD-027] updated at the Procedural Deadline A submission) and that the assumed plant type, number of sources and percentage on-time for each plant type appear to be reasonable.</p>
3.4	<p>Outline Code of Construction Practice</p> <p>An additional embedded environmental measure commitment (C-287) is included in the Outline Code of Construction Practice, which states that:</p> <p><i>“For the duration of the construction phase in this location, an enhanced acoustic barrier will be installed on the southern edge of the works, north of Brookfield caravan park. The barrier will be of a suitable dimension and sited appropriately to manage noise impacts at this location.”</i></p> <p>ADC is supportive of this additional commitment.</p>	<p>The Applicant welcomes Arun District Council's support of commitment C-287 secured through the Outline Code of Construction Practice [PEPD-033] via Requirement 22 of the Draft Development Consent Order [PEPD-009].</p>
3.5	<p>Comments on the draft Statement of Commonality of Statements of Common Ground (Deadline 1)</p> <p>ADC has reviewed the draft Statement of Common Ground (SoCG) between the Applicant and the Council and reviewed it against the Statement of Commonality of SoCG. We have also since met with the Applicant to discuss the SoCG, ahead of Deadline 1.</p> <p>We agree with most of the categorisations of the topics within Table 1-2 of the draft Statement of Commonality of SoCG, as discussions continue. We would note that the Socio-Economics box has the potential to be marked as 'orange' ('some matters under discussion/some matters not agreed') depending on the outcome of forthcoming discussions as outlined below.</p>	<p>The Applicant welcomes Arun District Council's agreement on the majority of the categorisations of the topics within Table 1-2 of the draft Statement of Common Ground (SoCG) and is continuing discussions to agree a Statement of Common Ground with Arun District Council.</p>
3.6	<p>Written Representation (Deadline 1)</p> <p>ADC has previously set out in the Relevant Representation, initial PADS and within the Local Impact Report some concerns regarding disruption and impacts to residents, businesses, the local economy (particularly tourism upon which Arun is heavily reliant upon) and the environment. Furthermore, concerns regarding the adequacy of the application documents and commitments to mitigation and compensation measures within Arun have also been previously raised. Details regarding adequacy of the application documents and commitments to mitigation and compensation measures are given in the initial PADS and within the Local Impact Report. These have not been repeated here. However, we have noted below where there are considered changes/additions to our previous representations:</p> <ul style="list-style-type: none"> • Since the preparation of the Local Impact Report for Arun, the reserved matters application (CM/48/21/RES) for Land to the West of Church Lane, South of Horsemere Green Lane, 	<p>The Applicant has provided responses to Arun District Councils Relevant Representation at Deadline 1 (Applicants responses to Relevant Representations [REP1-017]) and responses to Arun District Councils Local Impact Report above (References 1.1 to 11.3 of Table 2-1). The Applicant is continuing discussions to agree a Statement of Common Ground with Arun District Council</p> <p>For responses to the reserved matters application (CM/48/21/RES) for Land to the West of Church Lane, South of Horsemere Green Lane, Climping (strategic housing allocation SD10 of the adopted Local Plan) and the updated Appendix 21.1: Baseline sound report, Volume 4 of the ES [PEPD-026] please see References 2.7 and 3.2 respectively.</p>

Ref **Written Representation Comment**

Climping (strategic housing allocation SD10 of the adopted Local Plan) referred to in the Local Impact Report has been approved subject to planning conditions. Given this, there is now a greater likelihood that construction of this residential development is likely to coincide and be built out alongside the operations of Climping Compound; and

- As above, we have reviewed the updated Baseline Sound Report from the Applicant. The additional baseline noise data provided are considered to appropriately characterise the baseline noise environment around the location of the proposed Climping Construction Compound and is considered to satisfy the point raised in paragraph 8.25 of the Local Impact Report.

The Applicant has noted in initial discussions regarding the SoCG that the community benefits package of proposals will be consulted on 'in the second half of 2024' and does not form a legal or DCO requirement. We are seeking discussions with the Applicant on the disruption and impacts as outlined in the Local Impact Report and how this can be adequately mitigated and compensated for. In addition to the points raised and the above, all other concerns outlined in the Relevant Representation, initial PADS and within the Local Impact Report remain at this stage.

Applicant's Response

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 EN-1 (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 (HoTs) for Deadline 3.

3. References

Defra (2023). *What you can count towards a development's biodiversity net gain*. [Online] Available at: <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng#:~:text=Examples%20of%20other%20schemes%20you,sustainable%20drainage%2C%20or%20nutrient%20mitigation> [Accessed: March 2024].

Department for Energy Security and Net Zero, (2023a). *DESNZ Public Attitudes Tracker*. [Online] Available at: <https://www.gov.uk/government/collections/public-attitudes-tracking-survey> [Accessed: March 2024].

Department for Energy Security and Net Zero (2023b). *Overarching National Policy Statement for Energy (EN-1)*. [online] Available at: https://assets.publishing.service.gov.uk/media/64252f3b60a35e00120cb158/NPS_EN-1.pdf [Accessed: 12 March 2024].

Department of Energy and Climate Change (2011a). *Overarching National Policy Statement for Energy (EN-1)*. [online] Available at: <https://assets.publishing.service.gov.uk/media/65a794dd96a5ec000d731abe/1938-overarching-nps-for-energy-en1-withdrawn.pdf> [Accessed: 12 March 2024].

Fáilte Ireland, (2021). *Report on Visitors Awareness and Perceptions of the Irish Landscape*. Dublin; Fáilte Ireland.

IPROW (2020). *Environmental Impact Assessment: Appraising Access*. Lancaster; IPROW.

Office of National Statistics, (2023). *Annual Population Survey*. [Online] Available at: <https://www.nomisweb.co.uk/datasets/apsnew> [Accessed: March 2024].