

Rampion 2 Wind Farm Category 8: Examination Documents Applicant's Responses to West Sussex County Council Deadline 1 Submissions

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Executive Summary

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

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

1.3 Structure of the Applicant's Responses

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

- ▶ Arun District Council (**Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.44)**);
 - ▶ Brighton and Hove City Council (**Applicant's Responses to Brighton and Hove City Council Deadline 1 Submissions (Document Reference: 8.48)**);
 - ▶ Horsham District Council (**Applicant's Responses to Horsham District Council Deadline 1 Submissions (Document Reference: 8.45)**);
 - ▶ Mid Sussex District Council (**Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.46)**);
 - ▶ South Downs National Park Authority (**Applicant's Responses to South Downs National Park Authority Deadline 1 Submissions (Document Reference: 8.47)**); and
 - ▶ West Sussex County Council (this document: **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 West Sussex County Council. Each response is identified in the relevant table:

- West Sussex County Council's Local Impact Report: **Table 2-1**; and
- West Sussex County Council's Written Representation: **Table 2-2**.

2. Applicant's Response to West Sussex County Council's Deadline 1 Submissions

Table 2-1 Applicant's Response to West Sussex County Council Local Impact Report [REP1-054]

Ref	Local Impact Report Comment	Applicant's Response
1. Introduction		
1.1	Terms of Reference 1.1. Rampion Extension Development Limited (the 'Applicant') has submitted an application for a Development Consent Order (DCO) for an extension to the currently operating Rampion 1 Offshore Wind Farm, known as the Rampion 2 Offshore Wind Farm (the 'Project').	The Applicant has no further comments at this time on matters raised in the introduction of the West Sussex County Council Local Impact Report.
1.2	1.2. This is the Local Impact Report (LIR) of West Sussex County Council ('WSCC'), one of the host authorities for the Project.	
1.3	1.3. Section 104 of the Planning Act 2008 (the 'Act') requires the Secretary of State to have regard to LIRs in deciding applications. The Act defines an LIR 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)" (section 60(3)).	
1.4	1.4. Provided that the LIR fits within this definition, its structure and content is a matter for the Local Authority. However, guidance is provided in the Planning Inspectorate's Advice Note One: LIRs (version 2, April 2012), which states that the LIR should set out the local authority's view of likely positive, neutral and negative local impacts, and give its view on the relative importance of different social, environment or economic issues and the impact of the scheme upon them.	
1.5	1.5. This LIR has, therefore, been prepared in accordance with section 60(3) of the Planning Act 2008 (as amended) and having regard to the guidance in the Planning Inspectorate's Advice Note. Accordingly, it seeks to assist the Examining Authority (ExA) by presenting WSCC's assessment of the likely impacts of the Project, based on local information, expert judgement, and evidence.	
1.6	1.6. This LIR appraises the impacts likely to result from the Project and identifies whether the impacts are considered to be negative, positive or neutral, taking into account proposed mitigation measures. It also considers whether further work should be undertaken, including mitigation, to address negative issues identified, and raises any missed opportunities for enhancement measures.	
1.7	1.7. This LIR appraises the DCO documents submitted by the Applicant at the submission stage, as well as those at the Procedural Deadline. It also provides additional commentary on the points raised during the Issue Specific Hearing (ISH 1) on 7 and 8 February 2024. Any further submissions will be addressed through subsequent written evidence through the Examination process.	
1.8	1.8. The topic areas covered in the LIR are set out in Table 1 below. The topics covered do not reflect the full remit of those addressed in the Environmental Impact Assessment (EIA) but highlight what are considered by WSCC to be the key issues within their remit. As the remit of WSCC ends at the low water mark (with respect to the offshore elements of the Project), impacts beyond this point have not been addressed other than where they have onshore impacts (such as visual).	
1.9	1.9. WSCC is the upper-tier local authority for the county of West Sussex as a whole and has a range of statutory responsibilities to provide services and discharge regulatory functions, which together affect a great many aspects of the	

Ref	Local Impact Report Comment	Applicant's Response
	<p>built, natural, and social environment. These functions include acting as Local Highway Authority, Local Transport Authority, Waste Planning Authority, Waste Disposal Authority, Minerals Planning Authority, County Planning Authority, Lead Local Flood Authority, Fire Authority (including public safety), Public Health Authority, Local Education Authority, and Social Services Authority. WSCC also holds responsibility for maintaining the Definitive Map and the Historic Environment Record.</p>	
1.10	<p>1.10. The LIR does not reflect the views of District and Borough Councils within the County or those of the South Downs National Park Authority (SDNPA).</p>	
1.11	<p>1.11. In producing this LIR, WSCC has not sought the views of the public or local interest groups as to any particular matters that should be reflected in the LIR; however, reference is made to local representations made to WSCC where they support WSCC's findings.</p>	
1.12	<p>1.12. WSCC has experience of the Nationally Significant Infrastructure Project (NSIP) planning regime. WSCC is a host authority for the proposed Gatwick Northern Runway Project DCO and the (currently paused) A27 Arundel Bypass Project DCO. WSCC was also a host authority and discharging authority for the consented Rampion 1 Offshore Wind Farm. A summary of relevant experience of key WSCC officers involved in writing this LIR is included in Appendix A.</p>	
2. Description of the area		
2.1	<p>Natural Environment 2.1. The South Coast Plain within West Sussex is a flat, coastal landscape between the dip slope of the South Downs and the waters of Sussex Bay (English Channel) and the Solent. It has a low, sweeping coastline with extensive urban development along the coast, including inland towns and villages, an extensive string of seaside towns, and associated infrastructure including trunk and other major roads. The Manhood Peninsula is one of few undeveloped stretches of coastline, extending to its southerly headland at Selsey Bill.</p>	<p>The Applicant has no further comments at this time on matters raised in paragraphs 2.1 to 2.5 of the West Sussex County Council Local Impact Report.</p>
2.2	<p>2.2. The coastline also includes Chichester Harbour National Landscape (formerly Area of Outstanding Natural Beauty), one of several major inlets, which has distinctive landscapes and intertidal habitats. The offshore elements of the Project are primarily located within the Selsey Bill to Seaford Head Marine Character Area (07). This seascape is an extensive bay ('Sussex Bay') between the low-lying headland of Selsey Bill to the west and the distinctive chalk cliffs of Seaford Head to the east. Shingle beaches offset the major coastal resorts in the west of the MCA and vertical chalk cliffs characterise the east. The urban development along the coastline and on the coastal plain is backed to the north of the major settlements by the prominent ridge of the South Downs.</p>	
2.3	<p>2.3. Stretching from its landfall on the flat Coastal Plain near Climping and over the South Downs to Bolney substation in the Low Weald, the nearly 39km long cable route passes through a number of geology types, including gravel, alluvium, chalk, greensand and clay. This varied geology supports a great diversity of landscapes and habitats within a predominantly farmed landscape. The cultural landscapes and ecology are of significance at the local, national, and international level. These are key issues for considering the impact of the proposed onshore works, including the importance of rapid and high-quality reinstatement of the landscape.</p>	
2.4	<p>2.4. Climping, the chosen landfall for the Project, is an open, undeveloped and ecologically sensitive stretch of coastline (including a Site of Special Scientific Interest (SSSI), Local Nature Reserve (LNR) and Local Wildlife Site (LWS). Heading inland, the onshore cable route passes under the tidal River Arun near Littlehampton.</p>	
2.5	<p>2.5. The route heads along the River Arun floodplain with its grazing marshes and ditch network. A 13km section of the cable route from the A27 at Hammerpot to just east of Washington lies within the South Downs National Park (SDNP), an</p>	

Ref	Local Impact Report Comment	Applicant's Response
	<p>area designated for its special qualities, including landscape and wildlife. The landscape here includes large blocks of ancient woodland on the dip slope of The Downs, open arable farmland and chalk downland. Entering the Low Weald, the cable route passes through a landscape of small ancient woodlands, the Adur Valley and its tributaries, small fields of pasture, and scattered ponds to the proposed substation location, east of Cowfold.</p>	
2.6	<p>Historic Environment 2.6. The DCO Limits lie within the setting of multiple designated heritage assets, including Grade I, II* and II listed buildings, conservation areas and scheduled monuments. It also intersects with two designated heritage assets, the scheduled Medieval earthworks east and southeast of St Mary's Church (NHLE 1005828), located to the south of Ford and east of Horsemere Green villages, and also narrowly intersects with Sullington Conservation Area.</p>	<p>The Applicant notes that these areas are intersected by the proposed DCO Order Limits but only to facilitate operational access and no works would affect these assets.</p>
2.7	<p>2.7. The onshore cable route represents a transect through the landscape, which crosses a variety of landscape types with rich and varied archaeological potential. Three zones are apparent, which reflects this diversity.</p>	<p>The Applicant notes that not all features described within paragraphs 2.7 to 2.13 are within the proposed DCO Order Limits. Please refer to the responses in Table 15 for further detail.</p>
2.8	<p>2.8. Zone 1: South Coast Plain, includes archaeological potential characterised by: early prehistoric artefactual material; buried prehistoric landscapes; later prehistoric settlement and agriculture practices; later prehistoric funerary activity; late Iron Age to Romano-British settlement and land-use; medieval settlement and agriculture; post medieval settlement agriculture; and military coastal defences.</p>	
2.9	<p>2.9. Zone 2: South Downs, includes archaeological potential characterised by: early prehistoric artefactual material; prehistoric settlement and agriculture practices; prehistoric flint mining activity; prehistoric monumental funerary activity; early medieval mortuary activity; medieval settlement and agriculture; post medieval settlement agriculture; and military activity.</p>	
2.10	<p>2.10. A section of the onshore cable route within Zone 2, formerly consulted on as LACR-01d, crosses an area of the South Downs that forms part of an incredibly rich and complex multi-period prehistoric landscape of national significance. The Early Neolithic flint mining features, concentrated at Black Patch, Harrow Hill, Cissbury and Church Hill, constitute the earliest evidence industrial activity in Britain and are of at least national significance in their own right. Extensive evidence is documented within the route corridor and study area for Bronze Age funerary activity, including multiple barrows and barrow cemeteries. A number of nationally significant Bronze Age monuments are present, including Middle Bronze Age Itford Hill style enclosed settlements at New Barn Down and Cock Hill, and a late Bronze Age farm at Blackpatch Hill.</p>	
2.11	<p>2.11. Multi-period activity demonstrating continuity of occupation and reuse of earlier industrial and funerary sites is documented at multiple locations within the landscape, such as the late Bronze Age univallate earthwork enclosure that partially overlies the Neolithic flint mines on Harrow Hill. The landscape contains considerable evidence of later activity, including extensive Iron Age field systems and settlements, as well as Romano-British field systems and a Romano-British farmstead at Harrow Hill.</p>	
2.12	<p>2.12. The geophysical survey has identified multiple dispersed pit-type anomalies or areas of enhanced magnetism with unclear origins within the proposed DCO Limits in the vicinity of known Neolithic flint mining sites.</p>	
2.13	<p>2.13. Zone 3: Low Weald, includes archaeological potential characterised by: early prehistoric artefactual material; later prehistoric settlement and agriculture practices; later prehistoric industrial activity; Roman industry and communications; medieval settlement and agriculture; post medieval settlement, agriculture and emparkment; post medieval industry and communications; and military activity.</p>	
2.14	<p>Economic Background 2.14. The West Sussex economy is generally a diverse economy and in 2021 (latest figures) was worth around £23.3bn. This was down from its peak in 2019 at £24.3bn, due to the impact of the pandemic and low levels of growth since. These</p>	<p>The Applicant has no further comments at this time on matters raised in paragraphs 2.14 to 2.22 of the West Sussex County Council Local Impact Report.</p>

Ref	Local Impact Report Comment	Applicant's Response
	diverse range of sectors, include health and life sciences, financial and business services, transport, distribution and wholesale, and the high-quality natural environment supporting a strong leisure and tourism offer.	
2.15	2.15. Growth in Gross Value Added (GVA) in the last five years (2016-2021) was lower in West Sussex at 9% than nationally (14%) and regionally (15%); however, there was significant variation across the County.	
2.16	2.16. Over the last year of records (2020-21), there was 2.2% growth in GVA in the County. Again, this was a lower rate of growth than seen nationally and regionally. This overall low level of growth and downturn in GVA can be attributed to the transport sector and the impact that the pandemic had on air transport. Accommodation and food services was another sector impacted by the pandemic; however, over the last year (2020-21), this sector has begun to see significant growth across the County.	
2.17	2.17. In 2021, the accommodation and food service activities and its contribution to GVA was highest in Arun and grew by 24% over the last year (2020-2021), the highest growth rate seen in the sector in the County. This sector can be attributed to the strength of the visitor economy in Arun and across the coastal districts.	
2.18	2.18. Recent research undertaken on the economic impact of tourism ¹ finds the value of tourism in 2022 was estimated to be £2.0bn in West Sussex, an increase of 51% from the previous year (but a 5% decrease since 2019). Chichester and Arun are contributors to the county value, and also contribute the highest number of jobs to this sector. It was estimated that 14% of jobs in Chichester and Arun are tourism related. 1 Economic Impact of Tourism 2022 results West Sussex county and districts– Destination Research	
2.19	2.19. In recent years, the West Sussex local authorities have collaborated on ambitions to support and grow the visitor economy through the countywide Experience West Sussex Partnership. From spring 2024, Experience West Sussex will transition into a new Experience Sussex partnership covering West Sussex and East Sussex to help deliver a pan-Sussex Plan for Growth. Experience Sussex and VisitBrighton will partner strategically to work with the national body Visit England through its Local Visitor Economy Partnership accreditation scheme, working with local destinations and businesses. This national recognition will bring additional opportunities and support to the sector.	
2.20	<p>Social and Demographic</p> <p>2.20. At the time of the 2021 Census, the population of West Sussex was 882,800, up by over 75,000 (or 9.4%) from the 2011 Census, a higher percentage increase in population than the national and regional average, and also higher than the neighbouring upper tier authorities of Surrey, Hampshire, East Sussex and Brighton and Hove. The growth rate over this time was highest amongst the older age groups (over 65s), in line with national and regional trends, with Horsham seeing the highest percentage increase at 31% in over 65-year-olds. Arun has the largest population in the County (at 165,000) making up 19% of the total West Sussex population, and Adur the smallest at 7.3%.</p>	
2.21	2.21. The working age population of the county (20-64 years) made up 55.4% of the total population, lower than the national average. Generally, the south west of the county (Adur, Arun, Chichester, Worthing) has a lower proportion of working age population.	
2.22	<p>Traffic and Transport</p> <p>2.22. Traffic associated with the Project is anticipated to use a combination of A-classified roads (A27, A259, A284, A280, A24, A281, A283, and A272) for the majority of journeys before approaching local construction or operational accesses using either B, C or unclassified roads. In some cases, for example for the Washington construction compound, Oakendene (west) compound, and the Oakendene substation, direct access is achieved onto A classified roads.</p>	The Applicant has no further comments at this time on matters raised in paragraphs 2.22 to 2.26 of the West Sussex County Council Local Impact Report.
2.23	2.23. The majority of the roads are maintained by WSCC with the exception of the A27 and A23, which form part of the Strategic Road Network maintained by National Highways. All of the A roads not forming part of the SRN are either partly	

Ref	Local Impact Report Comment	Applicant's Response
	<p>or entirely within the Major Roads Network. The majority of the WSCC-maintained A roads are physically unconstrained single carriageways. Only the A24, A27 (except where this passes through Arundel and Worthing), A23, and sections of the A259 are dual carriageway. The nature of the A roads understandably vary where these pass through urban and rural areas. For the purposes of this Project, where access is proposed (either construction/decommissioning or operational) the nature of the roads is predominantly rural and subject to varying speed limits from 40mph through to the National Speed Limit.</p>	
2.24	<p>2.24. The nature of other roads used for local access varies significantly. The majority of B and C class roads are variable in nature between urban and rural areas, have varying speed limits, and are generally unconstrained. Other unclassified roads, such as Michelgrove Lane, Spithandle Lane, and Kent Street, are also indicated to be required. These are single track roads that have insufficient width for large vehicles to pass.</p>	
2.25	<p>2.25. It should be noted that, with few exceptions, that roads within rural areas outside of settlements lack any facilities for Non-Motorised Users (NMUs) irrespective of the classification or posted speed limit. Despite the lack of facilities, NMUs are still expected to be present albeit in small numbers particularly around settlement edges and rights of way crossings. There will be locations where equestrians and cyclists will use the carriageway.</p>	
2.26	<p>2.26. Air Quality Management Areas are also in place on the A27 in Worthing, A283 at Storrington, and A272/A281 at Cowfold.</p>	
3. Policy Context		
3.1	<p>National Policy Statements – Energy Generation 3.1. Part 2 of the Planning Act 2008 makes provision for National Policy Statements (NPS). NPSs comprise the Government's objectives for the development of NSIPs and set out national policy against which NSIP applications are assessed. The Secretary of State (SoS) is required to determine a DCO Application in accordance with an NPS, except in certain limited circumstances set out in Subsections 104(4) to (8) of Planning Act 2008.</p>	<p>The Applicant has no further comments at this time on matters raised in paragraphs 3.1 to 3.3 of the West Sussex County Council Local Impact Report.</p>
3.2	<p>3.2. Para 1.1.6 of EN-1, states "<i>This NPS, in particular the policy and guidance on generic impacts in Part 5, may also be helpful to local planning authorities (LPAs) in preparing their local impact reports</i>".</p>	
3.3	<p>3.3. There are currently 12 designated NPSs of which six relate to energy generation. The three NPSs relevant to the Project, which were designated from revised drafts in November 2023, are: Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero (DESNZ), 2023); National Policy Statement for Renewable Energy (EN-3) (Department for Energy Security and Net Zero (DESNZ), 2023); and National Policy Statement for Electricity Networks (EN-5) (Department for Energy Security and Net Zero (DESNZ), 2023).</p>	
3.4	<p>3.4. However, for the purposes of this LIR, and as stated in Section 1.6 of EN-1 (DESNZ, 2023), for the purposes of transitional provisions following the designation, "The Secretary of State has decided that for any application accepted for examination before designation of the 2023 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS".</p>	<p>Notwithstanding these transitional arrangements, the Applicant submitted a Statement on the Implications of the 2023 National Policy Statements [REP1-031] at Deadline 1 that sets out the implications that the NPSs for Energy, now designated by Parliament, may have for the Proposed Development. The new NPS is clearly an important and relevant matter to the Secretary of State's decision.</p>
3.5	<p>3.5. As this is the case in this instance, the following NPS will be referenced: Overarching National Policy Statement for Energy (EN-1) (Department of Energy and Climate Change (DECC), 2011a) National Policy Statement for Renewable Energy (EN-3) (DECC, 2011b); and National Policy Statement for Electricity Networks (EN-5) (DECC, 2011c).</p>	

Ref	Local Impact Report Comment	Applicant's Response
3.6	<p>National Planning Policy Framework 3.6. The overall strategic aims of the National Planning Policy Framework (NPPF, December 2023) and the various NPS are consistent; however, they have differing but equally important roles to play.</p>	<p>The Applicant considers that the relationship between the NPPF and the NPSs is confirmed at Paragraph 5 of the NPPF. This confirms that the NPPF 'does not contain specific policies for nationally significant infrastructure projects' which are 'determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework).'</p>
3.7	<p>3.7. The NPPF provides a framework upon which local authorities construct local plans to bring forward developments, and the NPPF would be a material consideration in planning decisions for such developments under the Town and Country Planning Act 1990. An important function of the NPPF is to embed the principles of sustainable development within local plans prepared under it. The NPPF is also likely to be an important and relevant consideration in decisions on NSIPs but only to the extent relevant to that project.</p>	
3.8	<p>Relevant WSCC Policies and Plans 3.8. The following are key documents that have policies and plans relating to the Project. Where appropriate they have been referred to throughout this LIR.</p>	<p>The Applicant has no further comments at this time on matters raised in paragraph 3.8 of the West Sussex County Council Local Impact Report.</p>
3.9	<p><i>West Sussex Waste Local Plan (April 2014)</i> 3.9. The current development framework for waste development in West Sussex is the West Sussex Waste Local Plan (WLP), adopted in April 2014. The WLP provides the spatial strategy for waste development in the county and contains policies governing decisions about applications for planning permission.</p>	<p>The policies of the Waste Local Plan are acknowledged in Part 2.5 of the Outline Site Waste Management Plan [APP-225].</p> <p>Part 7 of that documents sets out the measures that are proposed to minimise waste generated during construction and promote recycling, consistent with Policy W23, and the implementation is secured through Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
3.10	<p>3.10. The WLP includes Policy W23 (Waste Management within Development), which is relevant to the proposal. Policy W23 seeks that waste generated during construction, demolition or excavation is minimised, and opportunities are maximised for re-using and recycling waste that arises.</p>	
3.11	<p><i>West Sussex Joint Minerals Local Plan (July 2018, Partial Review March 2021)</i> 3.11. The West Sussex Joint Minerals Local Plan (JMLP) adopted in July 2018, with partial changes adopted in March 2021, is the current development framework for minerals development in West Sussex. The JMLP provides the spatial strategy for minerals development in the county and contains policies governing decisions about applications for planning permission.</p>	<p>Policy M9 is considered within Part 4.7 of the Planning Statement [APP-036].</p>
3.12	<p>3.12. The JMLP is of importance to proposals related to the Project, as the DCO Limits are underlain by safeguarded minerals. Policy M9 seeks to protect mineral resources from sterilisation.</p>	
3.13	<p>3.13. The JMLP is supported by the West Sussex Minerals and Waste Safeguarding Guidance, which provides information on how safeguarded policies are to be applied and the evidence that should be provided when considering safeguarding.</p>	
3.14	<p><i>West Sussex Transport Plan 2022–2036 (2022)</i> 3.14. The West Sussex Transport Plan was adopted in April 2022 and is the County Council's main policy on transport. The Plan contains a number of thematic and area transport strategies that the intended to deliver the plans objectives and address key challenged by improving, maintaining and managing the transport network.</p>	<p>The Applicant accepts and agrees with this.</p>
3.15	<p><i>West Sussex Walking and Cycling Strategy (2016-2026)</i> 3.15. The West Sussex Walking and Cycling Strategy (2016-2026) contains the County Council's aims and objectives for cycling and walking during the period 2016 – 2026. It provides guidance in support of prioritising cycling and walking infrastructure in new development and contains a list of over 300 potential walking and cycling improvements.</p>	<p>The Applicant accepts and agrees with this.</p>
3.16	<p><i>West Sussex Rights of Way Management Plan (2018–2028)</i> 3.16. The West Sussex Rights of Way Management Plan (2018–2028) sets out WSCC's approach to managing the Public Rights of Way network, as required under the Countryside and Rights of Way Act 2000 (i.e. to produce a Rights of</p>	<p>The Applicant accepts and agrees with this.</p>

Ref	Local Impact Report Comment	Applicant's Response
	Way Improvement Plan). It outlines opportunities available for considering improvements to the network and sits alongside the walking and cycling strategy.	
3.17	<p><i>West Sussex Local Flood Risk Management Strategy</i></p> <p>3.17. The current Local Flood Risk Management Strategy (LFRMS) was approved in 2013. Work on the review of the LFRMS, which went out to public consultation in autumn 2021, is currently paused pending a wider review of related strategies and plans.</p>	The Applicant accepts and agrees with this.
3.18	<p><i>West Sussex County Council Climate Change Strategy (2020–2030)</i></p> <p>3.18. The West Sussex County Council Climate Change Strategy (CCS) sets out the County Council's ambitions to be a carbon neutral and climate resilient organisation by 2030, in line with the commitments to tackle climate change and protect the environment that underpin all priorities in the Council Plan 2021-2025. It provides a framework for all other WSCC strategies and policies to reflect climate change action and embed mitigation and adaptation principles across all areas of work and service delivery. The CCS outlines commitments by the County Council on climate action. Specifically relevant are its commitments to reduce carbon emissions, particularly by increasing the amount of renewable energy used and generated in West Sussex, and to support a local green economy.</p>	<p>As set out in Part 4.2 of the Planning Statement [APP-036], Section 3.4 of the 2011 NPS sets out that large scale deployment of renewables will help the UK to tackle climate change by reducing the UK's emissions of CO₂, deliver jobs and reduce fossil fuel demand. Paragraph 3.4.5 establishes that, for the UK to meet its climate change commitments, <i>"it is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable electricity generation projects is therefore urgent"</i>.</p> <p>More recently the status of the Proposed Development as 'Critical National Policy' (CNP) infrastructure is confirmed in the November 2023 NPS.</p> <p>For these reasons the Proposed Development is considered to be an integral part of increasing the amount of renewable energy used and generated in West Sussex, and to support a green economy, consistent with this Strategy.</p>
3.19	<p><i>Our Council Plan (2021–2025)</i></p> <p>3.19. The plan sets out the priorities for WSCC over four years and the outcomes WSCC wants to achieve for people who live and work in West Sussex.</p>	The Applicant notes the priorities of the West Sussex County Council Plan, the Applicant's response above to 3.18 applies here too.
3.20	3.20. It focuses on four priorities, all of which are underpinned by a cross-cutting theme of tackling climate change: Keeping people safe from vulnerable situations; A sustainable and prosperous economy; Helping people and communities to fulfil their potential; and Making the best use of resources.	
3.21	3.21. The plan also contains a set of performance indicators that will be used to measure the impact of the work undertaken in the county and whether outcomes have been achieved and delivered on the four priorities in the plan.	
3.22	<p><i>County Council Economy Plan (2020–2024)</i></p> <p>3.22. The plan is an update of the Economic Growth Plan 2018-2023 and sets out WSCC's priorities for supporting the recovery of the West Sussex economy.</p>	The socio-economic effects of the Proposed Development are assessed in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] submitted with the DCO Application. The DCO Application has also included an Outline Skills and Employment Strategy [PEPD-037] , secured by Requirement 33 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) that will help to support the skills and employment needs within West Sussex.
3.23	3.23. The Economy Plan has nine priority themes, setting out where WSCC is best placed to make a difference: Themes 1-3 reflect the spatial economic challenges for Crawley and the wider Gatwick Diamond, and for the coastal and rural economies; Themes 4-5 focus on the fundamental platforms of business start-ups, existing businesses, and employment and skills; Themes 6-7 focus on two key sectors hit hard, the visitor economy, with links to hospitality and the health and social care market, under considerable strain from COVID-19; and Themes 8-9 focus on the opportunities we are keen to embrace around digital infrastructure and the application of digital technology to boost business productivity and enhance digital skills and the importance of embedding climate change and the environment in the reset approach.	

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4. Summary of the Proposed Development		
4.1	<p>Introduction</p> <p>4.1. The Applicant is seeking development consent to construct and operate a new offshore wind farm located between 13km and 25km off the Sussex Coast. The Project is a proposed expansion of the existing Rampion Offshore Wind Farm (Rampion 1).</p>	<p>The Applicant has no further comments at this time on matters raised in paragraphs 4.1 to 4.4 of the West Sussex County Council Local Impact Report.</p>
4.2	<p>4.2. Rampion 1 has 116 wind turbine generators (WTGs) with a 140m blade tip height and an installed capacity of 400 megawatts (MW). The offshore elements of the Project will be located adjacent to Rampion 1, occupying an area of approximately 160km². The Project would have up to 65 WTGs with a maximum blade tip height of 325m. Marine cables would connect the WTGs to up to three offshore substations, and up to four cables from these substations will transfer the electricity onshore.</p>	
4.3	<p>4.3. The onshore parts of the Project would comprise cable circuits to be buried underground along a route of approximately 39km from a landfall at Climping in the Arun District of West Sussex to a new onshore substation at Oakendene, 2km east of Cowfold in the Horsham District. This would then connect to the existing National Grid Bolney substation as the National Grid interface location in the Mid Sussex District.</p>	
4.4	<p>4.4. The Applicant has signed a grid connection agreement with National Grid for a capacity of up to 1,200MW for the Project, powering the equivalent of 1 million UK homes.</p>	
4.5	<p>4.5. The construction of the Project, including all off and onshore components, is anticipated to take approximately four to five years.</p>	<p>The description of the offshore elements of the Proposed Development provided by West Sussex County Council (WSSC) is taken from the Preliminary Environmental Information Report (Rampion Extension Development Limited (RED), 2021). The current version of the Proposed Development description can be found in Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement [APP-045].</p>
4.6	<p>4.6. The turbines, substations and foundations are expected to operate for 30 years, after which a decision would be made whether to refurbish the offshore plant or remove it. It is anticipated that all offshore structures above the seabed would be completely removed. The onshore cables and any buried offshore cables would be left buried in situ. The onshore substation may be used as a substation site after decommissioning of the Project or it may be upgraded for use by another development (which would be subject to a separate planning application).</p>	
4.7	<p>Offshore</p> <p>4.7. The offshore components of the Project would comprise of: Up to 90 offshore wind turbine generators (WTGs); Associated foundations and inter-array cables; Up to three offshore substations; Up to four offshore export cables, each in its own trench; and Up to two offshore interconnector export cables between the offshore substations.</p>	
4.8	<p>4.8. The WTGs would have a height to blade tip of up to 325m from the Lowest Astronomical Tide (LAT). The WTG towers, nacelles (i.e. casings) and blades will be transported from a port to the Project array area on the installation vessels or on separate transport vessels and assembled in location. The WTGs would comprise three WTG blades linked to an axis and attached to a nacelle which houses a gearbox, generator, and transformer. This would be placed at the top of a tower, which may be assembled in sections on top of a foundation. The nacelle would be able to rotate to face the oncoming wind direction. The transformer in the nacelle steps up generated electricity to a higher voltage to reduce losses during transmission over the longer distances to the substation. As such, the size and capacity of the WTGs for the Project would be determined during the final design stage prior to construction. The final turbine design would be selected in accordance with the parameters set out in the DCO. The maximum design scenario for the WTG layout is included in the Project Description chapter of the ES.</p>	
4.9	<p>4.9. Offshore substations collect the electricity generated by the WTGs via electrical cables so that it can be transmitted onshore and then to the National Grid. It is anticipated that there would be up to three offshore substations. The</p>	

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	substations would transform generated electricity from the WTGs to a higher voltage for transmission to shore via export cables. Although the location and extent of the offshore substations would be confirmed through the detailed design process, they would be located within the proposed DCO Limits.	
4.10	4.10. The Project may use two offshore interconnector export cables to link together the offshore substations in the array area. This provides the transfer of generated power from the east side of the site to the west side where the export cable corridor is located. Electricity from the offshore substations will be transmitted via up to four export cables to the transition joint bays (TJBs) located at the landfall near Climping Beach.	
4.11	Onshore 4.11. The onshore components of the Project, which would be landward of Mean High Water Springs, would comprise: A single landfall site using Horizontal Directional Drilling (HDD) installation techniques located at Climping; Buried onshore cables in a single corridor approximately 38.8km in length travelling through Arun District, the South Downs National Park, Horsham District and Mid Sussex District; A new onshore substation located at Oakendene near Cowfold, which would connect to the existing National Grid Bolney substation, Mid Sussex via underground cables; and An extension at the existing National Grid Bolney substation of up to 0.63ha comprising electrical components and equipment necessary to connect the electricity generated by the Project to the existing National Grid network.	The Applicant has no further comments at this time on matters raised in paragraphs 4.11 to 4.17 of the West Sussex County Council Local Impact Report.
4.12	4.12. The onshore cable corridor is proposed from the landfall at Climping through to a new substation at Oakendene, and then from the new onshore substation at Oakendene to the existing National Grid Bolney substation. This also includes extension to and additional infrastructure at the existing National Grid Bolney substation (in Mid Sussex District) to connect the Project to the national grid electrical network.	
4.13	4.13. The onshore cable corridor is approximately 38.8km in length and would include: a typical cable construction corridor of 40m in width (which varies across the length of the corridor); trenchless crossing compounds; temporary infrastructure, including trenchless crossing areas; and a permanent infrastructure corridor width up to 25m (or wider at trenchless crossing locations), including HVAC transmission cables and associated joint bays.	
4.14	4.14. Open cut crossing methodology would predominantly be used. Where appropriate, trenchless crossing techniques would be used to cross, for example, main watercourses, railways, and roads that form part of the Strategic Highways Network.	
4.15	4.15. During construction, temporary construction compounds would be required along the cable corridor for landfall works, trenchless crossings and logistics (storage of materials and equipment, location of CBS batching plant, and welfare facilities and office space). Five sites have been identified as locations for temporary construction or logistic compounds, these are: Climping compound (approximately 61,300m ²); Washington compound (approximately 39,100m ²); Oakendene substation compound (approximately 25,000m ²); Oakendene west compound (50,000m ²); and The existing National Grid Bolney substation compound (approximately 3,500m ²).	
4.16	4.16. Temporary construction compounds would also be required where trenchless crossing techniques are used along the onshore cable route to cross features such as main watercourses, railways and roads that form part of the Strategic Highways Network. These trenchless crossing temporary construction compounds typically have an area of 50m x 75m. A temporary construction HDD compound would also be required for landfall works, with the temporary construction compound being used for the HDD activities, cable pulling and construction of the TJBs. The landfall temporary construction HDD compound would be located behind Climping beach either approximately 600m or 900m north east of Atherington with an area of approximately 100m x 120m.	
4.17	4.17. The purpose of the new onshore substation at Oakendene is to increase the onshore cable route voltage to the 400kV required to connect to the existing National Grid Bolney substation. The onshore substation would comprise	

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	<p>electrical components and equipment necessary to connect the electricity generated by the Project to the existing National Grid network, including, for example: transformers, switch room, control building, and welfare facilities. Some equipment will be placed outdoors and other equipment would be housed in buildings or enclosures. The maximum footprint for the proposed onshore substation at Oakendene would be up to six hectares within the onshore substation site boundary. The remaining site area includes a combination of land to be reinstated and handed back to the landowner and landscaping and drainage works. The site would be securely fenced. New infrastructure is required at the existing National Grid Bolney substation to provide a cable connection from the proposed Oakendene substation to the existing National Grid Bolney substation as the National Grid interface location.</p>	
5. Local Impact Report Methodology		
5.1	<p>Introduction 5.1. This section provides details on how the local impacts have been identified, evaluated, assessed, and presented within the LIR. This section also identifies what is not included in the scope of this assessment.</p>	<p>The Applicant has no further comments at this time on matters raised in Section 5 of the West Sussex County Council Local Impact Report and refers to the responses in Section 7 onwards with regards to specific aspect areas.</p>
5.2	<p>Identification – a topic-based approach 5.2. The LIR presents the local impacts WSCC wants to be brought to the attention of the ExA, which primarily relate to the topics as presented in the Project ES or those where it is not specifically covered in the ES, but where it is considered, local impacts will be felt. These are: SLVIA; LVIA; Socioeconomics; Noise and Vibration; Onshore Ecology; Arboriculture; Traffic and Transport; Mineral Safeguarding; Historic Environment; Water Environment; Emergency Services; Public Rights of Way; and Public Health.</p>	
5.3	<p>Data gathering- an evidence-based approach 5.3. Each topic-based section contains an assessment of positive, neutral, and negative impacts, during both construction and operation of the Project.</p>	
5.4	<p>5.4. WSCC has based its evaluation of the local impacts on evidence gathered and the judgement of specialists, including both WSCC officers who have been consulted to identify the impacts in their own area of expertise and those external specialists contracted to support WSCC (see Appendix A for Pen Portraits). This evidence gathering comes from a number of sources, including: Via local knowledge of the DCO Limits; Previous experience from construction and operation of Rampion 1; Professional judgement; Knowledge gained on the Project via ETGs and consultation events during the pre-application period; Review and evaluation of the DCO documentation; Evaluation against WSCC policies and plans; and National Policy Statements.</p>	
5.5	<p>5.5. To ensure a consistent approach, the topic specific sections have been collated into a standard format.</p>	
5.6	<p>Evaluating the nature of the impacts 5.6. Once the evidence was gathered on the potential impacts, the next stage was the implementation of a systematic approach to clearly indicate if these impacts were positive, neutral, or negative and why.</p>	
5.7	<p>5.7. Furthermore, additional refinement was added to clarify when such impacts were likely to occur, for example, during construction, operation or indeed long term strategic impacts on the local area.</p>	
5.8	<p>Presentation of findings 5.8. For each relevant topic, the key issues for WSCC are identified and commentary is provided on the extent to which the Applicant addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant.</p>	

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5.9	5.9. For each topic area, this LIR sets out: National and WSCC policy (where applicable) context; The positive, neutral and negative impacts of the Project during the construction phase, as anticipated by WSCC; The positive, neutral and negative impacts of the Project during the operational phase, as anticipated by WSCC; The suitability of the measures proposed by the Applicant to avoid, reduce, mitigate or compensate the identified impacts; Where applicable, proposals by WSCC for alternative or additional measures to better address the identified impacts; The need for obligations and new or amended DCO Requirements.	
5.10	<p>Exclusions to the themed based approach</p> <p>5.10. There are a number of things this LIR purposely does not do, which are detailed below. Environmental Statement (ES): The LIR does not replicate the ES nor is it necessary to replicate any assessment already produced in respect of the Project. Community consultation: In producing the LIR, WSCC did not, and is not required to, carry out its own consultation with the local community. Balancing exercise: In accordance with Advice Note One, this LIR consists of a statement of positive, neutral, and negative local impacts, but it does not contain a balancing exercise of the positives and negatives. That is the prerogative of the ExA. Representation of third-party comments; it is not the purpose of the LIR to duplicate the representations of Parish Councils, organisations and members of the public that have been made to WSCC or directly to the Applicant about the Project (prompted for example, by the Applicants consultation). Reference is made to local representations made to WSCC where they support WSCC findings; however, WSCC has also encouraged such respondents to register as Interested Parties so their representations about the Project will be considered by the ExA. Statement of compliance with National Policy Statements (NPS); WSCC has not included an assessment of compliance with an NPS as this is the prerogative of the ExA in making a recommendation to the SoS, who as per the Act, must have regard to them in the decision-making process. WSCC consider that it is still helpful to refer to NPSs and other policy to use as a background for the assessment of impacts.</p>	
6. Principle of Development and Overarching Comments		
6.1	<p>Principle of Development</p> <p>6.1. WSCC acknowledges the target set by the UK Government of delivering over a third of electricity from offshore wind by 2030 and, therefore, it is supportive of the principle of offshore wind development in helping to tackle the challenges faced by climate change.</p>	<p>The Applicant notes these overarching comments from West Sussex County Council (WSCC) and highlights the approach to avoiding, reducing and minimising the environmental effects of the Proposed Development through the commitments to be delivered through the management plans included in the DCO Application and secured by the Draft Development Consent Order [PEPD-009] (updated at Deadline 2). The Applicant has sought to identify mitigation to the highest environmental standards, however it must be acknowledged that for a project of this scale, it is not possible to avoid all significant adverse effects and these must be balanced against the benefits of the Proposed Development in the overall decision making as described in Section 5.4 and 5.5 of the Planning Statement [APP-036].</p> <p>The Applicant welcomes the constructive approach outlined by WSCC under paragraph 5.9 and will carefully consider “proposals by WSCC for alternative or additional measures to better address the identified effects; the need for obligations and new or amended DCO Requirements”.</p>
6.2	<p>6.2. WSCC recognises the national importance of having a balanced supply of electrical generation, including increasing renewable energy supplies from offshore turbines in helping decarbonise the UK’s energy sector. Critical national infrastructure must not only deliver the Government’s energy objectives, but also deliver sustainable societal and economic impacts in the regions that are hosting them. Therefore, the Project needs to be achieved without significant adverse effects on the environment, local communities, and economy of West Sussex.</p>	
6.3	<p>6.3. The WSCC Council Plan sets out a key focus area for promoting a sustainable and prosperous economy and identifies the following objective: “<i>We will continue to deliver commitments in our Climate Change Strategy, in particular</i>”</p>	<p>The Applicant has no further comments at this time on matters raised on paragraphs 6.3 to 6.6 of the West Sussex County</p>

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	<i>positioning the county as a place for innovation in green technology and renewable energy. We will [...] play a key role in influencing others to make the right choice and encourage and enable the community and businesses to innovate and make decisions which optimise the use of renewable energy, reduce carbon impact and promote nature recovery and biodiversity.</i>	Council Local Impact Report and refers to the responses in Section 7 onwards with regards to impacts arising related to specific topic areas.
6.4	6.4. The WSCC 2030 Energy Strategy recognises the key role that the WSCC plays in enabling and influencing others to make changes beyond what it controls. Supporting the corporate Climate Change Strategy, the 2030 Energy Strategy identifies the following objective: <i>“We will develop, and support our partners to develop, more sustainable energy generation and (heat) networks in West Sussex which will contribute to the decarbonisation of energy (heat and power) in the country.”</i>	
6.5	6.5. The WSCC Climate Change Strategy further acknowledges the need to external partnerships to achieve carbon reductions across the County. It highlights the opportunity that WSCC has to engage with and support activities beyond its direct control: <i>“We want everyone in our communities to have the opportunity to move to, and benefit from, a low carbon and adapted way of living. The opportunities that extend beyond the reach of the County Council’s operation and remit, and we want to work as effectively as we can to influence as best we can.”</i>	
6.6	6.6. The Applicant has identified that the offshore infrastructure associated with the Project will have potentially significant adverse impacts on the seascape, coastal landscapes, and people who live, work and visit West Sussex. The onshore infrastructure at the substation site also has the potential to negatively impact a number of environmentally sensitive areas and features, and on residential amenity during the lifetime of the Project.	
6.7	<p>Overarching Comments</p> <p>6.7. Although the Project is supported in principle by WSCC (because it would make a significant contribution to the provision of renewable energy), there are number of matters of significant concern that have not been satisfactorily addressed to date by the Applicant and are presented within this LIR.</p>	The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.
6.8	6.8. Therefore, it is crucial that essential mitigation, enhancement, and compensation is in place to ensure that the Project leaves a positive lasting legacy within the County.	
6.9	6.9. There is currently a limited scope and scale of the draft section 106 principles presented by the Applicant, which indicate a disappointing level of commitment to West Sussex. The concerns are reflected in the gap in expectations that currently exist between the Applicant and WSCC.	
6.10	6.10. WSCC and other stakeholders must have confidence that the commitments and mitigation measures proposed by the Applicant to reduce the adverse effects presented, are secured sufficiently with the control documents and dDCO.	
6.11	6.11. It is noted within the latest version of the dDCO (PEPD-010), WSCC is included as having a role (either as approver or consultee) for a number of DCO Requirements. WSCC should only be party to DCO Requirements, as a consultee, that directly relate to its statutory functions as either the Local Highways Authority (LHA) or Lead Local Flood Authority (LLFA). It should also be noted that full cost recovery via a legal agreement would be required to undertake this consultee role, due to the substantial amount of work involved.	There are a number of requirements which relate directly to matters in respect of which WSCC exercises a statutory function. For these matters it is considered that it is appropriate for WSCC to be the discharging authority and this is consistent with numerous development consent orders made for offshore wind farms. As provided for in Schedule 14 a fee is payable to the discharging authority for each application to discharge a requirement. .
6.12	6.12. The Community Benefits Package, referenced within the submission documents is described as ‘remaining separate’ from the planning process. However, due to the adverse effects identified by the Project, WSCC considers that the Community Benefits Package should be a firm commitment and secured through the DCO.	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)

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<p>response to the consultation on Community Benefits for Electricity Transmission Network Infrastructure (December 2023), which stated: <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>		
<p>7. Seascape, Landscape, and Visual Impact (ES Chapter 15)</p>		
7.1	<p>Summary</p> <p>7.1. Although WSCC recognises that offshore wind energy would inevitably result in changes to coastal seascapes and views, based upon the current Project (as presented in the DCO submission) WSCC has concerns about the scale of likely impacts of the Wind Turbine Generators (WTGs) and offshore substations. This is in combination with the currently operating Rampion 1 Offshore Wind Farm. Commentary within this LIR is focussed on the visual impacts of the offshore elements on West Sussex.</p>	<p>The Applicant agrees that offshore wind energy development will inevitably result in changes to coastal seascapes and views, which is recognised in National Policy Statement (NPS) EN-1 (Department of Energy and Climate Change (DECC), 2011a) <i>"Virtually all nationally significant energy infrastructure projects will have effects on the landscape"</i>. Responses to West Sussex County Council's Local Impact Report comments on the visual impacts of the offshore elements of Rampion 2 on West Sussex is provided further as follows.</p>
7.2	<p>7.2. As acknowledged by the Applicant through the Seascape Landscape and Visual Impact Assessment (SLVIA) findings, the Project will result in adverse seascape, landscape, and visual effects to people living, working, and visiting West Sussex during both the construction and operational phases.</p>	<p>The Applicant notes West Sussex County Council's concerns regarding the significant visual effects identified in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] on views experienced by people living, working and visiting the West Sussex coastline, resulting particularly from the apparent scale and western lateral spread of wind turbine generators (WTGs) in the field of view out to sea, in combination with the operational Rampion 1 wind farm.</p>
7.3	<p>7.3. The SLVIA (APP-056) is detailed, and it provides useful information to enable the consideration of impacts on SLVIA aspects. Engagement has been undertaken with the Applicant through the pre-application process on identifying viewpoints and analysis of the Zones of Theoretic Visibility (ZTV) produced to date. WSCC is broadly satisfied with the methodology and its application within the assessment.</p>	<p>The Applicant appreciates feedback from West Sussex County Council (WSCC) that the seascape, landscape and visual impact assessment (SLVIA) in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] is detailed, provides useful information for the consideration of impacts and is satisfied with the methodology for the assessment. The Applicant welcomes the engagement undertaken with WSCC through the pre-application and Examination process.</p>

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7.4	7.4. There is a concern however, that a worst-case scenario relative to West Sussex receptors has not been presented. It must be demonstrated that the Maximum Design Scenario (MDS), which has balanced the number of turbines between both Zone 6 and the western Extension Area, is truly the worst case for receptors in West Sussex if the dDCO allows for a greater number of turbines to be placed to the west. There are also concerns that the Requirement in the dDCO does not clearly limit the number and height of WTGs in accordance with the maximum parameters defined in the assessment.	<p>The Applicant has provided Deadline 1 Submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037], which provides further justification that the maximum design scenario (MDS), with a balance of turbine numbers between the Zone 6 and western Extension Area, is representative of the worst case in terms of seascape, landscape and visual effects.</p> <p>The maximum total rotor swept area is 4,450,000.00m² as secured in Part 3, Requirement 2, Schedule 1 of the Draft Development Consent Order [PEPD-009] and this will not be exceeded, regardless of the choice of Wind Turbine Generator (WTG) in the final Proposed Development. 65 of the larger WTG type (325m tip height, 295m rotor diameter) results in a total rotor swept area of 4,442,702.89 m². 66 of the larger WTG type would result in a total rotor swept area of 4,511,052m², thereby exceeding the maximum set out in the DCO. Further information on how the number of WTGs is limited by the Development Consent Order is available in Pre-Exam Procedural Deadline Submission - 8.23 - Examining Authority requested additional information - Revision A [PEPD-041].</p>
7.5	7.5. The provided photomontages are useful tools that aid in the assessment of visual effects. They show the significance of impacts likely to be experienced by receptors in West Sussex, in particular, the impacts that would result from the lengthy westerly extension, which would significantly extend the field of view over which impacts on seascape would be experienced.	The Applicant welcomes West Sussex County Council's feedback on the usefulness of the photomontage visualisations (as submitted with Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056]) in aiding the assessment of visual effects of the Proposed Development.
7.6	7.6. It is acknowledged that there has been an evolution in offshore design and reduction in offshore DCO Limits prior to submission, which has been welcomed by WSCC. However, the iterative changes to the design of the offshore elements has not resulted in a major reduction to the potential visual effects upon West Sussex receptors.	The Applicant welcomes recognition from West Sussex County Council that there has been an evolution the offshore design and a reduction in the spatial extent of the proposed DCO Order Limits (array area), which are embedded within the Proposed Development through the proposed DCO Order Limits and Works Areas shown on the Offshore Works Plans [PEPD-004] and Works Area Descriptions provided in full in Schedule 1 of the Draft Development Consent Order [PEPD-009] . The Applicant notes a reduction in the western extent of the proposed DCO Order Limits, compared to the Preliminary Environmental Information Report (PEIR) Assessment Boundary, illustrated in Figure 3.3 in Chapter 3: Alternatives – Figures, Volume 3 of the Environmental Statement (ES) [APP-075] which resulted in some reduction in the western lateral spread of wind turbine generators (WTGs). The wind farm separation zone to the west of Rampion 1 and the area for Rampion 2 WTGs and offshore substations (Offshore Works Plans [PEPD-004]) also provides some separation between the arrays in certain views from West Sussex, such as Viewpoint 9: Shoreham and Viewpoint 10: Worthing (Figure 15.35 in Chapter

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		<p>15: Seascape, landscape and visual impact assessment - Figures (Part 5 of 8), Volume 3 of the ES [APP-092] and Viewpoint 19 Highdown Hill (Figure 15.44 in Chapter 15: Seascape, landscape and visual impact assessment - Figures (Part 6 of 8), Volume 3 of the ES [APP-093]). Together with the reduction in the eastern spatial extent of the proposed DCO Order Limits and a reduction in number of WTGs, the Applicant considers that there has been some reduction in effect on West Sussex receptors however it accepts that these design changes made to the proposed DCO Order Limits (array area) have not resulted in a 'major reduction' in effects assessed for these receptors.</p>
7.7	<p>7.7. The findings of the SLVIA conclude that even with embedded mitigation measures, significant adverse effects for areas of West Sussex will be felt during all stages of the Project, predominantly along the coastal plain. No attempt at further mitigation through the reduction in size and scale of the WTGs has been undertaken by the Applicant. Neither has there been the production of a secured set of offshore design principles for the detailed design stage, if consented, to reduce the potential effects presented. WSCC is not satisfied that the Applicant has demonstrably exhausted all reasonable mitigation measures in terms of design of the offshore elements.</p>	<p>The Applicant notes the significant visual effects on views experienced from the coast of West Sussex identified in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056]. 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. The Applicant has described how evolution of the design and principles have been secured in post-hearing submission Deadline 1 Submission – 8.25.25 Applicant's Post Hearing Submission – Issue Specific Hearing 1 Appendix 5 – Further Information for Action Point 27 – South Downs National Park [REP1-024] and Deadline 1 Submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037]. These reductions in the developable area and design principles are embedded within the Proposed Development through the proposed DCO Order Limits and Works Areas shown on the Offshore Works Plans [PEPD-004] and Works Area Descriptions provided in full in Schedule 1 of the Draft Development Consent Order [PEPD-009].</p>
7.8	<p>7.8. The Applicant must continue to work with stakeholders to further develop commitments to the layout and extent of WTGs and offshore substations to reduce the significant visual impacts predicted. In working with stakeholders to secure a set of design principles specific to views experienced from West Sussex, there needs to be commitment by the Applicant that a lesser impactful design can be secured.</p>	<p>The Applicant will continue to engage with West Sussex County Council on matters regarding seascape, landscape and visual impacts.</p>
7.9	<p>7.9. Should Development Consent be granted, WSCC considers it necessary to secure a package of community contributions secured through the DCO, in consideration of the harm caused by the significant adverse effects identified.</p>	<p>Please see response above reference 6.12.</p>
7.10	<p>7.10. WSCC acknowledges the revised documents submitted by the Applicant at the Procedural Deadline. This has resulted in documentation missing from the original submission being presented by the Applicant, which has been considered within this LIR. It does not fundamentally change the position of WSCC regarding the SLVIA concerns raised to date.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>

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Table 7: Summary of Impacts – Seascape, Landscape and Visual Impact

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
7a	Landscape and Visual effects (including nighttime effects) of construction and operation of the WTGs/ offshore export corridor/ offshore substations upon West Sussex receptors	C/O	Negative	Avoid, Reduce, Mitigate - The Applicant must continue to work with stakeholders to further develop commitments to reduce the layout and extent of turbines, to reduce the significant visual impacts as presented. This also requires further demonstration by the Applicant that the assessment is the worst case for receptors in West Sussex. Compensate - Should Development Consent be granted, WSCC therefore consider it necessary to secure a package of contributions secured within the DCO, in consideration of the harm caused by the significant adverse effects identified.	NPS EN-1 (Paragraphs 5.9.5-5.9.7 and 5.9.21) NPS EN-3 (Paragraphs 2.4.2, 2.6.202, and 2.6.204-2.6.206)	<p>The Applicant will continue to engage with West Sussex County Council on matters regarding seascape, landscape and visual impacts.</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms (HoTs) for Deadline 3.</p>
7b	Interaction/ invisibility with onshore elements	C	Negative	Mitigate - The Applicant must provide a more detailed assessment of effects and mitigation for where receptors will be affected by more than one element of the Project, namely both on and offshore.	NPS EN-3 (Paragraph 4.26)	Inter-related landscape and visual effects of the offshore and onshore elements of the Proposed Development are assessed in Chapter 30: Inter-related effects, Volume 2 of the Environmental Statement [APP-071] (Table 30-14).
7.11	Policy Context National Policy Statements 7.11. Both NPS EN-1 and NPS EN-3 include aspects relevant to seascape, landscape, and visual matters.					Noted, the Applicant has no further comments on this matter at this time.
7.12	7.12. NPS EN-1, Overarching NPS for Energy, paragraphs 5.9.5 to 5.9.7 have regard to the assessment aspects, with 5.9.8 focusing upon decision making: "Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate."					Table 15-2 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] lists the national planning policy within National Policy Statement (NPS) EN-1 (Department of Energy and Climate Change (DECC), 2011a) relevant to the assessment of the effects on seascape, landscape and visual receptors and how these have been addressed in the assessment or through the design of the Proposed Development.
7.13	7.13. Paragraphs 5.9.18 to 5.9.20 have regard to visual impact and includes, in para 5.9.18, "All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast".					

Ref	Local Impact Report Comment	Applicant's Response
7.14	7.14. Para 5.9.21 refers to mitigation: "Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the IPC may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function", and para 5.9.22 states "Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration."	
7.15	7.15. NPS EN-3, Renewable Energy Infrastructure states in paragraph 2.4.2 "Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology."	<p>Table 15-2 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] and Table 18-2 of Chapter 18: Landscape and Visual Impact Assessment, Volume 2 of the ES [APP-059] lists the national planning policy within National Policy Statement (NPS) EN-3 (Department of Energy and Climate Change (DECC), 2011b) relevant to these assessment of the effects on seascape, landscape and visual receptors and how these have been addressed in the assessment or through the design of the Proposed Development.</p> <p>The Applicant considers that the design process and embedded environmental measures of these two chapters maximise opportunities for 'good design'. This has included avoiding sensitive landscape features (Chapter 3: Alternatives, Volume 2 of the ES [APP-044]) and embedded environmental measures (Section 18.7 of Chapter 18 Landscape and Visual Impact Assessment, Volume 2 of the ES [APP-059]).</p> <p>This process has continued through the principles of the Design and Access Statement (DAS) [AS-003] and the Outline Landscape and Ecology Management Plan [APP-232] which include a series of good design principles, the provision of outline landscaping in the form of the Indicative Landscape Plan, an Architectural Strategy and other opportunities to provide further mitigation in addition to the Indicative Landscape Plan.</p>
7.16	7.16. Paragraph 2.6.202 states "Where a proposed offshore wind farm will be visible from the shore, an SLVIA should be undertaken which is proportionate to the scale of the potential impacts", along with paras 2.6.204 to 2.6.206 which focus on methodology and scope of the SLVIA.	
7.17	7.17. With regards potential interrelated visual effects - Paragraph 4.2.6 states that the ES should: "...consider how the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place".	
7.18	<p>WSCC Policy</p> <p>7.18. There are no WSCC policies of relevance to the Project.</p>	Noted, the Applicant has no further comments on this matter at this time.
7.19	<p>Construction and Operational Phase - Impacts</p> <p>7.19. The construction and operational impacts of the offshore elements have been assessed as being of the same magnitude and significance on all viewpoints and visual receptors by the Applicant within the SLVIA, albeit caused by differing activities. As with the ES, both phases are therefore discussed together for the purposes of this LIR section.</p>	Noted, the Applicant has no further comments on this matter at this time.
7.20	<p>Positive</p> <p>7.20. No positive impacts have been identified during the construction and operational phases for SLVIA aspects.</p>	Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
7.21	<p>Neutral 7.21. No neutral impacts have been identified during the construction and operational phases for SLVIA aspects.</p>	Noted, the Applicant has no further comments on this matter at this time.
7.22	<p>Negative <i>Construction and Operation of Offshore Elements</i> 7.22. An assessment of the visual effects arising from the construction, operation, and maintenance of the offshore elements of the Project on representative viewpoints within West Sussex (outside of the South Downs National Park (SDNPA) is set out within the SLVIA. On the whole, WSCC is satisfy with the number of viewpoints produced, the location of these, and that the presented findings are robust, although it is felt they are downplayed in some circumstances.</p>	The Applicant appreciates feedback from West Sussex County Council that the seascape, landscape and visual impact assessment (SLVIA) in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] is on the whole robust in its findings and is satisfied with the number and location of viewpoints included for assessment.
7.23	7.23. There are a number of settlements within West Sussex that form the almost contiguous, linear urbanised coastline between Shoreham-by-Sea, Worthing, Lancing, Littlehampton, Selsey and Bognor Regis. The sensitivity of residents of these coastal edge settlements to the changes associated with the offshore elements of the Project is assessed by the Applicant as medium-high, reflecting that the views have medium value and the receptors experiencing the view have a high susceptibility to change.	Noted, the Applicant has no further comments on this matter at this time.
7.24	7.24. Even with the acknowledgement that the visual amenity experienced by some viewers is already influenced by the presence of the existing Rampion 1 OWF, the addition of the offshore elements of the Project would result in a significantly greater visual impact from a number of viewpoints than views of the existing Rampion 1 alone. This would, in turn, cause the offshore wind farms to become the dominant feature in the seascape and lead to a curtaining effect across Sussex Bay.	The Applicant agrees that the addition of the offshore elements of the Proposed Development will result in a greater visual impact on views from West Sussex than the existing Rampion 1 alone, however it provides further comments on the degree to which it would be 'dominant' and have a 'curtaining effect', drawing on the effects assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] . It is recognised that the effect of the offshore elements of the Proposed Development on views from the West Sussex coast results particularly from the apparent scale and western lateral spread of wind turbine generators (WTGs) in the field of view out to sea, in combination with the operational Rampion 1 wind farm. The vertical height/apparent scale of the Rampion 2 WTGs will be larger than the Rampion 1 WTGs, however they are viewed in within the context of a large-scale seascape and due to their distance offshore (13.6km at Worthing to 14.9km Selsey) there will be a clear separation from the coast to the WTGs on the sea horizon beyond the immediate nearshore seascape, which reduces their 'dominance'. The assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] recognises that there will be a loss of open undeveloped seascape as a result of the additional lateral spread of the western extension of the WTG array and its influence in the open views from the West Sussex coast out across the sea, however the open sea skyline is retained on either side of the array, views along the shoreline eastwards and westwards are unaffected, and panoramic views to the sea will still be experienced (albeit with an increased wind farm developed skyline). The array is also relatively 'permeable', with views between turbines to the sea and sky beyond. It does not enclose sections of complex or indented coastline due to the scale

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7.25	7.25. Based upon the MDS presented, the SLVIA findings indicate that the predominant adverse visual impacts will be felt by West Sussex receptors along the South Coast Plain. This is due to the low-level coastline where there are direct, large-scale, open views out to sea and sky. Key viewpoints include (from east to west), Lancing (Viewpoint F), Worthing (Viewpoint 10), Ferring (Viewpoint E), Littlehampton (Viewpoint 11), Climping Beach (Viewpoint 40), Bognor Regis (Viewpoint 12), Pagham (Viewpoint 13), and Selsey Bill (Viewpoint 14).	<p>of the broad, open Sussex Bay. The wind farm separation zone to the west of Rampion 1 and the area for Rampion 2 WTGs and offshore substations (Offshore Works Plans [PEPD-004]) also provides some separation between the arrays and reduces the 'curtaining effect' in certain views from West Sussex, such as Viewpoint 9 Shoreham and Viewpoint 10 Worthing (Figure 15.35 in Chapter 15: Seascape, landscape and visual impact assessment - Figures (Part 5 of 8), Volume 3 of the ES [APP-092]) and Viewpoint 19 Highdown Hill (Figure 15.44 in Chapter 15: Seascape, landscape and visual impact assessment - Figures (Part 6 of 8), Volume 3 of the ES [APP-093]) and the Applicant notes a reduction in the western extent of the proposed DCO Order Limits, compared to the Preliminary Environmental Information Report (PEIR) Assessment Boundary, illustrated in Figure 3.3 in Chapter 3: Alternatives - Figures, Volume 3 of the ES [APP-075] which resulted in some reduction in the western lateral spread of WTGs.</p> <p>The Applicant agrees that the addition of the offshore elements of Rampion 2 will result in a greater visual impact on views from West Sussex than the existing Rampion 1 alone. These effects are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056].</p> <p>The Applicant notes these viewpoints are assessed in detailed in Appendix 15.4: Viewpoint assessment, Volume 2 of the Environmental Statement (ES) [APP-160] and photomontage visualisations illustrating the predicted view of Rampion 2 from these viewpoints are shown in Figure 15.35 to Figure 15.39 in Chapter 15: Seascape, landscape and visual impact assessment - Figures (Part 5 of 8), Volume 3 of the ES [APP-092], Figure 15.59 in Chapter 15: Seascape, landscape and visual impact assessment - Figures (Part 7 of 8), Volume 3 of the ES [APP-094] and Figure 15.78 and Figure 15.79 35 in Chapter 15: Seascape, landscape and visual impact assessment - Figures (Part 8 of 8), Volume 3 of the ES [APP-095].</p>
7.26	7.26. No attempt at further mitigation through the reduction in size and scale of the WTGs has been undertaken by the Applicant. It is, therefore, of concern to WSCC that viewers in these areas will be influenced by the offshore elements of the Project to such a degree of harm during both construction and operation.	<p>While it is accepted that wind turbine generators (WTGs) of smaller size/scale than proposed by the Applicant may reduce the magnitude of change and likely significance of effects on receptors in West Sussex, the Applicant cannot commit to WTGs lower in height than the parameters set out in Table 4-2 of Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement [APP-045] based on the WTGs expected to be commercially available at the point of delivery. The Applicant notes material planning policy in National Policy Statement (NPS) EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023a)</p>

Ref	Local Impact Report Comment	Applicant's Response
7.27 to 7.30	<p><i>Interrelated Effects - Visibility</i></p> <p>7.27. The Applicant acknowledges in Chapter 30 (APP-071) that inter-related effects will occur on those viewpoints and visual receptors near the landfall, or near to the onshore cable corridor, where the construction of the onshore infrastructure will occur in areas that may also be susceptible to changes resulting from views of the construction of the offshore elements of Rampion 2. There are not many viewpoints that are shared between the SLVIA and LVIA, which makes it difficult to make robust conclusions upon the level of potential impact in these locations.</p> <p>7.28. Views experienced by receptors within localised parts of the West Sussex coastal plain, the Lower Arun Valley, and its shoreline (between Littlehampton and Climping), could potentially experience significant inter-related effects during, and close to, the construction of the landfall and onshore cable route, together with the construction of the offshore elements of Rampion 2 in offshore views, over a short-term period when their construction periods overlap.</p> <p>7.29. Potentially significant construction stage inter-related visual effects are likely to occur in close proximity to the construction of onshore infrastructure at the landfall and the onshore cable route, from where there is potential for simultaneous or sequential views of the construction of the offshore elements of Rampion 2 out to sea in sea views from these routes.</p> <p>7.30. These include views from short sections of the Arun Way, NCR2, Littlehampton Golf Club and Littlehampton West Beach, including Climping Beach. Significant inter-related visual effects could potentially be experienced, particularly focused on views the western part of Littlehampton West Beach (also includes Climping Beach), including the Arun Way (England Coastal Path/PROW 829 all overlap with Arun Way) which passes along the beach, where there are likely to be close views of the landfall and cable route during construction, together with the construction of the offshore elements of Rampion 2 out to sea in offshore views.</p>	<p>(paragraph 2.8.253) that states “Neither the design nor scale of individual wind turbines can be changed without significantly affecting the electricity generating output of the wind turbines. Therefore, the Secretary of State should expect it to be unlikely that mitigation in the form of reduction in scale will be feasible”.</p> <p>Inter-related visual effects of the offshore and onshore elements of the Proposed Development are assessed in Chapter 30: Inter-related effects, Volume 2 of the Environmental Statement (ES) [APP-071] (Table 30-14), which are summarised in 7.27 – 7.30 of West Sussex County Council’s Local Impact Report.</p> <p>A limited number of viewpoints and visual receptors in West Sussex are identified as having potential to have inter-related effects arising through the potential change to views resulting from the construction of the onshore infrastructure and offshore infrastructure. The Applicant would point to the following representative viewpoints in West Sussex shared between the seascape, landscape and visual impact assessment (SLVIA) and landscape and visual impact assessment (LVIA), from which inter-related effects may occur:</p> <ul style="list-style-type: none"> Viewpoint 40 Climping Beach (Figure 15.59 in Chapter 15: Seascape, landscape and visual impact assessment - Figures (Part 7 of 8), Volume 3 of the ES [APP-094]) and onshore cable corridor Viewpoint A (Figure 18.19a-c in Chapter 18: Landscape and visual impact - Figures (Part 2 of 6), Volume 3 of the ES [APP-099]). Viewpoint 33 Arundel Castle (Figure 15.56 in Chapter 15: Seascape, landscape and visual impact assessment - Figures (Part 7 of 8), Volume 3 of the ES [APP-094]) and onshore cable corridor Viewpoint E (Figure 18.25a-b in Chapter 18: Landscape and visual impact - Figures (Part 2 of 6), Volume 3 of the ES [APP-099]). <p>Significant inter-related visual effects are focused on the shoreline of the Lower Arun Valley between Littlehampton and Climping (including Climping Beach), where there are likely to be close views of the landfall and cable route during construction, together with the construction of the offshore elements of the Proposed Development out to sea in offshore views. Views experienced by receptors visiting the keep at Arundel Castle could potentially experience significant inter-related effects, which affords a perspective over the coastal plain and the construction of the onshore cable corridor with the offshore elements of the Proposed Development in the seascape backdrop in the southerly view.</p>

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		<p>Inter-related visual effects are assessed as diminishing with distance north along the Arun Valley, where offshore views quickly become intermittent and less frequent, due to the enclosure of the low-lying valley, field boundaries and settlement, which limit views of the offshore elements of the Proposed Development.</p> <p>The Applicant notes that the programming would likely mean there would be some degree of separation between the construction of the onshore infrastructure and construction of the offshore elements of the Proposed Development. Wind turbine generator installation is programmed to start towards the end of the onshore cable corridor construction with less than 1 year overlap as shown in Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045] (Graphic 4-24). The period over which potentially significant inter-related effects on during construction is therefore limited to the short-term with inter-related effects being temporary and becoming not significant during the operation and maintenance phase.</p>
7.31	<p>Required Mitigation <i>Intervisibility</i></p> <p>7.31. Secured outline construction documents, such as the Outline Code of Construction Practice (OCoCP) (and Construction Method Statements) (PEPD-033) should provide greater certainty on the duration, phasing, and sequencing of construction activities, particularly in areas where multiple construction activities both on and offshore will be undertaken.</p>	<p>Section 4.7 of Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement (ES) [APP-045] provides a summary of the indicative construction programme that has informed the assessments within the ES. Schedule 1, part 3, requirement 10 of the Draft Development Consent Order [PEPD-009] secures that the detail of the stages (equivalent to phases) of works are to be submitted and approved by the relevant planning authorities.</p>
7.32	<p><i>Maximum Design Scenario (MDS)</i></p> <p>7.32. Due to the significant adverse visual effects presented by the Applicant, WSCC is not satisfied that they have demonstrably exhausted all reasonable mitigation measures in terms of design of the offshore elements.</p>	<p>The Applicant will continue to engage with WSCC on matters regarding seascape landscape and visual impacts, however 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.</p>
7.33	<p>7.33. There is currently no securement through the dDCO of the MDS presented as part of the SLVIA (65 WTGs at 325m to blade tip), or securement of a less impactful design, through a set of offshore design principles.</p>	<p>Reductions in the developable area and design principles set out in Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] are embedded within the Proposed Development through the proposed DCO Order Limits and Works Areas shown on the Offshore Works Plans [PEPD-004] and Works Area Descriptions provided in full in Schedule 1 of the Draft Development Consent Order [PEPD-009].</p>

Ref	Local Impact Report Comment	Applicant's Response
7.34	<p>7.34. Consideration should be given to an offshore layout that has an overall potential for lesser impacts upon West Sussex. WSCC requests that the below be further explored by the Applicant:</p> <ul style="list-style-type: none"> • Reduction in the height and number of WTGs; • Consideration of using the full north-south extent of the offshore DCO Limits to reduce the lateral spread, and a design to allow for more coherent block layout; and <p>A more detailed understanding and discussion of the balance between the potential locations of turbines in the western extension area (which would clearly be more detrimental to receptors along the West Sussex coastline) and that of Zone 6 (the unused area of the original Rampion 1 zone).</p>	<p>The Applicant has explored these points regarding the potential for lesser impacts upon West Sussex and provides the following comments:</p> <ul style="list-style-type: none"> • As noted in the response to 7.26 above, the Applicant cannot commit to wind turbine generators (WTGs) lower in height than the parameters set out in Table 4-2 of Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement [APP-045] based on the WTGs expected to be commercially available at the point of delivery. The height of individual WTG cannot be changed without significantly affecting the electricity generating output of the WTGs and the viability of the Proposed Development. Mitigation in the form of reduction in WTG height will not be feasible. The Applicant notes that the number of WTGs has already been reduced between the first statutory consultation in July 2021 (published in the Preliminary Environmental Information Report) and that proposed within the DCO Application. • The Applicant recognises there is a potential for a narrower 'block' of WTGs to be accommodated in the western extension area utilising the full north-south extent of the proposed DCO Order limits (array area) but cannot commit to limiting the lateral (west-west) extent of the western extension area to be potentially utilised for WTGs due to the technical, economic and other environmental requirements of the design of the Proposed Development. <p>The Applicant has provided Deadline 1 Submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037], which provides further justification that the maximum design scenario (MDS), with a balance of turbine numbers between the Zone 6 and western Extension Area, is representative of the worst case in terms of seascape, landscape and visual effects.</p>
7.35	<p>7.35. Securement within the dDCO of a robust set of offshore design principles is required to ensure the least impactful offshore design scenario is taken forward, if consented.</p>	<p>Reductions in the developable area and design principles set out in Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] are embedded within the project through the Order Limits and Works Areas shown on the Offshore Works Plans [PEPD-004] and Works Area Descriptions provided in full in Schedule 1 of the Draft Development Consent Order [PEPD-009].</p>
7.36	<p>7.36. Should Development Consent be granted, WSCC considers it necessary to secure a package of community benefits, secured through the DCO, in consideration of the harm caused by the significant adverse effects identified by the Applicant in relation to West Sussex.</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</p>

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		<p>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>
8. Socio-economics (ES Chapter 17)		
8.1	<p>Summary</p> <p>8.1. During the construction phase of the Project, the Applicant estimates that out of a total of 4,060 FTE jobs created nationally during construction, 80 full time equivalent (FTE) jobs would be created in Sussex; however, there is no certainty that any of these opportunities will be taken-up by West Sussex's residents. Supply-chain expenditure retained by local businesses in Sussex is anticipated by the Applicant to be around £30.1m, some of which may be captured in West Sussex. According to the Applicant, between 40-50 FTE direct jobs will be generated by the Project once operational, with an additional 500 FTE indirect/supply chain jobs created. Again, there is no certainty that any of these opportunities will be created in West Sussex.</p>	<p>The Applicant notes that there is a level of uncertainty associated with any economic impact assessment of this nature. Due to the maximum design scenario approach, the economic impact assessment has used conservative assumptions when assessing the supply chain expenditure captured by local businesses. In addition to this there is an assumption that no local construction port will be used and therefore local job opportunities for the offshore construction are assumed to be limited.</p> <p>Significant opportunities for West Sussex include the use of local workers during the construction of the onshore infrastructure. Given that the onshore infrastructure will be located in West Sussex, these jobs will be highly accessible for local people, offering significant scope for local benefits.</p>
8.2	<p>8.2. WSCC considers the low economic impact arising from the Project as a negative from the perspective of West Sussex. This is in view of the low level of supply chain expenditure and the likely very limited employment generation expected to occur in West Sussex that could benefit its local businesses and residents.</p>	<p>Whilst the Applicant acknowledges the concern about the low level of economic impact, the commonly held view is that any increase in Gross Value Added (GVA) or employment should be regarded as a positive economic impact.</p>
8.3	<p>8.3. WSCC seeks to maximise potential benefits with regards to the local economy, skills, education and employment opportunities through working with the Applicant and engaging with local stakeholders where appropriate. For example, WSCC considers there to be potential for further development of programmes that support local businesses to grow and offer their services to become part of the Project supply chain. Further engagement should therefore include exploration of how local supply chain benefits, jobs, and training opportunities can be generated for local businesses and people.</p>	<p>The Applicant is launching RWEs Supplier Transparency Engagement Platform (STEP) in the region for local businesses to register as interested parties to supply the Project or RWEs broader portfolio. Under the STEP initiative, RWE has developed four initial steps aimed at improving transparency, engagement and information exchange regarding UK&I offshore wind projects progressing through development and construction. These four pillars are: a series of project specific web pages, hosting a suite</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>of supplier engagement days (the first of which for the Project is in May 2024), host regular online one to one drop-in sessions with supply chain managers, and a supplier portal with open search functionality.</p> <p>The Applicant will develop supply chain commitments in the relevant document which would be secured through the Contract for Difference from Department for Energy Security and Net Zero.</p>
8.4	8.4. Regarding recreation, WSCC considers that the construction of the Project will have a negative impact on a variety of onshore and inshore recreational activities that mitigation will not adequately address.	<p>Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] provides an assessment of onshore and inshore recreational activities and concluded the Proposed Development a limited number of significant effects on specific public rights of way.</p>
8.5	8.5. For tourism, the impact of both construction and operation of the Project at Paragraph 5.13.4 it is considered by WSCC to be potentially negative. Visitors may be deterred from undertaking visits, such as to coastal resorts, recreational routes, for water sports and to beaches. This would occur either due to the setting of these being changed by visual impacts from onshore and offshore works during construction, the visual presence of offshore infrastructure during operation, or from changes to the general perception of the area as a visitor location. This could result in loss of income and the jobs this supports.	<p>The assessment in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (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 shows that offshore wind farm developments generate very limited, or no negative impacts on visitor numbers or expenditure during the construction phase and operation and maintenance phase.</p> <p>Although some studies suggest that certain areas may be at more risk of a negative effect on visitors (particularly those that attract older visitors and whose visitor offer is directly related to the quality of the natural landscape).</p> <p>For many of the visitors to the area, the quality of the landscape not the only consideration, especially with the seascape already characterised by views of the existing Rampion 1 offshore wind farm. When analysing tourism employment data, there is no evidence which suggests that the volume and value of tourism has suffered as a result of the visibility of the existing Rampion 1 offshore wind farm along this stretch of coast. In fact, the tourism data shows generally positive growth up to the COVID-19 pandemic and then a recovery from the COVID-19 pandemic.</p>
8.6	8.6. The Applicant must provide more robust evidence of how it plans to mitigate negative impacts on the visitor economy, both in terms of recreational activities and tourism, and enhance local economic benefit. This should include additional mitigation to address visual impacts on users and businesses, and financial mitigation which provides compensation for adverse impact and to support the sector more generally.	<p>As outlined in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] and outlined in reference 8.5 (above), no significant impacts on the volume and value of the visitor economy are anticipated as part of the Proposed Development. Therefore, no further mitigation is required.</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in</p>

Ref	Local Impact Report Comment	Applicant's Response
8.7	<p>8.7. The OSES has been updated by the Applicant (PEPD-037). Whilst it is clear progress has started to be made on the strategy, there is still some way to go. The Applicant has engaged with a number of stakeholders including West Sussex as part of a first tranche of engagement. The document states that engagement covered key concerns and issues related to education, skills and employment; opportunities for collaboration and identification of existing programmes and activities. WSCC had one exploratory meeting but specific details on areas such as existing skills gaps and potential initiatives was not discussed. Whilst a second round of additional consultees has been identified in the OSES, the strategy makes no mention of continued engagement with WSCC.</p>	<p>relation to the relevant policy set out in NPS 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p> <p>In relation to skills gaps, Table 5.1. of the latest Outline Skills and Employment Strategy (oSES) [PEPD-037] outlines the existing skills programmes and initiatives within Sussex which the Applicant will further explore; to identify where such initiatives meet the objectives set out within this oSES and subsequently identify where the Applicant can add value through their support. Where there are identified gaps, the Applicant will seek to work with skills stakeholders to develop new initiatives to address these.</p> <p>In terms of continued engagement, para 6.1 of the oSES [PEPD-037] states, 'This oSES will provide example activities. As these are confirmed through further stakeholder engagement, the Applicant will continue to develop the approach to implementing the agreed activities and propose measures for monitoring them, with time frames where appropriate. This will be detailed within the subsequent Skills and Employment Strategy'.</p> <p>Furthermore, the Applicant can confirm continued engagement with West Sussex County Council on subsequent iterations of the oSES [PEPD-037].</p>
8.8	<p>8.8. The OSES now includes a list of existing skills programmes within Sussex that will be targeted but no clarity has been provided on how this list was selected and whether these programmes are actually relevant to target from both a geographical catchment or skills perspective. The Applicant has also provided a very basic list of potential initiatives in Table 5.2, however this lacks detail and is essentially just a generic list.</p>	<p>The list of existing skills programmes set out in Table 5.1 of the Outline Skills and Employment Strategy (oSES) [PEPD-037] that the Applicant has indicated they will further explore are based in Sussex, and these, along with the suggested activities for the Applicant to consider set out in Table 5.2, were all identified during the stakeholder consultation meetings by key stakeholder organisations.</p> <p>The suggested activities are deliberately high level at this stage. As set out in 6.1.1 of the oSES [PEPD-037], activities will be confirmed through further stakeholder engagement and the Applicant will continue to develop the approach to implementing the agreed activities and propose measures for monitoring them, with time frames where appropriate. This will be detailed within the subsequent Skills and Employment Strategy.</p>

Ref	Local Impact Report Comment			Applicant's Response		
Table 8: Summary of Impacts – Socio-economics						
Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
Supply Chain and Economic Impact						
8a	Limited opportunities for supply chain expenditure to be captured by West Sussex businesses	C/O	Negative	Mitigate: through ensuring the Applicant carries out further work to understand how locally retained expenditure can be increased. Mitigate: through ensuring the Applicant works with local stakeholders to develop programmes to support local businesses in their ability to become suppliers to the Project.		<p>The Applicant disagrees that supply chain opportunities are a negative impact. Employment and Gross Value Added (GVA) supported by additional expenditure into the study area is considered as a beneficial impact. During the operation and maintenance phase, long term skilled jobs will be supported from the operations and maintenance base which offers opportunities for skills development in a growing industry.</p> <p>The Applicant is launching RWEs Supplier Transparency Engagement Platform (STEP) in the region for local businesses to register as interested parties to supply the Project or RWEs broader portfolio. Under the STEP initiative, RWE has developed four initial steps aimed at improving transparency, engagement and information exchange regarding UK&I offshore wind projects progressing through development and construction. These four pillars are: a series of project specific web pages, hosting a suite of supplier engagement days (the first of which for the Project is in May 2024), host regular online 1-to-1 drop-in sessions with supply chain managers, and a supplier portal with open search functionality.</p> <p>The Applicant will develop supply chain commitments in the relevant document which would be secured through the Contract for Difference from Department for Energy Security and Net Zero.</p>
8b	Employment to be generated in West Sussex is either nil or minimal given the potential of the project to generate jobs nationally	C/O	Negative	Mitigate : through ensuring the Applicant works with local stakeholders to develop programmes to support residents in accessing employment related to the project during the construction phase.		The outline Skills and Employment Strategy [PEPD-037] is provided for this purpose. The Applicant disagrees that employment opportunities are a negative impact as they are neutral or positive based on the assessments provided.
Skills, Education and Employment						
8c	Insufficient impact on the enhancement of skills and	C/O	Negative	Mitigate: through ensuring the Applicant to develop the Outline Skills and Employment Strategy to demonstrate how net additional benefit can be achieved. In addition, the Applicant should work with local stakeholders	NPS EN-1 (Paragraph 5.13.4) The WSCC 'Economy Plan 2020-2024'	The Outline Skills and Employment Strategy (oSES) [PEPD-037] sets out the approach that will be adopted by the Applicant, with the aim of promoting skills and employment opportunities, via education and training for local economic benefit within the Sussex area. One of the key examples of

Ref	Local Impact Report Comment		Applicant's Response		
	employment for local people		to understand local specific issues and need to provide lasting benefit for local skills, education and employment.		<p>initiatives that will be leveraged as part of the strategy is to support jobs and skills in the local supply chain, by promoting training and employment opportunities to local residents. This will be further developed in subsequent iterations.</p> <p>In terms of continued engagement, paragraph 6.1. of the oSES [PEPD-037] states, 'This oSES will provide example activities. As these are confirmed through further stakeholder engagement, the Applicant will continue to develop the approach to implementing the agreed activities and propose measures for monitoring them, with time frames where appropriate. This will be detailed within the final Skills and Employment Strategy'.</p> <p>Furthermore, the Applicant can confirm continued engagement with West Sussex County Council on subsequent iterations of the oSES [PEPD-037].</p>
Recreation and Tourism Economy					
8d	Adverse impact on onshore and offshore recreational activities during construction phase	C	Negative	<p>Mitigate and reduce: the impacts (which are short term during construction) through environmental measures which reduce visual impacts. This includes minimising the duration of construction activities.</p>	<p>NPS EN-1 (Paragraph 5.13.6) The WSCC 'Economy Plan 2020-2024' The West Sussex Economic Collaboration Report 2023 report</p> <p>Chapter 7: Other marine users, Volume 2 of the Environmental Statement [APP-048] assesses the effects on offshore recreational users with no significant effects identified. 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 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>
8e	Potentially significant adverse impact on Sussex as a visitor tourism destination	C/O	Negative	<p>Mitigate and compensate: through the provision of funding from the Applicant to support visitor economy initiatives, such as providing investment in marketing and business support across the sector, tourism business support grants and services or supporting attractions and events.</p>	<p>NPS EN-1 (Paragraph 5.13.6) The WSCC 'Economy Plan 2020-2024' The West Sussex Economic Collaboration Report 2023 report.</p> <p>The assessment within Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] did not identify any significant effects on tourism and therefore further mitigation is not required.</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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</p>

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		to engage with stakeholders in relation to how residual effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.
8.9	Policy Context <i>National Policy Statements (NPSs) Overarching National Policy Statement for Energy, EN-1</i> 8.9. The socio-economic impacts of National Significant Infrastructure Projects (NSIPs) are discussed in Section 5.13 of the Overarching National Policy Statement for Energy (EN-1). EN-1 sets out that construction, operation, and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels.	Noted, the Applicant has no further comments on this matter at this time.
8.10	8.10. Paragraph 5.13.4 states socio-economic impacts for assessment may include: The creation of jobs and training opportunities (including their sustainability); The contribution to the development of low-carbon industries locally, nationally, and regionally; The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; The effects (positive and negative) on tourism and other users of the area impacted; The impact of a changing influx of workers during the different construction, operation, and decommissioning phases of the energy infrastructure. This could change the local population dynamics and alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure). There could also be effects on social cohesion depending on how populations and service provision change as a result of development; and Cumulative effects – if development consent were to be granted for a number of projects within a region within a similar timeframe, there could be some short-term negative effects, such as a shortage of construction workers to meet the needs of other industries and major projects in the region.	Noted, the Applicant has no further comments on this matter at this time.
8.11	8.11. Paragraph 5.13.5 states the Applicant should describe the existing socio-economic conditions in the areas surrounding the proposed development and state how the development's socio-economic impacts correlate with local planning policies.	Noted, the Applicant has no further comments on this matter at this time.
8.12	8.12. Paragraph 5.13.6 notes socio-economics may be linked to other impacts, such as visual impacts, but also impact tourism and local businesses. The Applicant is encouraged to demonstrate that local suppliers have been considered in any supply chain.	Noted, the Applicant has no further comments on this matter at this time.
8.13	8.13. Paragraph 5.3.17 notes that the Applicant should consider developing strategies for accommodation, especially during construction and decommissioning phases, to include the need to provide temporary accommodation for construction workers if required.	Noted, the Applicant has no further comments on this matter at this time.
8.14	<i>National Policy Statement for Renewable Energy Infrastructure, EN-3</i> 8.14. EN-3 is to be read in conjunction with EN-1 and provides planning guidance for developers of nationally significant renewable energy projects. The NPS does not discuss specific socio-economic impacts to be considered; however, paragraph 2.10.69 states the Applicant should set out what would be decommissioned and removed from the site at the end of its operational life, considering where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation.	Noted, the Applicant has no further comments on this matter at this time.
8.15	<i>National Policy Statement for Electricity Networks Infrastructure, EN-5</i> 8.15. EN-5 is to be read in conjunction with EN-1 and EN-3 and provides planning guidance for developers of nationally significant electricity network infrastructure projects. The NPS does not specifically refer to socio-economic impacts; however, paragraph 2.9.25 states the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied the benefits accruing from the former proposal clearly outweigh any extra economic, social or environmental impacts that it presents.	The transitional arrangement for the use of the 2024 National Policy Statements (NPSs) is acknowledged by West Sussex County Council in reference 3.4 (above). Notwithstanding, the transitional arrangement means that the Proposed Development is assessed against the 2011 suite of

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8.16	<p>WSCC Policy <i>Our Council Plan 2021-2025</i></p> <p>8.16. The Plan sets out the ambitions for what WSCC would like to achieve for communities in West Sussex by 2025. This includes a sustainable and prosperous economy and to make the best use of local resources. It seeks to implement a social value framework that will ensure procurement processes are accessible to local providers to maximise the use of local suppliers in supply chains, securing added economic, social, and environmental benefits for residents. This is to include jobs and opportunities for local people, and access to education, training, and support.</p>	<p>NPSs, the guidance for Offshore Wind Energy is contained at Part 2.8 of the NPS for Renewable Energy Infrastructure (EN-3) rather than EN-5.</p> <p>Paragraph 1.3.2 of EN-5 specifically confirms that: <i>'This NPS does not seek to repeat the material set out in EN-1 or EN-3.... The policy in EN-3 on offshore wind in particular contains details relevant to offshore transmission.'</i></p>
8.17	<p>WSCC Economy Plan 2020-2024</p> <p>8.17. The Plan was prepared in response to the economic challenges resulting from Covid-19. Prior to the pandemic, West Sussex had higher than national and regional levels of economic activity and employment rates. The Plan seeks to set realistic ambitions for the local economy and identify ways to partner with different entities, such as business and trade organisations, to address the economic challenges being faced.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
8.18	<p>8.18. It introduces a range of themes, setting out related headline actions to achieve associated goals. Theme 2 seeks to 'protect and revive coastal towns', working with partners to generate long-term career opportunities in coastal areas and secure infrastructure investment. Theme 5 of the plan is to 'enable employment and skills recovery and resilience'. WSCC will focus on higher value, knowledge economy sectors and skills, responding to business needs and growth opportunities. Theme 6 of the Plan is to 'protect and revive tourism and the visitor economy'. Development proposals will need to protect the high-quality natural environment, the character and distinctiveness of the county, and maintain the attractiveness to businesses and employees.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
8.19	<p>West Sussex Economic Collaboration Report 2023</p> <p>8.19. The report was carried out to review how WSCC and the seven District and Borough Councils can collaborate on economic development, regeneration, growth, and to propose next steps. Its findings include recognition that green technology, sustainability, digital and IT are key areas with increasing demand for skills. It states opportunities for education and skills providers to continue to work towards delivering skills in shortage areas and places with increasing demand, including in technical, engineering, and digital skills.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
8.20	<p>8.20. The report highlights the unique selling points of West Sussex's rurality, coast, and sea environments for the visitor economy. There are strategic pan-Sussex developments on the visitor economy with a key principle of adopting a sustainable, high value green tourism approach that leverages natural assets. Development must therefore seek to protect and enhance these natural assets whilst also supporting communities to access services and employment sites.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
8.21	<p>West Sussex Transport Plan 2022-2036</p> <p>8.21. The purpose of the Plan is to set out how WSCC, working with its strategic partners, will address key challenges in improving, maintaining, and managing the transport network in the period to 2036 and facilitate access to education, healthcare, employment, and leisure facilities (see Transport section of this LIR for more details).</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>

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8.22	<p><i>West Sussex Rights of Way Management Plan 2018 – 2028</i></p> <p>8.22. The Plan serves to protect Public Rights of Way (PRoW) for residents and visitors to enjoy the West Sussex countryside, including public footpaths, bridleways, restricted byways and byways open to all traffic (see Public Rights of Way section of this LIR for more details).</p>	Noted, the Applicant has no further comments on this matter at this time.
8.23	<p>Construction Phase – Impacts</p> <p>Positive</p> <p>8.23. No positive socio-economic impacts arising from construction of the Project have been identified.</p>	Rampion 2 will create jobs and gross value added (GVA) within the Study Area and these effects should therefore be considered as a positive effects.
8.24	<p>Neutral</p> <p>8.24. No neutral socio-economic impacts arising from construction of the Project have been identified.</p>	Noted, the Applicant has no further comments on this matter at this time.
8.25	<p>Negative</p> <p><i>Supply Chain Expenditure</i></p> <p>8.25. The Applicant assesses that the overall level of supply chain expenditure retained by local businesses is anticipated to be minimal. WSCC considers the limited supply chain engagement to be a missed opportunity to provide meaningful local economic benefit. The Council Plan 2021-2025 identifies measures to maximise the use of local suppliers in supply chains. Further work by the Applicant was expected in respect of scenarios to increase local supply chain expenditure and improve the low economic impact of the project during construction; however, this work does not seem to have not been undertaken. The Applicant's assessment (refer Table 17-7) indicates that locally retained expenditure could be higher in practice and has been conservative in assessing a worst case, but without reference to the further work that was expected.</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 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> <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>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>
8.26	<p><i>Local Economic Impact</i></p> <p>8.26. The Applicant assesses that 80 full-time equivalent (FTE) jobs FTE will be generated in Sussex out of 4,060 FTE jobs nationally during construction of the Project. WSCC considers the limited generation of employment within West Sussex to be a missed opportunity to provide meaningful local economic benefit. A key theme within WSCC's Economy Plan 2020-2024 is the recovery of employment levels. Further work was expected to be prepared by the Applicant in respect of scenarios to increase local supply chain expenditure that would generate more employment opportunities locally and improve the low economic impact of the Project during construction; however, this has not been prepared.</p>	
8.27	8.27. Also, although an explanation of why induced socio-economic impacts have not been assessed is provided, the implications of not considering these impacts are not explained and is unclear as this is not stated as a limitation.	As noted in paragraph 17.8.5 of Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] <i>“the socio-economic assessment excludes the induced impacts generated by Rampion 2 across all phases, as these are typically affected by greater uncertainty and are more difficult to measure and defend robustly in terms of their scale and additionality.”</i> This follows approaches taken on other offshore wind farm projects. This

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8.28	8.28. Finally, reporting effects at a more local level (i.e. by each local authority, West Sussex, East Sussex, and Brighton & Hove) would be more appropriate to show how the employment opportunities will be spread within Sussex and aid interpretation of the conclusions.	assessment approach was taken to ensure that the economic effects were robust and not overstated. The implications of excluding this is that there are further employee expenditure related economic benefits that the assessment has not quantified. Based on the Applicant's knowledge of economic multipliers and the scale of employment of Rampion 2, the inclusion of induced effects would be similar but lower than the indirect effects and would not materially impact on the magnitude of impact assessment for jobs and gross value added (GVA).
8.29	<p><i>Skills, Education, and Employment</i></p> <p>8.29. As discussed above, a key theme in the WSCC Economy Plan 2020-2024 is to enable the recovery of skills and employment. Our Council Plan 2021-2025 sets out WSCC's aim to implement procurement processes which maximise education, training, and skills opportunities for West Sussex residents. WSCC welcomes that the Applicant has prepared an Outline Skills and Employment Strategy (OSES) (APP-256) which has recently been updated (PEPD-037); however, it has a number of concerns with the proposals.</p>	Noted, the Applicant has no further comments on this point at this stage.
8.30	8.30. It lacks detail on potential initiatives that are directly aligned with local specific issues and need. The OSES also provides no explanation on whether it would differentiate between the provision and outputs offered through the Project against the those offered in a 'business as usual' scenario. It also does not demonstrate net additional benefit. A route map for developing the strategy further is not provided; for example, it is not clear on the timeline for developing the strategy when stakeholder engagement will take place and how regular this will be.	<p>The outline Skills and Employment Strategy (oSES) [PEPD-037] submitted with the DCO Application and indeed the second iteration of the oSES [PEPD-037], submitted to the Examining Authority in January 2024 were 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. However, the second iteration does include existing and suggested initiatives and activities either ran by local institutions, designed to align with local initiatives or to otherwise benefit those seeking skills and employment training in the Sussex and surrounding area.</p> <p>In terms of continued engagement, paragraph 6.1. of the oSES [PEPD-037] states, 'This oSES will provide example activities. As these are confirmed through further stakeholder engagement, the Applicant will continue to develop the approach to implementing the agreed activities and propose measures for monitoring them, with time frames where appropriate. This will be detailed within the subsequent Skills and Employment Strategy'.</p>

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8.31	<p><i>Recreation</i></p> <p>8.31. WSCC considers that the construction of the Project will have a negative impact on onshore and inshore recreational activities. Local visitors value the coastal area for the quality and connectivity of the access network, which enables enjoyment of the scenery and recreational activities, both onshore and inshore. These activities include users of PRow (see Section 18) wind/kite surfers, recreational anglers, village green users and scuba diving activities, as well as events. These would be impacted in a range of ways, including through temporary or intermittent obstruction to public access routes, including to PRow, temporary exclusion from areas of Access Land, and temporary or intermittent disturbance/reduced amenity and interruption to events.</p>	<p>Furthermore, the Applicant can confirm continued engagement with West Sussex County Council on subsequent iterations of the oSES [PEPD-037]. For the next iteration of the oSES [PEPD-037], the Applicant further agrees to include a route map for developing the strategy including the approximate frequency of stakeholder engagement.</p>
8.32	<p>8.32. The Applicant's assessment itself concludes that construction of the Project is predicted to have significant residual adverse effects on users of the PROWs with other residual adverse effects also expected.</p>	<p>Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] identifies significant residual effects on a limited number of public rights of way (PROWs) with the majority of residuals effects on PROWs assessed as not significant.</p>
8.33	<p><i>Tourism Economy</i></p> <p>8.33. The tourism sector is a priority in economy plans across Sussex, including West Sussex's Economy Plan 2020-2024, Our Council Plan 2021-2025, and the West Sussex Economic Collaboration Report 2023. A report for the Sussex Visitor Economy Initiative published in September 2023 identifies that the economic impact of tourism in Sussex (pre pandemic in 2019) was £5bn, with the area attracting over 62 million visitors and supporting 74,000 FTE jobs. Of this, West Sussex accounted for some 24 million of these visitors and 38,250 jobs.</p>	<p>The Applicant notes that, whilst more recent baseline data is now available on the economic impact of the visitor economy, this data would not change the overall findings of the assessment in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058].</p>
8.34	<p>8.34. As acknowledged in the Applicant's assessment, both in ES Chapter 17 Socio-economics (APP-058) and ES Chapter 15 Seascape, Landscape and Visual Impact Assessment (APP-056), uninterrupted sea views are important to the character and sense of space when within the settlements and popular tourist/visitor areas along the seafront; this includes at Worthing and Bognor Regis, particularly their historic setting, and also at Littlehampton, and Selsey. The assessment in ES Chapter 15 notes specifically that no measures are available to completely mitigate impacts on views from coastal settlements and significant adverse effects on users of all of these seafronts are assessed. It is evident, therefore, that these locations are at a heightened risk of a negative impact on their tourism.</p>	<p>The evidence base shows no evidence that views of offshore wind farms have a negative impact on the tourism economy of coastal areas. Employment in tourism related sectors in Brighton and Hove continued to grow over the period when Rampion 1 was constructed and in subsequent years when it was operational (up until the COVID-19 pandemic). In Brighton and Hove, the number of visits and visitor expenditure both grew in the years after construction, increasing by 8% and 11% respectively between 2014 and 2019. In 2019, the West Sussex tourism economy was valued at over £2.1billion, delivering 38,520 jobs however equivalent trend data is not available for West Sussex.</p> <p>As noted in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058] research by Hatch (2022) presents further analysis of tourism employment trends (from two years pre construction, 2014 to 2 years post construction 2019) for seaside towns located within 30 km of Rampion 1. The data showed that, when totalled across the nine seaside towns (Bognor Regis, Littlehampton & Worthing, Saltdean & Seaford and Brighton, Shoreham-by-sea, Southwick & Portslade-by-sea),</p>

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		<p>tourism employment was higher in the operational period (23,000 full time equivalent (FTE) jobs) compared to the pre-construction period (21,000 FTE jobs). Tourism employment in the nearby seaside towns increased by 9% when comparing average employment levels in the pre-construction period to the post-completion operational period. This was above the growth in local districts (5%), the region (4%) and Great Britain (5%).</p> <p>It is the Applicant's view that offshore wind farm development can be embraced as part of a positive perception of a sustainable coast.</p>
8.35	8.35. Also, visitors to coastal locations, such as Climping Beach and Littlehampton, which are at or close to the cable route landfall area will experience both onshore and offshore impacts from construction activities concurrently.	<p>The Applicant recognises that visitors to the onshore Study Area at landfall Climping Beach and Littlehampton, which are at or close to the cable route landfall area will experience both onshore and offshore impacts from construction activities concurrently.</p> <p>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 Environmental Statement [APP-058].</p>
8.36	8.36. WSCC considers there is likely to be a negative impact on the ability to attract visitors to the area, which is not adequately assessed; this raises several key concerns as outlined below.	<p>The Applicant considered a wide range of evidence and existing studies and the baseline characteristics of the area in the assessment in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058]. The assessment identifies negligible residual effects on the volume and value of visitors.</p>
8.37	8.37. The Applicant provided a significant amount of secondary evidence on the impact of energy infrastructure projects to support its assessment in ES Chapter 17 Socio-economics (APP-058) in both Section 17.6 and Section 17.9; however, it	<p>The Applicant notes that there is a limited amount of ex-post research. However, there is enough information to conduct the</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>highlighted the lack of evidence gathered after developments are in operation as a limitation in its assessment at Paragraph 17.5.16. The implications of this limitation for its findings have not been set out by the Applicant. WSCC considers that such evidence would have a potentially important bearing on assessment findings as it would more conclusively demonstrate whether visitors are deterred from locations of Infrastructure of this scale, and the loss of any income and the jobs this supports. This is particularly important given that no local primary research has been undertaken into potential impacts on holiday/short-break planning by visitors.</p>	<p>assessment and it should be recognised that there is a certain level of uncertainty when assessing impacts on the value and volume of tourism. It should also be noted that the analysis of change in tourism employment during the period when offshore wind farms (presented in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058]) have been constructed and operational is ex-post evidence, even if it is not academic/peer-reviewed research.</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 opportunities associated with the construction and operation of the Proposed Development. <p>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 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>

Ref	Local Impact Report Comment	Applicant's Response
8.38	8.38. An example of such research was that undertaken for Navitus Bay Wind Park development [PINS Reference Number: EN010024], as referred to in Bournemouth Borough Council's Written Representations. Based on primary research prepared by that scheme's applicant, the Council forecast that, under the lowest impact scenario alone, there would be a 20% downturn in economic value in the tourism economy as a result of the project. WSCC considers that a comparable impact resulting from the Project would constitute a negative effect on the visitor economy if realised in West Sussex.	There is no ex post evidence that points to negative impacts on tourism economies.
8.39	8.39. There is also a lack of assertion within the assessment of potential impacts on the perception of Sussex as a place to visit. Only visitor trend analysis for Brighton & Hove is presented which, given the diversity of its offering, may be influenced by other unrelated factors such that its suitability for informing the assessment conclusion should only be given limited weight. Sussex-wide evidence referred to in this paragraph above has recently become available, which should be considered. Finally, reporting effects at a more local level (i.e. by each local authority, Arun, Brighton & Hove, Horsham, Mid Sussex) would be more appropriate to show how impacts would be experienced within Sussex and aid interpretation of the conclusions.	There is a lack of information provided to justify this forecast. A 20% reduction is very large considering that there is already an existing wind farm (Rampion 1), which experienced no such reduction.
8.40	8.40. The Applicant's assessment fails to identify measures and commitments that would support a boost to the tourism sector to overcome any adverse impacts, which is particularly important given the priority that this is given in economy plans across Sussex.	It appears that the research is an ex-ante visitor perception survey. This has numerous methodological limitations and has a significant risk of bias in the responses. The Navitus Bay wind farm was not developed and so there is no ex-post evidence to assess how the Bournemouth visitor economy fared during the construction and operation of the wind farm.
8.41	Operational Phase – Impacts Positive 8.41. No positive socio-economic impacts arising from operation of the Project have been identified.	The evidence from Rampion 1 and other operational offshore wind farms in the UK is more robust as it is ex-post evidence (despite these studies not being peer reviewed and having limited analysis of causality). As noted above in response to reference 8.34 and in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] research by Hatch (2022) presented further analysis of tourism employment trends. None of the offshore wind farms local tourism economies have experienced such significant (20%) reduction in tourism employment (when excluding the reduction from the COVID-19 pandemic). There is no justification to suggest West Sussex would diverge from the trend data observed in the rest of the UK.
8.42	Neutral 8.42. No neutral socio-economic impacts arising from operation of the Project have been identified.	Ex-post evidence on employment trends provides more robust evidence on the impact of wind farms on tourism as it is based on actual observed change in economic activity in the tourism sector. Perception based studies, such as the one referenced above have a number of limitations and are subject to significant bias in the responses.
8.41	8.41. The Applicant's assessment fails to identify measures and commitments that would support a boost to the tourism sector to overcome any adverse impacts, which is particularly important given the priority that this is given in economy plans across Sussex.	Given that no significant effects on the volume and value of tourism were identified in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058], commitments to support a boost to the tourism sector are not required.
8.42	Operational Phase – Impacts Positive 8.41. No positive socio-economic impacts arising from operation of the Project have been identified.	While the assessed number of local jobs is considered negligible at county scale, this remains a positive socio-economic effect.
8.42	Neutral 8.42. No neutral socio-economic impacts arising from operation of the Project have been identified.	Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
8.43	<p>Negative <i>Skills, Education and Employment</i></p> <p>8.43. As discussed above, a key theme within the WSCC Economy Plan 2020-2024 is to enable the recovery of skills and employment. Our Council Plan 2021-2025 sets out the aim to implement procurement processes which maximise education, training, and skills opportunities for West Sussex residents. WSCC welcomes that the Applicant has prepared an OSES which has recently been updated (PEPD-037); however, it has a number of concerns with the proposals as have been outlined in the construction section above. WSCC expects the Applicant to work with local stakeholders to further develop the OSES as a means for providing lasting benefit.</p>	<p>The outline Skills & Employment Strategy (oSES) [PEPD-037] (updated at the Procedural Deadline A submission) 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.</p>
8.44	<p><i>Tourism Economy</i></p> <p>8.44. The tourism sector is a priority in economy plans across Sussex, including within both West Sussex's Economy Plan, Our Council Plan and the West Sussex Economic Collaboration Report. A 2023 report estimated the economic impact of tourism in Sussex as being £5bn in 2019, which attracted over 62 million visitors and supported 74,000 FTE jobs. Of this, West Sussex accounted for some 24 million of these visitors and 38,250 jobs.</p>	<p>The Applicant notes that, whilst more recent baseline data is now available on the economic impact of the visitor economy, this data would not change the overall findings of the assessment in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058].</p>
8.45	<p>8.45. WSCC considers an adverse effect on the ability to attract visitors to the area to be likely with this being greatest during operation and from the offshore infrastructure. The Applicant provided a significant amount of evidence on the impact of energy infrastructure projects to support its assessment, yet it highlighted the lack of ex-post evidence of this impact as a limitation in its assessment. The implications of this limitation for its findings have not been set out by the Applicant. WSCC considers that such evidence would have a potentially important bearing on assessment findings and is particularly important given that no primary research has been undertaken into potential impacts on holiday planning/short breaks by visitors.</p>	<p>It is noted that West Sussex County Council greatest concerns are related to the offshore infrastructure. However, whilst there is less ex-post evidence, the evidence that does exist suggests there has been no negative impact on tourism from offshore wind development in the UK. In addition, tourism has grown during the operation of Rampion 1. Other factors such as the COVID-19 pandemic and even the summer weather in a particular year are more likely to have an impact on coastal tourism compared to the operation of a wind farm.</p>
8.46	<p>8.46. There is also a lack of assertion within the assessment of potential impacts on the perception of Sussex as a place to visit. Only visitor trend analysis for Brighton & Hove is presented which, given the diversity of its offering, may be influenced by other unrelated factors such that its suitability for informing the assessment conclusion should only be given limited weight. Sussex-wide evidence referred to in this paragraph above has become available, which should be considered. Finally, reporting effects at a more local level (i.e. by each local authority, Arun, Brighton & Hove, Horsham, Mid Sussex) would be more appropriate to show how impacts would be experienced within Sussex and aid interpretation of the conclusions.</p>	<p>The baseline outlined in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] considered what stakeholders identified as more sensitive coastal areas, but the assessment found no evidence for significant effects on those areas. The socio-economics Study Area was agreed as Sussex during scoping of the assessment and therefore, this was the primary Study Area used for the assessment.</p>
8.47	<p>8.47. The Applicant's assessment also fails to identify measures and commitments that would support a boost to the tourism sector to overcome any adverse impacts, which is particularly important given the priority that this is given in economy plans across Sussex.</p>	<p>Given that no significant effects on the volume and value of tourism were identified in Chapter 17: Socio-economics, Volume</p>

Ref	Local Impact Report Comment	Applicant's Response
8.48	<p>Required Mitigation Supply Chain Expenditure, Local Economic Impact, Skills, and Employment 8.48. The Applicant has not yet provided proposals that were expected to outline scenarios to increase local supply chain expenditure and improve what WSCC sees as the low economic impact of the Project. To address this, WSCC expects to see a clear, realistic, positive mitigation strategy with key targets that the Applicant is proposing in respect of supply chain expenditure and the local economy. WSCC also expects clarification on local economic benefits generally and how they can be increased, as detailed in the sections above.</p>	<p>2 of the Environmental Statement [APP-058], further commitments to support a boost to the tourism sector are not required.</p> <p>Measures to increase local supply chain expenditure are considered in the outline Skills and Employment Strategy [PEPD-037]. The assessment in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] is based on a conservative scenario and measures to increase the amount of local supply chain expenditure may boost the economic impacts.</p> <p>The Applicant will develop further supply chain commitments in the relevant document which would be secured through the Contract for Difference from Department for Energy Security and Net Zero.</p>
8.49	<p>8.49. Commitments from the Applicant are sought by WSCC on the following issues: Maximising the potential for local recruitment from within West Sussex; Creating tangible mechanisms to develop a local supply chain that includes businesses within the local area; Delivering social value for example through maximising the Project's opportunity to increase educational inspiration; and Adopting and funding a dynamic approach to monitoring skills, employment and education outcomes to maximise benefits.</p>	<p>In Section 5 of the latest outline Skills and Employment Strategy (oSES) [PEPD-037], The Applicant has set out draft objectives and areas of focus, existing skills programmes and initiatives where the Applicant can add value, and potential new activities. These will be further developed in the production of the final Skills & Employment Strategy outlining key objectives and activities, which is likely to include details of education, training and employment objectives, initiatives and activities.</p>
8.50	<p>8.50. Suggestions for the potential outputs and outcomes that these proposals should deliver include: Apprenticeship opportunities; Promoting take up of jobs by local residents; Providing supplier events for local businesses; Raising STEM education and careers engagement and awareness; and Delivering additional training for the employed workforce.</p>	<p>The Applicant refers to the response to references 8.3 and 8.49, above.</p> <p>In addition, the Applicant is holding the first Supplier Engagement Event for Rampion 2 on 01 May 2024 and subsequent events in the future. Forming part of The Applicant's parent company's Supplier Transparency & Engagement Programme (STEP), this event is primarily aimed at supply chain companies who are interested in learning about the opportunities presented by Rampion 2. It is intended to be a 'meet the supplier' style event, with the goal of providing early engagement opportunities for companies wishing to hear more about RWE's supply chain requirements for building the Rampion 2 project.</p> <p>The Applicant will develop supply chain commitments in the relevant document which would be secured through the Contract for Difference from Department for Energy Security and Net Zero.</p>
8.51	<p>8.51. WSCC would welcome the Applicant engaging with it to further discuss proposals and funding to increase economic benefits including its OSES (PEPD-037) which it notes has recently been updated.</p>	<p>The Applicant will continue to discuss these issues with West Sussex County Council.</p>
8.52	<p>Recreation and Tourism Economy 8.52. Due to the potential displacement of visitors from the area, both local and wider users of recreational activities and tourists, and the effect on the tourism economy sector, WSCC is seeking to engage with the Applicant to reduce, mitigate and compensate impacts.</p>	<p>The assessment in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] identified no significant residual effects on the visitor economy and therefore, no further</p>

Ref	Local Impact Report Comment	Applicant's Response
		mitigation is required. However, the Applicant is open to further engagement with West Sussex County Council.
8.53	8.53. In respect of the onshore and inshore recreational activities identified as being significantly adversely impacted by visual effects, the Applicant should provide additional mitigation to that currently proposed to reduce impacts (see Seascape, Landscape and Visual section of this LIR for more details on additional mitigation proposed).	Request for additional mitigation of visual effects are considered further in the Seascape, landscape and visual impact assessment section 7 of this response.
8.54	8.54. For visitors including local and wider users of recreational activities and tourists, WSCC is seeking to secure funding from the Applicant to support local visitor economy initiatives to mitigate impact. The Applicant's proposals for funding could be set out within a funding proposal and potentially a tourism strategy and action plan to be discussed and agreed with WSCC and relevant partners.	The assessment in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] identified no significant residual effects on the visitor economy and therefore, no further mitigation is required.
8.55	8.55. The plan or funding proposal would benefit from including a firm commitment from the Applicant to support marketing and promotion activities to be undertaken by our partner body 'Experience Sussex'. Potential themes and areas that the mitigation fund could deliver against include: Direct support for attractions and events; Tourism business support grants; Support resources for tourism businesses; Research visitor/business surveys; Destination marketing; and Development of visitor experience enhancements.	
8.56	8.56. A clear indication of the scale of investment proposed should be provided as part of any firm commitment so that relevant campaign and marketing activities can begin to be prepared. WSCC strongly recommends that any mitigation fund proposals are properly funded, managed, and delivered through Experience Sussex. WSCC would welcome the Applicant engaging with it to further discuss such proposals.	
9. Landscape and Visual Impact (ES Chapter 18)		
9.1	Summary 9.1. The submitted Landscape Visual Impact Assessment LVIA (APP-059) demonstrates that, even with mitigation, the Project would give rise to wide ranging significant impacts on several Landscape and Visual Receptors, both during construction and operation.	Noted, the Applicant has no further comments on this point at this stage.
9.2	9.2. It is accepted that the scale and nature of construction activities and utilitarian built infrastructure involved, is such that avoidance of landscape and visual impacts is difficult to achieve. In this regard, proposed embedded mitigation measures are, in principle, welcomed as generally well-considered measures to reduce and mitigate landscape and visual impacts.	The Applicant notes that the proposed embedded mitigation measures are, in principle, welcomed as generally well-considered measures to reduce and mitigate landscape and visual impacts.
9.3	9.3. However, WSCC remains concerned that landscape and visual impacts have been underestimated, that there is considerable uncertainty over the extent to which mitigation can be guaranteed/successful, and that further assessment, mitigation, and compensation should be considered.	The Applicant notes these concerns and has answered specific points on these aspects that acknowledge requirements for further assessment, mitigation, and compensation.
9.4	9.4. WSCC is concerned that the LVIA places reliance on reinstatement being carried out as soon as possible, which cannot be guaranteed. Visual impacts on individual properties may have been underestimated with the methodology for the Residential Visual Amenity Assessment (RVAA) being unclear. Further, many of the proposed mitigation commitments include significant caveats such as 'where this is the best environment solution and is financially and technically feasible' or 'where practicable/necessary/possible', meaning it is unclear as to what can or will be realistically secured by DCO requirements (and associated control documents).	<p>Please refer to the Applicant's response to West Sussex County Council's Relevant Representations reference 2.3.17 (i) and (ii) in Applicant's Response to Relevant Representations [REP1-017].</p> <p>The Applicant notes these concerns and has answered specific points on Residential Visual Amenity Assessment and proposed mitigation measures.</p>

Ref	Local Impact Report Comment	Applicant's Response
9.5	<p>9.5. WSCC is concerned that visual impacts of the Oakendene substation may have been underestimated, with additional View Point (VP) locations and associated visualisations required to best represent key visual receptors and provide accurate assessment of the level of impacts, and to inform appropriate mitigation and compensation. Design principles and outline landscaping proposals identified in the Design and Access Statement (AS-003) are welcomed, however, need further refinement, to be presented in a clearer manner, and to provide greater certainty over the likely site levels and the appearance, scale, and design of structures proposed.</p>	<p>Please refer to the Applicant's response to West Sussex County Council's Relevant Representations reference 2.3.17 (i) and (ii) in Applicant's Response to Relevant Representations [REP1-017].</p> <p>The Applicant confirms that they are in the process of seeking to agree access to Oakendene Manor to undertake viewpoint photography and will engage with WSCC, and Horsham District Council, in this process and supply visualisations of additional viewpoint photography at a later Examination Deadline subsequent to completion of this work, where required.</p> <p>The Chapter 18: Landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-059] is being updated for submission at Deadline 4 and will provide further clarification and assessment in relation to Viewpoints, and associated receptors including PRow, and transport routes.</p> <p>The Applicant notes that the principles of the Design and Access Statement [AS-003] DAS are welcomed and has agreed during engagement with WSCC to review the presentation of the design principles and the wording within the DAS to secure the delivery of the principles within. The Applicant currently expects to submit an update of this document at Deadline 3.</p>
9.6	<p>9.6. Given the Project will inevitably result in significant residual landscape and visual impacts, WSCC consider that these should be offset/compensated through the enhancement of retained hedgerows and trees both within and around the DCO Limits (e.g. through gapping up of hedgerows, additional native planting, management and enhancement of key landscape characteristics), and the delivery of PRow enhancements and thus amenity benefits to negatively affected receptors. This should be secured both as part of stage specific LEMPS (and through the provision of a S106 fund for any works/enhancements offsite).</p>	<p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p> <p>The Outline Landscape and Ecology Management Plan [APP-232] includes a series of landscape design principles, other opportunities and an Architectural Strategy (copied from the Design and Access Statement [AS-003]) to provide further mitigation in addition to the Indicative Landscape Plan (ILP). The 'other opportunities' include additional landscape provision and habitat creation beyond that in the proposed DCO Order Limits will be delivered through the approach to Biodiversity Net Gain by third parties on behalf of the Applicant and secured in the Draft Development Consent Order [PEPD-009] (updated at Deadline</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>2 submission). The Outline Landscape and Ecology Management Plan [APP-232] is being updated for submission at Deadline 3 with further details on mitigation measures regarding landscape design, ILP and an Architectural Strategy.</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] which has been updated at Deadline 2.</p>
9.7	9.7. In accordance with National Policy Statements, the Examining Authority will need to be satisfied that all landscape and visual impacts have been minimised/mitigated as far as practicable, and to determine whether any impacts would be outweighed by the benefits of the Project.	Noted, the Applicant has no further comments on this point at this stage.
9.8	9.8. WSCC acknowledge the revised documents submitted by the Applicant at the Procedural Deadline and these do not substantively affect the comments and concerns raised in this LIR.	Noted, the Applicant has no further comments on this point at this stage.

Table 9: Summary of Impacts – Landscape and Visual Impact

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
9a	Significant adverse landscape and visual impacts of the onshore cable corridor and construction compounds.	C/O	Negative	The embedded environmental measures set out within the various commitments (Table 18-25) are welcomed and supported, in principle. Such measures must be secured as part of the DCO and associated requirements, the draft version of which is welcomed, in principle. The following control documents will be of key importance, the outline versions of which (where provided) are welcomed, in principle; • Construction Method Statement • Code of Construction Practice (CoCP); • Landscape and Ecology Management Plan (LEMP); • Public Right of Way Management Plan (PRoWMP); and • Access Plans (Requirements 15 & 16). However, in addition to those measures, submitted in	NPS EN-1 (Paragraphs 4.5.3, 5.9.8, 5.9.17, 5.9.18, 5.9.22, and 5.9.23). NPS EN-3 (Paragraph 2.4.2). NPS EN-5 (Paragraph 2.8.2).	<p>The Applicant notes that embedded environmental measures and associated control documents set out within the various commitments are welcomed.</p> <ul style="list-style-type: none"> Reduce – It is not possible to retain all trees and hedgerows identified in the Outline Code of Construction Practice [PEPD-033] Vegetation Retention Plans due to the nature of the onshore elements of the Proposed Development. The Vegetation Retention Plans identify those areas of vegetation which will be retained as well as those which will be subject to removal or notching. Removal of vegetation within the development footprint and / or to provide access will be minimised as far as practicable. <p>Requirement 10 of the Draft Development Consent Order [PEPD-009] 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 Development Consent Order [PEPD-009], which has been updated at Deadline 2.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>draft/outline, the following must also be considered: Reduce: • As a minimum, all trees and hedgerows identified in the OCoCP Vegetation Retention Plans must retained and protected (unless there are truly exceptional circumstances as may be approved by the relevant planning authority); and • Removal of hedgerows to form accesses should be minimised as far as practicable. DCO Requirements 15 and 16 require review.</p> <p>Mitigate: • CoCPs (and Construction Method Statements) to provide greater certainty on the duration, phasing, and sequencing of construction activities, and how this will be programmed to ensure reinstatement can be maximised/expedited; • OLEMP to provide greater detail around the timing and specification of planting, maintenance and monitoring provisions, and to closely align with any details of phasing and sequencing, and arboricultural impacts as identified in stage specific CoCPs; and • Consider lessons learnt from Rampion 1 regarding success of reinstatement planting and improved recording, monitoring, and adherence to maintenance requirements and an effective handover mechanism to the OTFO. Compensate: • Enhancement of retained hedgerows and trees both within and around the around the DCO Limits to be secured as part of stage specific LEMPS and through the provision of a S106 fund. • Delivery of wider PRow enhancements and thus amenity</p>	<p>The Outline Landscape and Ecology Management Plan [APP-232] is being updated for submission at Deadline 3 with further details on mitigation measures regarding the Indicative Landscape Plan and an Architectural Strategy and greater detail on phasing and specification of planting, maintenance and monitoring provisions, to closely align with arboricultural impacts as identified in stage specific Code of Construction Practices. 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] which has been updated at Deadline 2.</p> <ul style="list-style-type: none"> • Compensation – Please refer to the Applicant's response in reference 9.6.

Ref	Local Impact Report Comment			Applicant's Response			
9b	Significant adverse landscape and visual impacts of the Oakendene substation and construction compounds.	C/O	Negative	benefits to negatively affected receptors through the provision of a S106 fund.	<p>The embedded environmental measures are set out within the various commitments (Table 18-25) are welcomed and supported, in principle. Such measures must be secured as part of the DCO and associated requirements, the draft version of which is welcomed, in principle. The following control documents will be of key importance, the outline versions of which (where provided) are welcomed, in principle; • CoCP; • Construction Method Statement; • LEMP; • PRowMP; • Access Plans (requirements 15 & 16); and • DAS. However, in addition to those measures, submitted in draft/outline, the following must also be considered. Reduce: • As a minimum all trees and hedgerows identified in the OCoCP Vegetation Retention Plans must retained and protected (unless there are truly exceptional circumstances as may be approved by the relevant planning authority). Omitted hedgerow south of the A272 must be considered; • Removal of hedgerows to form accesses should be minimised as far as practicable. DCO Requirements 15 and 16 require reviewed; and • Maximum extent of the two Oakendene construction compounds (as set out in Works Plans - Work No. 10) must be reduced as far practical (with a clear commitment to do so identified) and in accordance with OCoCP Vegetation Retention</p>	<p>NPS EN-1 (Paragraphs 4.5.3, 5.9.8, 5.9.17, 5.9.18, 5.9.22, and 5.9.23). NPS EN-3 (Paragraph 2.4.2). NPS EN-5 (Paragraph 2.8.2).</p>	<p>Please refer to the Applicant's response in reference 9a. As per the response to reference 9.5, the Applicant has agreed to review the content of the Design and Access Statement [AS-003] and currently expects to submit an update at Deadline 3.</p>

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Plans. **Mitigate:** • Consider lessons learnt from Rampion 1 regarding success of reinstatement planting and improved recording, monitoring, and adherence to maintenance requirements and an effective handover mechanism to the OFTFO; • Design and Access Statement (DAS) 'design principles' to be presented in a clear and consolidated table and to provide greater certainty over the measures adopted to secure a sympathetic, layout, appearance, scale and design/finishes; • DAS to set out the maximum extent of cut and fill operations and changes in final site levels. Consider opportunities to utilise final site levels to further minimise landscape and visual impacts; • DAS landscaping scheme to be refined and reinforced, to ensure screening effects maximised from key receptors; • DAS advance planting areas to be refined and added to; • Assessment must demonstrate that the DAS proposed 'curve' in the access road would be effective and/or this feature to be further emphasised/additional planting considered; and • DAS design principles to ensure the permanent access from the A272 will be 'low key' to be refined.

Compensate: • Enhancement of retained hedgerows and trees both within and around the around the DCO limits to be secured as part of stage specific LEMPS and through the provision of a S106 fund. • Delivery of wider PRow enhancements and thus amenity benefits to negatively affected

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9c	<p>Adverse landscape and visual impacts of the Bolney substation extension and construction compound.</p> <p>C/O</p> <p>Negative</p>	<p>receptors through the provision of a S106 fund.</p> <p>The embedded environmental measures are set out within the various commitments (Table 18-25) are welcomed and supported, in principle. Such measures must be secured as part of the DCO and associated requirements, the draft version of which is welcomed, in principle. The following control documents will be of key importance, the outline versions of which (where provided) are welcomed, in principle:</p> <ul style="list-style-type: none"> • CoCP; • Construction Method Statement; • LEMP; and • PRowMP; and • DAS <p>However, in addition to those measures, submitted in draft/outline, the following must also be considered:</p> <p>Reduce:</p> <ul style="list-style-type: none"> • OCoCP to clearly identify the substation extension construction compound; • DAS to be updated to provide for additional reinforcement tree planting north of Bob Lane and management of the hedge and trees to enhance screening (for AIS option); • DAS to make clear that all tree/vegetation losses will be avoided where possible; and • DAS landscaping plans to provide for advance planting and tree/hedgerow management. <p>Compensate:</p> <ul style="list-style-type: none"> • Enhancement of retained hedgerows and trees both within and around the around the DCO Limits to be secured as part of stage specific LEMPS and through the provision of a S106 fund. • Delivery of wider PRow enhancements and thus amenity benefits to negatively affected receptors through the provision of a S106 fund. <p>NPS EN-1 (Paragraphs 4.5.3, 5.9.8, 5.9.17, 5.9.18, 5.9.22, and 5.9.23). NPS EN-3 (Paragraph 2.4.2). NPS EN-5 (Paragraph 2.8.2).</p> <p>Please refer to the Applicant's response in references 9a and 9b.</p>

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9.9	<p>Policy Context <i>National Policy Statements</i> <i>Overarching National Policy Statement for Energy (EN-1) (July 2011)</i> 9.9. Of key relevance to the Project in landscape and visual impact considerations are the following paragraphs.</p>	<p>All national and local planning policy have been referenced in the Planning Statement [APP-036]. Chapter 18: Landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-059] also acknowledges national (Table 18-2 and 18-3) and local planning policy (Tables 18-4) where relevant to landscape and visual impact assessment, including the references made in references 9.10-9.20.</p>
9.10	<p>9.10. Paragraph 4.5.3: "In the light of the above, and given the importance which the Planning Act 2008 places on good design and sustainability, the IPC needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be. In so doing, the IPC should satisfy itself that the applicant has taken into account both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located) as far as possible. Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area."</p>	<p>Please see Applicant's response in reference 9.9. Paragraph 4.5.3 was not specifically referred to in Chapter 18: Landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-059] although reference was made to design in paragraphs 5.9.8, 5.9.17, and 5.9.22).</p>
9.11	<p>9.11. Paragraph 5.9.8: "Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate."</p>	<p>Please see Applicant's response in reference 9.9.</p>
9.12	<p>9.12. Paragraph 5.9.17: "The IPC should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation."</p>	<p>Please see Applicant's response in reference 9.9.</p>
9.13	<p>9.13. Paragraph 5.9.18: "All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project."</p>	<p>Please see Applicant's response in reference 9.9. The Applicant has noted the equivalent paragraphs 5.10.12-13 in the <i>Overarching National Policy Statement for Energy (EN-1)</i>, March 2023.</p>
9.14	<p>9.14. Paragraph 5.9.22: "Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration."</p>	<p>Please see Applicant's response in reference 9.9.</p>
9.15	<p>9.15. Paragraph 5.9.23: "Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista."</p>	<p>Please see Applicant's response in reference 9.9. The Applicant has noted the equivalent paragraphs 5.10.27 in the <i>Overarching National Policy Statement for Energy (EN-1)</i>, March 2023.</p>
9.16	<p><i>National Policy Statement for Renewable Energy Infrastructure (EN-3) (July 2011)</i> 9.16. Of key relevance to the Project in landscape and visual impact considerations are the following paragraphs.</p>	<p>Please see Applicant's response in reference 9.9.</p>
9.17	<p>9.17. Paragraph 2.4.2: "Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology."</p>	<p>Please see Applicant's response in reference 9.9.</p>

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9.18	<p><i>National Policy Statement for Electricity Networks (EN-5)(July 2011)</i> 9.18. Of key relevance to the Project in landscape and visual impact considerations are the following paragraphs.</p>	Please see Applicant's response in reference 9.9.
9.19	9.19. Paragraph 2.8.2:"New substations, sealing end compounds and other above ground installations that form connection, switching and voltage transformation points on the electricity networks can also give rise to landscape and visual impacts."	Please see Applicant's response in reference 9.9.
9.20	<p>WSCC Policy 9.20. There are no WSCC policies of relevance to the Project.</p>	Please see Applicant's response in reference 9.9.
9.21	<p>Cable Corridor and Compounds Construction Phase - Impacts Positive 9.21. It is not considered that there are positive impacts on the landscape during the construction phase. Construction works, whilst temporary, are generally disruptive in nature and are not expected to provide any positive impacts on the landscape.</p>	Noted, the Applicant has no further comments on this matter at this stage.
9.22	<p>Neutral 9.22. No neutral impacts have been identified during the construction phase.</p>	Noted, the Applicant has no further comments on this matter at this stage.
9.23	<p>Negative 9.23. Construction works for the installation of the onshore cable route would result in a 40m wide fenced construction corridor traversing 38.8km, wherein soil stripping/storage, trench excavation, cable laying/jointing, horizontal directional drilling (HDD), and temporary haul roads would occur. Further, the Project would require the provision of two large construction compounds at Washington and Climping (for up to 3.5 years), a large landfall construction compound proximate to the shoreline at Climping (for up to 2 years), and a minimum of 27 HDD compounds at various locations along the route (the precise duration of which are unclear at this stage). All compounds would contain large plant and equipment, staff welfare facilities, stockpiles/storage of materials, vehicular parking, lighting, and result in increased human and vehicular activity.</p>	Noted, the Applicant has no further comments on this matter at this stage.
9.24	9.24. The Project also requires significant volumes of removal and/or reduction (e.g. lopping/topping/coppicing/transplant) of mature hedgerows/trees impacting on the pattern of existing field boundaries, both of which in general terms form key landscape characteristics of the affected character areas and are important features influencing the views of visual receptors.	<p>Paragraphs 18.9.19 of Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement (ES) [APP-059] outlines that the construction of the onshore substation at Oakendene will change the character of the landscape and pattern of elements within the localised area. However, the proposed planting as part of the Indicative Landscape Plan for both the onshore substation at Oakendene and to a lesser extent the existing National Grid Bolney substation extension (paragraphs 18.9.33, 18.9.37, 18.10.27 and 18.10.29 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059]) will strengthen the "strong pattern of woodland, shaws and hedgerows" in line with the existing landscape character.</p> <p>Although the construction works for the onshore cable corridor will also affect the landscape character and pattern, paragraph 18.11.29 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] concludes that, during the operation and maintenance phase, the landscape elements will appear in isolation and will not be sufficient in number, density, pattern or</p>

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9.25	9.25. Such activities will inevitably be at odds with the predominantly rural landscape in which the corridor and construction compounds are located and would result in significant adverse landscape character and visual impacts over a lengthy period, experienced by several receptors including adjacent residential properties, PRow users, and those traveling through the area on adjacent roads.	distribution to sustain significant effects on landscape character. There will be no obvious 'linkage' between them due to the reinstatement of the onshore cable corridor.
9.26	9.26. During construction, the LVIA concludes moderate to major (significant) effects on 14 Local Character Areas (all of those which are directly crossed by the cable corridor) and moderate to major (significant) impacts on a wide range of visual receptors (11 transport routes, 4 long distance recreational routes, 4 recreational and tourist destinations, 47 Public Right of Way (PRow) and 2 areas of Open Access Land). WSCC concurs with this assessment; however, as set out below, it is considered that impacts may have been underestimated and further assessment and mitigation/compensation should be considered.	The duration of the construction works is assessed in the LVIA as 'short-term' which is the terminology used by Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment (IEMA), 2013) in Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the Environmental Statement [APP-167] and defined as 1-5 years. The Applicant has no further comments on this matter at this stage.
9.27	9.27. WSCC is concerned that the LVIA downplays the potential landscape and visual impacts of construction activities, considering them short-term, when 3.5-4 years is in fact a considerable period to be subjected to moderate to major, significant impacts.	<p>The Applicant has no further comments on this matter at this stage and has responded to further detail set out in matters below.</p> <p>Please see the Applicant's response to West Sussex County Council's Relevant Representations reference 2.3.18 in Applicant's Response to Relevant Representations [REP1-017], repeated below.</p> <p>The Applicant disagrees with West Sussex County Council's assertion that the landscape and visual impact assessment (LVIA) has 'downplayed' the potential landscape and visual effects of the construction activities by considering them as 'short-term'. It is technically correct to describe the duration of the landscape and visual effects during the construction phase as 'short-term' which covers development under 5 years duration in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment (IEMA), 2013) paragraph 5.51. The LVIA methodology is set out in Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the Environmental Statement [APP-167] and in turn accords with GLVIA3 which also describes the duration of 'medium term' effects as 6-10 years and 'long term' effects as greater than 10 years.</p>
9.28	9.28. Whilst the proposed mitigation measures as set out in the commitments register (Table 18-25) and associated outline control documents are welcomed, in many cases there is considerable uncertainty as to extent of mitigation they may realistically provide. Many of the commitments include significant caveats such as 'where this is the best environment solution and is financially and technically feasible' or 'where practicable/necessary/possible', meaning it is unclear as to what can or will be realistically secured by DCO requirements (and associated control documents).	The Applicant will review the wording of mitigation measures as set out in the Commitments Register [REP1-015] and supporting control documents.

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9.29	<p>9.29. For the cable route, the assessment of Landscape and Visual impacts seemingly takes into account of reinstatement being carried out as soon as possible, which cannot be guaranteed as phasing/sequencing of works has yet to be determined. This does not represent a consideration of the worst-case scenario. Based on experience of Rampion 1, large lengths of the cable route and associated fencing, soil storage and haul routes are likely to remain in place throughout the entire construction period to provide access, and for cable pulling/jointing activities, which extend the periods over which landscape and visual impacts take place (and prolong the period before which reinstatement planting is possible).</p>	<p>Please the Applicant's see response to West Sussex County Council's Relevant Representations reference 2.3.18 in Applicant's Response to Relevant Representations [REP1-017], repeated below.</p> <p>The Applicant cannot comment on the reinstatement of land following the Rampion 1 works as this is not a matter for this DCO Application.</p> <p>The level of effect and its significance is assessed for each landscape and visual receptor through a combination of the sensitivity of the receptor, and the scale or magnitude of change and its geographical extent in accordance with Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment (IEMA), 2013) and the landscape and visual impact assessment (LVIA) methodology set out in Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the Environmental Statement (ES) [APP-167]. The duration of the effect is reported separately and is not part of the assessment of the level of effect and its significance as noted in paragraphs 1. 5.14 and 1.6.14 of the Appendix. The duration is however used to describe the nature of the effect. This approach ensures that the level of effect is presented as a 'worst case' and not 'discounted' due to the short-term duration of the effect. This demonstrated by the summary reporting in Tables 18.40-45 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059], which describe the sensitivity, magnitude, level of effect and its significance separately under the heading for the phase of development and its duration. By way of example the A3 Arun and Adur Open Downs Landscape Character Area is assessed as Major (combination of High magnitude and High sensitivity as guided by the matrix in Table 1-5 of Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the ES [APP-167]. This is the highest level of effect possible in the LVIA and demonstrates no discounting or downplaying of the level of effect or its significance due to the nature of the effect being of short-term duration. In other examples where the magnitude is lower, for example the England Coast Path the magnitude is described as Medium due to reductions in the scale and / or geographical extent due to vegetation screening and intervening distance. This has resulted in Major / Moderate level of effect as guided by the matrix in Table 1-5 which is the highest level of effect possible for that combination of sensitivity and magnitude in the LVIA and demonstrates no discounting or downplaying of the level of effect or its significance due to the nature of the effect being of short-term duration.</p>

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		<p>In describing the nature of the effect, the LVIA recognises that the onshore development will be subject to phases of development and progressive restoration which would cause the assessed levels of effect would reduce or vary during the construction phase according to the phasing. The phasing details are not currently available to the assessment and consequently there is no 'effects pathway' by which the assessment could be downplayed or discounted due to the duration or phasing of the works. Therefore, a 'worst case' is assessed and significant effects are not 'downplayed'.</p> <p>Whilst the phasing/sequencing of works has yet to be determined, the Applicant considers it is correct to describe the nature of these effects as part of the assessment which are described in commitment C-19 of the Commitments Register [REP1-015] (provided at Deadline 1 submission) outlines '<i>The onshore cable will be constructed in discrete sections. The trenches will be excavated, the cable ducts will be laid, the trenches back-filled and the reinstatement process commenced in as short a timeframe as practicable</i>'. Details of how this will be secured are set out in reference 2.3.8.</p>
9.30	<p>9.30. It is not clear how selected Viewpoint Locations and Analysis (Appendix 18.2 – APP-168) has considered the impacts of visibility splays (be that for new or upgraded side access points), with the LVIA suggesting that Commitment C-165 (visibility to DMRB standards) would reduce landscape impacts. To the contrary, such a specification would likely open views and give rise to increased landscape/visual impacts. In this regard, although it is welcomed that the Outline Construction Traffic Management Plan (OCTMP) (PEPD -036a) suggests splays would be either minimised or avoided through traffic management, or coppicing (where possible), Table 4-2 of the OCTMP suggests there remains a potential for large lengths of vegetated roadside boundaries for 69 access points to be impacted, which has potential for significant impacts.</p>	<p>Please see the Applicant's response to West Sussex County Council's Relevant Representations reference 2.3.18 in Applicant's Response to Relevant Representations [REP1-017], repeated below.</p> <p>Whilst commitment C-165 (<i>Construction access will be provided with visibility splays designed to Design Manual for Roads and Bridges (DRMB) design standards as agreed with West Sussex County Council (WSSCC)</i>) is relevant to the landscape and visual impact assessment (LVIA) it is agreed that this should not have been included in Table 18-25 of Chapter 18: Landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-059] as an embedded environmental measure that would mitigate landscape and visual effects.</p> <p>The viewpoints illustrated in Figures 18.10-76, Chapter 18: Landscape and visual impact assessment – Figures (Part 1 of 6 to Part 6 of 6), Volume 3 of the ES [APP-098 to APP-103] do not show the details of vegetation removal or visibility splays and for the onshore cable corridor they are limited to the extent of the onshore cable corridor and the envelope for temporary construction compounds. Where vegetation removal is indicated on the Vegetation Retention Plans in Appendix B of the Outline Code of Construction Practice [PEPD-033] this is included in the LVIA.</p>

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9.31	<p>9.31. With specific regard to VPs identified, it is considered that those proximate to the construction compounds are not wholly sufficient or representative, potentially resulting in landscape and visual impacts being underestimated at these key disruptive features in within the landscape. VPs selected to assess construction compounds have not been discussed with WSCC as part of Expert Topic Groups (ETGs) prior to submission. Additional VPs and/or amended photography/visualisations are, therefore, suggested to understand the extent of visual impacts and inform mitigation or compensation, at construction compounds located at Washington, Climping and at landfall.</p>	<p>The Applicant is undertaking a review of accesses to establish if there are any instances where the extent of vegetation removal may exceed that currently shown on the Vegetation Retention Plans in Appendix B of the Outline Code of Construction Practice [PEPD-033]. Should the outcome of this exercise require updates to the vegetation retention plans or other DCO Application documents this will be updated in due course.</p> <p>All viewpoints for the onshore elements of the Proposed Development (including the construction compounds and landfill) were presented at Preliminary Environmental Information Report (PEIR) (published at the first statutory consultation in July 2021) and the Applicant has had several Expert Topic Group (ETG) discussions with West Sussex County Council (WSCC) on viewpoints which have been selected to illustrate multiple aspects of the onshore cable corridor works including temporary construction compounds.</p> <ul style="list-style-type: none"> • Landfall construction compound: The Landfall compound is screened by a shelterbelt to the northeast and visibility is illustrated by Figure 18.19 Viewpoint A of Chapter 18: Landscape and visual impact assessment – Figures (Part 2 of 6) of the Environmental Statement (ES) [APP-099]. In addition, the LVIA has had access to site survey of landscape and visual receptors in the surrounding area. • Climping construction compound: Climping compound is well screened by perimeter vegetation to the north along the field boundary / PROW 168, to the south along the A259 and west along Church Lane. Visibility is illustrated by Figure 18.21 Viewpoint B1, of Chapter 18: Landscape and visual impact assessment – Figures (Part 2 of 6) of the ES [APP-099]. Although not illustrated the LVIA has had access to the 360° photography from Viewpoints B, Q and C, site survey of landscape and visual receptors in the surrounding area. • Washington construction compound: Washington compound is well screened by perimeter vegetation and adjacent land use. Visibility is illustrated by Figures 18.31 Viewpoint H, 18.32 Viewpoint H1 of Chapter 18: Landscape and visual impact assessment – Figures (Part 3 of 6), Volume 3 of the ES [APP-100]. Additionally, Washington Compound will be screened by vegetation and landform when viewed from Figures 18.49 Viewpoint I, 18.52 Viewpoint J4, 18.53 Viewpoint J5, and 18.58 Viewpoint N Chapter 18: Landscape and visual impact assessment – Figures (Part 5 of 6 and Part 6 of 6), Volume 3 of the ES [APP-102 to APP-103]. In addition, the LVIA has had access to site survey of landscape and visual receptors in the surrounding area.

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		<p>In addition, please see the Applicant's response to WSCC Relevant Representations reference 2.3.17 Applicant's Response to Relevant Representations [REP1-017], part of which is repeated below.</p> <p>There are a total of 60 illustrated, annotated and assessed viewpoints along the onshore cable corridor at varying distances also agreed through discussions with stakeholders. This compares with only the provision of contextual photos provided for other similar projects such as the Awel y Mor Offshore Wind Farm.</p> <p>The viewpoints and visualisations illustrate the range of likely effects both near and far to the onshore elements of the Proposed Development and help to define the focus of the landscape and visual impact assessment (LVIA) and the likely levels of effect. It should be noted that whilst the zone of theoretical visibility (ZTV) indicates theoretical visibility, it cannot illustrate areas of significant effect. Equally the LVIA Study Area is not intended to encapsulate all areas from which the Proposed Development would be visible, rather it is indented to capture those areas of significant effects. The viewpoint analysis is provided in Appendix 18.2: Viewpoint Analysis, Volume 4 of the ES [APP-168] with a summary in Tables 1.1-3. It should be noted that this part of the LVIA is referred to as 'analysis' and not assessment. In contrast, the LVIA provides a full assessment of visual receptors in Appendix 18.4: Visual Assessment, Volume 4 of the ES [APP-170]. For example, the LVIA assesses 114 public rights of way (PRoWs) overlapped by the ZTV. Viewpoints are referred to where relevant, but the assessment of each PRoW draws on desk and site-based study, specific to each receptor and records a sequential assessment of the visual effects along the effected part of each route. This is in contrast to a 'single' viewpoint assessment from a fixed point at one location. It would not be practical or proportionate to provide a viewpoint for each PRoW, but where appropriate, reference to a viewpoint is provided to help illustrate the assessment. The same principle has been applied to all landscape and visual receptors some of which are area based (e.g. settlements or landscape character areas) and other linear and therefore cannot be fully represented by one viewpoint. Collectively the LVIA provides an assessment of a proportionate range of receptors and visualisations that illustrate a range of impacts sufficient to allow a reasonable understanding of the likely significant effects of the onshore elements of the Proposed Development.</p> <p>The Applicant will continue to engage with WSCC on viewpoints.</p>

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9.32	<p>9.32. The following VPs should be considered (and visualisations provided where appropriate): Landfall Compound - VP(Q): This should include views to the south, as at present only views of the cable route are included; Climping Compound -VP(B): This should include westerly views from the caravan park (noting that structures of up to 20m in height may be required and thus would not be screened by intervening vegetation); and Washington Compound – Additional viewpoints are required (possibly from the north-west) to assess potential impacts of the construction compound on the caravan park and other receptors. Further, public footpath 2701 passes directly through this compound (and will require diversion around the perimeter) the impacts upon which do not appear to have been considered (i.e. not included within Table 18-46). Impacts on views from this PRow receptor are likely to be significant.</p>	<p>Please refer to the Applicant's response in reference 9.31 above. The Applicant will consider the request in respect of viewpoints B, Q, and additional viewpoints and will continue to engage with West Sussex County Council on viewpoints.</p> <p>Climping Caravan Park has been included in the landscape and visual impact assessment (LVIA) and the visual effects (including views of the construction compound, noting that structures of up to 20m) are assessed as significant during the construction phase.</p> <p>PRow 2701 – This route is not assessed in the LVIA as it is largely routed through woodland to the north of the Washington Construction Compound. It would be subject to temporary closure and diversion during the construction period (Outline Public Rights of Way Management Plan [APP-230]).</p> <p>The Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement [APP-059] is being updated for submission at Deadline 4.</p>
9.33	<p>9.33. WSCC is concerned that visual impacts on individual properties have been underestimated. The assessment of impacts for individual properties is seemingly reliant on the findings of the accompanying RVAA (APP-171), the findings of which have not been incorporated in to the wider LVIA.</p>	<p>Please refer to the Applicant's response in reference 9.34 below.</p>
9.34	<p>9.34. In this regard, it is noted that the RVAA identifies significant visual impacts for most individual properties assessed; however, it goes on to conclude that none of the 21 properties identified would be subject to unacceptable effects on visual amenity. This is surprising given the magnitude of impacts identified. There is little discussion of the methodology for concluding 'No residential amenity impact' and as such the objectivity of these conclusions is unclear. It is questioned whether final conclusions have taken into account public interests (i.e. the benefits of the wider proposals), which should not influence conclusions on impacts on visual amenity. Further, many of the assessments for individual properties seemingly rely on temporary construction activity along the cable corridor being transient with progressive backfill and reinstatement (some stating "The duration of these effects will be limited to 3 to 4 months"). As highlighted above this cannot be guaranteed as phasing/sequencing of works has yet to be determined, and as such does not represent a consideration of the worst-case scenario.</p>	<p>Please see the Applicant's response to West Sussex County Council's (WSCC) Relevant Representations reference 2.3.17 in Applicant's Response to Relevant Representations [REP1-017], which is repeated below.</p> <p>The methodology for Residential Visual Amenity Assessment (RVAA) accords with the advice in the Landscape Institute's Residential Visual Amenity Assessment Technical Note 2/19, 15 March 2019 and full details of this are provided in Appendix 18.5: Residential Visual Amenity Assessment, Volume 4 of the Environmental Statement (ES) [APP-171] including Annex A. As such, the RVAA is considered fit for purpose and follows a methodology that has been used for many other developments and found to be acceptable.</p> <p>The RVAA addresses the private views from residential properties and the Landscape Institute's Residential Visual Amenity Assessment Technical Guidance Note 2/19 ('the LI guidance' CD009.003) advises that the planning system is designed to act in the public interest when making planning decisions. It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern.</p>

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		<p>However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before.</p> <p>In summary, there are essentially two stages to a RVAA concerning the identification of significant effects and the consideration of RVAA. The RVAA (Stage 1) identifies those properties which are likely to be significantly affected and subjects these to RVAA (Stage 2) which is summarised in Table 1-2 and detailed for each property in Annex A of Appendix 18.5: Residential Visual Amenity Assessment, Volume 4 of the ES [APP-171]. By assessing those properties which are 'most affected' or closest to the onshore cable corridor the RVAA has included the 'worst case'. If these properties are assessed as not breaching the residential visual amenity threshold, it can be reasonably assumed that properties less affected or further distance from the onshore cable corridor would not breach that threshold either. Furthermore, the RVAA makes a clear distinction between visual effects (Stage 1) and effects on residential visual amenity (Stage 2).</p> <p>Table 1-1 of the RVAA (Appendix 18.5: Residential Visual Amenity Assessment, Volume 4 of the ES [APP-171]) provides information / rationale for how residential properties were selected for RVAA and included in the RVAA. This has allowed a proportionate approach which takes account of the main living rooms and garden areas within each residential property included in the RVAA. The settlement assessment in Appendix 18.4: Visual Assessment, Volume 4 of the ES [APP-170] considers the visual effects likely to be experienced from settlements, which includes the residential areas public realm and public open spaces within the "selected viewpoints are only indicative of impacts for a limited proportion of receptors affected". Collectively the LVIA provides an assessment of a proportionate range of receptors and visualisations that illustrate a range of impacts sufficient to allow a reasonable understanding of the likely significant effects of the onshore elements of the Proposed Development.</p> <p>In assessing RVA the assessment draws from all of the information provided in the visual assessment and the LI guidance advises: "In this final step, and only for those properties where the largest magnitude of effect has been identified, a further judgement is required. This concluding judgement should advise the decision maker whether the predicted effects on visual amenity and views at the property are such that it has reached the Residential Visual Amenity Threshold, therefore potentially becoming a matter of Residential Amenity." The LI guidance</p>

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		<p>provides a number of examples, most of which relate to onshore wind farm development, the following example relates to linear development:</p> <p><i>“The Preston New Road (Appeal A) development appeal the Secretary of State agreed with the Inspector stating in the decision letter: “For the reasons given at IR12.117-12.120, the Secretary of State agrees with the Inspector that the proposal would not affect the outlook of any residential property to such an extent that it would be so unpleasant, overwhelming and oppressive that it would become an unattractive place to live (IR12.118).”</i></p> <p>Neither the landscape and visual impact assessment (LVIA) or the RVAA take account of the benefits of the wider proposals. The RVAA draws from the visual assessment for its judgement, and notes that the nature of the development will involve progressive backfill and reinstatement of short duration.</p> <p>Oakendene Manor – it has been agreed with WSCC to pursue a further viewpoint to the northwest of the onshore substation in the vicinity of Oakendene Manor. The provision of an additional viewpoint and site visit will further inform future detailed design and confirm the conclusions of the LVIA which reports significant effects on views from this location.</p> <p>Chapter 18: Landscape and visual impact assessment, Volume 2 of the ES [APP-059] is being updated for submission at Deadline 4 and the Applicant will review the RVAA accordingly.</p>
9.35	<p>Operational Phase - Impacts Positive</p> <p>9.35. It is not considered that there are positive impacts on the landscape during operational phase of the Cable Corridor.</p>	<p>Paragraph 2.6.6 Outline Landscape and Ecology Management Plan (LEMP) [APP-232] states <i>“Species selection will be confirmed as part of the stage specific LEMP and will be restricted to the use of native species ... chosen to meet to design principles and in particular ... to support the landscape design principles for amenity, screening and enhanced landscape character ...”</i></p>
9.36	<p>Neutral</p> <p>9.36. During the operational phase, cables and associated infrastructure (e.g. link boxes etc.) will all be buried underground, and operational and maintenance activities would be limited (e.g. periodic testing of the cable every 2-5 years requiring access to link boxes is light vehicles, and/or any repairs in the unlikely event of a failure). As a result, once operational land has been reinstated, the landscape impacts of the cable corridor are likely to be largely neutral (except for that set out below). Similarly, decommissioning would result in the cables being severed and left in place, thus resulting in limited potential for any landscape or visual impacts.</p>	<p>Noted, the Applicant has no further comments on this point at this stage.</p>
9.37	<p>Negative</p> <p>9.37. Following completion of construction, regardless of proposed reinstatement planting, landscape impacts resulting from tree, hedge, and vegetation removal are likely to continue for several years whilst new planting/seeding is established, and any coppiced/lopped or notched trees/hedgerows recover.</p>	<p>Replacement plants will grow and become established over a 5 Year period with maintenance continued until Year 10 with the nature, level and significance of these effects progressively reducing over this period.</p>

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9.38	9.38. The submitted LVIA concludes that there would be no significant effects on landscape character during the operation and maintenance phase; however, it recognises that there would inevitably be some significant residual effects arising from the loss of landscape features during construction. This would also be experienced by several visual receptors, including public roads, recreational routes, and up to 20 PRow. Such impacts could last (albeit decreasing over time) for up to 10 years. WSCC concurs with this assessment; however, as set out below, it is considered that impacts have been underestimated and further mitigation and/or compensation should be considered.	The Applicant has no further comments on this matter at this stage and has responded to further detail set out in matters below.
9.39	9.39. As above, any reliance placed on reinstatement being carried out as soon as possible is questioned. Experience of Rampion 1 has shown that in some cases, cable corridor reinstatement planting was not carried out progressively (only at the end of the construction period), that some areas have been subject to significant and consistent planting failures, some wildflower field margins have not been created, and there have been failures to remove temporary cable corridor fencing in some locations. As a result, the residual landscape impacts in the years following construction of the cable route may be greater than that assessed.	<p>The Applicant cannot comment on the reinstatement of land following the Rampion 1 works as this is not a matter for this DCO Application.</p> <p>The methodologies that will be used to ensure construction (including restoration) is undertaken in a sensitive and appropriate way can be found in the Outline Construction Method Statement [APP-255], the Outline Code of Construction Practice [PEPD-033], and the Outline Landscape and Ecology Management Plan [APP-232]. These documents are secured under Requirements 12, 22 and 23 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission).</p>
9.40	<i>Required Mitigation</i> 9.40. Given the scale and nature of construction activities involved, avoidance of landscape and visual impacts is difficult to achieve.	Noted, the Applicant has no further comments on this point at this stage.
9.41	9.41. The embedded measures set out in Table 18-25 (to be secured by relevant control documents and DCO Requirements) are supported, in principle, as methods to reduce and mitigate landscape and visual impacts. However, in addition to those measures, WSCC recommends the following should also be considered.	Noted, the Applicant has no further comments on this point at this stage.
9.42	9.42. Proposed Requirements and Outline Control documents need to provide greater certainty/clarity over the information that will be provided on the detailed duration, phasing, and sequencing of construction activities, and how this will be programmed to ensure reinstatement can be maximised as quickly as possible for each stage of the construction works. This is a considerable area of uncertainty that will be a key factor in determining the magnitude of landscape and visual impacts.	<p>The Applicant will ensure that Outline Control documents are aligned.</p> <p>Requirement 10 of the Draft Development Consent Order [PEPD-009] secures the submission of a programme showing the different stages comprising the Proposed Development and in respect of which other requirements may be discharged. Commitment C-103 (Commitments Register [REP1-015]) 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.' 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 be provided in the stage specific Landscape and Ecology Management Plans that would be delivered as part of the</p>

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9.43	<p>9.43. The OCoCP (PEPD-034) is welcomed insofar as it includes provisions to minimise the loss of such landscape features (as identified in the accompanying Vegetation Retention Plans). However, it is concerning that at 5.6.27 the OCoCP states “Where the construction approach would result in additional losses over those stated in the VRP, they must be highlighted in the stage specific CoCP and justified in consultation with the competent authority.....” which leaves considerable uncertainty. Concerns are also raised as to whether these plans accurately reflect all likely required impacts on tree/hedgerow features given that detailed access designs and visibility splays have not been confirmed. As a minimum, all trees and hedgerows identified in the OCoCP Vegetation Retention Plans must be retained unless there are truly exceptional circumstances to be approved by the relevant planning authority. The wording of the document should be updated to reflect this.</p>	<p>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] which has been updated at Deadline 2.</p> <p>The Applicant will review the wording of the Outline Code of Construction Practice [APP-224], paragraph 5.6.27 and supporting control documents.</p> <p>Please see the Applicant's response to West Sussex County Council's (WSCC) Relevant Representations reference 2.3.31 in Applicant's Response to Relevant Representations [REP1-017], which is repeated below.</p> <p>Section 4.4 of the Outline Construction Traffic Management Plan [PEPD-035a] provides details of visibility splay requirements for construction access junctions. Where it is proposed to use an existing farm gate accesses or farm tracks a visibility splay in accordance with Design Manual for Roads and Bridges will be provided by coppicing. Where this is not possible (for example due to ecological reasons) these accesses will be managed through traffic management.</p> <p>Further to this, the Applicant is also in discussion with WSCC on the visibility splays requirements at key accesses, with speed surveys being completed to inform visibility splay requirements. These speed surveys will be used to inform the requirements set out in the Outline Construction Traffic Management Plan [PEPD-035a] and access designs where these are being undertaken.</p> <p>Please see the Applicant's response to WSCC Relevant Representations reference 2.3.18 in Applicant's Response to Relevant Representations [REP1-017], which is repeated below.</p> <p>The viewpoints illustrated in Figures 18.10-76, Chapter 18: Landscape and visual impact assessment – Figures (Part 2 of 6), Volume 3 of the Environmental Statement [APP-099] do not show the details of vegetation removal or visibility splays and for the onshore cable corridor they are limited to the extent of the onshore cable corridor and the envelope for temporary construction compounds. Where vegetation removal is indicated on the Vegetation Retention Plans in Appendix B of the Outline Code of Construction Practice [PEPD-033] this is included in the LVIA</p> <p>The Applicant is undertaking a review of accesses to establish if there are any instances where the extent of vegetation removal</p>

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9.44	9.44. The ES provides little justification for the selected locations of the five main construction compounds that would be in place for lengthy periods. WSCC has concerns about the size of these compounds and proximity to visual receptors and would wish to see evidence to demonstrate they have been sited in the most environmentally acceptable locations.	<p>may exceed that currently shown on the vegetation retention plans in Appendix B of the Outline Code of Construction Practice [PEPD-033]. Should the outcome of this exercise require updates to the vegetation retention plans or other DCO Application documents these (including the LVIA) will be updated in due course.</p> <p>The Applicant has provided further requested evidence has been submitted in Deadline 1 Submission – 8.25.2 Applicant's Post Hearing Submission – Issue Specific Hearing 1 – Appendix 2 – Further information for Action Point 4 – Wineham Lane North [REP1-021]. 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. 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 Applicant 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 across the site. The Applicant notes that paragraph 4.4.1 NPS EN-1 (2011), against which the Proposed Development is to be assessed, states there is no “<i>general requirement to consider alternatives or to establish whether the proposed project represents the best option</i>”. This is reflected in paragraph 4.3.9 of NPS-EN1 (2023), which came into force in January 2024. Some specific policies require consideration of alternatives as set out in the National Policy Statement EN-1 (Department of Energy and Climate Change, 2011a), however these do not apply in relation to the comparison of the substation options.</p> <p>Section 3.6 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044] provides the information on the onshore substation site selection process. Section 3.6 describes the site selection process and the reasons for other sites being discounted based on the multi-disciplinary factors identified in the paragraph above. The selection of Oakendene is clearly stated as favourable for engineering, cost, and landowner considerations in paragraphs 3.6.23 to 3.6.25 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044]. Significant weight was also given to the environmental constraints and related policy in the overall balance of the decision. This Applicant has also developed further embedded environmental measures that have been presented in the application including the design principles in the Design and</p>

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		<p>Access Statement [AS-003], Outline Landscape and Ecology Management Plan [APP-232] and Outline Operational Drainage Plan [APP-223] secured by requirements 8, 12 and 18 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission) respectively.</p> <p>Four temporary construction compound (TCC) locations were considered in the Washington area, following the Scoping stage of the project. Following further engineering design review, environmental and land reviews, these were refined to the three alternatives presented at Preliminary Environmental Information Report (PEIR) (Rampion Extension Development Limited (RED), 2021), Washington TCC Option D, Washington TCC Option E and Washington TCC Option F were consulted on as part of the first statutory consultation in July 2023.</p> <p>Following the provision of the PEIR at the first statutory consultation in July 2021 (RED 2021), further design progress, including designs for trenchless crossing locations, land owner and stakeholder feedback and further environmental appraisals, reviewing impacts such as traffic, were taking into consideration. This enabled further refinement of options, and resulted in Washington TCC Option D, - renamed as 'Washington Temporary Construction Compound', as the chosen option in this location for the DCO Application submission.</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>
9.45	9.45. Any removal of hedgerows to form accesses should be minimised as far as practicable (and consideration given to traffic management measures that can further reduce any splay requirements). In this regard, it is imperative that any access plans to be submitted in respect of DCO Requirements 15 and 16, fully take into account the relevant commitments and retention of hedgerows as set out in OCoCP Vegetation Retention Plans. The wording of these requirements may need review to reflect this.	Please refer to the Applicant's response to reference 9.43 above.
9.46	9.46. Of key importance to mitigating the landscape impacts of the cable corridor during the operational phase will be the success of reinstatement and replacement planting. As a result, the effectiveness of stage specific LEMPs (DCO Requirements 12 and 13) is crucial. At present, it is considered that the OLEMP provides very limited detail around the	Please refer to the Applicant's response to reference 9.42 above.

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	timing and specification of planting, or maintenance and monitoring provisions, which requires greater clarification and certainty.	<p>The Applicant agrees that the detail in the Code of Construction Practice (CoCP) and the Landscape and Ecological Management Plan (LEMP) will need to be stage and location specific and provide information on scheduling (including advance planting), specification of planting / establishment, management and monitoring (and if not carried out by the Applicant, effective recording and handover mechanism). Stage specific LEMPs and CoCPs are secured through Requirement 12 and 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission).</p> <p>Following discussions with stakeholders the Applicant will provide further detail on vegetation loss, reinstatement, management, monitoring, and the process for delivering remedial actions (i.e. if localised planting fails) within the Outline Code of Construction Practice [PEPD-033] and the Outline Landscape and Ecology Management Plan [APP-232] when updated at Deadline 3.</p>
9.47	9.47. There will be a need for stage-specific LEMPs to closely align with any details of phasing and sequencing, and arboricultural impacts as may be identified in stage specific CoCPs. At this stage, it is unclear how/if such submissions will align.	Please refer to the Applicant's response to reference 9.42 above.
9.48	9.48. It is imperative that the lessons learnt from Rampion 1 are considered and further mitigation or compensation identified. In this regard, poor success of reinstatement and mitigation/compensation planting has often been linked to the responsibility for planting and maintenance being devolved to individual landowners. It is imperative that any proposed contractual arrangements for reinstatement planting (if not carried out by the Applicant) ensure consistency of approach, regular monitoring, and adherence to maintenance requirements. Similarly, it is crucial that any LEMP secures monitoring and maintenance requirements, and an effective recording and handover mechanism, to ensure that once the cable asset is taken on by the OFTO, that all required provisions of the LEMP are adhered to for a minimum of the 10-year reinstatement period.	Please refer to the Applicant's response to references 9.39 and 9.42 above.
9.49	9.49. Overall, there remains considerable uncertainty as to the potential magnitude of landscape and visual impacts, and even with mitigation, significant landscape and visual impacts are likely to occur. As a result, WSCC consider that the Applicant should offset/compensate these impacts through the enhancement of retained hedgerows and trees both within and around the DCO Limits (e.g. through gapping up of hedgerows, additional native planting, management and enhancement of key landscape characteristics) and the delivery of wider PRow enhancements and thus amenity benefits to negatively affected receptors. Such enhancements should be secured both as part of stage specific LEMPs and through the provision of a S106 fund for works offsite. Given the duration of construction works, all such enhancements should be delivered as early as possible (where they would be unaffected by the works) which would aid in minimising the period over which landscape and visual impacts would be experienced.	Please refer to the Applicant's response to reference 9.6 above.
9.50	9.50. Reference is also made to Sections 11 and 12 regarding Onshore Ecology and Arboriculture, which further outline concerns about the extent of key tree/hedgerow features impacted, and lack of suitable mitigation identified. Given such features are crucial elements in respect of impacts upon landscape and visual receptors, suitable mitigation and compensation must be secured.	Please refer to the Applicant's response to reference 9.6 above.
9.51	Oakendene Substation & Construction Compounds Construction Phase - Impacts	Noted, the Applicant has no further comments on this point at this stage.

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	<p>Positive 9.51. It is not considered that there are positive impacts on the landscape during the construction phase. Construction works, whilst temporary, are generally disruptive in nature and are not expected to provide any positive impacts on the landscape.</p>	
9.52	<p>Neutral 9.52. No neutral impacts have been identified during the construction phase.</p>	Noted, the Applicant has no further comments on this point at this stage.
9.53	<p>Negative 9.53. The construction of the Oakendene substation and associated compounds would result in the development of greenfield agricultural land, loss of mature hedgerows/trees and impact on the pattern of existing field boundaries, all of which form key landscape characteristics of the local character area. It would also result in the provision of two large construction compounds and associated accesses, for a period of up to four years, containing various plant and equipment, including cranes, concrete batching plants, staff welfare facilities, stockpiles/storage of materials, vehicular parking, and result in increased human and vehicular activity.</p>	Noted, the Applicant has no further comments on this point at this stage.
9.54	<p>9.54. Such activities would inevitably be at odds with the predominantly rural landscape in which the site is located and would result in significant adverse landscape character and visual impacts over a lengthy period, experienced by several receptors in the locality including adjacent residential properties, PRow users, and those traveling through the area on adjacent roads.</p>	Noted, the Applicant has no further comments on this point at this stage.
9.55	<p>9.55. During construction, the LVIA concludes major (significant) effects on the Local Character Area (J3 Cowfold & Shermanbury Farmlands), and Major/Moderate (significant) visual effects on two transports routes (A272 and Kent Street), and two PRow (1786 and 1788). WSCC concurs with this assessment; however, as set out below, is concerned that impacts may have been underestimated and further assessment and mitigation should be considered.</p>	The Applicant has no further comments on this matter at this stage and has responded to further detail set out in matters below.
9.56	<p>9.56. As is the case for the cable corridor and construction compounds, concerns are equally applicable to the Oakendene substation area in terms of the uncertainty of proposed mitigation measures within the commitments register given the caveats included (please see earlier sections, not repeated here to avoid duplication).</p>	Noted, the Applicant has no further comments on this point at this stage.
9.57	<p>9.57. With specific regard to VPs selected/assessed for the Oakendene substation area, it is somewhat surprising that no VPs or receptors north of the A272 (and within the High Weald National Landscape) have been identified.</p>	<p>Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement (ES) [APP-059] considers the potential landscape and visual effects of the onshore substation at Oakendene including long distance views from the High Weald Area of Outstanding Natural Beauty (AONB). Section 18.9 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] provides the assessment of effects on the onshore substation at Oakendene.</p> <p>The onshore substation at Oakendene will have a significant effect on the landscape character within which it is located, namely the J3 Cowfold & Shermanbury Farmlands Local Character Area (LCA) and within 100-250m of the surrounding area to the south and southwest throughout the construction, operation and maintenance and decommissioning phases. These effects are tightly contained by the mature vegetation which surrounds the onshore substation site at Oakendene. These limited effects are due to the location of the onshore substation site within a well-</p>

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		<p>established network of mature trees and woodland and the perimeter planting involving native trees as illustrated in the Appendix D Oakendene onshore substation Indicative Landscape Plan within the Design and Access Statement [APP-037].</p> <p>Although the High Weald AONB is located approximately 550m to the north of the proposed DCO Order Limits along the A272, site survey has revealed that there will be limited intervisibility between the onshore substation and the AONB. No significant effects on landscape character have been identified within the High Weald AONB or along its boundary (see Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059]).</p> <p>No significant visual effects have been identified in respect of views of visual receptors within the High Weald AONB and there are no significant effects on views that view north towards landmarks within the High Weald AONB that could affect its setting. The following viewpoints (in Chapter 18: Landscape and visual impact assessment – Figures (Part 2 of 6) , Volume 3 of the ES [APP-099]) are located within the High Weald AONB:</p> <ul style="list-style-type: none"> • Viewpoint SA6: PRoW 1750 north of Aglands; and • Viewpoint M: High Weald Landscape Trail (near Bolney). <p>Neither of these will view the onshore substation due to the intervening distance and vegetation screening and both viewpoints have therefore been omitted from the LVIA. Consequently, there will be no effect on the special qualities, setting and integrity of the High Weald AONB (see Chapter 18: Landscape and visual impact assessment , Volume 2 of the ES [APP-059]).</p> <p>The High Weald AONB Partnership agreed in response to the PEIR the effects would be minimal (email dated 12 July 2021).</p>
9.58	<p>9.58. Additional VP locations and associated visualisations are recommended to best assess the level of impacts at key receptors and to better inform mitigation and compensation (and substation design). The following VPs should be considered (and visualisations provided where appropriate):</p> <p>Footpath 1787 (wrongly excluded from identified visual receptors for the Oakendene substation by the LVIA). Parts of this footpath provide elevated northerly views across the substation site via an existing field access, which would likely to be exacerbated by the proposed cable route crossing also in this location (and associated temporary hedgerow removal which provides screening);</p> <p>A272, looking directly south at newly created access point. This is essential and requires a visualisation. At present, viewpoint SA2 is too far east, underplaying likely effects;</p> <p>Footpath 1786 south of Oakendene Manor (north of pond). A key viewpoint with obvious views likely (more representative of a worst case than viewpoint SA7); and.</p>	<p>Please see response to West Sussex County Council's (WSCC) Relevant Representations reference 2.3.17 in Applicant's Response to Relevant Representations [REP1-017], which is repeated below.</p> <p>The Applicant confirms that they are in the process of seeking to agree access to Oakendene Manor to undertake viewpoint photography and will engage with WSCC, and Horsham District Council, in this process and supply visualisations of additional viewpoint photography at a later Examination Deadline subsequent to completion of this work, where required.</p> <p>In summary, the following viewpoints are noted:</p>

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		<ul style="list-style-type: none"> Viewpoint SA1: Kent Street – Figures 18.10a-d, Chapter 18 : Landscape and visual impact assessment – Figures (Part 1 of 6), Volume 3 of the Environmental Statement (ES) [APP-098] demonstrates the views through a gap in vegetation along Kent Street during the winter months; Viewpoint SA2: A272 – Figures 18.11a-e, Chapter 18: Landscape and visual impact assessment – Figures (Part 2 of 6) , Volume 3 of the ES [APP-099]. A viewpoint was considered at the new access point, but safety concerns precluded this location and Viewpoint SA2 was provided as an alternative. Significant effects from along the A272 are reported in the landscape and visual impact assessment (LVIA) and the design principles in the Design and Access Statement [AS003] and Outline Landscape and Ecology Management Plan [APP-232] include mitigation and are secured through Requirements 8 and 12 of the Draft Development Consent Order [PEPD-009] updated at Deadline 2 submission. The outline layout design shows a curved approach road to the onshore substation, so that direct views can be screened by landscaping. It has been agreed with WSCC to examine a possible alternative viewpoint on land at Oakendene Manor on the southern side of the fence, at the access point to avoid safety concerns associated with taking photos on the A272. The provision of an additional viewpoint at this location may be useful for future detailed design although it would not alter the conclusions in the LVIA that significant effects on views from the A272 would occur at this point; Viewpoint SA3: PRoW 1786 Taintfield Wood – Figures 18.12a-j, Chapter 18: Landscape and visual impact assessment – Figures (Part 2 of 6) , Volume 3 of the ES [APP-099]. The viewpoint is representative of the views from the footpath between Kent Street and Oakendene Industrial Estate and captured the view from the edge of Taintfield Wood towards Oakendene Manor. Although alternative viewpoints could have been provided from the route of the onshore cable corridor or closer to the onshore substation, this viewpoint is between the two and views across to Oakendene Manor which is revealed on exiting the wood. Although a further viewpoint could have been provided as suggested, it is not considered by the Applicant to be proportionate and it would not alter the conclusions in the LVIA that significant effects on views from the footpath would occur and affect much of this route. The Outline Landscape and Ecology Management Plan [APP-232] includes partial mitigation and is secured through

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9.59	9.59. Further, as discussed above, concerns are raised that individual residential visual receptors have not be adequately assessed by the LVIA/RVAA.	<p>Requirement 12 of the Draft Development Consent Order [PEPD-009];</p> <ul style="list-style-type: none"> Viewpoint SA7: PRow 1788 southwest of Site, west of Taintfield Wood – Figures 18.13a-h, Chapter 18: Landscape and visual impact assessment – Figures (Part 2 of 6) , Volume 3 of the ES [APP-099]. The viewpoint illustrates significant effects from receptors along this route and is representative of significant effects from the A272 and the residential properties, which are included in the LVIA; and Oakendene Manor – it has been agreed with WSCC to pursue a further viewpoint to the northwest of the onshore substation in the vicinity of Oakendene Manor. The provision of an additional viewpoint at this location may be useful for future detailed design although it would not alter the conclusions in the LVIA of significant effects on views from this location. <p>Figure 18.9c, Chapter 18 : Landscape and visual impact assessment – Figures (Part 1 of 6), Volume 3 of the ES [APP-098] illustrates PRow 1786 and the LVIA describes this in Table 18-34 Chapter 18: Landscape and visual impact assessment, Volume 2 of the ES [APP-059] as “<i>routed between east of Taintfield Wood and the A272 via Oakendene Industrial Estate</i>”. As such the assessment includes part of PRow 1787 between Kent Street and Taintfield Wood. Allowing for this, it is agreed that PRow 1786 and part of PRow 1787 (approximately 200m) will be significantly affected during the construction period, as a result of both the construction of the onshore cable corridor and the Oakendene substation.</p> <p>During operation it is therefore also agreed that PRow 1786 and part of PRow 1787 will be significantly affected as described in Table 18-34 Chapter 18: Landscape and visual impact assessment, Volume 2 of the ES [APP-059] “<i>Oakendene substation components will be visible from this route through gaps and above intervening vegetation in the foreground as the path emerges north and east of Taintfield Wood</i>” This includes the gap for the field gate that would allow views north from part of PRow 1787 (assessed in the ES as part of PRow 1876). Significant visual effects from PRow 1786 and from field gate along PRow 1787 will persist through the operation period.</p> <p>Chapter 18: Landscape and visual impact assessment, Volume 2 of the ES [APP-059] is being updated for submission at Deadline 4.</p>
		Please refer to the Applicant's response in reference 9.34 .

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9.60	<p>Operational Phase - Impacts Positive</p> <p>9.60. It is not considered that there are positive impacts on the landscape during operational phase of the substation.</p>	<p>Paragraph 2.6.6 Outline Landscape and Ecology Management Plan [APP-232] states “Species selection will be confirmed as part of the stage specific LEMP and will be restricted to the use of native species ... chosen to meet to design principles and in particular ... to support the landscape design principles for amenity, screening and enhanced landscape character ...”</p>
9.61	<p>Neutral</p> <p>9.61. No neutral impacts have been identified during the operational phase.</p>	<p>Noted, the Applicant has no further comments on this point at this stage.</p>
9.62	<p>Negative</p> <p>9.62. Once constructed, the Oakendene substation would comprise a large-scale development of an industrial/utilitarian nature, containing large buildings and various tall external electrical infrastructure, and be surrounded by security fencing.</p>	<p>Noted, the Applicant has no further comments on this point at this stage.</p>
9.63	<p>9.63. As a result, despite the presence of existing electrical infrastructure in the wider locality, it would be a significantly alien feature at odds with the predominantly rural landscape in which it is located and give rise to permanent adverse landscape and visual impacts on adjacent residential properties, PRow users, and those traveling through the area on adjacent roads.</p>	<p>Noted, the Applicant has no further comments on this point at this stage.</p>
9.64	<p>9.64. Regardless of proposed planting, landscape impacts resulting from tree, hedge and vegetation removal, are likely to continue for several years whilst new planting/seeding is established, and any coppiced/lopped or notched trees/hedgerows recover.</p>	<p>Noted, the Applicant has no further comments on this point at this stage.</p>
9.65	<p>9.65. During operation, the LVIA concludes major (significant) effects on the Local Character Area (J3 Cowfold & Shermanbury Farmlands), reducing to moderate to major 10 years after completion (after planting has had time to establish). In terms of visual receptors, it concludes moderate to major (significant) impacts on Kent Street (up to five years following completion of construction), and moderate to major (significant) impacts on PRow 1786. WSCC notes this assessment; however, as set out below, is concerned that impacts may have been underestimated and further assessment, mitigation and compensation should be considered.</p>	<p>The Applicant has no further comments on this matter at this stage and has responded to further detail set out in matters below.</p>
9.66	<p>9.66. In the absence of evidence demonstrating the contrary (and further VPs/visualisations), WSCC considers that, once constructed, the substation would also be likely to result in significant visual impacts upon PRow 1787 (south of the site), the A272, and Oakendene Manor.</p>	<p>Noted, the Applicant has no further comments on this point at this stage.</p>
9.67	<p>9.67. Regarding views from Oakendene Manor, WSCC is concerned that despite the RVAA identifying significant visual impacts on views from this property, it concludes no significant impacts on visual amenity at this property, without robust or objective reasons for coming to this conclusion.</p>	<p>Please refer to the Applicant's response in reference 9.34 below.</p>
9.68	<p>9.68. Visualisations of the substation are provided at Figures 18.10 onwards and demonstrate that the substation will be an apparent and industrial feature a rural landscape. However, additional visualisations from the recommended VPs as set out above are required to better determine the magnitude of impacts and inform any mitigation and compensation measures (including the substation site design, layout and planting proposals). Further, it is concerning that the visualisations omit the tallest proposed structure (lightning mast – 18m) and thus do not provide a true representation of that proposed.</p>	<p>Please see response to West Sussex County Council's Relevant Representations reference 2.3.17 in Applicant's Response to Relevant Representations [REP1-017], which is repeated below.</p> <p>It is agreed that the visualisations omit the lightning mast at 18m tall. This is because the visualisations provide an impression of the Proposed Development based on the main components as described in the project description in Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement [APP-045] and the Indicative layouts and elevations shown in Appendix</p>

Ref	Local Impact Report Comment	Applicant's Response
9.69	9.69. The design, layout, and provision of landscaping at the substation will be crucial to minimising and mitigating the landscape and visual impacts of the Project. The design principles identified in the DAS need further refinement and to be presented in a clearer manner. They also need to provide greater certainty over the likely layout, appearance, scale, and design of structures proposed.	Please refer to the Applicant's response in reference 9.5 .
9.70	9.70. No details of site levels have been provided by the Applicant. Given a slope is present on the site and that all maximum heights for plant/structures are based on 'finished' ground levels, it is crucial to understand the extent of any cut and fill operations and likely final site levels. Any substantive change in site levels could result in significant changes to landscape and visual impacts.	The Indicative Landscape Plan set out in the Design and Access Statement [AS-003] , the Outline Operational Drainage Plan [APP-223] and the LVIA in Chapter 18: Landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-059] are all consistent with the cut-and-fill anticipated to create a level platform based on 'finished' ground levels for the onshore substation at Oakendene.
9.71	9.71. It is not clear if the proposed 'curve' in the access road will achieve visual screening from the A272 (and further visualisations are required to confirm this).	Please refer to the Applicant's response in reference 9.58 .
9.72	<p>Required Mitigation</p> <p>9.72. The scale and nature of activities and built electrical infrastructure proposed is such that avoidance of landscape and visual impacts is difficult to achieve.</p>	Noted, the Applicant has no further comments on this point at this stage.
9.73	9.73. The embedded measures set out in Table 18-25 (to be secured by relevant control documents and requirements) are supported, in principle, as methods to reduce and mitigate landscape and visual impacts. However, in addition to those measures, WSCC recommends the following should also be considered.	Noted, the Applicant has no further comments on this point at this stage.
9.74	9.74. 'Works Plans' (Work No. 10) and the OCoCP identify the maximum extent of the two Oakendene construction compounds. Within these areas (most notably the northern Oakendene substation compound), there are several trees and hedgerows that form important landscape features and provide screening from public views.	Noted, the Applicant will review outline control documents including the Design and Access Statement [AS-003] , the Outline Code of Construction Practice [PEPD-033] and the Outline Landscape and Ecology Management Plan [APP-232] in relation to vegetation overlapped by the footprint of the Oakendene construction compound and consider further vegetation retention. An update will be provided at Deadline 3.
9.75	9.75. It is important that various trees and hedgerows within these areas be retained and protected and, as a minimum, those identified in the accompanying Vegetation Retention Plans. As such, the OCoCP and Draft DCO Requirements must ensure that construction compounds are limited to areas realistically available, with this vegetation retained (i.e. compound areas be reduced as appropriate).	Please refer to the Applicant's response in reference 9.74 above.
9.76	9.76. Any removal of hedgerows on the southern side of the A272 to form accesses should be minimised as far as practicable (and during construction, consideration given to traffic management measures that can further reduce any splay requirements). It is concerning, therefore, that the A272 roadside hedgerow for the Oakendene west compound is not included in the OCoCP Vegetation Retention Plan (and for which coppicing maybe required to achieve required visibility splays). This is an important hedgerow for screening view from the A272 and adjacent residential properties. This hedgerow should be retained as far as is practicable.	Please refer to the Applicant's response in reference 9.43 . Two sections of hedgerow on the southern side of the A272 (H520) are shown as retained on Figure 7.2.1k of the Vegetation Retention Plan within the Outline Code of Construction Practice [PEPD-033] . A further section of hedgerow on the southern side of

Ref	Local Impact Report Comment	Applicant's Response
9.77	<p>9.77. The design, layout, and provision of landscaping at the substation will be crucial to minimising and mitigating its landscape and visual impacts. The final proposed layout of the substation and accompanying landscaping plans have not been discussed with WSCC as part of Expert Topic Groups (ETGs) prior to submission. As set out in NPS EN-1, there are several good design criteria that the applicant must adhere to including: appropriate siting of infrastructure within that site relative to existing landscape character, landform and vegetation; sensitive design of buildings and structures including careful selection of materials and finishes; and the provision of landscaping schemes (including offsite planting where appropriate).</p>	<p>the A272 (H520b) is shown to allow for the access to the onshore substation at Oakendene.</p> <p>Please refer to the Applicant's response in reference 9.5.</p> <p>The Applicant notes that the principles of the Design and Access Statement (DAS) [AS-003], are welcomed and has agreed during engagement with WSCC to review the presentation of the design principles and the wording within the DAS to secure the delivery of the principles within. The Applicant currently expects to submit an update of this document at Deadline 3.</p> <p>The Outline Landscape and Ecology Management Plan [APP-232] includes a series of good design principles, the provision of outline landscaping in the form of the Indicative Landscape Plan, an Architectural Strategy and other opportunities to provide further mitigation in addition to the Indicative Landscape Plan. The Outline Landscape and Ecology Management Plan [APP-232] is being updated for submission at Deadline 3 with further details on mitigation measures regarding good design.</p>
9.78	<p>9.78. In this regard, the details contained in the submitted DAS are welcomed and contain overarching principles that will generally aid in minimising the impacts of the Project. The Indicative Landscape Plan (Appendix D) is generally well thought out insofar as it seeks to surround the built development with new planting, and to bolster existing landscape features, with a view to screening the Project from key visual receptors. Advance planting proposals are also welcomed. However, there are several matters that could help ensure landscape and visual impacts are minimised and mitigated as far as is practicable, as follows.</p>	<p>Please refer to the Applicant's response in reference 9.5.</p>
9.79	<p>9.79. Given that 'design principles' will be the key benchmark against which any final design will be assessed by the relevant authority (as stipulated within DCO Requirement 8), it is crucial that they are presented in a clear and consolidated table, ordered by topic as relevant.</p>	<p>Please refer to the Applicant's response in reference 9.5 and 9.77.</p>
9.80	<p>9.80. Design principles also should provide greater certainty over the likely layout, appearance, scale, and design of structures proposed, which is currently lacking. Consideration should be given to sympathetic design and finishes of both perimeter fencing (e.g. dark green) and the main buildings on site (the DAS only suggests this 'will be considered as part of an architectural strategy to soften their appearance'). Key design matters, such as roof lines/building styles, materials/finishes of key buildings, should be established and set out in greater detail, if possible. It is further noted that the layout plan appears to show a structure on the southern elevation of the GIS building (not included in any visualisations), which should be explained. Consideration should also be given to a design principle that minimises any rooftop plant or ancillary structures for both the GIS substation and Control Room Buildings.</p>	<p>Please refer to the Applicant's response in references 9.5 and 9.77.</p>
9.81	<p>9.81. It is crucial to understand the extent of any cut and fill operations and likely final site levels. Dependant on any changes, there may be opportunities to utilise final site levels to further minimise landscape and visual impacts.</p>	<p>Please refer to the Applicant's response in reference 9.70.</p>
9.82	<p>9.82. It is considered that proposed landscaping could be both refined and reinforced to ensure that existing tree/hedgerow losses are compensated, and screening effects maximised. In this regard, to the south of the substation, an area is excluded from advance planting where the cable alignment enters the site. Given it is proposed that the cable would be installed by trenchless techniques in this location (and thus at a greater depth), it is not clear why this has been</p>	<p>Please refer to the Applicant's response in reference 9.5 and 9.77.</p>

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	<p>excluded or why scrub planting is proposed. It is recommended that this be reviewed, as taller/denser planting in this location would aid in screening the site from viewpoints to the south (notably PRow 1786 and 1787).</p>	<p>The Applicant will review this aspect of the Indicative Landscape Plan and provide an update of the Design and Access Statement [AS-003] and the Outline Landscape and Ecology Management Plan [APP-232], for submission at Deadline 3.</p> <p>Annex A of the Outline Landscape and Ecology Management Plan [APP-232], explains that only tree / shrub species can be planted over the cable easement.</p>
9.83	<p>9.83. In terms of advance planting, in addition to that identified in the DAS, it is considered that proposed native woodland buffers alongside the A272 (east and west of the proposed access) should also be included. Although it is recognised that some areas could not be advance planted owing to the need for temporary construction access visibility splays, advance planting would still be possible to the rear of splays and would aid in screening of the site establishing more quickly.</p>	<p>Please refer to the Applicant's response in reference 9.76.</p> <p>The Indicative Landscape Plan (ILP) for the onshore substation at Oakdene and its design principles are set out in the Design and Access Statement [AS-003] and further expanded on in the Outline Landscape and Ecology Management Plan [APP-232].</p> <p>With respect to advance planting, this is secured by the design principles in the DAS [AS-003] with further information on advanced planting is provided in paragraph 2.6.4 of the Outline Landscape and Ecology Management Plan [APP-232] which states "A programme of landscape works will be provided setting out the programme according to relevant planting seasons and maximising opportunities for advance planting prior to construction to allow trees to mature during the construction works and in advance of completion of the onshore substation. Some of the landscaping will be established prior to the beginning of construction (advance planting), with the remainder being delivered following the completion of the substation and the decommissioning of temporary construction compounds."</p> <p>Requirement 8 (2) of the Draft Development Consent Order [PEPD-009] requires detailed design for the onshore substation to accord with the principles established in the Design and Access Statement [AS-003]. Hedgerow management along the A272 is included in the Design and Access Statement [AS-003] secured via Requirement 8 within the Draft Development Consent Order [PEPD-009] and Outline Landscape and Ecology Management Plan [APP-232] to increase screening, subject to requirements for visibility splays. The Applicant is considering whether further planting immediately south of the hedgerows along the A272 is included as advance planting to further increase the screening potential of views along the A272.</p> <p>The Landscape and Ecology Management Plan is secured through Requirements 12 and 13 of the Draft Development Consent Order [PEPD-009].</p>

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		The Design and Access Statement [AS-003] and the Outline Landscape and Ecology Management Plan [APP-232] are being updated for submission at Deadline 3.
9.84	9.84. Given the uncertainty as to the effectiveness of the proposed 'curve' in the access road, this feature may need to be further emphasised and/or additional planting considered. The design principle to ensure the permanent access from the A272 will be 'low key, matching the style of existing farm/estate access with limited signage' is welcomed. Consideration should also be given to sympathetic signage design, markings and surfacing materials (e.g. avoid large painted markings in favour of granite setts, consider an appropriate hard surface typical of the rural environment as installed at the Rampion 1 substation).	Please refer to the Applicant's response in reference 9.58, 9.76 and 9.83 . The Applicant acknowledges that the design principles for the permanent access off the A272 are welcomed by West Sussex. They will endeavour to ensure that attention is also given to sympathetic signage design, markings and surfacing materials. This aligns with the existing design principle to maximising opportunities for advanced planting. The Design and Access Statement [AS-003] and the Outline Landscape and Ecology Management Plan [APP-232] are being updated for submission at Deadline 3.
9.85	9.85. Overall, as is the case for the cable corridor, there remains considerable uncertainty as to the potential magnitude of landscape and visual impacts, and even with mitigation, significant landscape and visual impacts are likely to occur. WSCC considers that the Applicant should offset/compensate these impacts through the enhancement of retained hedgerows and trees both within and around the around the DCO Limits (e.g. through gapping up of hedgerows, additional native planting, management and enhancement of key landscape characteristics) and through a fund to provide for the delivery of wider PRow enhancements and thus amenity benefits to negatively affected receptors.	Please refer to the Applicant's response in reference 9.6 above.
9.86	9.86. Reference is also made to Sections 11 and 12 regarding Ecology and Arboriculture, which further outline concerns about the extent of key tree/hedgerow features impacted and lack of suitable mitigation identified. Given such features are crucial elements in respect of impacts upon landscape and visual receptors, suitable mitigation and compensation must be secured.	Please refer to the Applicant's response in reference 9.6 above.
9.87	<p>Extension at the existing National Grid Bolney Substation and Construction Compound</p> <p>Construction Phase - Impacts</p> <p>Positive</p> <p>9.87. It is not considered that there are positive impacts on the landscape during the construction phase. Construction works, whilst temporary, are generally disruptive in nature and are not expected to provide any positive impacts on the landscape.</p>	Noted, the Applicant has no further comments on this point at this stage.
9.88	<p>Neutral</p> <p>9.88. No neutral impacts have been identified during the construction phase.</p>	Noted, the Applicant has no further comments on this point at this stage.
9.89	<p>Negative</p> <p>9.89. The construction of the extension to the national grid substation will result in the development of a limited area greenfield agricultural land, and the loss of a section of mature hedgerow/trees, which form key landscape characteristics of the local character area. It would also result in the provision of a 0.35ha construction compound on an area of hardstanding to the north of existing substation (not identified in the OCoCP plans – Appendix A) for a period of up to 3.5 years, containing various plant and equipment including cranes, staff welfare facilities, stockpiles/storage of materials, vehicular parking, and result in increased human and vehicular activity.</p>	Noted, the Applicant has no further comments on this point at this stage.

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9.90	9.90. Such activities will inevitably be at odds with the predominantly rural landscape in which the site is located and would result in some adverse landscape character and visual impacts over a lengthy period, in particular experienced users of PRow 1T.	Whilst the Applicant agrees, it should also be noted that the site area for the extension to the national grid substation is characterised by existing electrical infrastructure as a result of the existing National Grid Bolney substation and the Rampion 1 substation and UK Power Networks assets.
9.91	9.91. During construction, the LVIA concludes none to minor effects on the Local Character Area (LW1 Hickstead and Low Weald) and Major (significant) visual effects upon part of PRow 1T. WSCC concurs with this assessment; however, as set out below, it is considered that further mitigation should be considered.	Noted, the Applicant has no further comments on this point at this stage.
9.92	9.92. It is surprising that a VP has not been provided for footpath 1T, the western extent of which passes close to the proposed construction compound, associated access and physical works, and which the LVIA concludes would be a significantly affected visual receptor. Nonetheless, on the basis there are limited opportunities to provide any meaningful screening and LVIA acknowledgement of major visual impacts for this receptor, it is not considered that an additional VP is required.	Noted, the Applicant has no further comments on this point at this stage.
9.93	<p>Operational Phase - Impacts Positive</p> <p>9.93. It is not considered that there are positive impacts on the landscape during the operational phase of the substation extension works.</p>	Paragraph 2.6.6 Outline Landscape and Ecology Management Plan [APP-232] states “Species selection will be confirmed as part of the stage specific LEMP and will be restricted to the use of native species ... chosen to meet to design principles and in particular ... to support the landscape design principles for amenity, screening and enhanced landscape character ...”
9.94	<p>Neutral</p> <p>9.94. No neutral impacts have been identified during the operational phase.</p>	Noted, the Applicant has no further comments on this point at this stage.
9.95	<p>Negative</p> <p>9.95. Once constructed, the substation extension would be of an industrial/utilitarian nature, containing tall buildings and/or external electrical infrastructure, and be surrounded by security fencing. However, given the presence/context of the existing Bolney National Grid and Rampion 1 substations immediately adjacent and mature boundary vegetation/screening in the locality, any landscape and visual impacts would likely be minor and predominantly limited to users of PRow 1T/Bob Lane and any impacts on the character of the locality resulting from the loss of trees/hedgerow.</p>	Noted, the Applicant has no further comments on this point at this stage.
9.96	9.96. During operation, the LVIA concludes negligible to minor effects on both landscape character and visual receptors. Although WSCC concurs with this assessment, further mitigation and compensation should be considered.	Please refer to the Applicant's response in reference 9.101 .
9.97	<p>Required Mitigation</p> <p>9.97. The embedded measures set out in Table 18-25 (to be secured by relevant control documents and DCO Requirements) are supported, in principle, as methods to reduce and mitigate landscape and visual impacts. However, in addition to those measures, WSCC recommends the following should also be considered.</p>	The Applicant welcomes the support of West Sussex County Council for the embedded measures on Landscape and Visual impacts set out in Table 18-25 of Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement [APP-059].
9.98	9.98. 'Works Plans' (Works Nos. 20 and 10) and the OCoCP identify the maximum extent of the substation extension. However, the OCoCP omits the substation extension compound which must be included.	Noted, the Applicant will review the Outline Code of Construction Practice [PEPD-033] and where required an update will be provided.

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9.99	9.99. The retention and provision of additional landscaping at the substation extension will be important in minimising and mitigating its landscape and visual impacts. In this regard, the details contained in the submitted DAS are welcomed and contain overarching principles that will generally aid in minimising the impacts of the Project	The Applicant acknowledges that the details contained in the Design and Access Statement [AS-003] are welcomed by West Sussex County Council.
9.100	9.100. The DAS (AS-003) presents two options for the substation extension (GIS or AIS). Indicative Landscape Plans (Appendix C) for both options provide for additional reinforcement tree planting north of Bob Lane and management of the hedge and trees to enhance screening, which is welcomed. However, the AIS option highlights the potential for a much larger area of existing vegetation/trees to be removed ('subject to detailed design). The DAS should make clear that all such losses will be avoided, where possible. Further, given the potential for additional vegetation loss associated with the AIS option, it is considered that the corresponding planting proposals should provide for replacement planting and/or additional tree planting in the immediate locality to compensate for losses.	The decision on final design of the substation design lies with National Grid Electricity Transmission (NGET).
9.101	9.101. For the Oakendene substation, areas of advance planting are indicated. However, outline Landscape Plans for the substation extension do not include any such reference. New planting and management of the hedge and trees alongside Bob Lane are seemingly unaffected by constitution works; as a result, this should be identified as an area of advance planting (and management), and the DAS/supporting plans updated as necessary.	The Applicant is updating the Outline Landscape and Ecology Management Plan [APP-232] for clarity and will submit a revised version for Deadline 3.
9.102	9.102. Even with mitigation, significant landscape and visual impacts are likely to occur (in particular for PROW users during construction). WSCC considers that the Applicant should offset/compensate these impacts through the enhancement of retained hedgerows and trees both within and around the around the DCO limits (e.g. through gapping up of hedgerows, additional native planting, management and enhancement of key landscape characteristics), and through a fund to provide for the delivery of wider PROW enhancements and thus amenity benefits to negatively affected receptors.	The Applicant welcomes discussion of specific enhancement opportunities, particularly within the area of the South Downs National Park.
10. Noise and Vibration (ES Chapter 21)		
10.1	<p>Summary</p> <p>10.1. Given the technical nature of Noise and Vibration assessments submitted, WSCC defer to Environmental Health Officers to provide a detailed review of likely noise and vibration impacts from the Project. Nonetheless, based on experience of Rampion 1, WSCC has the following observations/concerns.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.2	10.2. The submitted assessment of noise and vibration impacts concludes that noise arising from the construction and operation of the offshore elements of the Project (i.e. offshore turbines and substation), would be negligible to minor (not significant) based on the limited levels of noise generated and the distance from onshore receptors. WSCC does not dispute these findings, albeit notes a lack of reference to experience/lessons learnt from Rampion 1 (where offshore piling activities resulted in noise complaints from the local community).	The noise complaints that arose during piling for Rampion 1 are recognised, and offshore piling was scoped into the assessment on the basis of the previous experience. However, the assessment in Section 21.9 of Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] determined that the worst-case sound level from offshore piling was 34dB L _{Aeq,T} . This level is significantly below the thresholds of significance from BS5228 Annex E and would not be significant.
10.3	10.3. Construction works will result in the use of large machinery/plant and HGV movements over a wide linear geographical area, including the siting of large construction compounds for up to four years, and use of HDDs at several locations along the cable route; this will inevitably result in some noise impacts for receptors proximate to the works.	<p>The Applicant accepts that there will be temporary noise effects over a wide area, but these will be mitigated using Best Practicable Means and are not significant due to the short duration that they will affect any single receptor.</p> <p>The impacts of works at temporary construction compounds have been considered at all nearby sensitive receptors in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018]. Outline proposals for mitigation have been proposed</p>

Ref	Local Impact Report Comment	Applicant's Response
10.4	10.4. Given the nature and duration of construction activities (in particular, at construction compounds) and noting the generally low background noise levels associated with the predominantly rural location of the works, WSCC is concerned that construction noise impacts may have been underestimated. There is also concern that there is considerable uncertainty over the duration of some noise producing activities and the extent to which noise mitigation can be guaranteed/successful.	<p>to minimise off-site noise generation and these proposals will be further developed once more detailed programming and plant selection has been carried out. No significant noise or vibration impacts are predicted when the mitigation is applied.</p> <p>Trenchless crossing (such as horizontal directional drilling (HDD) impacts are not significant during the day when the highest level of activity would occur. HDD plant use at nighttime has been considered carefully and mitigation is required to be applied where significant effects could be encountered such that no residual significant effects are predicted.</p>
10.5	10.5. During the construction phase, mitigation of noise impacts would be secured principally through stage specific CoCPs and associated Noise Management Plans (NMPs). The outline provisions for these control documents as well considered measures to reduce noise impacts; therefore, they are supported in principle. However, further details/clarifications are required and an outline NVMP (ONVMP) should be provided to give greater certainty of the duration/sequencing of works and to demonstrate that noise impacts would be minimised, and mitigation measures maximised.	<p>The background noise levels are not considered in the assessment of construction noise. Where ambient noise levels have not been measured, the most stringent 'Category A' has been used to characterise the receptors. The uncertainty of the construction noise is recognised, as the details required to fully predict the noise generation are not available at this stage.</p> <p>The mitigation proposed and resultant sound levels will be controlled through the application of Noise and Vibration Management Plans as secured through Requirement 22 of the Draft Development Consent Order [PEPD-009].</p> <p>The Applicant welcomes West Sussex County Council's support in principle for the provision of stage specific Code of Construction Practices and Noise and Vibration Management Plans.</p> <p>The Applicant will consider the request for the provision of an Outline Noise and Vibration Monitoring Plan.</p>
10.6	10.6. During operation, the key potential for noise impacts arises from the proposed Oakendene substation and siting of large electrical plant, which would inevitably result in permanent elevated localised noise levels in a rural area where background noise levels are relatively low.	<p>Although the initial estimate of impact with respect to British Standard (BS) BS4142 considers a 5dB difference between the rating level and representative background level as being indicative of an adverse impact, the standard requires that the assessor considers the context of the assessment of the new noise source in its environment. As such, the operational noise levels have been considered alongside the presence of low background noise levels and have considered both absolute and relative noise levels compared to the observable adverse effect levels at night-time. Recommendations have been made to reduce the sound level below the Lowest Observable Adverse Effect Level (LOAEL) at all receptors, and therefore the conclusions of no significant effects are considered by the Applicant to align with the requirements of BS:4142 and environmental impact assessment (EIA).</p>

Ref	Local Impact Report Comment	Applicant's Response
10.7	10.7. WSCC is concerned that operational noise impacts of the substation have been underestimated and that a number of residential properties in close proximity to the site, may experience adverse noise impacts, in particular during the night-time. Concerns are also raised that there has been no assessment of potential noise impacts on the amenities of neighbouring Public Rights of Way (PRoW).	<p>The absolute noise level (i.e. the specific noise level from the onshore substation at Oakendene) is not exceeding 35 dB $L_{\text{night, outside}}$, in line with the World Health Organisation (WHO) Night Noise Guidelines (2009), therefore no observed effects on sleep would be expected. On this basis, it is considered that the predicted noise emissions from the onshore substation would not constitute adverse impact in terms of British Standard (BS) 4142 during the night-time, and therefore satisfy the requirements of The Sussex Noise Guidance for Developers (West Sussex County Council et al., 2021), despite exceeding the level difference guidance.</p> <p>Section 1.1 of the scope of BS 4142 states: <i>“The methods described in this British Standard use outdoor sound levels to assess the likely effects of sound on people who might be inside or outside a dwelling or premises used for residential purposes upon which sound is incident.”</i></p> <p>The standard does not state anywhere in the scope that it would be considered appropriate to assess commercial noise on a Public Right of Way, where receptors will be transient. As such, it is considered that the approach the Environmental Statement has taken, i.e. <i>“Public Rights of Way (PRoWs) would have been considered without the presence of residences, however, in the case of the substation options, there were nearby residences in each direction and therefore the nearby residences are the determining factor in terms of assessment and mitigation.”</i> is appropriate and affords users of PRoWs a greater level of protection than they would otherwise benefit from</p>
10.8	10.8. Mitigation of noise impacts from the operational phase of the substation would be secured principally through selection of plant and integral attenuation features that would achieve specified rating levels at the nearest sensitive receptors (as specified within the DAS (AS-003), and the implementation of an operational noise management plan (including monitoring provisions). Such measures are supported in principle; however, it is considered that the proposed noise maximum rating levels for sensitive receptors should be lower and that the plant/enclosures should be selected from the outset to minimise noise as far as practicable (regardless of any set rating levels).	<p>The Applicant agrees that the onshore substation design should seek to minimise noise generation to as low as practicable, as this is in line with the guidance set out in Planning Practice Guidance: Noise.</p> <p>However, as the rating levels predicted at receptors have been assessed as avoiding significant effects at all receptors, the Applicant considers that more stringent noise limits than those proposed in the Design and Access Statement [AS-003] and secured through Requirement 29 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) would be excessive and impose significant cost burden on the project with little demonstrable benefit in terms of perceived noise reductions.</p>
10.9	10.9. Given the Project would inevitably result in some adverse noise impacts for several receptors over a wide area (including residents and PRoW users), WSCC considers that this should be offset/compensated through a Community Benefit Fund and through s106 PRoW enhancement contribution and thus provide amenity benefits to negatively affected leisure users.	<p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms (HoTs) for Deadline 3.</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: <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> 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>
10.10	10.10. In accordance with NPS the ExA will need to be satisfied that significant adverse impacts on health and quality of life from noise have been avoided, and that remaining adverse noise impacts have been mitigated and minimised (including through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and the use attenuation features to reduce noise transmission).	Noted, the Applicant has no further comments on this matter at this time.
10.11	10.11. WSCC acknowledge the revised documents submitted by the Applicant at the Procedural Deadline and these do not substantively affect the comments and concerns raised in this LIR.	Noted, the Applicant has no further comments on this matter at this time.

Table 10: Summary of Impacts – Noise and Vibration

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
10a	Offshore noise and vibration impacts	C	Neutral	Based on there being no likelihood of significant noise impacts, no mitigation is specified. However, noting that construction of the offshore elements of Rampion 1 resulted in several noise complaints/concerns being reported	EN-1 (Paragraphs 5.11.4, 5.11.9 and 5.11.11).	The Applicant recognises that noise complaints were encountered during the offshore piling at Rampion 1. However, the predictions of noise from offshore piling show that sound levels will be significantly below the threshold of significance onshore. Therefore, the likelihood of significant effects has been assessed to be low, even at night. The

Ref	Local Impact Report Comment			Applicant's Response		
				because of foundation piling works combined with specific weather conditions/piling locations, it is not clear how lessons learnt from these events have been considered/taken forward. As a result, the following should be considered: Reduce: Demonstrate that lessons learnt from Rampion 1 have been considered and consider whether there may be a need to restrict hours of offshore piling activities during certain periods of combined atmospheric conditions/piling locations that could lead to noise disturbance. Mitigate: Consider whether there is need for any monitoring of offshore noise to demonstrate no impacts and/or a provide a clear process for investigating, responding to, and addressing any noise complaints received.		assessment does not suggest that imposing restrictions on working hours would be proportionate. The proposals for monitoring and complaint procedures will be incorporated into the stage specific Noise and Vibration Management Plan as secured through Requirement 22 5h of the Draft Development Consent Order (DCO) [PEPD-009] (updated at Deadline 2).
10a	Offshore noise and vibration impacts	O	Neutral	On the basis that the submitted assessment of noise and vibration impacts concludes that noise arising from the construction and operation of the offshore elements of the Project would not be significant (and no issues are apparent as were for Rampion 1), WSCC defers to Environmental Health Officers to provide detailed comments for any offshore related noise and vibration impacts.	EN-1 (Paragraphs 5.11.1–5.11.13)	The Applicant has no further comment on this matter at this time.
10b	Onshore noise and vibration impacts	C	Negative	The embedded environmental measures are set out within the various commitments (Table 21-20) are welcomed and supported, in principle. Such measures must be secured as part of the DCO and associated requirements, the draft version of which is welcomed, in principle. The following control documents will be of key importance, the outline versions of which (where	EN-1 (Paragraphs 5.11.1, 5.11.4, 5.11.5, 5.11.6, 5.11.8, 5.11.9, 5.11.10, 5.11.11 and 5.11.12).	Section 4.7 of Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement (ES [APP-045]) provides a summary of the indicative construction programme that has informed the assessments within the ES. Schedule 1, part 3, requirement 10 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) secures that the detail of the stages (equivalent to phases) of works are to be submitted and approved by the relevant planning authorities. Detailed measures will be incorporated within the Noise and Vibration Management Plans which are secured via Requirement 22 of Draft

Ref	Local Impact Report Comment	Applicant's Response
	<p>provided) are welcomed, in principle: • CoCP (to contain NMPs); and • Construction Method Statement. However, in addition to those measures, submitted in draft/outline, the following must also be considered. Mitigate: • OCoCP to provide greater certainty on the duration, phasing, and sequencing of construction activities, and clarify how this will affect methodologies for any further assessment/monitoring of noise and required mitigation; • OCMS to clarify the methodologies to demonstrate that detailed trenchless HDD proposals would result in 'no new or materially different environmental effects arising compared to those assessed in the ES'. • An outline NVMP should be provided including details of how stage specific submissions would be structured, key noise management provisions to be adopted, the methodologies/scope (including timings) for proposed further noise survey/assessment and specify all relevant noise threshold limits. It should also set out how monitoring will be undertaken and outline mechanisms to address any reported noise issues (or exceedance of set thresholds). • Proposed Construction and Communications Plans (CCPs) should build upon similar arrangements adopted for Rampion 1, and experience gained. Availability of direct contacts for overseeing contractors (on a 24hr basis) is recommended. • Controls over working hours require greater certainty/refinement. Any justified 'out of hours' works should only take place in exceptional circumstances where approved by the relevant planning authority. Compensate: • A Community Benefits Fund to provide for the delivery and improvement of</p>	<p>Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The Applicant will consider the request for the provision of an Outline Noise and Vibration Monitoring Plan (NVMP) including the points raised. However, the Applicants notes that an Outline Noise and Vibration Managed Plan will be representative, not specific, as the information to be able to produce a detailed NVMP is not available.</p> <p>Please see above response reference 10.9 with respect to compensation and community benefits.</p>

Ref	Local Impact Report Comment			Applicant's Response		
10c	Onshore Cable Corridor noise and vibration impacts	O	Neutral	<p>wider community facilities and a s106 PRow enhancement contribution in area where residents and leisure users would be negatively affected.</p> <p>During the operational phase, cables and associated infrastructure (e.g. link boxes etc.) will all be buried underground and are not typically noise generating.</p>	EN-1 (Paragraphs 5.11.1–5.11.13)	Noted, the Applicant has no further comments on this matter at this time.
10d	Oakendene substation noise and vibration impacts	O	Negative	<p>The proposal to ensure maximum noise rating levels at the nearest residential receptors and subsequent monitoring compliance therewith are supported, in principle, as methods to reduce and mitigate noise and vibration impacts. In addition, the inclusion of specific physical mitigation measures for plant at the substation (e.g. harmonic filter dampening, dampening and potentially enclosures for transformers) are also welcomed. Such measures must be secured as part of the DCO and associated requirements, the draft version of which is welcomed, in principle. The following control documents will be of key importance, and are welcomed, in principle: • Design and Access Statement: and • Operational Noise Management Plan. However, in addition to those measures, the following must also be considered.</p> <p>Reduce: Proposed threshold rating levels at sensitive receptors proximate to the substation (as specified in Commitment 231, the DAS and/or Requirement 29), in particular for night-time periods, should be set closer to existing background levels.</p> <p>Mitigate: • The quietest practicable substation plant/and physical noise mitigation measures must be selected from the outset (to include consideration of optimisation of plant</p>	EN-1 (Paragraphs 5.11.1, 5.11.3, 5.11.4, 5.11.6, 5.11.8, 5.11.9, 5.11.10, 5.11.11, 5.11.12).	<p>The Applicant considers that, as sound levels will be reduced to as low as practicable with the addition of appropriate mitigation and that the rating levels predicted at receptors have been assessed as avoiding significant effects at all receptors (in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018]), more stringent noise limits than those proposed in the Design and Access Statement [AS-003] would be excessive and impose significant cost burdens on the Proposed Development with little demonstrable benefit in terms of perceived noise reductions.</p> <p>The suggested mitigation methods are either unlikely to be feasible (e.g. putting noise sources in buildings) or likely to give appreciable reductions (e.g. orientation optimisation).</p>

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	<p>layout, containment of noise generating plant within buildings, and use of noise barriers). A specific design principle should be added to the DAS to this effect. • Controls over working hours require greater certainty/refinement. Any justified 'out of hours' works should only take place in exceptional circumstances where approved by the relevant planning authority. Compensate: A Community Benefits Fund to provide for the delivery and improvement of wider community facilities and a s106 PRow enhancement contribution in area where residents and leisure users would be negatively affected.</p>	
10.12	<p>Policy Context National Policy Statements 10.12. Of key relevance to the proposals for noise and vibration impacts is Section 5.11 (Paragraphs 5.11.1–5.11.13) in National Policy Statement for Energy (EN-1) (July 2011), which are replicated in the Table 21-2 of the submitted noise and vibration assessment (APP-062).</p>	Noted, the Applicant has no further comments on this matter at this time.
10.13	<p>10.13. This NPS highlights that excessive noise can have wide-ranging impacts on quality of human life through sleep disturbance, annoyance and enjoyment of areas of value, and upon biodiversity. It sets out the key factors that determine likely noise impacts as being the levels and nature of noise created and the proximity to sensitive receptors. Of particular relevance to the comments of WSCC are the following specific paragraphs.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.14	<p>10.14. Paragraph 5.11.4: "Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise; identification of noise sensitive premises and noise sensitive areas that may be affected; the characteristics of the existing noise environment; a prediction of how the noise environment will change with the proposed development; in the shorter term such as during the construction period; in the longer term during the operating life of the infrastructure; at particular times of the day, evening and night as appropriate. an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas; and measures to be employed in mitigating noise. The nature and extent of the noise assessment should be proportionate to the likely noise impact."</p>	The operational noise assessment within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] includes all the elements referenced and concluded that with mitigation, there are no significant effects. This is secured by the application of suitable noise limits within the Design and Access Statement [AS-003] in accordance with Requirement 29 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).
10.15	<p>10.15. Paragraph 5.11.8: "The project should demonstrate good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission".</p>	There is limited ability to house the noise generating equipment at the onshore substation within buildings and limited scope to alter the noise generation of the substation by optimising the layout. Due to the size of the onshore substation equipment and the effective height of the noise sources within the substation, any bunds or acoustic screens will need to be long and tall to be effective. As the operational noise assessment within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement

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10.16	10.16. Paragraph 5.11.9: "The IPC should not grant development consent unless it is satisfied that the proposals will meet the following aims: avoid significant adverse impacts on health and quality of life from noise; mitigate and minimise other adverse impacts on health and quality of life from noise; and where possible, contribute to improvements to health and quality of life through the effective management and control of noise."	<p>[PEPD-018] concluded that with mitigation, there are no significant effects, the benefit provided would be unlikely to be appreciable.</p> <p>Chapter 28: Population and human health, Volume 2 of the Environmental Statement (ES) [APP-069] draws from and builds upon key outputs from the noise and vibration assessment and therefore the potential noise effects are addressed in further detail in Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018].</p> <p>With regards to the potential changes in noise exposure on public rights of way (PRoWs), this is not considered relevant to the population and health assessment. This is on the basis that such changes would be transient in nature, and even if the potential presence of long-term noise changes on these routes would deter use (subjective impact), there are nearby comparable and accessible alternative PRoWs which can be used for recreation and physical activity.</p> <p>On the basis that public health is preventative in nature, any proposed mitigation measures required to minimise harm are focused on the environmental determinants of health such as air quality, noise and transport.</p> <p>Noise-related targeted secondary mitigation to reduce effects on specific receptors is proposed where appropriate and have been taken into consideration when assessing potential health and wellbeing effects in Chapter 28: Population and human health, Volume 2 of the Environmental Statement [APP-069].</p>
10.17	10.17. Paragraph 5.11.10: "When preparing the development consent order, the IPC should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent."	Recommended noise limits stated in the Design and Access Statement [AA-003] and secured through Requirement 29 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) are predicted to be met with defined mitigation measures.
10.18	10.18. Paragraph 5.11.11: "The IPC should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the IPC may wish to impose requirements. Any such requirements should take account of the guidance set out in Circular 11/95 (see Section 4.1) or any successor to it."	Mitigation is proposed for both operational and construction phases. Significant effects are avoided with mitigation measures in place. Further assessment is required as more detailed design takes place and any additional mitigation will be confirmed in the respective noise management plan to ensure that levels do not give rise to significant effects.
10.19	10.19. Paragraph 5.11.12: "Mitigation measures may include one or more of the following: engineering: reduction of noise at point of generation and containment of noise generated; lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural barriers, or other buildings; and administrative: restricting activities allowed on the site; specifying acceptable noise limits; and taking into account seasonality of wildlife in nearby designated sites."	Noise from the operational onshore substation is proposed to be mitigated by engineered means at source. Acceptable noise limits have been proposed.

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10.20	WSCC Policy 10.20. There are no WSCC policies relevant to the Project.	Noted, the Applicant has no further comments on this matter at this time.
10.21	Construction Phase - Impacts Positive 10.21. It is not considered that there are any positive noise and vibration impacts during construction. Construction works, whilst temporary, are generally disruptive in nature and result in elevated noise levels in the local environment.	Noted, the Applicant has no further comments on this matter at this time.
10.22	Neutral 10.22. The submitted assessment of noise and vibration impacts concludes that noise arising from the construction of the offshore elements of the Project (i.e. offshore turbines and substation) would be negligible to minor (not significant), based on the limited levels of noise generated and the distance from onshore receptors. WSCC defers to Environmental Health Officers to provide detailed comments. However, it is noted that construction of the offshore elements of Rampion 1 did result in several complaints/concerns being reported (including report of sleep disturbance), which the Rampion 1 team reported were attributable to foundation piling works combined with specific weather conditions. It is not clear how lessons learnt from these events have been considered/taken forward.	The Applicant recognises the noise complaints encountered during the offshore piling at Rampion 1. However, the predictions of noise from piling show levels significantly below the threshold of significance. That does not mean offshore piling will be inaudible and as West Sussex County Council indicates, onshore noise levels may be exacerbated by meteorological conditions outside the control of the contractors carrying out the works. Proposals for noise monitoring will be considered within the Noise and Vibration Management Plan for this phase of works.
10.23	Negative 10.23. Construction works will result in the use of large machinery/plant and traffic (including HGVs), for soil stripping/storage, trench excavation, cable laying/jointing, Horizontal Directional Drilling (HDD) and construction/upgrade of substations. Further, the works would require the provision of four large construction compounds (two at the Oakendene substation area (for up to 4 years), one at Washington, and one at Climping (for up to 3.5 years)), a large landfall construction compound proximate to the shoreline at Climping (for up to two years), and some 27 HDD compounds at various locations along the route (the precise duration of which are unclear at this stage) wherein large plant would be located and in increased human and vehicular activity can be expected. There will also be the use of the existing National Grid Bolney substation compound, for the National Grid substation extension works.	Noise from construction has been assessed in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] using the code of practice. Embedded and targeted mitigation have been employed to reduce all impacts to non-significant. Noise management plans will be used and these are secured through Requirement 22 5h of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).
10.24	10.24. Such activities will inevitably result in some noise impacts for several receptors over a wide area proximate to the works, including adjacent to residential properties, community services, commercial buildings, leisure areas (including PRow), heritage assets, and terrestrial ecology.	Noise impacts are expected due to the construction works, but these are temporary, and no significant effects are predicted. The durations of activities will be provided in accordance with
10.25	10.25. During construction, the submitted assessment of noise and vibration impacts concludes that there would be no significant noise and vibration impacts on any identified receptors. Given the nature of construction activities (and their significant duration, in particular, at main compounds) and noting the low background noise levels in what are predominantly rural locations, this is surprising. In this regard, whilst WSCC defer to Environmental Health Officers for any detailed review of likely impacts, WSCC has the following observations/concerns.	Low ambient noise levels have been accounted for in the construction noise assessment. The assessment has been carried out using the statutory code of practice for construction noise.
10.26	10.26. Table 21-10 of the assessment identifies the relevant noise sensitive receptors that are to be considered. However, Figure 21.2 (APP-106) does not appear to include all types of receptors identified. In this regard, there is a lack of consideration of PRow (listed as a 'leisure receptor'). Although it is recognised that impacts on PRow users would be largely transitory, such impacts remain of importance, particularly for PRow likely to be subject to a longer duration of impacts (e.g. at construction compound locations). Further, no noise contours for the cable route trenching activities have been provided.	The presentation of construction noise contours has been undertaken for static worksites. Contours were considered inappropriate for the linear trenching works as these are a moving source and the contours would either present levels as a worst case that are only experienced for a single day, or averaged along arbitrary lengths such that the levels assessed were artificially low. For constantly moving worksites, a qualitative assessment is considered by the Applicant to be appropriate, particularly due to the expected residency time in the vicinity of any single receptor.

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		<p>Public Rights of Way (PRoWs) have not been discounted, but due to the transitory nature of their users these would not benefit from the same level of protection than residential receptors. At all the static worksites assessed it was considered that the PRoWs benefited from construction noise controls provided for residential receptors.</p> <p>Trenching works may cause very temporary impacts as pedestrians pass by the works, but PRoWs will be screened where possible and adverse health impacts will be avoided through the application of best practice through the Noise Management Plans for this activity.</p>
10.27	<p>10.27. Given the assessment of noise impacts are largely reliant on impacts identified at 'key' receptors identified in Figure 21.2 (APP-106), the full extent/number of receptors potentially adversely affected is unclear. Even if only a 'low' impact, the reader should be in no uncertain terms as to the number and extent of receptors likely to be adversely affected to understand the scale/extent of impacts arising (and any compensation attributed accordingly).</p>	<p>Please see above response reference 10.9 with respect to compensation.</p>
10.28	<p>10.28. Consideration of noise impacts of cable route construction and use of side accesses are seemingly dismissed as short in duration, despite having the potential to result high noise levels at sensitive receptor locations. It is purported that construction noise would be time limited as trenching operations would pass quickly (less than 10 days). However, this fails to take into account longer duration works associated with construction of haul roads, joint bays, cable pulling, cable jointing (which may require use of mobile generators). Furthermore, it does not recognise that the cable route may serve as a key haul route in rural areas and remain in place for long periods in some cases. Therefore, the duration of noise impacts cannot be guaranteed until detailed phasing arrangements have been established at the Requirement stage.</p>	<p>Use of side accesses are assessed in paragraph 21.9.59 within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018]. The assessment found that noise from heavy goods vehicles (HGV's) movements at 5m from all routes were below the threshold of significance.</p> <p>The assessments were undertaken with consideration of the rural nature of the area and concluded that there are no significant noise effects.</p>
10.29	<p>10.29. The methodology to establish the magnitude of construction impacts is such that, in some cases, noise levels above BS5228 thresholds only result in low impacts, which are deemed as 'not significant'. This is seemingly predicated on a limited duration of noise generating activities, however, it is unclear whether the worst case scenario (a maximum of 3.5 years) has been considered. As a result, this may be an underestimation of potential impacts. BS5228 thresholds are 'thresholds for a medium impact' and, as such, impacts above these levels will be greater. Of key concern is the potential for noise impacts on receptors close to main construction compounds (and the Climping landfall compound), which will be in place for up to four years.</p>	<p>Although the project is 3.5 years, the worst-case durations of construction noise are not. Where thresholds of significance are potentially exceeded by the works, but the duration that the receptor will be exposed to the noise is less than a month, this is below the temporal threshold and not significant.</p> <p>Predictions of noise from Climping compound are presented in Table 21.28 within Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018]. Predicted levels are significantly below the threshold of significance. It is not suggested that the nature of noise at Climping Compound is below the temporal threshold.</p>
10.30	<p>10.30. The submitted assessment places too much reliance on 'embedded measures', all to be captured as part of stage specific Code of Construction Practices (CoCP), the effectiveness of which cannot be certain at this stage. Although such measures would help to reduce noise, the extent to which they can do so is uncertain at this stage (noting measures in some cases will be adopted 'where practicable').</p>	<p>The Outline Code of Construction Practice [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, and C-263 (Commitments Register [REP1-015] updated at the Deadline 1 submission). Commitment C-263 includes the production of a Noise and</p>

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10.31	<p>10.31. In this regard, it is noted that that OCoCP (APP-224), Section 4.2 suggests that the detailed design for HDD crossings will be confirmed at the detailed design stage as part of Construction Method Statements (CMS). This leaves significant uncertainty as the potential for noise impacts. Further, the Outline Construction Method Statement (OCMS) suggests that for any changes to trenchless crossings (currently identified as preferred options), confirmation will be provided that there are no new or materially different environmental effects arising compared to those assessed in the ES. However, no methodology as to how this will be assessed/established has been provided.</p>	<p>Vibration Management Plan (NVMP) during detailed design based on the principles in the Outline Code of Construction Practice [PEPD-033], detailing best practicable means and location specific mitigation and secured by Requirement 22 of the Draft Development Consent Order [PEPD-009] updated at Deadline 2. 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.</p> <p>The proposed approach is to keep levels below the threshold of significance. Where the levels are predicted to be close to the threshold of significance at any sensitive receptor, the Noise and Vibration Management Plan will identify where such exceedances could occur, what mitigation is required, and how the levels will be monitored.</p>
10.32	<p>10.32. There is considerable reliance of stage specific NVMPs to be provided as part of CoCPs. Although such NVMPs are welcomed, no outline drafts have been provided to date, leaving uncertainty as to the mitigation measures that may be possible in individual circumstances. It will be vital that NVMPs specify appropriate noise controls for each stage.</p>	<p>The Applicant considers that in applying a worst-case approach to the assessment of construction noise assessment, the uncertainty on such predictions will tend toward overestimation of noise rather than underestimation. The process of reassessing construction noise with the submission of Noise and Vibration Management Plans (Commitment C-263 within the Outline Code of Construction Practice (CoCP) [PEPD-033] and secured by Requirement 22 of the Draft Development Consent Order [PEPD-009] updated at Deadline 2) provides an additional opportunity to define the appropriate mitigation. Retrospective application of mitigation is not anticipated to be required, but the Applicant considers that providing a mechanism to undertake such retrospective measures is appropriate and helps with contingency planning.</p>
10.33	<p>10.33. The relevant commitment (C-263) states “Where any significant deviation from the initial sound level predictions is identified, such that levels in excess of the BS 5228 thresholds of significance are likely, the Noise and Vibration Management Plan (NVMP) shall be updated or a Section 61 application will be made to the relevant Local Planning Authority”. It is somewhat concerning that the potential for noise impacts is seemingly reliant on further noise assessment at the detailed design stage and that noise levels above ES predictions will only be addressed by subsequent review. The scope/methodologies of any such assessments are unclear and trigger levels undefined (e.g. ‘significant deviation’ not defined).</p>	<p>This is not an unusual position. The Applicant considers that relying on outline construction predictions ahead of contractor confirmation of determining final methodology, would be a risk compared with updating the assessment following design progression. 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>
10.34	<p>10.34. There is limited, if any, detail on how Commitment 19 (C-19) will be secured and the type of information that will be provided on detailed phasing and sequencing of construction activities. Given noise assessments are predicated on the durations of construction activities, it is essential to understand the scope of the information to be provided and for it to be demonstrated that timescales of activities would not be longer than that assessed as a worst case.</p>	<p>Commitment C-19 (Commitment Register [REP1-015]) is included in the Outline Code of Construction Practice [PEPD-033] and is secured via Requirement 22 and Requirement 10 respectively of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>

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10.35	10.35. Noise impacts from construction compounds at night-time appear to have been underestimated. Despite noise level predictions identifying several properties/receptors close to trenchless crossings (night-time) being subject to noise levels above BS5228 thresholds, conclusions seemingly downplay the magnitude of impacts as 'low' predicated on the use of acoustic barriers. The effectiveness of acoustic barriers will presumably depend upon their length, height, and position relative to the noise source/sensitive area. At this stage, it is uncertain if barriers will be effective or practicable in all circumstances.	With regard to trenchless crossings, 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] .
10.36	10.36. Cumulative impacts have excluded consideration of cable trenching works and trenchless crossing activities. Paragraph 21.12.4 (of APP-062) suggests cable trenching and trenchless crossings are sufficiently temporary that cumulative impacts with other developments do not need to be considered. Given the potential duration and impacts of such works (which remains uncertain until phasing, access arrangements and trenchless crossing techniques have been confirmed) and high levels of noise generated by trenchless crossings on a 24hr basis, concerns are raised about this omission.	It is not possible to determine such granularity at this stage. The general principle is that noise from trenched works will be of a low magnitude and of a short duration such that such cumulative noise is very unlikely. However, if there are scheduled works that could accumulate such that the threshold of significance is potentially exceeded. This will be assessed in the Noise and Vibration Monitoring Plans, and mitigation and monitoring proposals will be revisited.
10.37	10.37. Except for trenchless crossings, there is limited consideration of the potential noise impact of works outside of normal working hours. It is accepted that provisions are made for further approval to be required as part of stage specific CoCPs; however, based on experience of Rampion 1, requests for weekend working in rural locations were commonplace and there were several late/early working hours requests for programmed activities (e.g. concrete pours/floats, delivery and oil filling of transformers, cable jointing etc), which would inevitably require extended working hours. Such activities, particularly at the Rampion 1 substation area, resulted in considerable annoyance/disturbance to local residents. As a result, the likely frequency, duration and impacts of 'out of hours' works should be assessed, based on experience of Rampion 1.	The Applicant considers that work outside agreed hours will be undertaken by exception, as described in the Outline Code of Construction Practice [PEPD-033] secured via Requirement 22 within the Draft Development Consent Order [PEPD-033] , and as such the proposed controls are adequate.
10.38	<p>Operational Phase - Impacts Offshore Turbines (WTGs) and Offshore Substations Positive</p> <p>10.38. No positive noise impacts have been identified for the operational phase of the Project.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.39	<p>Neutral</p> <p>10.39. The submitted assessment of noise and vibration impacts concludes that noise arising from the construction and operation of the offshore elements of the proposal (i.e. offshore turbines and substation), would be negligible to minor (not significant) based on the limited levels of noise generated and the distance from onshore receptors. WSCC does not dispute these findings, albeit it defers to Environmental Health Officers to provide detailed comments.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.40	<p>Negative</p> <p>10.40. No negative noise impacts have been identified for the operational phase of the Project.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.41	<p>Cable Corridor Positive</p> <p>10.41. No positive noise impacts have been identified for the operational phase of the Project.</p>	Noted, the Applicant has no further comments on this matter at this time.

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10.42	<p>Neutral 10.42. During the operational phase, cables and associated infrastructure (e.g. link boxes etc.) will all be buried underground and are not typically noise generating. Operational and maintenance activities would be limited (e.g. periodic testing of the cable every 2-5 years requiring access in light vehicles to link boxes and/or any repairs in the unlikely event of a failure). As a result, once operational and land has been reinstated, noise impacts of the cable corridor are likely to be neutral. Similarly, decommissioning would result in the cables being severed and left in place, thus resulting in limited potential for noise impacts and/or noise producing activities that would likely be short in duration.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.43	<p>Negative 10.43. No negative noise impacts have been identified for the operational phase of the Project.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.44	<p>Oakendene Substation Positive 10.44. No positive noise impacts have been identified for the operational phase of the Project.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.45	<p>Neutral 10.45. No neutral noise impacts have been identified for the operational phase of the Project.</p>	Noted, the Applicant has no further comments on this matter at this time.
10.46	<p>Negative 10.46. Oakendene substation would result in the permanent siting of large electrical plant, including transformers, shunt reactors, harmonic filters and heat exchangers, and will result in elevated noise emissions in a rural locality where background noise levels are relatively low. As a result, the substation would inevitably result in changes to the immediate noise environment and have a negative impact on several nearby receptors, including neighbouring residential properties and PRow users.</p>	The effects on residential receptors has been assessed Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] and is not significant. Noise emission at the public rights of way (PRow) would be of low magnitude and users of the PRow would be transitory such that no significant effects would be experienced. Furthermore, the onshore substation is located adjacent to the A272 which will dominate the ambient noise during the day, when the PRow would be used.
10.47	<p>10.47. During operation, the submitted assessment of noise and vibration impacts concludes that there would be no significant noise and vibration impacts on any identified receptors. Given the potential for the substation to produce noise and background noise levels are low in what is a predominantly rural location, WSCC considers this surprising and likely to be an underestimation. WSCC defers to Environmental Health Officers for any detailed review of likely impacts; however, the following observations/concerns are raised.</p>	The Applicant considers that the prediction methodology and the noise survey have been applied appropriately. The assessment in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] has been carried out in accordance with BS4142:2014 +A1:2019. As such the Applicant considers that the conclusions are representative.
10.48	<p>10.48. Noise level predictions for the Oakendene substation (with mitigation) identify three proximate residential properties (two properties on Kent Street and Oakendene Manor) that would be likely to experience noise above background levels by +4 or +5dB during the night-time. However, the submitted assessment concludes the magnitude of impacts as 'low' and not significant. BS4142 suggests that the greater the noise level above background, the greater the magnitude of impact, and that a difference of +5dB is likely to be an indication of an adverse impact, depending on the context. As a result, it is concerning that permanent night-time noise impacts of the Project on these properties may have been underestimated.</p>	Although the initial estimate of impact uses a subtraction of the Background (LA90,T) Level from the Rating Noise Level and suggests that +5dB is indicative of an adverse impact, the standard details that the initial estimate of impact should be weighed against the context of the noise in its environment. The determination of significance during the night is considered to be contingent on the potential for health effects due to sleep disturbance. As the assessment within the noise and vibration chapter determined that sleep disturbance was very unlikely at the absolute levels predicted, the determination of adverse impact at night was not confirmed, and therefore an assessment of no significant adverse effects was confirmed.

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10.49	10.49. It is therefore similarly concerning that the noise limits specified in the dDCO Requirement 29 (which refers to those set out in the DAS and Commitment C-231) have adopted +5dB above background as a noise threshold that the substation design would need to achieve.	Please see comment above reference 10.48 . The Applicant considers that the limits set out in the Design and Access Statement [AS-003] protect the nearby residents from adverse impact.
10.50	10.50. It is also concerning that there appears to be no assessment of the potential noise impacts on neighbouring PRoW (an identified leisure receptor); this includes public footpath 1786, which would pass immediately alongside the southwest boundary of the substation. Although any noise impacts on users of PRoW are likely to be transitory, the amenities of adjacent PRoW will inevitably be permanently adversely impacted by noise arising from the substation.	Noise emission at the point of the PRoWs would be of low magnitude and users of the PRoWs would be transitory such that no significant effects would be experienced. Furthermore, the substation is located adjacent to the A272 which will dominate the ambient noise during the day, when the PRoWs would be used. Amenity of users with respect to noise would be unchanged.
10.51	10.51. Mitigated noise impacts at identified receptors are reliant on the selection of specific physical/plant at the substation, including harmonic filter dampening and potentially enclosures for transformers. It is understood that such mitigation would be secured where necessary to achieve noise specified noise limits. On the basis that adverse noise impacts at some receptors would occur (in the range of a Lowest Observed Adverse Effect Level), the NPS requires noise to be mitigate and reduced as far as practicable.	Adverse impacts have not been determined for the reasons discussed above (see reference 10.48). The proposed noise limits set out in the Design and Access Statement [AS-003] provide sound levels at receptors that do not give rise to any observable adverse effects (sleep disturbance) so are considered by the Applicant to be below the Lowest Observed Adverse Effect Level (LOAEL).
10.52	10.52. The requirement for an operational noise management plan (NMP) for Oakendene substation (Draft DCO Requirement 29) is welcomed. However, it is concerning that a NMP would only be required prior to commissioning, by which point, the substation design and plant choices (and thus likely noise emissions) are already likely to have been fixed.	This is correct; however, the Applicant considers that the noise limits are the primary mechanism for protecting receptors and this is secured through Requirement 29 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).
10.53	<p>Required Mitigation Construction Phase</p> <p>10.53. The scale and duration of construction activities is such that avoidance of noise and vibration impacts is difficult to achieve.</p>	Noise from construction has been assessed in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] using the code of practice. Embedded and targeted mitigation have been employed to reduce all impacts to non-significant. Noise management plans will be used and these are secured through Requirement 22 5h of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).
10.54	10.54. The embedded measures set out in Table 21-20 (to be secured in the main as part of an OCoCP and DCO Requirements) are supported, in principle, as they are considered by WSCC to be appropriate methods to reduce and mitigate noise and vibration impacts. However, in addition to those measures, WSCC recommend the following should also be considered.	The Applicant welcomes West Sussex County Council's support, in principle, to the embedded environmental measures set out in Table 21-20 and assertion that they are considered appropriate methods to reduce and mitigate noise and vibration impacts.
10.55	10.55. Given the reliance placed on further noise assessment, mitigation, and monitoring to be secured as part of stage specific NVMPs (to be submitted as part of any stage specific CoCP), an outline NVMP should be provided. As a minimum, this should include details of how such plans would be structured, key noise management provisions to be adopted, the methodologies/scope (including timings) for proposed further noise survey/assessment, and specify all relevant noise thresholds that would be adhered to (including a definition of 'significant deviation'). It should also set out how monitoring will be undertaken and outline details of the likely mechanisms that will be adopted to address and respond to any reported noise issues (or exceedance of set thresholds).	The Applicant will consider the request for the provision of an Outline Noise and Vibration Monitoring Plan (NVMP) including the points raised, to be provided at a future Deadline. However, the Applicants notes that an Outline Noise and Vibration Managed Plan will be representative, not specific, as the information to be able to produce a detailed NVMP is not available.
10.56	10.56. Given noise assessments are predicated on the durations of construction activities (which influence the methodologies and thresholds adopted for noise assessment), it is essential to understand the scope of the information to be provided in respect of Commitment C-19 (cable route completed in discrete sections with reinstatement as soon as	Noted, the Applicant has no further comments on this matter at this time.

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	practicable) and how any such details will be reflected in any stage specific COCP and NVMP. Control documents/DCO Requirements will need to clearly specify timescales of activities to ensure that they are no longer than that assessed as a worst case.	
10.57	10.57. Similarly, there is a need to understand how any detailed design for trenchless crossings (HDD) confirmed as part of CMS, intend to demonstrate that there would “no new or materially different environmental effects arising compared to those assessed in the ES”.	Noted, the Applicant has no further comments on this matter at this time.
10.58	10.58. Proposed Construction and Communications Plans (CCP – the likely content of which are very broadly outlined at section 2.6 and 2.7 of the OCoCP), are welcomed and should build upon similar arrangements adopted for Rampion 1 and experience gained. Availability of contacts (on a 24hr basis where necessary) is vital to ensure that action can be taken quickly to remediate noisy activities. For Rampion 1, a direct report/discussion with overseeing contractors was the most expedient and effective way for corrective action to be taken.	Noted, the Applicant has no further comments on this matter at this time.
10.59	10.59. At present working hours are only specified in the OCoCP. It is recommended, as was the case for Rampion 1, that requirements set out construction hours as this could provide for greater certainty of control. Further, any specific control over construction hours (be that via requirement or as worded in the OCoCP) should build on the wording set out at section 4.4 of the OCoCP as follows. It should be made clear that working hours apply to the use of any generators. ‘Shoulder hours’ should be considered (e.g. 0700-0900 and 1700-1900 hrs) restricting the use of noisy plant where proximate to sensitive receptors. ‘Out of hours’ works should only be agreed by the relevant planning authority where justified and in exceptional circumstances. Any ‘other works requiring extended working hours’ must be justified and approved by the relevant planning authority rather than only a notification made.	<p>Working hours 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. 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] at the Deadline 1 submission and will be updated in the Outline Code of Construction Practice [PEPD-033] for the next submission of this document.</p> <p>As outlined in the Outline Code of Construction Practice [PEPD-033], no activity outside these hours (including Sundays, public holidays, or bank holidays) will take place apart from under the following circumstances:</p> <ul style="list-style-type: none"> • Where continuous periods (up to 24 hours, 7 days per week) of construction work are required for HDD (as HDD is a continuous activity that cannot be paused once started);

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10.60	10.60. Given construction activities would inevitably result in some adverse noise impacts for several receptors over a wide area (including residents and PRow users), WSCC consider this should be offset/compensated through a Community Benefits Fund to provide for the delivery and improvement of wider community facilities and a s106 PRow enhancement contribution in areas where residents and leisure users would be negatively affected.	<ul style="list-style-type: none"> • for other works requiring extended working hours such as concrete pouring which will require the relevant planning authority to be notified at least 72 hours in advance; • or the delivery of abnormal loads to the connection works, which may cause congestion on the local road network, and will require the relevant highway authority to be notified at least 72 hours in advance; or • as otherwise agreed in writing with the relevant planning authority.
10.61	<p>Operational Phase</p> <p>10.61. The avoidance of noise and vibration impacts with the development of a permanent substation within a largely undeveloped rural location is difficult to achieve.</p>	<p>There is no mechanism that would give rise to operational vibration.</p> <p>The noise assessment in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] demonstrates that significant effects are avoided.</p>
10.62	10.62. The proposed measures to set maximum rating levels at the nearest residential receptors (via DCO Requirement 29) and subsequent monitoring (via an operational NMP) to demonstrate compliance with set limits are supported, in principle, as they are appropriate methods to reduce and mitigate noise and vibration impacts. In addition, the inclusion of specific physical mitigation measures for plant at the substation (e.g. harmonic filter dampening, dampening and enclosures for transformers) are also welcomed.	Noted, the Applicant has no further comments on this matter at this time.
10.63	10.63. However, in addition to those measures, WSCC recommends that the following should also be considered.	Noted, the Applicant has no further comments on this matter at this time.
10.63	10.64. Proposed threshold rating levels at sensitive receptors proximate to the substation should be revisited, in particular, for night-time periods where assessments show there may be potential for adverse impacts. It is recommended that for the thresholds specified in Commitment 231, the DAS (and/or Requirement 29) should be set closer to existing background levels to minimise the potential for impacts upon neighbouring receptors.	<p>The assessment in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] does not support this comment. Adverse impacts during the night (sleep disturbance), are avoided by the noise limits secured by Requirement 29 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
10.65	10.65. The design of the substation, selection of the quietest plant practicable, and maximisation of physical noise attenuation measures, should be specified from the outset (i.e. not only to achieve specified limits). To achieve this, it is recommended that DAS) should include such a commitment (and outline details of the physical measures to be adopted).	<p>This approach is not standard it could lead to overdesign, which the Applicant considers to be contrary to the principles of sustainable development. The proposed mitigation has been selected to target the key noise generating equipment at the onshore substation to ensure significant adverse noise effects are avoided.</p>
10.66	10.66. Given the permanent siting of the Oakendene substation would inevitably result in adverse noise impacts for several receptors in the immediate locality (including residents and PRow users). WSCC consider this should be	<p>The noise assessment in Chapter 21: Noise and vibration, Volume 2 of the Environmental Statement [PEPD-018] does not</p>

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	offset/compensated through a Community Benefits Fund to provide for the delivery and improvement of wider community facilities and a s106 PRoW enhancements contribution in areas where residents and leisure users would be negatively affected.	support this conclusion. No such widespread adverse impacts are predicted. The users of the public rights of way (PRoWs) will likely experience ambient noise from the A272 in greater magnitude than the noise emitted from the operational substation. Appendix 21.1: Baseline Sound report, Volume 4 of the Environmental Statement [PEPD-025] identifies levels of 50dB 200m south of the A272 and 160m east of the Oakdene Industrial Estate. The users of the PRoWs may be exposed to audible levels of noise as they pass the substation, but traffic noise will dominate.
11. Onshore Ecology (ES Chapter 22)		
11.1	<p>Summary</p> <p>11.1. The Terrestrial Ecology and Nature Conservation chapter of the ES (APP-063) identifies a range of impacts, mostly arising during the construction phase of the Project. These include temporary and permanent habitat loss (including broadleaved semi-natural woodland, hedgerow and semi-improved grassland), habitat fragmentation (with consequent reduction in ecological connectivity) and disturbance to species (such as from noise and lighting). The assessment within the ES is based on a 'maximum design scenario' approach. Thus, there should be potential to reduce some impacts at the detailed design stage. WSCC seeks more robust design principles to secure this.</p>	<p>A new commitment (C-292) has been added to the Commitments Register [REP1-015] and will be included within the Outline Code of Construction Practice [PEPD-033] when it is updated at Deadline 3. The commitment reads:</p> <p><i>"During detailed design the mitigation hierarchy will be applied to avoid losses of key habitats (e.g. woodland, hedgerows, scrub, watercourses and semi-improved grassland) where possible, and where not to minimise losses and mitigate for them. At each crossing of sensitive habitats a suitably qualified and experienced ecologist will provide advice to the design engineers with justification of approach provided. The approach at individual crossings will be detailed in the relevant stage specific Code of Construction Practice".</i></p> <p>This commitment is written to ensure that the detailed design process fully takes into account habitat loss. Commitments ensuring effective mitigation for artificial lighting (C-105) and noise (C-26) (see Commitments Register [REP1-015]) are already in place.</p>
11.2	<p>11.2. The Project is reliant on a large number of embedded environmental measures to avoid or reduce impacts. These embedded environmental measures, which are presented as a commitments register, include the use of HDD to cross designated sites and ancient woodland, vegetation retention plans, pre-commencement surveys of protected species, scheduling of construction activity to minimise disturbance to sensitive species, micro-siting of cable ducts, reinstatement of habitats, and the delivery of at least 10% Biodiversity Net Gain (BNG). Whilst WSCC welcomes the commitments register, concern is raised over the use of ambiguous wording, such as 'wherever possible' (Commitment C115), 'as far as reasonably possible' (C27), 'are not practical' (C17), 'where appropriate' (C115), 'shortest practicable timeframe' (C133) and 'as short a timeframe as practicable' (C229). The commitments need to be strengthened to give confidence in delivery of mitigation measures.</p>	<p>The Applicant notes the comment. The reasoning for the wording is below:</p> <p>Commitment C-115: Hedgerows will be notched 'wherever possible' as it is not possible to do this in all locations due to various reasons including (1) hedgerows running at an oblique angle across the onshore cable route, (2) hedgerows being present in a location where the onshore cable changes direction and (3) tree lines where notching may be difficult due to existing structure. As the Vegetation Retention Plans will be a part of the stage specific Code of Construction Practice secured via Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission) the relevant local authorities in consultation with Natural England will have the</p>

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		<p>opportunity to review the detailed design proposals and question the reasoning at any given crossing.</p> <p>Commitment C-115: Translocation of hedgerows to be 'where appropriate' is included following discussions with the Expert Topic Group (see Section 22.3 of Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063]) due to stakeholders concerns that this method would not work in all instances (for example in locations where thin soils lie on top of chalk). As noted above, the decisions made on a hedgerow-by-hedgerow basis will be able to be reviewed and questioned via the relevant local authorities in consultation with Natural England through the stage specific Code of Construction Practice secured via Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission).</p> <p>C-27: The use of the as far as reasonably possible is reasonable in this regard insofar as the exact same condition may not be achievable. The Applicant notes that reinstatement will still be subject to the requirements of management plans including the Outline Landscape and Ecology Management Plan [APP-232], secured by draft DCO [PEPD-009] (updated at Deadline 2) Requirement 12.</p> <p>Where commitment C-17 describes watercourses being crossed using open cut trenching techniques where trenchless crossing techniques are not required or not practical. The wording does not change the outcome of the assessment as the Crossings Schedule shown within the Outline Code of Construction Practice [PEPD-033] shows all watercourse crossings where trenchless crossings have been committed to.</p> <p>C-133: It is not feasible to put an exact timescale on the length of time a stockpile would be present. However, the works would be undertaken in accordance with the Outline Soils Management Plan [APP-226], and the Outline Code of Construction Practice [PEPD-033] with regards the pollution control mentioned in the commitment. Both are secured by draft DCO [PEPD-009] Requirement 22 (updated at Deadline 2).</p> <p>Commitment C-229 is not specific as it does not differentiate between the restoration of the bank and bed habitat and the riparian habitat. Paragraph 5.6.44 of the Outline Code of Construction Practice [PEPD-033] discusses the process for bed reinstatement and bank re-profiling, whilst commitment C-103 covers restoration of scrub etc. on the bank sides.</p>

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11.3	11.3. The Project is heavily reliant on the success of HDD in avoiding significant impacts to a number of sensitive sites, including ancient woodland and Sullington Hill LWS. Concern is raised over the absence of any contingency measures should the HDD technique fail.	Noted, the Applicant has no further comments on this matter at this time.
11.4	11.4. To avoid a deficit in biodiversity growing as the construction programme progresses, the Project will follow two courses of action. The first is to enable a progressive reinstatement of habitats, whilst the second is to secure 70% of the deficit in biodiversity (as calculated using Natural England's Biodiversity Metric 4.0) prior to commencement of construction. Any remaining shortfall identified following detailed design, will be secured prior to construction works being completed. Successful implementation of these courses of action will be crucial to mitigating biodiversity impacts during the construction phase.	Noted, the Applicant has no further comments on this matter at this time.
11.5	11.5. Rapid and successful reinstatement of habitats and landscape features along the cable corridor and at the temporary construction compounds, will be key. It is proposed to reinstate habitats to their current condition only (i.e. no enhancement proposed). It is intended that the majority of habitats temporarily lost during construction works would be reinstated within two years, other than in specific locations such as the temporary construction compounds, some haul roads, and Oakendene substation. Rapid and successful restoration of habitats and landscape features to their former condition, or better, will be crucial to minimise the impacts of habitat loss and fragmentation. WSCC is concerned that successful reinstatement may take considerably longer than the Applicant anticipates. Regular monitoring, combined with rapid remedial measures, will be critical.	Commitment C-103 (see Commitments Register [REP1-015]) controls the time between loss and reinstatement occurring, whilst the Outline Landscape and Ecology Management Plan [APP-232] recognises that establishment will need to be monitored, managed and remedial actions taken across a ten-year period. Following discussions with West Sussex County Council and other stakeholders, the Applicant has agreed to provide further detail on how monitoring, management and remedial actions will take place in an updated version of the Outline Landscape and Ecology Management Plan [APP-232] to be submitted at Deadline 3.
11.6	11.6. Woodland is the only habitat that would not be reinstated within the cable easement; due to operational reasons, scrub will be established. According to the Applicant, the loss of semi-natural broadleaved woodland will be compensated by the planting of 2.7ha of woodland at Oakendene substation.	Noted, the Applicant has no further comments on this matter at this time.
11.7	11.7. WSCC welcomes the commitment to deliver a minimum of 10% BNG for the onshore works, including the cable route, trenchless crossing compounds, temporary construction compounds, and Oakendene substation. This would comprise of both on-site BNG, focused on habitat creation at Oakendene substation, and off-site BNG. The proposal to deliver significant elements of BNG prior to the commencement of construction, plus more during the early stages of construction, are key to addressing biodiversity impacts during the construction phase.	Noted, the Applicant has no further comments on this matter at this time.
11.8	11.8. WSCC has some concerns about the delivery of BNG according to this timescale, given it would involve the purchase of BNG units from third party providers. Once the detailed design stage of the Project has been completed, the Applicant would produce more refined proposals for BNG for discussion and agreement with the relevant planning authority, which would be secured through a requirement of the DCO.	The Applicant notes that within the area of the Proposed Development, there are already third-party providers advertising opportunities along and close to the route of the proposed DCO Order Limits. For example, the Weald to Waves project provides a map showing opportunities at and close to the landfall, south and east of Washington and south of Ashurst, whilst Horsham District Council have flagged an interest in engaging with the Applicant with regards the 'Wilder Horsham' project. A number of landowners affected by the Proposed Development have also noted interest in delivering biodiversity net gain (BNG). Therefore, at this point the Applicant is confident that the level of opportunity to secure biodiversity units in the area is high.
11.9	11.9. WSCC acknowledges the revised documents submitted as part of Procedural Deadline and is reflected where relevant within this LIR section.	Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
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Table 11: Summary of Impacts – Onshore Ecology

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
11a	Permanent habitat loss along the onshore cable corridor	C/O	Negative	<p>Avoid/Reduce: Detailed design must seek to minimise habitat loss. Design Principles to commit to this are required for the cable corridor within the Design and Access Statement (DAS- AS-003).</p> <p>Compensate/Enhance: WSCC seeks clarity on the purpose and content of the BNG Strategies to be produced for each stage, referred to in DCO Requirement 14.</p> <p>Compensate/Enhance: WSCC requests that the mechanism to deliver off-site BNG, including the sign off process and proof of purchase of biodiversity units, is secured through DCO Requirement 14. Compensate/Enhance: WSCC seeks a landscape, ecology and heritage enhancement fund through a S106 Agreement. Monitor: WSCC requests further detail in the Outline Landscape and Ecology Management Plan (OLEMP) (APP-232) regarding maintenance regimes, season and frequency of monitoring, recording methods, identification and implementation of remedial works, and reporting mechanisms. Monitor: Details are requested in the OLEMP regarding handover arrangements to an OFTO, including management and monitoring. Monitor: WSCC seeks an environment and heritage Compliance Officer for the duration of the construction and 10-year aftercare periods through a S106 Agreement.</p>	NPS EN-1 (Paragraphs 5.3.3, 5.3.7, 5.3.8 and 5.3.18).	<p>The Vegetation Retention Plans within the Outline Code of Construction Practice [PEPD-033] demonstrate the actions taken to avoid and reduce habitat loss. These will be repeated in more detail in stage specific Code of Construction Practice documents that are secured via Requirement 22 of the Draft Development Consent Order [PEPD-009] provided at Deadline 2 submission.</p> <p>Please also see response to reference 11.1.</p> <p>The Biodiversity Net Gain Information that will be produced (secured through Requirement 14 of the Draft Development Consent Order [PEPD-009]) for each stage is to ensure that for each element of the detailed design that suitable front-loaded biodiversity unit delivery is discussed and agreed with the relevant planning authority. This then allows the Proposed Development to begin that stage of construction.</p> <p>The Applicant notes the request for a landscape, ecology and heritage enhancement fund.</p> <p>The Applicant will be providing further detail on monitoring, maintenance and remedial works in an updated version of the Outline Landscape and Ecology Management Plan [APP-232] to be submitted at Deadline 3.</p> <p>The Applicant notes that request for an environment and heritage Compliance Officer for the duration of the construction and 10-year aftercare periods.</p>

Ref	Local Impact Report Comment	Applicant's Response
11b	<p>Temporary habitat loss along the onshore cable corridor and at the five temporary construction compounds</p> <p>C/O</p> <p>Negative</p> <p>Avoid/Reduce: Detailed design must seek to minimise habitat loss. Design Principles to commit to this are required for the cable corridor within the DAS.</p> <p>Compensate/Enhance: WSCC seeks clarity on the purpose and content of the BNG Strategies to be produced for each stage, referred to in DCO Requirement 14.</p> <p>Compensate/Enhance: WSCC requests that the mechanism to deliver off-site BNG, including the sign off process and proof of purchase of biodiversity units, is secured through DCO Requirement 14. Compensate/Enhance: WSCC seeks a landscape, ecology and heritage enhancement fund through a S106 Agreement. Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans. Compensate/Enhance/Monitor: WSCC requests further detail in the OLEMP regarding maintenance regimes, season and frequency of monitoring, recording methods, identification and implementation of remedial works, and reporting mechanisms. Compensate/Enhance/ Monitor: WSCC requests that a detailed maintenance, management and monitoring protocol (MMMP) is secured under Requirement 13 (Implementation and maintenance of landscaping). Monitor: WSCC seeks an environment and heritage Compliance Officer for the duration of the construction and 10-year aftercare periods through a S106 Agreement</p>	<p>NPS EN-1 (Paragraphs 5.3.3, 5.3.4, 5.3.7, 5.3.8 and 5.3.18).</p> <p>Please see response in reference 11.1.</p> <p>See response in reference 11A (above).</p> <p>The Applicant would deliver proof of purchase of off-site biodiversity units in line with process described for the mandatory biodiversity scheme by Defra. Requirement 14 provides the relevant planning authority, in consultation with the statutory nature conservation body, the opportunity to ensure this occurs.</p> <p>See response in reference 11A (above).</p> <p>The reinstatement of habitat has been considered within the assessment as the realistic worst case which is the replacement of habitat like for like (i.e. the opportunity for enhancement is not considered). This is because agreements with individual landowners can only be made when a detailed design is understood and a delivery schedule known.</p> <p>The Applicant will be providing further detail on monitoring, maintenance and remedial works in an updated version of the Outline Landscape and Ecology Management Plan [APP-232] to be submitted at Deadline 3.</p> <p>With the update of the Outline Landscape and Ecology Management Plan [APP-232] to be submitted at Deadline 3 certainty will be provided through the control document that is secured by Requirement 13 of the Draft Development Consent Order [PEPD-009] updated at Deadline 2 submission.</p> <p>See response in reference 11A (above).</p>

Ref	Local Impact Report Comment		Applicant's Response			
11c	Temporary habitat fragmentation/loss of ecological connectivity along the onshore cable corridor and at the site compounds and substation sites	C	Negative	<p>Avoid/Reduce: Detailed design must seek to minimise habitat loss. Design Principles to commit to this are required for the cable corridor within the DAS.</p> <p>Compensate/Enhance: WSCC seeks clarity on the purpose and content of the BNG Strategies to be produced for each stage, referred to in DCO Requirement 14.</p> <p>Compensate/Enhance: WSCC requests that the mechanism to deliver off-site BNG, including the sign off process and proof of purchase of biodiversity units, is secured through DCO Requirement 14. Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.</p>	NPS EN-1 (Paragraphs 5.3.3, 5.3.4, 5.3.7, 5.3.8 and 5.3.18.)	<p>Please see response in reference 11.1.</p> <p>Please see response in reference 11A (above).</p> <p>Please see response in reference 11B (above).</p> <p>Please see response in reference 11B (above).</p>
11d	Habitat loss at Oakendene Substatio	C/O	Negative	<p>Compensate/Enhance: WSCC seeks clarity on the purpose and content of the BNG Strategies to be produced for each stage, referred to in DCO Requirement 14.</p> <p>Compensate/Enhance: WSCC requests that the mechanism to deliver off-site BNG, including the sign off process and proof of purchase of biodiversity units, is secured through DCO Requirement 14. Compensate/Enhance/ Monitor: WSCC requests further detail in the OLEMP regarding maintenance regimes, season and frequency of monitoring, recording methods, identification and implementation of remedial works, and reporting mechanisms.</p> <p>Compensate/Enhance/ Monitor: WSCC requests that a detailed maintenance, management and monitoring protocol (MMMP) is secured under Requirement 13</p>	NPS EN-1 (Paragraphs 5.3.3, 5.3.4, 5.3.7, 5.3.8 and 5.3.18).	<p>Please see response in reference 11A (above).</p> <p>Please see response in reference 11B (above).</p> <p>Please see response in reference 11B (above).</p> <p>Please see response in reference 11B (above).</p>

Ref	Local Impact Report Comment			Applicant's Response		
				(Implementation and maintenance of landscaping). Compensate/Enhance/ Monitor: All habitats at Oakendene substation must be managed for a minimum of 30 years, not just those which count towards the commitment to BNG, as currently proposed in the OLEMP. Monitor: Details are requested in the OLEMP regarding handover arrangements to an OFTO, including management and monitoring.		The Applicant notes this comment.
11e	Habitat loss at Bolney Substation	C/O	Negative	Compensate/Enhance/ Monitor: WSCC requests further detail in the OLEMP regarding maintenance regimes, season and frequency of monitoring, recording methods, identification and implementation of remedial works, and reporting mechanisms. Compensate/Enhance/ Monitor: WSCC requests that a detailed maintenance, management and monitoring protocol (MMMP) is secured under Requirement 13 (Implementation and maintenance of landscaping). Compensate/Enhance/ Monitor: All habitats at Bolney substation must be managed for a minimum of 30 years, not just those which count towards the commitment to BNG, as currently proposed in the OLEMP	NPS EN-1 (Paragraphs 5.3.3, 5.3.4, 5.3.7, 5.3.8 and 5.3.18).	Please see response in reference 11A (above). Please see response in reference 11B (above). The Applicant notes this comment.
11f	Impacts to ecologically important and sensitive sites: Climping Beach SSSI, Littlehampton Golf Course and Atherington Beach LWS, Sullington Hill LWS, and ancient	C	Neutral	Mitigate: The Construction Method Statements should consider contingency measures in the event of HDD failure or frac out.	NPS EN-1 (Paragraphs 5.3.3, 5.3.4, 5.3.7, 5.3.8, 5.3.10, 5.3.11 and 5.3.18).	Requirements 22 and 23 of the Draft Development Consent Order [PEPD-009] (provided at Deadline 2 submission) secure a Code of Construction Practice and onshore Construction Method Statement. The Code of Construction Practice covers (at 5j) an emergency response plan and (at 5k) a pollution prevention plan and pollution incident response plan. The onshore Construction Method Statement (at 2b) restricts access within these sensitive sites.

Ref	Local Impact Report Comment			Applicant's Response		
	woodland at Michelgrove Park and Calcot Wood. All to be crossed by trenchless crossing (HDD), thus avoiding terrestrial habitats.					
11g	Impacts on semi-natural broadleaved woodland, including habitat loss, root damage and increased incidence of windthrow	C/O	Negative	<p>Avoid/Reduce: Detailed design must seek to minimise habitat loss. Design Principles to commit to this are required for the cable corridor within the DAS Compensate: Woodland above the cable ducts to be reinstated as scrub. The OLEMP needs to describe how this scrub will be designed and managed, including its long term management.</p> <p>Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.</p>	NPS EN-1 (Paragraphs 5.3.3, 5.3.4, 5.3.7, 5.3.8 and 5.3.18).	<p>See response in reference 11.1.</p> <p>The Outline Landscape and Ecology Management Plan [APP-232] is being updated and will be submitted at Deadline 3. This updated document will provide further details on scrub establishment and management.</p> <p>See response in reference 11B (above).</p>
11h	Impacts on ancient woodlands at Michelgrove Park and Calcot Wood, including pedestrian access to monitor path of HDD drill using hand-held monitoring equipment	C	Neutral	<p>Avoid/Reduce: Detailed design must seek to minimise habitat loss. Design Principles to commit to this are required for the cable corridor within the DAS. Mitigate: Further information is required on pedestrian monitoring of HDD drill head as it passes beneath ancient woodland and how ecological impacts will be avoided. The proposed method should be detailed in the stage specific CoCP. Mitigate: The Construction Method Statement should consider contingency measures in the event of HDD failure or frac out.</p>	NPS EN-1 (Paragraphs 5.3.3 and 5.3.14).	<p>See response in reference 11.1.</p> <p>Pedestrian monitoring of the horizontal directional drilling (HDD) drill head does not require any ground breaking and is achieved through use of hand-held equipment (a hand-held unit measuring the strength of a signal sent from a transmitter at the front of the drill string). Vegetation management is not usually required unless, for example, bramble patches require cutting back to allow progress (no areas that require vegetation management within HDDs have been identified during the baseline surveys). When the Outline Code of Construction Practice [PEPD-033] is updated at Deadline 3, reference will be made to the pedestrian access needs.</p> <p>See response in reference 11F.</p>

Ref	Local Impact Report Comment			Applicant's Response		
11i	Loss of trees	C and O	Negative	<p>Compensate: The OCoCP (PEPD - 034) states that trees removed along the cable corridor will be replaced by new planting elsewhere within the proposed DCO Limits 'as far as possible'. All trees lost must be replaced, either within the DCO Limits or nearby. Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.</p>	NPS EN-1 (Paragraphs 5.3.14 and 5.3.18).	<p>The approach to tree replacement is within Section 8.5 of Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194]. This information will be included within the Outline Landscape and Ecology Management Plan [APP-232] when it is updated for Deadline 3.</p> <p>See response in reference 11B (above).</p>
11j	Large tree species within the cable easement will be cut down or reduced in size to avoid root damage to the transmission cables throughout their operational life	O	Negative		NPS EN-1 (Paragraphs 5.3.4, 5.3.7 and 5.3.18).	<p>Tree loss is being reviewed and an updated version of both Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194] and the Outline Code of Construction Practice [PEPD-033] will be provided at Deadline 3. Trees on existing hedgerow lines will be replaced. A cable restrictive covenant is required to protect the cable infrastructure. This prevents intrusive activities which could damage the underground infrastructure (e.g. building, excavation, intrusive trees), however given that mature trees have been avoided as far as possible in the design and hedgerow trees are being replaced repeated tree loss would not be expected (i.e. reinstatement would be achieved with appropriate species planted).</p>
11k	Loss of approximately 378m of tree line	C and O	Negative	<p>Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.</p>	NPS EN-1 (Paragraphs 5.3.7, 5.3.14 and 5.3.18).	See response in reference 11B (above).
11l	Impacts on veteran trees, including the seven known to be within or close to DCO Limits	C	Neutral		NPS EN-1 (Paragraphs 5.3.7, 5.3.14 and 5.3.18).	Noted, the Applicant has no further comments on this matter at this time.
11m	Impacts on hedgerows, notably the 89 hedgerows which	C and O	Negative	<p>Mitigate: WSCC has concerns over the success of hedgerow 'notching' and thus requests reassurance in the OLEMP that any necessary remedial</p>	NPS EN-1 (Paragraphs 5.3.3, 5.3.7, 5.3.8 and 5.3.18).	As discussed with West Sussex County Council and other stakeholders, further detail will be provided within the Outline Landscape and Ecology Plan [APP-232] to be provided at Deadline 3.

Ref	Local Impact Report Comment			Applicant's Response		
	will suffer loss (1440m temporarily lost including 244m species-rich, and 622m permanently lost)			measures, such as re-planting, will be implemented as soon as possible. Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.		See response in reference 11B (above).
11n	Impacts on scrub	C	Negative	Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans	NPS EN-1 (Paragraphs 5.3.4, 5.3.7 and 5.3.18).	See response in reference 11B (above).
11o	Impacts on calcareous grassland and semi-improved species-rich grassland	C	Negative	Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.	NPS EN-1 (Paragraphs 5.3.3, 5.3.7, 5.3.8 and 5.3.18).	See response in reference 11B (above).
11p	Impacts on coastal and floodplain grazing marsh	C	Negative	Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.	NPS EN-1 (Paragraphs 5.3.3, 5.3.7, 5.3.8 and 5.3.18).	See response in reference 11B (above).
11q	Impacts on rivers, including River Arun and Adur: All main rivers to be crossed by trenchless crossing avoiding likely impacts	C	Neutral	Mitigate: The Construction Method Statements should consider contingency measures in the event of HDD failure or frac out.	NPS EN-1 (Paragraphs 5.3.3, 5.3.7, 5.3.8 and 5.3.18).	See response in reference 11F (above).
11r	Impacts on streams and wet ditches: 39 stream/wet ditches will be crossed by the cable route. Of these, the cable ducts and haul road will cross 22	C	Negative	Avoid/Reduce: Detailed design must seek to minimise habitat loss. Design Principles to commit to this are required for the cable corridor within the DAS. Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage	NPS EN-1 (Paragraphs 5.3.3, 5.3.7, 5.3.8 and 5.3.18).	See response in reference 11.1 . See response in reference 11B (above).

Ref	Local Impact Report Comment		Applicant's Response		
11s	Impacts on ponds: C Although there are 13 ponds within the DCO Limits, none will be lost or directly impacted	Neutral		NPS EN-1 (Paragraphs 5.3.3, 5.3.8 and 5.3.18).	Noted, the Applicant has no further comments on this matter at this time.
11t	Impacts on legally protected species due to habitat loss, habitat severance and disturbance, including bats, hazel dormouse, water vole, badger, great crested newt and reptiles	Negative	<p>Mitigate: An ECoW to implement destructive searches in potential reptile habitat at the site compounds, not just along the cable route. The OCoCP needs to be amended to reflect this change.</p> <p>Compensate/Enhance: WSCC seeks a landscape, ecology and heritage enhancement fund through a S106 Agreement. Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.</p>	NPS EN-1 (Paragraphs 5.3.3, 5.3.8 and 5.3.18).	<p>The Applicant has updated commitment C-208 (see Commitments Register [REP1-015]) to reflect this comment. It now reads 'Pre-construction surveys for reptiles at the location of the substation will be undertaken prior to construction to determine current distribution. Where necessary appropriate mitigation will be implemented to ensure legal compliance. This will include trapping and translocation (within the immediate area). Within the construction area the Ecological Clerk of Works will implement destructive search techniques to avoid the death or injury of individual animals in localised patches of suitable habitat.'</p> <p>See response in reference 11A (above).</p> <p>See response in reference 11A (above).</p>
11u	Impacts on rare or notable species, including nightingale, turtle dove, skylark, common toad and glow-worm.	Negative	<p>Avoid/Reduce: Detailed design must seek to minimise impacts on rare or notable species. Design principles must commit to this.</p> <p>Mitigate/Enhance: OLEMP must ensure that all habitat reinstatement and enhancement in areas known to support notable species, such as breeding nightingale, has particular regard to their specific requirements.</p>	NPS EN-1 (Paragraphs 5.3.3, 5.3.4 and 5.3.18).	<p>The Applicant agrees and notes the approach to legally protected and notable species described within the Outline Code of Construction Practice [PEPD-033].</p> <p>The Applicant agrees and will clarify this point within the Outline Landscape and Ecology Management Plan [APP-232] when it is updated at Deadline 3.</p>
11v	Impacts on breeding birds	Negative	Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively	NPS EN-1 (Paragraphs 5.3.3, 5.3.4 and 5.3.18).	See response in reference 11B (above).

Ref	Local Impact Report Comment			Applicant's Response		
11w	Impacts on wintering birds, including waterfowl which are designated features of nearby SPAs.	C	Negative	sought and included in the stage specific LEMPS and landscape plans. Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.	NPS EN-1 (Paragraphs 5.3.3, 5.3.4 and 5.3.18).	See response in reference 11B (above).
11x	Impacts on fish	C	Negative	Enhance: Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought and included in the stage specific LEMPS and landscape plans.	NPS EN-1 (Paragraphs 5.3.4, 5.3.7 and 5.3.18).	See response in reference 11B (above).
11.10	Policy Context National Policy Statements <i>National Policy Statement for Renewable Energy Infrastructure (NPS EN-1)</i> 11.10. NPS EN-1 paragraph 5.3.3 states that “Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity.”			The Applicant notes this comment and considers this has been delivered within Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063].		
11.11	11.11. Paragraph 5.3.4 states that “The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity.” This policy is also highly relevant as the proposed works extend across ecologically sensitive landscapes, including some 13km of cable route within the South Downs National Park.			The Applicant notes this comment and considers this has been delivered within Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement (ES) [APP-063] and in Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193].		
11.12	11.12. As a general principle, paragraph 5.3.7 states, “development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (...); where significant harm cannot be avoided, then appropriate compensation measures should be sought”.			The Applicant notes this comment. The mitigation hierarchy has been applied throughout the evolution of the design of the Proposed Development.		
11.13	11.13. In decision-making, appropriate weight should be attached to: designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment (para 5.3.8). NPS EN-1 recognises that SSSIs “should be given a high degree of protection” (paragraph 5.3.10) and “where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI development consent should not normally be granted unless benefits of the development outweigh impacts after mitigation” (paragraph 5.3.11).			The Applicant notes this comment and considers this has been addressed within Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063].		
11.14	11.14. NPS EN-1 highlights the importance of ancient woodland and that “once lost it cannot be recreated” (paragraph 5.3.14). Development consent should not be granted for any development that would result in the loss or deterioration of ancient woodland unless the benefits of the development in that location outweigh the loss of the woodland habitat. The biodiversity value of aged or ‘veteran’ trees is also highlighted and that their loss should be avoided.			The Applicant notes this comment and considers this has been addressed within Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063].		

Ref	Local Impact Report Comment	Applicant's Response
11.15	11.15. NPS EN-1 paragraph 5.3.18 is of considerable relevance to the Project in stating that: "The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements; habitats will, where practicable, be restored after construction works have finished; and opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals."	The Applicant notes this comment. The mitigation hierarchy has been applied throughout the evolution of the design of the Proposed Development. A new commitment (C-292) will be published at Deadline 3 to read ' <i>During detailed design the mitigation hierarchy will be applied to avoid losses of key habitats (e.g. woodland, hedgerows, scrub, watercourses and semi-improved grassland) where possible, and where not to minimise losses and mitigate for them. At each crossing of sensitive habitats a suitably qualified and experienced ecologist will provide advice to the design engineers with justification of approach provided. The approach at individual crossings will be detailed in the relevant stage specific Code of Construction Practice.</i> ' This will be secured via Requirement 22 of the Draft Development Consent Order [PEPD-009] .
11.16	WSCC Policy 11.16. There are no WSCC policies that are relevant to the Project.	Noted, the Applicant has no further comments on this matter at this time.
11.17	Construction Phase – Impacts Positive 11.17. It is not considered that there are positive impacts on ecology during the construction phase. Construction works, whilst temporary, are generally disruptive in nature and are not expected to provide any positive impacts on ecology.	Noted, the Applicant has no further comments on this matter at this time.
11.18	Neutral 11.18. The proposal to deliver significant elements of BNG prior to the commencement of construction, plus more during the early stages of construction, are key to alleviating a growing biodiversity deficit as the construction programme progresses. The amount of BNG to be delivered early in the Project, and its predicted success, including speed of establishment, are currently unknown.	Noted, the Applicant has no further comments on this matter at this time.
11.19	11.19. An HDD approach is proposed as the method to cross a number of sensitive sites, including Climping Beach SSSI, Littlehampton Golf Course and Atherington Beach LWS, Sullington Hill LWS, ancient woodland at Michelgrove Park and Calcot Wood, River Arun and River Adur. Assuming the HDD is successful, it will avoid the need for any ground-breaking operations within these sensitive sites, thereby avoiding the likelihood of significant impacts. There are, however, some risks associated with the HDD technique as discussed below under 'Negative' impacts.	Noted, the Applicant has no further comments on this matter at this time.
11.20	11.20. Significant impacts to ancient woodland should be avoided through implementation of the proposed mitigation and avoidance measures, including a 25m buffer zone.	Noted, the Applicant has no further comments on this matter at this time.
11.21	11.21. There are at least seven veteran trees within or close to the DCO Limits. Since all will be retained through design avoidance (Commitment C174, APP-254), no impacts are predicted.	Noted, the Applicant has no further comments on this matter at this time.
11.22	11.22. Although there are thirteen ponds within the DCO Limits, none will be lost or directly impacted.	Noted, the Applicant has no further comments on this matter at this time.
11.23	Negative 11.23. Construction phase impacts include temporary and permanent habitat loss (including broadleaved semi-natural woodland, hedgerow and semi-improved grassland), habitat fragmentation (with consequent reduction in ecological connectivity) and disturbance to species (such as from noise and lighting).	Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
11.24	11.24. Temporary habitat loss during the construction phase will include 2.5ha of coastal and floodplain grazing marsh, 0.96ha of semi-improved grassland, 0.4ha of woodland, 1ha of scrub, 1130m of hedgerow (of which 244m is species-rich) and 378m of tree line. There will be 41 crossings of rivers, streams, and ditches, of which 22 are proposed for crossing using open trenching techniques and 19 through the use of trenchless methods. Each open cut crossing will require the removal of 30m of bankside vegetation.	Noted, the Applicant has no further comments on this matter at this time.
11.25	11.25. Although most of the habitat loss is temporary, there will be some permanent habitat loss, notably along the cable route and at Oakendene substation, including 622m of hedgerow. 0.4ha of woodland along the cable route will be reinstated as mixed scrub.	Noted, the Applicant has no further comments on this matter at this time.
11.26	11.26. The proposed extension to the existing National Grid Bolney substation lies within semi-improved grassland, broadleaved woodland and scattered scrub and would sever habitat connectivity between two areas of broadleaved woodland.	Noted, the Applicant has no further comments on this matter at this time.
11.27	11.27. Construction activities, notably noise, lighting, disturbance and habitat severance, have the potential to impact a range of species. There is potential for impacts on legally protected species, including bats, water vole, badger, great crested newt, and reptiles. Safeguards to ensure legal compliance would be included in a stage specific Biodiversity Management Plan (BMP) within the stage specific Code of Construction Practice prepared by the appointed contractor(s). An ECoW would work in conjunction with the contractors to ensure compliance with relevant wildlife legislation, agreed mitigation and best practice.	Noted, the Applicant has no further comments on this matter at this time.
11.28	11.28. Construction activities may also impact a number of rare or notable species, such as nightingale, turtle dove and skylark, all of which are on the UK Red List. Measures to minimise impacts on these, and other notable species, will be included in the stage specific BMPs.	Noted, the Applicant has no further comments on this matter at this time.
11.29	11.29. WSCC is concerned that successful reinstatement of habitats, such as hedgerows, may take considerably longer than the Applicant anticipates. As a consequence, the impacts of temporary habitat loss and habitat fragmentation may persist for longer. The ES appears to assume that most habitats would be reinstated within two years of loss, other than at temporary construction compounds and Oakendene substation. WSCC's experience from Rampion 1 was that the speed, quality, and ultimate success of habitat reinstatement was extremely variable. Factors associated with failure included drought, poor aftercare maintenance (such as weeding of planted trees and lack of animal protection), inadequate monitoring, and delays in re-planting following failure. Repeated failure was also an issue. WSCC is concerned that similar issues could arise again. To ensure all reinstated habitats are effectively established, they would be subject to appropriate maintenance, management (including adaptive management) and monitoring for a period of 10 years, as stated in Commitment C199. Regular monitoring of all reinstated habitats, combined with rapid remedial measures, will be critical.	<p>The Applicant's assessment in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063] is provided on the basis that the reinstatement begins within two years of the loss occurring in the majority of locations. The Applicant recognises that the time to reach target condition will differ between habitat types (e.g. trees take time to mature).</p> <p>The Applicant has met with West Sussex County Council and has agreed to update the Outline Code of Construction Practice [APP-232] to provide more information on management, monitoring and the process of remedial action. This will be submitted at Deadline 3.</p>
11.30	11.30. Although WSCC has concerns about the success of hedgerow 'notching', it recognises that this technique does offer some advantages and therefore is worth attempting provided any necessary remedial measures, such as re-stocking, are implemented immediately.	Noted, the Applicant has no further comments on this matter at this time.
11.31	11.31. Early delivery of BNG will be important to alleviating a growing biodiversity deficit as the construction programme progresses.	Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the Environmental Statement [APP-193] details the front loading of 70% of biodiversity units for each stage prior to construction commencing.

Ref	Local Impact Report Comment	Applicant's Response
11.32	<p>11.32. As mentioned under 'Neutral' impacts, above, HDD may well avoid significant ecological impacts. However, WSCC expresses concern that there appear to be insufficient feasibility studies for the Applicant to be totally confident in the success of HDD. Indeed, the ES states that 'should HDD fail, additional consent would be required to deliver an alternative solution' (ES Chapter 22: Terrestrial ecology and nature conservation, Table 22-6 APP-062). It is therefore of concern that the Applicant has not considered any contingency measures should HDD fail. Furthermore, there is a risk of accidental loss of drilling fluid (frac out), although it would appear that any resultant ecological impacts are likely to be localised.</p>	<p>Trenchless crossing (such as Horizontal Directional Drilling (HDD) is a mitigation that has been used routinely for linear projects (electrical transmission cables and pipelines (e.g., gas, oil and water) for both large infrastructure and smaller scale projects. Trenchless crossing has been used frequently to cross a range of sensitive ecological features including designated sites, ancient woodland, rivers and other priority habitats and make landfall for both offshore wind farm transmission cables and electrical interconnectors. For example, an HDD crossing of 550m through chalk substrate, with a sizeable change in elevation (80 to 90m difference) was successfully completed at Dunstable Downs on the Kensworth to Rugby Pipeline project for CEMEX in 2008 (including crossing part of Dunstable and Whipsnade Downs Site of Special Scientific Interest (SSSI)). It is also notable that HDD within chalk substrate was carried out successfully on the route of the transmission cable for the Rampion 1 Offshore Wind Farm, as was an HDD to make landfall. The approach to minimising and effectively managing the risks of trenchless crossings is outlined in the Outline construction method statement [APP-255] and the Outline Code of Construction Practice [PEPD-033] secured via Requirement 22 and 23 of the Draft Development Consent Order [PEPD-009] respectively. Further, consideration of the risk is provided in Section 22.9 of Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063].</p> <p>Commitment C-5 (Commitments Register [APP-254]) (provided at Deadline 1 submission) has been updated at the Deadline 1 submission to clarify that Horizontal Directional Drill (HDD) or other trenchless technology will be deployed in accordance with Appendix A: Crossing Schedule of the Outline of Construction Practice [PEPD-033] secured via Required 22 within the Draft Development Consent Order [PEPD-009]. The Applicant will not switch to open-cut trenching at these locations. The appropriate realistic Worst-Case Scenario has been assessed in the ES. Note, that in the unlikely event that another trenchless technology is deployed at a specific crossing, this would require demonstration that there are no materially new or materially different environmental effects. Any change will need to be approved by the relevant planning authority through amendment to the stage specific Code of Construction Practice and Crossing Schedule.</p>
11.33	<p>Operational Phase - Impacts Positive</p> <p>11.33. WSCC welcomes the commitment to deliver a minimum of 10% BNG. This will comprise of both on-site BNG, focused on habitat creation at Oakendene substation, and off-site BNG. It is anticipated that some BNG delivered early in the Project, including prior to the commencement of construction, plus more during the early stages of construction,</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>

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	would be established and making a positive contribution to local biodiversity. During the early years of operation, new habitats will continue to be created and others enhanced through further delivery of off-site BNG.	
11.34	11.34. There is an exciting opportunity for the Project, through BNG, to make an early and significant contribution to the West Sussex Local Nature Recovery Strategy (LNRS), due to be published in draft by March 2025. Further information is available on The Sussex Nature Partnership website: https://sussexlnp.org.uk/local-nature-recovery-strategies-for-sussex/ .	The Applicant notes this comment and is happy to engage with West Sussex County Council on this subject.
11.35	11.35. WSCC understands that the Applicant is in discussion with the Weald to Waves Project (https://www.wealdtowaves.co.uk/) regarding delivery of local, off-site BNG. Importantly, this BNG would be secured and managed for a minimum period of 30 years.	Noted, the Applicant has no further comments on this matter at this time.
11.36	Neutral 11.36. A few habitats, such as coastal and floodplain grazing marsh, may be restored to their original condition within a couple of years.	Noted, the Applicant has no further comments on this matter at this time.
11.37	Negative 11.37. There will be some permanent loss of woodland along the cable route. In accepting that this woodland would be reinstated as mixed scrub, the replacement scrub habitat must be designed and managed to maximise biodiversity, such as providing nesting habitat for nightingales. It would require regular and long-term management, such as coppicing at an appropriate time of year. There appears to be a lack of information and commitment as to how this would be achieved after the 10-year maintenance, management and monitoring period.	Noted, the Applicant has no further comments on this matter at this time.
11.38	11.38. Approximately 622m of species-poor hedgerow with trees will be permanently lost at Oakendene substation. A total of 36 individual trees will be lost, including mature hedgerow trees.	Noted, the Applicant has no further comments on this matter at this time.
11.39	11.39. The Bolney National Grid substation extension will result in the loss of 0.3ha of broadleaved woodland leading to severance of habitat connectivity between two areas of broadleaved woodland.	Noted, the Applicant has no further comments on this matter at this time.
11.40	11.40. The negative impacts of temporary habitat loss may persist longer than hoped due to poor or failed habitat reinstatement. WSCC recalls situations of repeated failure in reinstating hedgerows, species-rich grasslands and field margins along the Rampion 1 onshore cable route. There is particular concern should re-planting be required in say year 9 of a 10-year aftercare plan. Any necessary remedial works, such as re-planting, must be implemented as soon as possible.	The Applicant has met with West Sussex County Council in January and February 2024 and has agreed to update the Outline Code of Construction Practice [APP-232] to provide more information on management, monitoring and the process of remedial action. This will be submitted at Deadline 3.
11.41	11.41. Large tree species within the cable easement would be cut down or reduced in size to avoid root damage to the transmission cables throughout their operational life.	The Applicant is updating tree losses in the Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194] for submission at Deadline 3.
11.42	11.42. The requirement to sell the transmission assets to an Offshore Transmissions Owner (OFTO) part way through the 10-year aftercare period has the potential to disrupt the maintenance and monitoring activities. A poor handover process resulted in such issues with Rampion 1.	As part of the suite of agreements with the Offshore Transmissions Owner (OFTO) for the transfer of the transmission assets, the Applicant will enter into a transfer of benefit agreement regarding the Development Consent Order (DCO) powers and obligations (including the ongoing maintenance and monitoring activities). In addition to transferring the benefit of the DCO as regards the transmission assets, this agreement will transfer responsibility for compliance with the DCO and requirements relating to the OFTO

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		infrastructure (i.e. those secured via the control documents). The Applicant will retain the DCO powers and obligations as regards the array area and offshore wind turbines.
11.43	<p>Required Mitigation Construction Phase <i>Amendments requested to DAS</i></p> <p>11.43. Detailed design must seek to minimise habitat loss, and therefore a set of robust design principles to commit to this are required for the cable corridor, which currently are not included as part of the DAS.</p>	Please see response in reference 11.1 .
11.44	<p>11.44. The detailed design must seek to minimise impacts to rare or notable species, such as nightingale, glow-worm, great crested newt, common toad and grass snake, many of which are found outside designated sites. This is particularly relevant for the works at Oakendene substation, and the cable route from the A281 near Partridge Green to Bolney substation via Oakendene. The design principles in the DAS should commit to minimising impacts to rare or notable species.</p>	Please see response in reference 11.1 .
11.45	<p><i>Amendments requested to OCoCP</i></p> <p>11.45. An ECoW must implement destructive searches in potential reptile habitat at the construction compounds, not just along the cable route. The OCoCP needs to be amended to reflect this change.</p>	Please see response in reference 11T .
11.46	<p>11.46. Further information is required on pedestrian monitoring of the HDD drill head as it passes beneath ancient woodland and how ecological impacts will be avoided. The proposed method should be detailed in the stage specific CoCP.</p>	Please see response in reference 11H .
11.47	<p>11.47. The OCoCP states that trees removed along the cable corridor would be replaced by new planting elsewhere within the proposed DCO Limits 'as far as possible'. All trees lost must be replaced, either within the DCO Limits or nearby. The OCoCP should be amended to reflect this required commitment.</p>	Please see response in reference 11I .
11.48	<p><i>Amendments to Construction Method Statements</i></p> <p>11.48. It is of concern that the Applicant has not considered any contingency measures should HDD technique fail, which must be addressed through the Construction Method Statements.</p>	Please see response in reference 11.32 .
11.49	<p><i>Amendments to the OLEMP</i></p> <p>11.49. Opportunities for habitat enhancement, rather than simply reinstatement, should be actively sought along the onshore cable corridor and at the five temporary construction compounds, and included in the stage specific LEMPS and landscape plans. It might, for example, be possible to create species-rich grassland at the Washington site compound, and further exploration of opportunities across the Project need to be undertaken by the Applicant. This needs to be highlighted in the OLEMP.</p>	Please see response in reference 11B .
11.50	<p>11.50. WSCC is concerned over potential impacts to breeding nightingales along the northern section of the cable route through loss of thick hedgerow and scrub habitat, and disturbance. The OLEMP must ensure that all habitat reinstatement and enhancement in areas known to support breeding nightingale has particular regard to their specific requirements.</p>	Noted, the Applicant has no further comments on this matter at this time.
11.51	<p>11.51. WSCC has concerns about the success of hedgerow 'notching' and thus requests reassurance in the OLEMP that any necessary remedial measures, such as re-planting, would be implemented as soon as possible.</p>	Please see response in reference 11.29 .
11.52	<p>Construction and Operational Phases <i>Amendments to the OLEMP</i></p>	Please see response in reference 11.29 .

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	11.52. The success of habitat reinstatement and creation would be critical to mitigating ecological impacts during both the construction and operational phases. The effectiveness of stage specific LEMPs (DCO Requirements 12 and 13) would be crucial. Thus, WSCC requests further detail in the OLEMP regarding maintenance regimes, season and frequency of monitoring, recording methods, identification and implementation of remedial works, and reporting mechanisms.	
11.53	11.53. Woodland above the cable ducts would be reinstated as mixed scrub. The OLEMP should describe how this scrub habitat would be designed and managed to maximise biodiversity, such as providing nesting habitat for nightingales. It would require regular and long-term management, such as coppicing at an appropriate time of year. Furthermore, there is a lack of information and commitment as to how this scrub would continue to be managed after the 10-year maintenance, management, and monitoring period.	Please see response in reference 11.40 .
11.54	11.54. Since the transmission assets would be sold to an OFTO, details are requested in the OLEMP regarding handover arrangements and measures to ensure that the required provisions of the stage specific LEMPs (DCO Requirements 12 and 13) are adhered to for a minimum of the 10-year aftercare period.	As noted in the Applicant's response in reference 11.42 , the agreements to transfer the transmission assets will be legally binding. The Applicant will review whether this can be noted in the Outline Landscape and Ecology Management Plan [APP-232] .
11.55	11.55. WSCC requests that both retained and newly created habitats at Oakdene and Bolney substations are managed for a minimum of 30 years, not just those which count towards the commitment for BNG, as currently proposed in the OLEMP.	Noted, the Applicant has no further comments on this matter at this time.
11.56	<p>Requirements and Obligations</p> <p>11.56. WSCC requests that a detailed maintenance, management, and monitoring protocol (MMMP) is secured under Requirement 13 (Implementation and maintenance of landscaping).</p>	See response in reference 11B .
11.57	11.57. WSCC assumes that the BNG Strategy associated with DCO Requirement 14 (Biodiversity net gain) will comprise a detailed BNG implementation plan as Requirement 14 (3) of the Draft DCO states: "The biodiversity net gain strategy for each stage must be implemented as approved." However, clarity is requested on the purpose and content of this BNG strategy and whether it will cover both on-site and off-site BNG.	See response in reference 11A .
11.58	11.58. The proposal to deliver significant elements of BNG prior to the commencement of construction, plus more during the early stages of construction, are key to addressing biodiversity impacts during the construction phase. WSCC is concerned that the Applicant may find this timescale difficult to achieve given it would involve the purchase of BNG units from third party providers who would then be responsible for its implementation. Whilst the commitment to BNG is secured through DCO Requirement 14, the mechanism to ensure the delivery of off-site BNG, to an agreed timescale, is unclear. Greater clarity is requested on the BNG sign off process with the relevant planning authority. Furthermore, WSCC requests that this sign off process and proof of purchase of biodiversity units are both specifically referred to in DCO Requirement 14 through which they need to be secured.	See response in reference 11.8 .
11.59	11.59. WSCC seeks the following through S106 Agreement, which is further explained in Appendix F. An environment and heritage Compliance Officer for the duration of the construction and 10-year aftercare periods; and A landscape, ecology, and heritage enhancement fund.	See response in reference 11A .
11.60	11.60. The Environment and heritage Compliance Officer would monitor compliance with the approved documents, including the stage specific CoCPs, stage specific Biodiversity Management Plans, stage specific BNG Strategies and stage specific LEMPs. They would provide a key point of contact for the Applicant and their contractor(s) in relation to addressing unforeseen ecological issues (perhaps in liaison with the ECoW), receipt of monitoring reports, and reaching agreement, where necessary, over remedial works, such as where habitat re-instatement or creation has failed.	See response in reference 11A .

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11.61	11.61. A landscape, ecology and heritage enhancement fund would be used to deliver measures to conserve and enhance cultural landscapes, habitats and heritage features across the diversity of landscapes impacted by the onshore cable route. This fund would be made available to landowners for projects such as hedge planting to improve habitat connectivity, restoration of chalk grassland through scrub control, creation of dewponds and management of veteran trees.	See response in reference 11A .
12. Arboriculture (ES Chapters 18 and 22)		
12.1	<p>Summary</p> <p>12.1. The submitted Arboricultural Impact Assessment (AIA) (APP-194) demonstrates the significant impact of the Project on arboricultural features. This includes the loss of: 1440m of hedgerow; 0.1ha of woodland; 2.05ha of tree groups; and 63 individual trees. Further impact to retained arboricultural features will occur, though mitigation measures are proposed to prevent adverse effects. Whilst the AIA has been submitted in support of the Environmental Statement (ES) and informs on impacts to arboricultural features as material planning considerations, it is recognised that the assessment does not directly correlate to the various assessments of significance made within the ES chapters but rather helps inform the resulting impact leading to the effect.</p>	Noted, the Applicant has no further comments on this matter at this time.
12.2	12.2. As a result of the above stated arboricultural impacts, it has been demonstrated within the ES that the Project would give rise to wide ranging significant effects on landscape and visual receptors, as well as ecological receptors, both during construction and operation. Both of which are considered by WSCC within their topic specific sections of this LIR.	Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063] recognises negative effects associated with tree loss but does not conclude these to be significant in EIA terms.
12.3	12.3. It is accepted that the scale and nature of construction activities and utilitarian built infrastructure involved, is such that avoidance of arboricultural impacts is difficult to achieve. The proposed embedded mitigation measures and control documents are welcomed as they consider most measures to reduce, compensate or mitigate such impacts.	Noted, the Applicant has no further comments on this matter at this time.
12.4	12.4. However, WSCC remains concerned with the removal of highly valued arboricultural features within the footprint of the Oakdene substation are of significant concern. Further evidence is required to understand how the assessment of alternative substation sites considered these receptors in the evaluation process. Despite the limited compensation measures proposed within the DCO Limits, the impacts here are permanent leading to a 'lifetime' effect. WSCC considers that the landscape design principles and outline landscaping proposals require further clarity and expansion to demonstrate the appropriateness and effect of the current proposals for their desired use.	<p>The Applicant has provided further requested evidence has been submitted in Deadline 1 Submission – 8.25.2 Applicant's Post Hearing Submission – Issue Specific Hearing 1 – Appendix 2 – Further information for Action Point 4 – Wineham Lane North [REP1-021].</p> <p>The approach to tree replacement is within Section 8.5 of Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194]. This information will be brought within the Outline Landscape and Ecology Management Plan [APP-232] when it is updated for Deadline 3.</p>
12.5	12.5. WSCC acknowledges the revised documents within the Procedural Deadline submission, which have been considered in this section of the LIR.	Noted, the Applicant has no further comments on this matter at this time.

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Table 12: Summary of Impacts – Arboriculture

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
	Partial loss of tree groups and hedgerows within wood pasture or parkland (HPI).	C	Negative	Avoid: Detailed design should look to further reduce tree loss within tree group G887 wherever possible. Compensation: Provide replacement planting, characteristic of existing species, to provide connectivity of G887, H281 and H282.	NPS EN-1 (Paragraph 5.9.17) NPS EN-3 (Paragraph 2.4.2) NPPF (Paragraphs 136 & 180).	The Applicant notes this comment. Response in reference 11.1 provides information on how the mitigation hierarchy will be applied at the detailed design phase.
	A worst case scenario requiring the removal of: 1440m of hedgerow; 0.1ha of woodland; 2.05ha of tree groups; and 63 individual trees.	C	Negative	Compensation: Within the OLEMP, secure essential compensatory tree planting methodology, as identified within the AIA. Proposed essential compensation should be distinguishable from that being proposed as biodiversity net gain. Change: The OLEMP must secure the delivery of stage specific LEMPs in accordance with the arboricultural impact assessment. This includes methodology for the adequate provision of replacement tree planting.	NPS EN-1 (Paragraph 5.9.17) NPS EN-3 (Paragraph 2.4.2) NPPF (Paragraphs 136 and 180).	See response in reference 12.4 .
	Retention of trees, woodland, hedgerow and tree lines through trenchless crossings (HDD) – subject to mitigating working practices.	C	Neutral		NPS EN-1 (Paragraph 5.9.17) NPS EN-3 (Paragraph 2.4.2) NPPF (Paragraphs 136 and 180)	Noted, the Applicant has no further comments on this matter at this time.
	Reduced impacts to trees, woodland, hedgerow and tree lines through reduced open trench widths and notching practices for cable installation– subject	C	Negative	Change: The OCoCP should secure detailed working methodology for notching techniques with the stage specific LEMPs. In addition, a tabular schedule of the vegetation removal plans should also be required.	NPS EN-1 (Paragraph 5.9.17) NPS EN-3 (Paragraph 2.4.2) NPPF (Paragraphs 136 and 180)	An update to the Outline Code of Construction Practice [PEPD-033] and the Outline Landscape and Ecology Management Plan [APP-232] will be provided at Deadline 3.

Ref	Local Impact Report Comment	Applicant's Response
	<p><i>Overarching National Policy Statement for Energy (EN-1) (July 2011)</i> 12.6. Of key relevance to the proposals in arboricultural impact consideration are the following paragraphs.</p>	
12.7	<p>12.7. Paragraph 5.3.14: "Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why."</p>	Noted, the Applicant has no further comments on this matter at this time.
12.8	<p>12.8. Paragraph 5.8.5: "The absence of designation for such heritage assets does not indicate lower significance. If the evidence before the IPC indicates to it that a non-designated heritage asset of the type described in 5.8.4 may be affected by the proposed development then the heritage asset should be considered subject to the same policy considerations as those that apply to designated heritage assets."</p>	Noted, the Applicant has no further comments on this matter at this time.
12.9	<p>12.9. Paragraph 5.9.8: "Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate."</p>	Noted, the Applicant has no further comments on this matter at this time.
12.10	<p>12.10. Paragraph 5.9.17: "The IPC should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation."</p>	Noted, the Applicant has no further comments on this matter at this time.
12.11	<p>12.11. Paragraph 5.9.22: "Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration."</p>	Noted, the Applicant has no further comments on this matter at this time.
12.12	<p>12.12. Paragraph 5.9.23: "Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista."</p>	Noted, the Applicant has no further comments on this matter at this time.
12.13	<p><i>National Policy Statement for Renewable Energy Infrastructure (EN-3) (July 2011)</i> 12.13. Of key relevance to the proposals in arboricultural impact consideration is Paragraph 2.4.2: "Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology."</p>	Noted, the Applicant has no further comments on this matter at this time.
12.14	<p><i>National Planning Policy Framework (NPPF), (December 2023)</i> 12.14. The National Planning Policy Framework (NPPF) is an important and relevant consideration of for National Significant Infrastructure Projects (NSIPs). The NPPF does not contain specific policies for NSIPs.</p>	Noted, the Applicant has no further comments on this matter at this time.
12.15	<p>12.15. Of key relevance to the proposals in arboricultural impact consideration are the following paragraphs.</p>	Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
12.16	12.16. Paragraph 136 which recognises the important contribution of trees to the character and quality of urban environments, as well as their help to mitigate and adapt to climate change. It also states that planning policies and decisions should ensure that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.	Noted, the Applicant has no further comments on this matter at this time.
12.17	12.17. Paragraph 180 states that “planning policies and decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”.	Noted, the Applicant has no further comments on this matter at this time.
12.18	12.18. Paragraph 186 states that “planning applications should be refused where development results in the loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists”.	Noted, the Applicant has no further comments on this matter at this time.
12.19	12.19. Annex 2: The glossary defines ancient woodland, as well as ancient or veteran trees. The latter is defined as “A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.”	Noted, the Applicant has no further comments on this matter at this time.
12.20	12.20. These definitions have been applied to irreplaceable habitat recognised within National Planning Statements mentioned above.	Noted, the Applicant has no further comments on this matter at this time.
12.21	WSCC Policy 12.21. There are no WSCC policies relevant to the Project.	Noted, the Applicant has no further comments on this matter at this time.
12.22	Cable Corridor, Oakendene Substation and compounds Construction Phase – Impacts Positive 12.22. It is not considered that there are positive impacts on trees, woodlands or hedgerows (hereby referred collectively as arboricultural features) during the construction phase. Construction works require the removal of many arboricultural features to accommodate the Project as stated below.	Noted, the Applicant has no further comments on this matter at this time.
12.23	Neutral 12.23. Providing detailed design seeks to reduce the number of trees removed through micro-siting the cable route, as well as implementing environmental mitigation measures stated within the AIA, no unnecessary loss or adverse impacts are expected to facilitate the final design. This relies on the amendment of the Outline Landscape and Ecological Management Plan (OLEMP) and Outline Code of Construction Plan (OCoCP) to ensure arboricultural method statements and tree protection plans to be produced within the Landscape and Ecological Management Plans (LEMPs) in accordance with the AIA. Further, the close monitoring of construction activity will be required to ensure that such mitigating measures are adequately complied with; Commitment C-207 states an Ecological Clerk of Works (ECoW) will be employed with relating arboricultural methodology identified within the AIA.	Noted, the Applicant has no further comments on this matter at this time.
12.24	12.24. In correlation with the above statement, no adverse impacts leading to the loss of veteran trees nor ancient woodland have been identified. Buffer zones with appropriate temporary protection measures are to be employed in accordance with statutory guidance to prevent adverse impacts; ancient woodland will be provided a buffer zone of 25m, 10m greater than the minimum recommended within statutory guidance.	Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
12.25	12.25. No loss of Habitats of Principle Importance (HPI), including deciduous woodland and traditional orchards, has currently been identified to facilitate construction (note potential loss of a small area of deciduous woodland is possible due to incomplete surveys results).	Noted, the Applicant has no further comments on this matter at this time.
12.26	12.26. Multiple Horizontal Directional Drilling (HDD) trenchless crossings have been proposed, which reduces the impact and loss of numerous arboricultural features, including veteran trees and ancient woodland. Where HDD crossings pass under the buffer zones of ancient woodland or veteran trees, the depth of transmission cables are committed to be maintained at a minimum depth of 6m to avoid adverse damage to their root systems.	Noted, the Applicant has no further comments on this matter at this time.
12.27	12.27. The methodology applied within the AIA to identify a tree's 'veteran status' aims to reflect the definition of a veteran tree within the NPPF. Seven trees within the survey area have been identified as veteran and are to be retained and provided temporary protection from construction activity.	Noted, the Applicant has no further comments on this matter at this time.
12.28	Negative 12.28. Construction activities are stated to require the removal of 1,440m of hedgerow, 0.1ha of woodland, 2.05ha of tree groups, and 63 individual trees at a worst case scenario. Despite a majority being recognised as a long-term but temporary loss due to the replacement planting strategies, the severity of the interim loss should not be downplayed with regard to the benefits these receptors provide that are not required to be assessed within the application (such as: natural capital, storm water alleviation, improved air quality, social connections, health and wellbeing (physical and neurological), carbon sequestration, and general provision of biodiversity). Following completion of construction, the loss of these benefits resulting from tree, hedge, and vegetation removal are likely to continue for decades (in some cases centuries) whilst new planting/seeding is established or any coppiced/lopped or notched trees/hedgerows recover.	Noted, the Applicant has no further comments on this matter at this time.
12.29	12.29. The AIA categorises trees in line with BS5837: 2012, which is a policy requirement of most local plans and recognised within the industry nationwide.	Noted, the Applicant has no further comments on this matter at this time.
12.30	12.30. Tree loss required within the Oakendene substation footprint includes 11 high value category A trees (73% of the total individual trees removed within this category, totalled at 15 within the entire Project). In addition, 11 moderate value category B trees also require removal (31% of the total individual trees removed within this category, totalled at 36 within the entire Project). These trees are important natural landscape features, both as hedgerow trees and as individual trees, with local plan policies supporting their retention. Some are recognised as historical features within the site due to their size and condition. Whilst not recognised as veteran trees within the ES, some are locally notable and have the potential to be of near veteran status, which would take centuries to replace. Further, it is not clear how the assessment of alternative sites considered tree values at a site level, to inform design layout and therefore site selection as recommended within BS5837:2012. Therefore, it is not apparent that trees have been considered appropriately when selecting the substation site.	See response in reference 12.4 .
12.31	12.31. Compensation for arboricultural loss is not possible within the Oakendene substation footprint, with the proposed landscape design principles being relatively limiting and predominantly focusing on replacing habitat and screening only. The proposed planting immediately surrounding the substation is of such close proximity to infrastructure that routine maintenance will likely be required. This potentially limits the ultimate size of the tree planting and therefore purpose of the planting where screening and habitat creation is required.	Noted, the Applicant has no further comments on this matter at this time.
12.32	12.32. Oakendene substation requires the removal of trees ref. T280, T324, T325, T326, T327 & T328, which are shown for removal, though the reasoning is not apparent and has not been justified. Existing trees should be retained, wherever possible, in line with NPPF paragraph 136.	The Applicant notes that removal is shown based on the realistic worst-case scenario for the delivery and operation of the onshore substation. This is based on the indicative substation layout described in Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement [APP-045] . Detailed design will seek to minimise losses (see response in reference 11.1).

Ref	Local Impact Report Comment	Applicant's Response
12.33	12.33. The Bolney National Grid substation extension requires the partial removal of trees within a woodland and tree group totalling 0.3ha. These features have not been surveyed in detail and have a high possibility of being deciduous woodland, a HPI as recognised within the Natural Environment and Rural Communities Act, 2006. The general area of W67 is recognised as deciduous woodland within Natural England's priority habitats inventory.	Noted, the Applicant has no further comments on this matter at this time.
12.34	12.34. The above stated tree removal will sever the remaining vegetative connectivity between W67 and nearby deciduous woodland south of Bob Lane (immediately south of the substation), some of which is also recognised as ancient woodland. This will lead to further fragmentation of W67 beyond what has already occurred to facilitate existing infrastructure within the substation.	Noted, the Applicant has no further comments on this matter at this time.
12.35	12.35. Land designated as wood pasture and parkland (HPI) will be impacted through the partial removal of tree group G887 and hedgerows H281 and H282. A 30m open-cut corridor is required through G887 and will temporarily sever connections from the adjacent ancient woodland site, Olivers Copse, from the nearby woodland, Kitpease Copse. The justification for open cut trenching opposed to a trenchless crossing methodology has not been identified; trenchless crossing would significantly reduce impacts on the tree group, and consequently reducing negative impacts on landscape character and the visual amenity of users of the Public Right of Way (PRoW).	An open cut trenching method in this location has been specified as it lies within a Source Protection Zone for potable groundwater (see Chapter 26: Water environment, Volume 2 of the Environmental Statement [APP-067]).
12.36	12.36. A number of embedded mitigation measures have been adopted to reduce impacts to receptors including arboricultural features. This includes reduced open cut corridor widths and various 'notching' techniques to facilitate the cable installation. Whilst this demonstrates good design principles by seeking to reduce or avoid maximum impacts notably at a local level, which is welcomed, these practices will not significantly reduce the overall impact to the various arboricultural features and remains a negative impact for this reasoning.	Noted, the Applicant has no further comments on this matter at this time.
12.37	12.37. Trees T609, T611, T613 & T617 (including high and moderate quality trees) are identified for removal despite being within an area of trenchless crossing through HDD. As no justification for their loss has been identified, this tree loss is considered to be unnecessary and does not demonstrate that existing trees are retained wherever possible in line with NPPF paragraph 136. However, it is acknowledged that the errata proposed for amendment, within Appendix 3 of the Covering Letter (PEPD-001), states that these trees would be retained in all situations (subject to submission of amended documents through the examination process).	An update to Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194] will be made in line with updates to the vegetation retention plans in the Outline Code of Construction Practice [PEPD-033] for submission at Deadline 3.
12.38	12.38. Thirty of the trees surveyed have been identified to be approaching 'veteran status' due to either their condition or size, which shows key characteristics of veteran trees. Many of them could be impacted by construction activity and therefore tree protection is proposed as mitigation; however, tree protection has been provided for the minimum root protection area (as recommended by BS5837:2012). A larger buffer zone similar to that of veteran trees has not been considered. Many of these trees' root systems are likely to be far larger and more sensitive to construction activities, such as excavation and soil compaction, than younger or smaller trees typically found in abundance. Therefore, the impact is likely to be greater to these trees than trees not displaying veteran characteristics and a larger area of protection would be of greater benefit.	The Applicant will consider this request further during the update to the Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194] for submission at Deadline 3.
12.39	12.39. Two trees, T1236 & T1273, are approaching 'veteran status' in the near future and are within the DCO Limits for certain aspects of the construction activities, which could require their removal. Whilst not considered irreplaceable habitat by definition of the AIA, replacement tree planting cannot re-create the centuries of natural processes required to develop such characteristic features (and notably not within the short 30 year project life-span). For this reasoning, their loss is considered an operation phase impact. This is also considered an operational phase impact due to the lifetime loss within the realm of the Project lifespan in comparison to the identified trees' lifespan.	An update to Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194] will be made in line with updates to the vegetation retention plans in the Outline Code of Construction Practice [PEPD-033] for submission at Deadline 3. T1236 and T1237 will be shown as retained.
12.40	12.40. Hedgerows and treelines have been identified within the order limits that have missed and not identified on vegetation retention plans presented within the OcoCP. For example, a hedgerow aligning the A272 north of the site	See response in reference 12.37 .

Ref	Local Impact Report Comment	Applicant's Response
	compound west of Oakendene Manor, ref. H60 within the Arboricultural Constraints Plan, and treelines that align the north-east side of Kent Street. Further examples are presented in Appendix G.	
12.41	12.41. The woodland retention plan (Figure 7.2.2h, OcoCP) shows a gap between W385 and W865, which is proposed to be used as a construction and operational access from Wineham Lane, Oakendene. This gap contains newly-planted trees planted in mitigation of effects from the original Rampion project; the cumulative effects of such changes has not been presented.	See response in reference 12.37 .
12.42	12.42. Construction access points identified within the CTMP are not considered to have been adequately assessed in consideration of existing trees and hedgerows. For example, access point A-33 is summarised within the CTMP to utilise an existing gated access which is outside of the order limit; however, relevant plans show this access to be crossing a prominent hedgerow that is not identified within hedgerow retention plans (within the OcoCP) nor other application documents. Further examples are presented in Appendix G.	See response in reference 12.37 .
12.43	12.43. Requirements 15 and 16 of the draft DCO regards highway accesses and requires them to meet design standards in accordance with the Department for Transport Design Manual for Roads and Bridges. As the CTMP, AIA and OcoCP has not taken full account of the impacts to arboricultural features as a result of required accesses, such as the example above, WSCC is concerned about the potential for further requests for hedgerow or tree removal, which should have been considered in the application. Further examples are presented in Appendix G.	See response in reference 12.37 .
12.44	Operational Phase – Impacts Positive 12.44. It is not considered that there are positive impacts to arboricultural features during operational phase of the Project.	Noted, the Applicant has no further comments on this matter at this time.
12.45	Neutral 12.45. Potential enhancements and increased canopy cover/area of arboricultural features may arise through the delivery of BNG. However, as this strategy cannot be committed to in full at this stage, it is not yet clear how this will be delivered and is unlikely to be of positive impact within the DCO Limits. Further, the benefits of the arboricultural features delivered might not be provided within the lifespan of the Project and may not outweigh the current benefits of the current tree population as this differs entirely from biodiversity gain.	The delivery of BNG is committed to fully and secured within the Draft Development Consent Order [PEPD-009] via Requirement 14. Therefore, it is reasonable to conclude that there will be a positive overall outcome to biodiversity.
12.46	Negative 12.46. Important hedgerows have been surveyed for meeting the definition of the Hedgerow Regulations 1997. Fourteen hedgerows were identified within the survey area, none of which would be lost permanently. Those requiring temporary partial loss have reduced working corridor widths to minimise impacts as best possible with consideration of the construction activity required.	Noted, the Applicant has no further comments on this matter at this time.
12.47	12.47. The permanent removal of 646m of hedgerow is required to facilitate the Oakendene substation. Not only will this be of local habitat and visual loss (due to the existing PRoW), some of the features proposed for removal are elements of the Oakendene Manor historic parkland, with historic mapping evidence indicating that they are of considerable age and likely to have been purposefully planted as part of successive parkland planting schemes during the 19 th century. This includes trees ref. T247, T250, T253, T255, T262 & T265, which are clearly individually depicted on the 1875 Ordnance Survey (OS) presented within the Oakendene parkland: historic landscape assessment (APP-211). The tree data as stated within the Arboricultural Impact Assessment (APP-194), generally correlates their age/presence to the trees shown on the 1875 OS mapping due to their larger stem sizes.	Noted, the Applicant has no further comments on this matter at this time.
12.48	12.48. T247 and T250 are likely to have been deliberately planted, potentially as feature trees within the informal or naturalistic style designed parkland landscape. With regard to trees T253, T255, T262 and T265, their general presence has been referred to within the historic landscape assessment as a hedgerow field boundary feature, which is their more	The tree data from the Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement (ES) [APP-194] was reviewed and informed the baseline and

Ref	Local Impact Report Comment	Applicant's Response
	<p>recent use. No consideration has been given towards their original use as individual trees within the historic parkland; the consistency of species and spacing is indicative of deliberate planting along the existing boundary for aesthetic purposes, likely intended to be viewed within the parkland and from the manor. Their identifiable presence as mature trees on the 1875 OS mapping supports this. This potentially also includes trees ref. T258, T259, T261, though their stem size suggests they are of a younger age and are more likely to have been planted to as replacements or enhancements.</p>	<p>assessment within Appendix 25.5: Oakendene parkland historic landscape assessment, Volume 4 of the ES [APP-211]. Some trees have the potential to be surviving specimens of historic planting schemes from former parkland use. Where trees collectively form part of the historic interest of the former parkland or the setting of Oakendene Manor, this has been adequately addressed in the assessment in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p> <p>The Applicant notes Horsham District Council's comment in their Local Impact Report "13.10 The substation would involve removal of field trees. These trees may have been part of the managed estate in the nineteenth century but this does not mean they contribute to the special interest of the listed building through its managed landscape (parkland) setting. This is the case here. The trees as a group and individually do not contribute to the special interest of the Listed Building through its setting."</p>
12.49	<p>12.49. These trees are therefore part of the historic parkland setting of Grade II listed Oakendene Manor and can be considered to contribute to the heritage significance (and the ability to appreciate that significance) of this designated heritage asset.</p>	<p>See response in reference 12.48.</p>
12.50	<p>Required Mitigation 12.50. Given the scale and nature of construction activities involved, avoidance of arboricultural loss or impacts is not entirely possible to achieve.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
12.51	<p>12.51. The embedded environmental measures set out in Table 1-1 of the commitments register are reflected within the AIA and OCoCP. These are supported, in principle, as methods to reduce and mitigate arboricultural impacts. However, these need to be secured by the relevant control documents and requirements as identified in the paragraphs below.</p>	<p>See response in reference 12.37.</p>
12.52	<p>Construction Phase 12.52. The OLEMP must state the requirement to submission of stage-specific LEMPs, which will adhere to the AIA submitted. This must include direct references to the provision of arboricultural methods statements, tree protection plans and landscaping plans. This is to ensure tree protection and essential tree replacement planting is as expected, adequate and enforceable. Landscape proposals for essential replacement tree, hedgerow or woodland compensation must be distinguishable from that required for biodiversity net gain (such as quantities or area of planting required for each).</p>	<p>See response in reference 12.37.</p>
12.53	<p>12.53. In addition to the embedded environmental measures mentioned, WSCC recommends the following should also be considered.</p>	<p>See response in reference 12.37.</p>
12.54	<p>12.54. The OLEMP should provide detailed landscape design principles providing replacement planting characteristic of existing species, which enhances connectivity to woodland ref W67 from G1075</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
12.55	<p>12.55. Detailed design for the cable corridor should look to reduce tree loss or impacts currently identified as a worst-case scenario wherever design or construction change allows. This is to ensure no unnecessary tree removal or impact occurs, which must be reflected within the stage-specific LEMPs. In particular, there is a need to reduce tree loss within tree group G887 and to provide essential replacement planting characteristic of existing species, to provide connectivity of G887, H281 and H282.</p>	<p>See response in reference 11.1.</p>

Ref	Local Impact Report Comment	Applicant's Response
12.56	12.56. The OCoCP needs to secure the production of method statements with working methodology and aftercare practices for 'notched' crossings, as well as a tabular schedule of the vegetation removal plans within the stage-specific LEMPs. Where trenchless crossings are proposed, detailed design must avoid or reduce the loss of arboricultural features, including trees T609, T611, T613 & T617.	See response in reference 12.37 .
12.57	12.57. With reference to changes to commitment C-115 within the OCoCP (PEPD-033), further clarification is needed to define what may be deemed 'appropriate' for the proposed temporary translocation of hedgerows.	See response in reference 11.2 .
12.58	12.58. The recently planted gap between W385 and W865, proposed to be used as a construction and operational access from Wineham Lane, Oakendene, must be adequately reinstated and should therefore not be used operationally. The temporary translocation of existing tree stock and its replacement following cease of temporary construction access should be considered.	See response in reference 12.37 .
12.59	12.59. Trees approaching near 'veteran status' are recommended to be provided greater root protection areas than the minimum recommended by BS5837:2012. Ideally, a 15m buffer would be provided similar to that recommended for Veteran Trees. This would help to ensure continuity of future veteran trees within the local landscape by reducing impacts to these trees as far as practically possible, rather than the minimum.	The Applicant will consider this request further during the update to the Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194] for submission at Deadline 3.
12.60	12.60. Paragraph 5.6.27 of the OCoCP (PEPD-033) identifies how additional loss of habitats will be addressed following detailed design. WSCC request this is amended to ensure that where the construction approach would result in additional losses over those stated in the VRP, such changes are clearly identified in a tabular format and shown on a revised VRP within the stage specific CoCP, which shall be submitted for approval by the relevant authorities prior to that stage of the works. Where appropriate, such changes are to be reflected within the Arboricultural Method Statement and Tree Protection Plan within the stage specific CoCP for that stage of works, and reinstatement requirements are reflected within the relevant stage specific LEMP.	See response in reference 12.37 .
12.61	12.61. Proposed Requirements and Outline Control documents need to provide greater certainty about the information that will be provided on the detailed duration, phasing, and sequencing of construction activities, and how this will be programmed to ensure reinstatement can be maximised as quickly as possible following each stage of the construction works. This is a considerable area of uncertainty.	See response in reference 12.37 .
12.62	12.62. Of key importance to compensating the arboricultural impacts of the cable corridor during the operational phase will be the success of reinstatement and replacement planting. As a result, the effectiveness of stage specific LEMPs (Draft DCO Requirements 12 and 13) is crucial. At present, it is considered that the outline LEMP provides very limited detail around the timing and specification of planting, or maintenance and monitoring provisions, which requires greater clarification and certainty.	See response in reference 12.37 .
12.63	12.63. It is imperative that the lessons learnt from Rampion 1 are considered with regard to delayed reinstatement and monitoring, which will need to be adequately addressed and secured. It is imperative that any proposed contractual arrangements for reinstatement planting ensure consistency of approach, regular monitoring, and adherence to maintenance requirements. Similarly, it is crucial that any LEMP secures monitoring and maintenance requirements, and an effective recording and handover mechanism, to ensure that once the cable asset is taken on by the OTFO that all required provisions of the LEMP are adhered to for a minimum of the 10-year reinstatement period.	See response in reference 12.37 .
12.64	Operational Phase 12.64. In liaison with stakeholders, detailed design of the Oakendene substation should, wherever possible, look to further reduce tree loss, notably those of higher quality (A and B category) and of historic interest. The design principles for the substation must consider the enhancement of retained trees or hedgerows early within the project timeline, as well as the	See response in reference 11.1 .

Ref	Local Impact Report Comment	Applicant's Response
	creation of new ones (including outside of the current order limits if needed to accommodate this). In order to enhance the landscape surrounding Oakendene Manor, individual planting within the historic parkland should include specimen trees from 'specie mix c' as presented within the AIA.	
12.65	12.65. Detailed design should look to avoid the loss of trees approaching 'veteran status' by micro-siting construction activity within areas designated as limits of deviation; in particular, this applied to trees T1236 & T1273. In addition, trees approaching 'veteran status' should be provided a greater minimum area of tree root protection (barriers or ground protection), matching buffer zones of veteran trees where possible.	See response in reference 11.1 .
12.66	12.66. Replacement tree planting strategies are conflicting, with only native tree species planting stated within the OLEMP as opposed to a small selection of non-native trees specified within the more welcomed replacement planting strategy within the AIA (subject to the removal of the following from mix C due to their locally invasive naturalisation potentially negatively impacting open countryside: Quercus cerris – Turkey Oak, Quercus ilex – Holm Oak and Quercus x turneri 'Pseudoturneri' – Turners Oak). However, it is acknowledged that the errata proposed for amendment, within Appendix 3 of the Covering Letter (PEPD-001), states that the planting strategy of the AIA will be updated to remove the unwanted species (subject to submission of amended documents through the examination process).	See response in reference 12.37 .
12.67	12.67. Non-native specimen tree planting should be used sparingly and strategically, incorporating them only for ornate purposes to replace the character of tree loss with the context of the landscape.	See response in reference 12.37 .
12.68	<p>Requirements and Obligations</p> <p>12.68. During engagement with the Applicant, a request was made to submit all recorded veteran and notable trees on the Woodland Trusts, Ancient Tree Inventory to provide a record in time of their presence. This would be welcomed as a commitment, or alternatively secured and confirmed by other means.</p>	The Applicant notes this comment and will consider this and provide a response at Deadline 3.
12.69	12.69. Due to the varied mitigation requirements needed to ensure the preservation of such a high volume of retained trees, woodlands and hedgerows, alongside other landscaping elements including hedgerow transplantation and reinstatement, a Section 106 obligation should be provided to fund a Compliance and Monitoring Officer for the relevant planning authority/authorities. This will enable an efficient approach to the oversight and discharge of requirements relating to construction and landscaping activities. Further information of this request is detailed within Appendix B of this Local Impact Report.	The Applicant notes this comment and will consider this and provide a response at Deadline 3.
12.70	12.70. Despite mitigation measures presented, residual impacts are expected on a wide range of arboricultural features (and the habitats that they provide), including hedgerows, trees of veteran and near veteran status, locally notable trees. A Section 106 obligation should provide a Landscape Enhancement fund for the surveying, identification and enhancement of hedgerows as well as ancient, veteran or notable trees within a set proximity to the Project. Further information of this request is detailed within Appendix B of this Local Impact Report.	The Applicant notes this comment and will consider this and provide a response at Deadline 3.
13. Traffic and Transport (ES Chapter 23)		
13.1	<p>Summary</p> <p>13.1. The construction works associated with the installation of the onshore cable route, substation, and other ancillary infrastructure are expected to have a negative impact on the local road network and the local communities the roads pass through. These negative impacts are a consequence of the anticipated increase in vehicular traffic arising from the workforce and material deliveries during the construction phase, and the resultant potential safety and amenity issues that may occur. Once the construction phase is complete, traffic generation would be limited to that required for inspection and maintenance purposes. The resultant movements during the operational phase are unlikely to be discernible from other traffic using the network. Once operational, the development would have neutral impact on the local highway network.</p>	The likely significant transport effects associated with the construction phase and operation and maintenance phase of the Proposed Development have been assessed in Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064], Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] and Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES [REP1-008]. The ES has concluded that the Proposed Development will generate only limited significant effects

Ref	Local Impact Report Comment	Applicant's Response
13.2	13.2. It is acknowledged that impacts during the construction phase will be temporary from a highway's perspective. The Applicant has proposed a number of mitigation measures during construction. These include an Outline Construction Workforce Travel Plan to encourage the use of sustainable transport options for construction workers. The benefits of this may be limited due to the unknown origins of individual workers and the potential lack of suitable alternative modes of transport to the site. Also, traffic management measures are proposed as part of Outline Construction Traffic Management Plan (OCTMP), with further stage specific management plans to be prepared as the Project is implemented.	during the construction phase, related to peak construction activity at two locations (Michelgrove Lane and Kent Street). The Outline Construction Workforce Travel Plan [APP-229] and Outline Construction Traffic Management Plan [REP1-010] form part of the suite of embedded environmental measures that ensure that the negative effects of the Proposed Development are mitigated where possible.
13.3	13.3. Due to the length of the onshore cable route and the requirement to gain access to it, a significant number of construction access points have been proposed by the Applicant. Existing and proposed vehicular accesses are intended to provide construction and operational access. The final details of the accesses will need to be submitted and agreed with WSCC prior to use. WSCC has reviewed the presented access options – see Appendix C, Table 1a.	The Applicant thanks West Sussex County Council for comments provided in Appendix C, Table 1a. These have been reviewed and responses provided to each comment in Appendix C of this document.
13.4	13.4. It is also expected that additional mitigation would be required to manage traffic movements at some of the proposed accesses, particularly those onto high speed and high trafficked roads. These additional measures would be required both for safety and traffic management purposes. These measures may in turn result in delays to non-development traffic.	
13.5	13.5. There are locations where several accesses are shown in close proximity to another. Whilst WSCC accept a need for optionality within the proposals, the Applicant should seek to reduce the total number.	The Applicant seeks rights for access necessary to construct and maintain the Proposed Development. As can be inferred from the non-consecutive numbering of the accesses, several accesses consulted upon have subsequently be removed during the course of design refinement (such as those at the Vinery) or retained only for operational use (such as Long Furlong Lane). The Applicant does not consider that any further refinement is possible at this stage.
13.6	13.6. Once constructed and operational, permanent accesses will still be required onto the highway network. Again, in light of the length of the cable route, a large number of operational accesses are indicated. Vehicle movements associated with the cable route and substation during the operational phase are anticipated to be minimal although the submitted statements do not quote any actual figures.	The Applicant agrees that traffic generated by the Proposed Development will be minimal during the operation and maintenance phase.
13.7	13.7. A substantial new permanent access is also intended onto the A272 to serve the proposed substation at Oakendene. Given the importance of this permanent, new access to serve the substation, the access design should be agreed at this stage with WSCC (i.e. prior to the DCO being approved) rather than being left as an agreement during the Discharge of Requirement stage. Any submissions for the access design should include a Stage One Road Safety Audit in accordance with current WSCC Policy.	The Applicant is currently preparing preliminary designs for each of the proposed compound locations (A-05, A-39 and A-63) and Oakendene substation (A-62), which will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination.
13.8	13.8. WSCC acknowledges the revised documents submitted by the Applicant at the Procedural Deadline. It is noted that the OCTMP has been updated; this is now revision B (PEPD – 035a). The updated document addresses errors to speed limits on roads referenced as well as addressing cropping issues that resulted in incomplete plans within the original OCTMP (APP -228). These updates do not influence or alter the comments raised in this section of the LIR.	Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
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Table 13: Summary of Impacts – Traffic and Transport

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
13a	A significant number of existing and new vehicular accesses are to be used to enable the construction of the cable route and substation.	C	Negative	<p>Reduce: The Applicant should seek to reduce the number of construction accesses</p> <p>Mitigate:</p> <ul style="list-style-type: none"> All accesses will need to be demonstrated as adequate taking account of current design standards and the anticipated traffic to ensure the proposals do not adversely impact on road safety; Road Safety Audits (RSAs) will be required for some accesses. It is recommended that RSAs are provided for the more heavily trafficked accesses to compounds on Church Lane, A283 Washington, and for the substation access onto the A272 prior to approval of the DCO. Further RSAs will be required for accesses onto high speed classified rural roads as the detailed design for these progresses. The suggested accesses to be audited are indicated Appendix C, Table 1b; and Additional 	NPPF, (Paragraph 114b) NPS EN-1 (Paragraph 5.13.6).	The Applicant thanks West Sussex County Council for comments. These have been reviewed and responses provided to each point in Appendix C this document. As stated in reference 13.5 , it is not possible to reduce the number of construction accesses further.

Ref	Local Impact Report Comment			Applicant's Response		
13b	New and existing accesses are indicated as being required for the operational phase.	O	Neutral	<p>temporary traffic management measures (e.g. traffic signals or 'Stop Go' boards) may be required for certain accesses to allow vehicles to safely egress the site onto the highway. This should be progressed through the stage specific construction management plans.</p> <p>Mitigate: • All accesses will need to be demonstrated as complying with current design standards; and • A RSA will be required for the permanent access serving the proposed Oakendene substation, a design for which should be agreed with WSCC during the Examination stage.</p>	NPPF (Paragraph 114b).	<p>The Applicant is currently preparing preliminary designs for each of the proposed compound locations (A-05, A-39 and A-63) and Oakendene substation (A-62), which will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination.</p> <p>Noting West Sussex County Council's comment 4.4.1 and 4.8.3 of Appendix C, the Applicant will review all proposed access junctions to confirm the appropriate visibility splay standard for each location (DMRB or Manual for Streets) through an update to the Outline Construction Traffic Management Plan [REP1-010].</p> <p>The requirement for the implementation of traffic management measures will be confirmed as part of stage specific Construction Traffic Management Plans secured through Requirement 24 of the Draft Development Consent Order [PEPD-009].</p>
13c	The Project has the potential to result in significant increases in HGVs on the WSCC maintained highway network through local communities as well as past sensitive local receptors (primarily schools). Roads will be used that are not	C	Negative	<p>Mitigate: As part of the OTCMP the following measures should be included, • The routing for HGVs as shown in the OTCMP will need be updated in light of comments made by WSCC within Appendix C, Table 1. This is to ensure</p>	NPPF (Paragraph 114b) NPS EN-1 (Paragraphs 5.13.6, 5.13.8 and 5.13.11).	<p>The Applicant thanks West Sussex County Council for comments. These have been reviewed and responses provided to each point in Appendix C this document.</p>

Ref	Local Impact Report Comment		Applicant's Response
	<p>designed, constructed, and ordinarily do not accommodate HGVs. This may result in increased wear and damage to these roads.</p>	<p>suitable roads are used. • The number of HGVs should be limited during network peak times. • A means of reporting transport issues and incidents by the public relating to the Project should be set up by the Applicant; • At specific locations, vehicle movements should be restricted to avoid conflicts with peak movements associated with schools; • Pre-construction, during, and post highway condition surveys are to be undertaken at identified locations as agreed with WSCC through phase specific construction management plans; and • Any damage to the highway (which shall include road surfaces, footways, and verges) that is attributed to Project construction traffic is to be made good by the Applicant and in agreement with WSCC.</p>	
13d	<p>The construction of the substation at Oakendene will result in abnormal loads using the highway network. These have the potential to delay traffic.</p>	<p>Mitigate: • An Abnormal Indivisible Loads (AIL) Assessment should be submitted to and agreed with WSCC Highways. • This may make use of a</p>	<p>NPS EN-1 (Paragraphs 5.13.8 and 5.13.11).</p> <p>Appendix 23.1: Abnormal Indivisible Load Assessment, Volume 4 of the Environmental Statement [APP-196] was submitted as part of the Development Consent Order Application. This included an assessment of delivery of onshore elements of the Proposed Development to Oakendene, consisting of three transformers and six shunt reactors. This assessment assumed that Shoreham Port would be utilised for abnormal indivisible load (AIL) deliveries associated with the Proposed Development on</p>

Ref	Local Impact Report Comment		Negative			Applicant's Response
13e	<p>The Project will require construction traffic (including HGVs) to use rural roads to access parts of the cable route as well as the existing National Grid substation on Wineham Lane. These rural roads will continue to be used by other road users, which could include pedestrians, cyclists, or equestrians, which could lead to conflicts and road safety concerns</p>	C	Negative	<p>pre-existing routing strategy from Shoreham Port to the existing National Grid substation at Bolney providing that Shoreham Port is used for the Project. This is set out within the submitted AIL Assessment; and • Movements should be timed to avoid network peak times. This should be specified within the OTCMP.</p>	<p>NPPF (Paragraph 114b and 112a. NPS EN-1 (Paragraphs 5.13.8 and 5.13.11).</p>	<p>the basis that it was used during Rampion 1 construction, and therefore used the same routing strategy to the onshore substation location at Oakendene.</p> <p>It is agreed that AIL movements should avoid peak traffic periods and therefore this will be included as an update the Outline Construction Traffic Management Plan [REP1-010] to be submitted at Deadline 3.</p> <p>Section 8.3 of the Outline Construction Traffic Management Plan [REP1-010] details traffic management measures which may be deployed throughout the construction phase at various junctions to mitigate effects associated with construction traffic. Whilst this includes aspects such as advisory temporary speed limits and warning signage, the Applicant will consider in further detail the potential for time restrictions on construction traffic movements at certain locations.</p>

Ref	Local Impact Report Comment		Negative	generated by the workforce could be reduced using measures within an OCWT.	NPPF (Paragraph 114b) NPS EN-1 (Paragraph 5.13.6, 5.13.8 and 5.13.11).	Applicant's Response
13f	The Project has the potential to result in increased vehicle flows on the A281 and A272 through Cowfold, as well as the A259, A283, and A24. All of these roads have existing traffic congestion issues at network peak times as recognised within the West Sussex Transport Plan.	C	Negative	<p>Mitigate: • Measures should be incorporated to reduce (i.e. time restrictions) or re-route vehicles away from the network peak times; • Where possible specific routing should be agreed through the OTCMP for elements of the proposals. For example, although accepted that some HGVs associated with the cable route may need to pass through Cowfold, all HGV movements associated with the construction of the Oakendene substation could be required to route to and from the east of Cowfold unless materials are coming from local sources; • Develop and implement the Construction Workforce Travel Plan based upon the OCWTP Plan. Specific additional measures will be required within the OCWTP given the rural locations that are presenting limited</p>	NPPF (Paragraph 114b) NPS EN-1 (Paragraph 5.13.6, 5.13.8 and 5.13.11).	<p>The Applicant will review this request to avoid construction traffic movements at peak periods.</p> <p>A detailed response to heavy goods vehicle (HGV) routing through Cowfold is provided in Appendix C.</p> <p>The Applicant will develop and implement a Construction Workforce Travel Plan in accordance with the Outline Construction Workforce Travel Plan [APP-229] as secured by Requirement 24 of the Draft Development Consent Order [PEPD-009]. This includes the provision of multi-occupancy vehicles to transport construction workers from temporary construction compounds to individual construction sites and will reduce the number of single occupancy vehicle trips generated by the Proposed Development.</p>

Ref	Local Impact Report Comment	C	Negative	options to use alternate transport modes. This could include shuttle buses from the main site compounds to more rural working locations to reduce single occupancy vehicle trips.	NPS EN-1 (Paragraph 5.13.6).	Applicant's Response
13g	Impact on local residents through temporary cable installation works, namely the use of open cut trenches (e.g. on Michelgrove Lane).	C	Negative	<p>Avoid: using open cut trenches on inappropriate routes (single track roads)</p> <p>Mitigate: through alternate trenching (i.e. trenchless drilling) techniques.</p>	NPS EN-1 (Paragraph 5.13.6).	<p>Temporary road closures to facilitate the open cut trench crossing of Michelgrove Lane (17a-17b) Moatfield Lane (48a-48b), Kings Lane (50a-50b) are shown within the Access, Rights of Way and Streets Plans [APP-012]. Notably, at the proposed crossing locations these roads are not public highway.</p> <p>The strategy to maintain private means of access during this period is described in Paragraph 5.7.10 of the Outline Code of Construction Practice [PEPD-033]. The following general principles will apply to the managed or private means of access during the onshore cable route construction:</p> <ul style="list-style-type: none"> • Any access restrictions or effect on individual properties will be kept to a minimum and the Applicant will work with local stakeholders to develop individual solutions to keep disruptions as slow as is reasonably possible; • All crossings of private means of access will be developed to allow emergency access at all times; • Contractors will be required to accommodate reasonable requests for access during the working day by temporary plating of the trench unless a suitable diversion is provided around the works; • The trench will be plated or temporarily backfilled outside of construction working hours where feasible to restore access, unless a suitable diversion is provided around the works; • Any access restrictions or closures will be communicated to all residents and businesses with affected rights of access; and • A nominated point of contact on behalf of the applicant will be communicated to all residents and businesses at least three months before the start of construction.

Ref	Local Impact Report Comment			Applicant's Response		
13h	Increase in vehicle movements during decommissioning of the Oakendene Substation.	D	Negative	Mitigate: Submit and agree suitable decommissioning traffic management plan, to include details of vehicle routing and traffic management measures at the site access.	NPPF (Paragraph 114b) NPS EN-1 (Paragraph 5.13.6, 5.13.8 and 5.13.11).	A final Code of Construction Practice will be required to be submitted and approved on a staged basis, in accordance with the Outline Code of Construction Practice [PEPD-033] , pursuant to Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2). The Applicant will develop and implement a Decommissioning Plan in advance of the decommissioning works as stated in Section 3.8 of the Outline Construction Traffic Management Plan [REP1-010] . This Decommissioning Plan will include details of vehicle routing and traffic management measures at the site access.
13i	Use of vehicle accesses during the operational phase	O	Neutral	Impacts from vehicular traffic during the operational phase are anticipated to be minimal. An OWTP is proposed to encourage and promote alternate means of access where feasible.	NPS EN-1 (Paragraph 5.13.6).	The Applicant agrees that vehicular traffic using operational accesses will be minimal. Along the onshore cable route, periodic testing of the cable is likely to be required (every two to five years) during the operation and maintenance phase. This will require access to the link boxes at defined inspection points along the onshore cable route. Unscheduled maintenance or emergency repair visits will typically involve attendance by up to three light vehicles, such as vans, in a day at any one location. In exceptional circumstances, equipment may be required to be replaced, then the use of an occasional heavy goods vehicle (HGV) may be utilised, depending on the nature of the repair.
13.9	Policy Context National Policy Statements 13.9. The Overarching NPS for Energy (EN-1) provides the policy and guidance on generic impacts that may arise. Section 5.13 covers 'Traffic and Transport'. Of relevance are as follows.			Noted, the Applicant has no further comments on this matter at this time.		
13.10	13.10. Paragraph 5.13.1: "The transport of materials, goods and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through increased congestion. Impacts may include economic, social and environmental effects. Environmental impacts may result particularly from increases in noise and emissions from road transport. Disturbance caused by traffic and abnormal loads generated during the construction phase will depend on the scale and type of the proposal."			The likely significant transport effects associated with the construction phase and operation and maintenance phase of the Proposed Development have been assessed in Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] , Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] and Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES [REP1-008] . These assessments have concluded that the Proposed Development will generate a very limited number of significant effects related to transport, limited to peak construction periods at two locations (Michelgrove Lane and Kent Street).		

Ref	Local Impact Report Comment	Applicant's Response
13.11	13.11. Paragraph 5.13.2: "The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development as set out in Section 2.2 of this NPS."	A suite of embedded environmental measures is included by the Applicant as part of the Proposed Development including those included in the Outline Construction Traffic Management Plan [REP1-010] , Outline Public Rights of Way Management Plan [APP-166] and Commitments Register [REP1-015] .
13.12	13.12. Paragraph 5.13.6: "A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the IPC should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development."	
13.13	<p>13.13. The NPS provides additional guidance on mitigation: Paragraph 5.13.8: "Where mitigation is needed, possible demand management measures must be considered and if feasible and operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts."</p> <p>Paragraph 5.13.11: "The IPC may attach requirements to a consent where there is likely to be substantial HGV traffic that: control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements, make sufficient provision for HGV parking, either on the site or at dedicated facilities elsewhere, to avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force."</p>	Noted, the Applicant has no further comments on this matter at this time.
13.14	13.14. The NPS additionally requires any project that is likely to have significant transport implications provides a Transport Assessment (TA) as part of the Environmental Statement. The assessment and mitigation within the TA should be agreed through consultation with the Highway Authorities.	The likely significant transport effects associated with the construction phase and operation and maintenance phase of the Proposed Development have been assessed in Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] , Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] and Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES [REP1-008] , as agreed with the relevant Highway Authorities.
13.15	13.15. Where appropriate, a travel plan should also be included that contains measures to mitigate transport impacts. The Applicant should also provide details of measures to improve access by public transport, walking, and cycling, to reduce the need for parking associated with the proposals, and to mitigate transport impacts	<p>The Applicant will develop and implement a Construction Workforce Travel Plan in accordance with the Outline Construction Workforce Travel Plan [APP-229] and Outline Operational Travel Plan [APP-227] as secured by Requirement 24 and 32 of the Draft Development Consent Order [PEPD-009]. These documents include a range of measures to promote walking, cycling and public transport use noting that this may not always be a viable transport option for constructions workers given the need to carry tools and equipment.</p> <p>Specifically related to parking, the Outline Construction Workforce Travel Plan [APP-229] includes the provision of multi-occupancy vehicles to transport construction workers from temporary construction compounds to individual construction sites and will reduce the number of single occupancy vehicle trips and parking demand generated by the Proposed Development. In addition, the Outline Operational Travel Plan [APP-227] notes that staff travelling by car share will be given priority over single occupancy car parking spaces.</p>

Ref	Local Impact Report Comment	Applicant's Response
13.16	13.16. National Planning Policy Framework (NPPF, December 2023) provides the Government's planning policies for England. Whilst paragraph 5 of the NPPF (MHCLG, 2021) states that it does not contain specific policies for NSIPs, the NPPF itself may be considered by the SoS to be an "important and relevant" consideration to its decision in accordance with s104 of the Planning Act 2008. Of relevance are as follows.	Noted, the Applicant has no further comments on this matter at this time.
13.17	13.17. Paragraph 114: "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) Appropriate opportunities to promoted sustainable transport modes can be – or have been – taken up, given the type of development and its location. b) Safe and suitable access to the site can be achieved for all users: c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code, and d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway	<p>The Applicant has provided a response to each point below:</p> <ul style="list-style-type: none"> a) The Applicant will develop and implement a Construction Workforce Travel Plan in accordance with the Outline Construction Workforce Travel Plan [APP-229] and Outline Operational Travel Plan [APP-227] as secured by Requirement 24 and 32 of the Draft Development Consent Order [PEPD-009]. These documents include a range of measures to promote walking, cycling and public transport use noting that this may not always be a viable transport option for constructions workers given the need to carry tools and equipment. b) The Outline Construction Traffic Management Plan [REP1-010] provides details of the design requirements for all accesses required as part of the Proposed Development, noting that this document will be updated for Deadline 3 to reflect comments received by West Sussex County Council (WSCC) on the requirement of Road Safety Audits and use of Manual for Streets visibility splays at some locations. Furthermore, the Applicant is currently preparing preliminary designs for each of the proposed compound locations (A-05, A-39 and A-63) and Oakendene substation (A-62), which will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination. c) Car parking associated with the construction and operational phases of the Proposed Development will be determined at detailed design in accordance with relevant standards. d) The likely significant transport effects associated with the construction phase and operation and maintenance phase of the Proposed Development have been assessed in Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064], Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] and Appendix 23.2: Traffic Generation Technical Note Assessment , Volume 4 of the ES [REP1-008], as agreed with the relevant Highway Authorities.
13.18	13.18. Paragraph 116: "Within this context, applications for development should: a) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use. b) Address the needs of people with disabilities	The Applicant considers that only items d) and e) of paragraph 116 are relevant to the Proposed Development on the basis that it will be either a construction site or private site where public access is not permitted. In response to item d) the maximum design

Ref	Local Impact Report Comment	Applicant's Response
	<p>and reduced mobility in relation to all modes of transport, c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards, d) Allow for the efficient delivery of goods, and access by service and emergency vehicles, and e) Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations.”</p>	<p>parameters proposed for the temporary construction compounds, onshore substation at Oakendene and existing National Grid Bolney substation extension take account of logistics requirements for each site. Access junctions will also be designed in accordance with Design Manual for Roads and Bridges guidance and subject to independent Road Safety Audits.</p> <p>In relation to car parking (item e), the Outline Operational Travel Plan [APP-227] secured by 32 of the Draft Development Consent Order [PEPD-009] states that electric vehicle charging points will be available as part of the substation parking to encourage low emission journeys.</p>
13.19	<p>WSCC Policies 13.19. The Local Transport Plan, West Sussex Transport Plan (WSTP), covers the period 2022 to 2036. The WSTP is WSCC's main policy on transport and supports delivery of WSCC plans and priorities. The WSTP covers a range of transport topics and includes objectives for transport related matters as well as Area Transport Strategies. Related to the Project and its potential highway impacts, the WSTP covers 'Freight' as well as potential existing locations of congestion.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
13.20	<p>13.20. The Lorry Route Network forms part of the WSTP. This provides guidance on the strategic and local roads recommended for use by lorries and heavy goods vehicles in West Sussex.</p>	<p>Figure 7.6.6 of the Outline Construction Traffic Management Plan [REP1-010] outlines construction traffic routes for the Proposed Development which have been formed taking into account the advisory HGV routes identified in the West Sussex Transport Plan 2022- 2036 (WSCC 2011), restrictions such as weight and height limits and suitability of routes based on a review of road types and widths.</p>
13.21	<p>13.21. The WSCC Road Safety Audit (RSA) Policy applies to all relevant schemes that are proposing to make alterations to the adopted highway network. The principal objective of the RSA process is to identify where a potential collision might occur on the public highway because of the proposed or constructed highway works. The RSA Policy is required to give due consideration to the safety of all road users using the public highway particularly the more vulnerable including pedestrians, cyclists, equestrians, and motorcyclists.</p>	<p>The Applicant will continue discussions with West Sussex County Council on the need for speed surveys, road safety audits (RSAs), also noting the comments received in Table 1b of Appendix C which notes requirements for each of the proposed access junctions. The proposed usage and characteristics of the accesses will be assessed, in order to inform the potential need for the various surveys at each location.</p> <p>The Applicant is also currently preparing preliminary designs for each of the proposed compound locations (A-05, A-39 and A-63) and Oakendene substation (A-62), which will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination.</p>
13.22	<p>13.22. The WSCC Permit Scheme have been introduced to enable the effective monitoring and management of all activities that need road space, such as road maintenance, utility street works, new developments, and public events. This has been introduced under the Traffic Management Act 2004. The Permit Scheme applies to all adopted roads within the County. The objectives of the Permit Scheme are to reduce disruption to the road network, improvements to the overall network management, a reduction in delay to the travelling public, a reduction in costs to businesses caused by</p>	<p>The Applicant will review this request and provide an update in the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 where appropriate.</p>

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	delays, promotion of a safer environment, and reduced carbon emissions. The Permit Scheme is relevant due to the requirement for the proposals to undertake works within the public highway.	
13.23	Construction Phase – Impacts Positive 13.23. Project is not considered to offer any positive impacts to the local highway network during construction.	Noted, the Applicant has no further comments on this matter at this time.
13.24	Neutral 13.24. The Project is not considered to offer any neutral impacts to the local highway network during construction.	Noted, the Applicant has no further comments on this matter at this time.
13.25	Negative 13.25. A significant number of existing and temporary vehicular accesses are indicated to be required. The formation and use of these accesses have the potential to result in negative impacts on the highway network. The introduction of further accesses would result in potential road safety issues through vehicles manoeuvring into and out of these, as well as resulting in delays to other traffic again through vehicles turning into and out of these but also from any traffic management measures necessary to manage the operation of access points.	<p>The Applicant is currently preparing preliminary designs for each of the proposed compound locations (A-05, A-39 and A-63) and Oakendene substation (A-62), which will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination.</p> <p>The Applicant will review all proposed access junctions to confirm the appropriate visibility splay standard for each location (DMRB or Manual for Streets) through an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3.</p> <p>The Applicant is currently preparing traffic management strategies to support the safe movement of construction traffic on single-track roads such as Michelgrove Lane and Kent Street. These will be submitted to WSCC prior to Deadline 3 with a view of reaching agreement in principle on a preferred strategy prior to the end of the examination.</p> <p>The requirement for the implementation of traffic management measures will be confirmed as part of stage specific CTMPs secured through Requirement 24 of the Draft Development Consent Order [PEPD-009].</p>
13.26	13.26. The Project will generate increased vehicle movements on the highway network during construction; this will include increased HGV activity. The increase in vehicle movements will add to existing congestion issues. Whilst impacts would be worse at network peak times, the Project will still result in a notable impact particularly on lightly trafficked rural roads throughout the proposed working day. These impacts may result in safety and/or other amenity issues.	<p>The likely significant transport effects associated with the construction phase and operation and maintenance phase of the Proposed Development have been assessed in Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064], Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] and Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES [REP1-008]. The ES has concluded that the Proposed Development will generate only limited significant effects during the construction phase, related to peak construction activity at two locations (Michelgrove Lane and Kent Street).</p>

Ref	Local Impact Report Comment	Applicant's Response
13.27	<p>13.27. Access will be required along rural roads that are not designed or constructed to accommodate HGVs, resulting in increased wear and damage to the local highway network. Given the anticipated vehicle movements, there is the potential for damage to result to certain roads. The use of these roads will need to be carefully managed with mechanisms included within any phase specific management plan to enable damage to be repaired.</p>	<p>As stated in Section 8.4 of the Outline Construction Traffic Management Plan [REP1-010], each access point to any public highway by any temporary construction access road or track utilised as part of the onshore elements of the Proposed Development will be inspected. These inspections will take place before first use, at frequent intervals during the construction phase and following final use, so that the surface of the highway remains in good repair. The frequent inspections will also enable any repairs to be made in a timely manner throughout the construction phase.</p> <p>At the end of the construction phase, the temporary construction accesses and crossing points shall be inspected and a programme of works to restore them to the condition they were in before the construction phase commenced will be agreed with National Highways as the strategic road authority and West Sussex County Council as the local highway authority.</p> <p>Any works within the highway limits will be reinstated to a standard commensurate to that prior to the commencement of the construction works and agreed with the relevant highways' authority (West Sussex County Council), as per commitment C-160 (Commitments Register [REP1-015]) which covers both the condition surveys and subsequent repairs.</p>
13.28	<p>13.28. The use of rural roads, which have no dedicated provisions for pedestrians, cyclists, or equestrians, may result in the increased potential for conflict between these user groups and construction traffic. There is a clear safety issue associated with increasing vehicle activity on roads that have no specific provision for non-motorised road users. Vehicular activity on these roads should be restricted, where possible, with specific mitigation otherwise provided as part of phase specific construction management plans.</p>	<p>Where possible, construction traffic has been routed on Strategic A and B class roads, where footways are available or the presence of non-motorised users is expected to be minimal.</p> <p>Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] have both assessed the impact of the Proposed Development on Pedestrian Amenity, Delay, Severance, and Fear and Intimidation. The ES has concluded that the Proposed Development will generate only limited significant effects during the construction phase, related to peak construction activity at two locations (Michelgrove Lane and Kent Street). To mitigate these effects the Applicant is currently preparing a traffic management strategy for each of these to which will demonstrate how safe access can be achieved by construction traffic. These strategies will be submitted to WSCC with an aim of reaching agreement in principle on a preferred strategy before the end of the examination.</p> <p>All temporary construction traffic management implementation plans will need to be approved by West Sussex County Council and will be applied in accordance with guidance and procedures</p>

Ref	Local Impact Report Comment	Applicant's Response
13.29	13.29. The increase in vehicle movements may worsen highway congestion at peak network times on the A259, A24, A283, A281, and A272. These locations are identified within the WSTP. The main impacts will be increased journey times but also potential amenity impacts. Impacts at peak times should be limited where possible.	<p>as defined within Section 14 of the Road Traffic Regulation Act 1984.</p> <p>One of the primary objectives of the Outline Construction Traffic Management Plan [REP1-010] is to keep construction traffic to a minimum during peak network periods to reduce the impact on the highway network. Section 8.4 of the Outline Construction Traffic Management Plan [REP1-010] outlines the construction traffic management and mitigation measures. The Outline Construction Traffic Management Plan [REP1-010] is secured through Requirement 24 of the Draft Development Consent Order [PEPD-009] provided at Deadline 2 submission.</p> <p>Construction heavy goods vehicle (HGV) movements associated with the onshore elements of the Proposed Development will normally take place during the core working hours, and for the shoulder hour before and after these core working hours.</p> <p>A booking system (included in the Delivery Management System) will be used so that construction deliveries to the construction sites are spread across the working day (where feasible). This will minimise the impact of construction HGV traffic during the peak periods. The booking schedule will also form part of and inform the monitoring processes of the stage specific Construction Traffic Management Plan.</p> <p>If delivery vehicles are associated with the 24/7 hrs trenchless construction working, they will work outside the core hours. For all other deliveries they will be restricted to core and shoulder working hours.</p> <p>The stage specific Construction Traffic Management Plan will provide further details regarding the management of deliveries in such a way as to minimise the impact from vehicles queuing or travelling at unsociable times.</p>
13.30	<p>Operational Phase - Impacts Positive</p> <p>13.30. There are no operational phase impacts that will benefit users of the local highway network.</p>	Noted, the Applicant has no further comments on this matter at this time.
13.31	<p>Neutral</p> <p>13.31. During the operational phase, the Project is expected to generate some vehicle movements. Precise numbers are given only for the port-based activities located in Newhaven, East Sussex. Within the Traffic Generation Note, figures are not included for the operational accesses (including the proposed Oakendene substation) located within West Sussex. For the most part, it is anticipated that these movements are unlikely to be discernible from ordinary traffic flows and, as such, are considered neutral.</p>	As stated in Section 1.3 of the Outline Operational Travel Plan [APP-227] , the operation and maintenance phase requires a minimal number of operational staff at the onshore substation at Oakendene as the onshore substation will not be staffed and will only require visual checks approximately once a week. There will be a maximum two-week period once a year during which maintenance staff will be at the onshore substation daily. If there is

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		<p>an unplanned event, there would be more personnel required (transformer change etc.), however this would only be temporary.</p> <p>Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the Environmental Statement has been updated at Deadline 1 [REP1-008] to include details within Section 7 of operational traffic movements associated with the onshore substation, cable route and offshore elements of the Proposed Development. It is estimated that 40-50 full time staff will be required for offshore maintenance of the Proposed Development (i.e. maintenance staff travelling to the base from which vessels would transfer them offshore for maintenance tasks).</p>
13.32	<p>13.32. There is the limited potential for some negative impacts to arise if elements of the ancillary infrastructure requires replacing. Impacts could include short term increases in HGV activity and traffic management works within the highway network.</p>	<p>As detailed in Section 4.8 of Chapter 4: The Proposed Development [APP-045], maintenance of the onshore cable is expected to be minimal. During operation and maintenance phase, periodic testing of the cable is likely to be required (every two to five years). This will require access to the link boxes at defined inspection points along the onshore cable route. Unscheduled maintenance or emergency repair visits will typically involve attendance by up to three light vehicles, such as vans, in a day at any one location. Very infrequently, 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>
13.33	<p>13.33. Operational vehicular accesses, including that serving the proposed substation at Oakendene, are proposed onto the local highway network. These are to be designed in accordance with current design standards (namely Manual for Streets or Design Manual for Roads and Bridges) and guidance based upon the speed limit or recorded traffic speeds on the road in question and that may be agreed with WSCC Highways. Providing the accesses are built to an agreed standard, the formation and use of these would have a neutral highway impact. At present, WSCC has received no indicative layouts for any accesses associated with the proposals.</p>	<p>The Applicant is only proposing a single permanent operational access (A-63) to service the onshore substation at Oakendene. This will be design for approval by the Highways Authority in accordance with Requirement 15 of the Draft Development Consent Order [PEPD-009] with the Applicant currently preparing required a preliminary design for this access junction. This will be subject to an independent Road Safety Audit with reaching agreement in principle with WSCC on the proposed layout before the end of the Examination.</p> <p>The existing National Grid Bolney substation extension would be served by the present access to the existing substation site. All operational accesses for maintenance of the onshore cable route are sought as rights of access to utilise existing infrastructure.</p>
13.34	<p>Negative 13.34. No negative impacts are anticipated during the operational phase.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
13.35	<p>Required Mitigation 13.35. The general approach taken by the Applicant to mitigation is appropriate. A review of the mitigation measures (i.e. the Outline Construction Traffic Management Plan, Outline Construction Workforce Travel Plan, Outline Operational Travel Plan) are outlined in Appendix C. In summary, WSCC would require a number of further mitigation measures and amendments to proposed measures to address the concerns identified. The provision of mitigation is considered a key</p>	

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	aspect to avoid impacts on highway users. The mitigation measures once agreed will need to be secured through the DCO with further detailed measures (e.g. phase specific construction management plans) agreed as the works come forward.	
13.36	Outline Construction Traffic Management Plan 13.36. Develop the OCTMP and thereafter implement phase or location-specific Construction Traffic Management Plans based on the Outline Plan. Detailed comments are made in Appendix C, Table 1.	These comments have been reviewed and responses provided to each point in Appendix C of this document.
13.37	13.37. In summary, the OCTMP should be updated to include restrictions on construction traffic movements during network peak times and at specific locations (i.e. in the vicinity of schools), as well as to include appropriate mitigation to manage construction movements on rural to ensure road safety is not unacceptably compromised. Changes or confirmation is also sought about a number of matters in the submitted OCTMP.	The Applicant has no further comments on this matter at this time.
13.38	13.38. As part of the OCTMP, the Applicant should seek where possible to reduce the number of construction accesses, which are currently proposed as part of the Project. WSCC has highlighted in Appendix C, Table 1a where concerns are raised with regards to specific locations. All accesses (both permanent and temporary) will need to be demonstrated as adequate, taking account of current design standards and the anticipated traffic to ensure the proposals do not adversely impact on road safety. It is also necessary to undertake RSA for accesses as identified within Appendix C, Table 1b, which would need to be agreed with WSCC.	As stated at reference 13.5, it is not possible to reduce the number of construction accesses further. These comments have been reviewed and responses provided to each point in Appendix C of this document.
13.39	Construction Phase Travel Plan and an Operational Phase Travel Plan 13.39. The Applicant should Implement a Construction Phase Travel Plan (CPTP) and an Operational Phase Travel Plan. Further comments are made on the CPTP in Appendix C, Table 2. The CPTP would seek to reduce single vehicle occupancy and promote alternate means of travel. Specific measures will be required within this given the rural locations presenting limited options for alternate transport modes.	The Applicant will develop and implement a Construction Workforce Travel Plan in accordance with the Outline Construction Workforce Travel Plan [APP-229] and Outline Operational Travel Plan [APP-227] as secured by Requirement 24 and 32 of the Draft Development Consent Order [PEPD-009] . These documents include a range of measures to promote walking, cycling and public transport use noting that this may not always be a viable transport option for constructions workers given the need to carry tools and equipment. This includes the provision of multi-occupancy vehicles to transport construction workers from temporary construction compounds to individual construction sites and will reduce the number of single occupancy vehicle trips generated by the Proposed Development.
13.40	Abnormal Indivisible Loads Assessment 13.40. The Applicant should develop and implement an Abnormal Indivisible Loads Assessment relevant to the port being used. If appropriate, this should seek to use the pre-existing abnormal loads routing strategy from Shoreham Port to the existing National Grid substation at Bolney for the purposes of accessing Oakendene.	The Applicant wishes to direct WSCC's attention to the Appendix 23.1: Abnormal Indivisible Load Assessment, Volume 4 of the Environmental Statement [APP-196] .
13.41	Requirements and Obligations 13.41. WSCC has reviewed Part 3 (Streets), Schedule 1 (Part 3), and Schedule 2 and 3 of the Draft DCO (PEPD-010) and has identified a number of areas that will need to be resolved with the Applicant through the Examination phase. These include inconsistencies between the Draft DCO and the wording within other outline mitigation documents, the appropriateness of references to certain design guidance, and the requirement and need for deemed consents. Further detail is provided in Appendix B of the LIR.	These comments have been reviewed and responses provided to each point in Appendix B of this document.

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14. Mineral Safeguarding (ES Chapter 24)		
14.1	<p>Summary 14.1. One of the key onshore elements of the Project is a buried cable route for a maximum length of up to 38.8km. Parts of the proposed cable route are underlain by minerals (building stone, brickmaking clay, and soft sand) that are safeguarded by the West Sussex Joint Minerals Local Plan (JMLP) (July 2018, Partial Review March 2021).</p>	Noted, the Applicant has no further comments on this matter at this time.
14.2	14.2. The NPS for Energy (EN-1), paragraph 5.11.28 states that “where development has an impact upon a Mineral Safeguarding Area (MSA), appropriate mitigation measures should be put in place...”	Noted, the Applicant has no further comments on this matter at this time.
14.3	14.3. It is important, therefore, that consideration is given to ensuring that minerals are not needlessly sterilised. The Applicant seeks to address the issue of mineral safeguarding in Chapter 24 of the ES (APP-065), recognising the existence of the JMLP and associated safeguarding guidance. WSCC requested through its S42 consultation response and at Expert Topic Working Group meetings that a Mineral Resource Assessment (MRA) be produced that assesses the impact on safeguarded minerals or addresses the issue of severance of resources; however, one has not been provided by the Applicant.	Noted, the Applicant has no further comments on this matter at this time.
14.4	14.4. To ensure that minerals will not be needlessly sterilised, a MRA should be undertaken and the Outline Code of Construction Practice (PEPD-033) should be updated to provide sufficient detail about mineral safeguarding.	<p>Due to the location of the relevant Minerals Safeguarding Areas (MSAs), it is not possible for the onshore cable route to avoid the MSAs, however the design of the onshore cable route has taken the MSAs into account and minimises the extent of impact on the MSAs by running in as direct a line as possible, or for soft sand, running adjacent to the A283 (an existing constraint to extraction). The onshore cable route therefore avoids needless sterilisation as a first principle.</p> <p>In common with other projects of this nature, ground investigations to determine the precise amounts of mineral have not been undertaken at this stage, and this information would not become available until the construction phase. It is therefore not possible to identify the potential volumes of materials that could be recovered. This information would also be needed in order to identify the quality of material and its possible end-uses, so it is not possible to identify whether prior extraction could be utilised, and if so, how this would take place.</p> <p>It is therefore not possible for the minerals assessment provided in Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] to provide a detailed Minerals Resource Assessment that fully adheres to the West Sussex Minerals and Waste Safeguarding Guidance. However, it is also relevant that this guidance acknowledges that “<i>an MRA should be proportional to the size of the site and the scarcity of the mineral</i>” and therefore, Chapter 24: Ground conditions, Volume 2 of the Environmental Statement [APP-065] identifies that less than 1% of the Brick Clay MSA and less than 0.1% of the soft sand MSA would be affected by the Proposed Development. A similar</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>proportion of the Building Stone MSA is also expected to be affected. The information provided does provide a proportional and proper consideration through a robust assessment based on the information available and, where appropriate, considers worst case scenarios for the quantum of minerals affected by the Proposed Development.</p> <p>In terms of soft sand, the Outline Code of Construction Practice [PEPD-033] commits to a Materials Management Plan (MMP) being produced along with a commitment that the MMP will “<i>seek to maximise the reuse of excavated clean materials from the onshore cable construction corridor where practical and feasible</i>”. At this point in time, it cannot be confirmed whether the prior extraction of soft sand for off-site sales/use will be practical, as this could leave a substantial void along the onshore cable corridor which will then need infilling with imported materials to allow the cable construction to take place. It is considered that this approach would be unsustainable due to the additional transport and excavation / fill works required. The proposed approach would therefore maximise the re-use within the Proposed Development of material that is excavated for the cable construction, thereby not sterilising this resource which is already subject to sterilisation effects from the constraints of the A283’s proximity. Whilst soft sand remaining under the onshore cable route would be sterilised for the duration of the construction and operation and maintenance phases, it would become available again upon decommissioning. As noted above, it is not possible to calculate the potential volumes of soft sand that may be affected at this time, and the proposed worst-case approach is therefore considered acceptable and provides confidence that mitigation will be enacted. Stage specific Code of Construction Practice will be required in accordance with Requirement 22 of the Draft Development Consent Order [PEPD-009].</p>

Table 14: Summary of Impacts – Minerals Safeguarding

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
14a	Needless sterilisation of safeguarded minerals (building stone, clay and soft sand)	C/O	Negative	Mitigate - provide sufficient detail within the OCoCP (PEPD-032) about safeguarding minerals, the outcomes of a Mineral Resource Assessment (as required by WSCC), and	NPS for Energy EN-1 (Paragraph 5.11.19 and 5.11.28). West Sussex JMLP: Policy M9:	The response in reference 14.4 outlines that a proportional and robust assessment of minerals sterilisation has been provided at this stage, within Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] . Where appropriate, this assessment considers the following points from the West Sussex Minerals and Waste Safeguarding Guidance:

Ref	Local Impact Report Comment	Safeguarding Minerals	Applicant's Response
		<p>the requirements of the associated Materials Management Plan, including, but not limited to:</p> <ul style="list-style-type: none"> • Reference to mineral safeguarding, not limited to considering current demand levels. • The volumes and types of minerals expected. • Mechanisms to avoid needless sterilisation of minerals, including prior extraction and avoiding severance. • Evidence of discussion with local operators, who could process and manage any minerals. 	<ul style="list-style-type: none"> • an assessment of the available geological information about the site including quarrying history and borehole data; • consideration of other locations for the development that are outside the Minerals Safeguarding Area (MSA); • assessment of whether the proposal can be modified to avoid sterilisation; • commentary on why it is expected to be unfeasible and not viable to extract the mineral resource ahead of the development; <p>Similar to other pipeline or underground cable projects, detailed ground investigation works have not taken place at this stage in the project (e.g. the original Rampion project, Awel y Môr Offshore Windfarm, East Anglia ONE Offshore Wind Farm and HyNet Carbon Dioxide project). Due to the level of information which is available at this point in time, the assessment cannot provide full details of the quantities or quality of minerals which would be sterilised, and subsequently cannot confirm exactly how much mineral could be subject to re-use within the Proposed Development (or possible prior extraction if this was found to be viable). Due to this, no discussions with local operators, who could process and manage any minerals can be progressed at this time. Chapter 24: Ground conditions, Volume 2 of the ES [APP-065] and the Outline Code of Construction Practice [PEPD-033] therefore comply with the guidance as far as they are able to do so at this stage.</p>
14.5	<p>Policy Context National Policy Statements 14.5. National Policy Statement EN-1, paragraph 5.11.19 states that “Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.”</p>		Noted, the Applicant has no further comments on this matter at this time.
14.6	14.6. Paragraph 5.11.28 of EN-1 states that “Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.”		Noted, the Applicant has no further comments on this matter at this time.
14.7	<p>WSSC Policy 14.7. The West Sussex Joint Minerals Local Plan (JMLP) (July 2018, Partial Review March 2021) sets out a Vision, Strategic Objectives, and a comprehensive set of policies for consideration of minerals development in the County.</p>		Noted, the Applicant has no further comments on this matter at this time.
14.8	14.8. Strategic Objective 5 seeks to safeguard potential economically viable mineral resources from sterilisation.		Noted, the Applicant has no further comments on this matter at this time.
14.9	14.9. Policy M9(b), Safeguarding Minerals, sets out how consideration should be given to proposals for non-mineral development within Mineral Safeguarded Areas: (b) Soft sand (including potential silica sand), sharp sand and gravel, brick-making clay, building stone resources and chalk reserves are safeguarded against sterilisation. Proposals for non-mineral development within the Minerals Safeguarded Areas (as shown on maps in Appendix E) will not be permitted		Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
14.10	<p>unless: (i) Mineral sterilisation will not occur; or (ii) it is appropriate and practicable to extract the mineral prior to the development taking place, having regards to the other policies in this Plan; or (iii) the overriding need for the development outweighs the safeguarding of the mineral and it has been demonstrated that prior extraction is not practicable or environmentally feasible.</p> <p>14.10. Parts of the proposed cable route are underlain by minerals (building stone, brickmaking clay, and soft sand) that are safeguarded. Policy M9 requires developers to demonstrate that either no mineral sterilisation will occur, that prior extraction will take place, or that there is an overriding need for the development that outweighs the need for safeguarding minerals, where it is demonstrated that prior extraction is not practicable or environmentally feasible.</p>	<p>Due to the location of the relevant Minerals Safeguarding Areas (MSAs) within West Sussex County Council (WSCC) area, it is not possible for the onshore cable route to avoid the MSAs, however the route proposed for the onshore cable has taken the MSAs into account and minimises the extent of impact on the MSAs by running in as direct a line as possible, or for soft sand, running adjacent to the A283 (an existing constraint to extraction). The onshore cable route therefore avoids needless sterilisation as a first principle.</p> <p>Paragraph 4.7.129 of the Planning Statement [APP-036] states that <i>“with regards to MSA the assessment has found that there will be a significant effect on the soft sand in the construction phase and operation and maintenance phase. In the context of WSCC Joint Mineral Local Plan Policy M9, it is identified that the soft sand MSA cannot be avoided, although the area potentially sterilised in the construction phase and operation and maintenance phase will be a very minor proportion of the overall area. There is a demonstrable overriding and urgent need for the Proposed Development (as demonstrated in Section 4.2 of this Planning Statement) and the infrastructure subject to the DCO Application is identified as a CNP (in line with NPS Draft EN-1 and Draft EN-3). There is no prospect of extracting the small area of sand resource (relative to the overall resource) prior to development and delivering a landform for a viable onshore cable corridor in this location. Furthermore, such an approach would not be environmentally feasible given the likely volume of sand that would need to be extracted and the volume of infill required to then provide a suitable landform for the onshore cable corridor. Additionally, there will be no barrier to a minerals developer accessing the soft sand resource following decommissioning. Therefore, it is considered that the Proposed Development accords with M9 and associated guidance.”</i></p>
14.11	<p>14.11. Paragraph 6.9.12 of the JMLP makes reference to safeguarding guidance. The West Sussex Minerals and Waste Safeguarding Guidance (March 2020) provides information for applicants for development that may impact safeguarded resources. Chapter 2 is specific to safeguarding mineral resources and sets out how consideration should be given to safeguarding minerals, through the preparation of a MRA to address clauses (b)(ii) and (b)(iii) of Policy M9.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
14.12	<p>14.12. Paragraph 2.8 of WSCC's Safeguarding Guidance sets out what information should be included within an MRA in order to give proper consideration of mineral safeguarding. This includes: An assessment of the geological information about the site including quarrying history, Geological memoirs, mineral assessments, and market appraisals; Site</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>investigations/borehole data (applicants may be required to carry out borehole testing if this information is not already available); Consideration of other locations for the development that are outside the MSA; Assessment of whether the proposal can be modified to avoid sterilisation; Assessment of the potential for the use of the mineral in the proposed development and whether it is feasible and viable to extract the mineral resource ahead of the development; An explanation of the viability of prior extraction and how it will be carried out (e.g. environmental impacts, timescales, availability of the market to deal with the increase in the mineral); Discussions with potential 'users' of the mineral; An explanation of how any voids will be 'backfilled' in preparation for development and/or incorporated into the design and layout of the development; and Building stone – an assessment of quarries (including active, inactive, and dormant), historic buildings using the stone, and alternative supplies of the stone.</p>	
14.13	14.13. The guidance also provides a number of maps that show the extent of the safeguarded minerals in West Sussex.	Noted, the Applicant has no further comments on this matter at this time.
14.14	14.14. The West Sussex Monitoring Reports are prepared annually and provide information related to minerals and waste planning and activities in West Sussex. The reports provide information specific to each mineral type, including the locations of existing sites, the amounts extracted on an annual basis, demand levels, and general information related to the Joint Minerals Local Plan.	Noted, the Applicant has no further comments on this matter at this time.
14.15	<p>Construction Phase – Impacts Positive</p> <p>14.15. No positive impacts during the construction phase are identified.</p>	Noted, the Applicant has no further comments on this matter at this time.
14.16	<p>Neutral</p> <p>14.16. No neutral impacts during the construction phase are identified.</p>	Noted, the Applicant has no further comments on this matter at this time.
14.17	<p>Negative</p> <p>14.17. Chapter 24 of the ES (APP-065) seeks to address the issue of mineral safeguarding. It recognises that parts of the cable route are underlain by safeguarded building stone, clay, and soft sand. Figure 24.3 (Volume 3, Chapter 24 (figures)) shows the extent of safeguarded soft sand and clay; however, it does not show the building stone, which is identified at the northern end of the onshore DCO Limits (APP-065, para 24.9.36), east of Cowfold. Brick clay, building stone and soft sand are addressed in turn in the following paragraphs.</p>	<p>The Building Stone Mineral Safeguarding Area (MSA) is not shown on Figure 24.3 of Chapter 24: Ground conditions – Figures, Volume 3 of the Environmental Statement (ES) [APP-111] as this information was not available on request from West Sussex County Council and it is not readily discernible from British Geological Society information how the MSA has been identified. Building Stone is however considered within Chapter 24: Ground conditions, Volume 2 of the ES [APP-065].</p>
14.18	<p>Brick Clay</p> <p>14.18. Brick clay is a regionally important resource and brickmaking has a long-established history in the central and north eastern parts of the county. Brick clay is also used to produce tiles, pavers, and pipes. At present, there are four active clay quarries that provide clay for four brickworks (Pitsham, Warnham, Laybrook, and Freshfield), the details of which can be found in the above linked monitoring reports.</p>	Noted, the Applicant has no further comments on this matter at this time.
14.19	14.19. Brickworks, or manufacturers of clay products, are generally located on or near to the extraction sites that supply them, and therefore rely on their own sites for their resource. Brickworks sometimes require importation of materials for blending purposes, and there may be opportunities for these sites to take any materials extracted prior to development, to avoid needless sterilisation.	Noted, the Applicant has no further comments on this matter at this time.
14.20	14.20. Paragraph 24.9.40 notes that three of the four sites in West Sussex have a landbank of less than 25 years of supply in their reserves, as required by NPPF paragraph 214c and Policy M5 of the JMLP. The West Hoathly Brickworks	The Applicant notes this comment and identifies that the reference to the National Planning Policy Framework should be to Paragraph 220c.

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	site has now ceased all operations, and therefore there are only three active brickworks, of which two have landbanks of more than 25 years.	
14.21	14.21. The ES, at paragraph 24.9.41, states that the magnitude of effect would be negligible due to the fact that there is extensive resource available and relatively healthy landbanks, and therefore the impacts will be 'Not Significant' in EIA terms. However; this has been determined in the absence of a MRA to assess impacts on safeguarded brick clay.	Noted, the Applicant has no further comments on this matter at this time.
14.22	14.22. The applicant's assessment for clay focuses on current demand and needs, and not the safeguarding of minerals for future generations as intended. No quantitative assessment has been provided or how much clay may be sterilised. Without these assessments, it is difficult to assess the significance of the impact for clay, and whether it has been underplayed.	<p>For the reasons noted in references 14.4 and 14a (above), it is not possible to undertake a formal Minerals Resource Assessment at this stage of the Proposed Development. For these reasons, and due to there being no comparative clay extraction sites close to the onshore cable route, it is also not considered appropriate to undertake a quantitative assessment for brick clay.</p> <p>The Applicant notes that the future demands for brick clay are not readily quantifiable beyond the West Sussex County Council Joint Minerals Local Plan (JMLP) period, and as such, has used information from the JMLP to consider the issue of future demand. For Brick Clay, the JMLP states (Paragraph 6.5.5) that national policy requires a 25-year landbank to be maintained, and for a number of sources of clay to be available. At the time of publication, the JMLP identified three clay extraction sites with over 25 years of reserves, one with 24 years of reserves and one with 10 years of reserves. The 10-year site then had an allocation made for its extension (Policy M11).</p> <p>Subsequent information from West Sussex County Council (reference 14.20) states that one of these five sites has ceased operations and that only two of the remaining sites have greater than 25 years' worth of reserves.</p> <p>The latest publicly available information from the West Sussex JMLP Monitoring report 2021/22 confirms that there are four active brick clay sites in West Sussex, two of which have reserves of over 25 years supply. It also notes that in total these four sites had reserves of 13.04 million tonnes, and annual sales of 0.28 million tonnes at the time of publication. This would equate to a 46-year landbank in total.</p> <p>For brick clay, Section GC-C-08 of the Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] goes on to identify that alongside the permitted reserves for brick clay, there is a substantial safeguarding area available for brick clay. This is well in excess of any of the other mineral safeguarding areas within the county. Although this means that the overlap between the proposed DCO Order Limits and the safeguarding area covers a greater area than for other minerals</p>

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14.23	<p><i>Building Stone</i> 14.23. Building stone extraction is generally a small-scale industry, which provides local stone of distinctive character, including Horsham Stone, Hythe Sandstone, Ardingly Sandstone, and flint. Stone is important for the repair of historic buildings. There are four active stone quarries in West Sussex extracting stone for building on a small scale, the details of which can be found in the above linked monitoring reports.</p>	<p>under consideration, it remains a small proportion of the overall safeguarding resource; estimated at less than 1%.</p> <p>With over 99% of the brick clay safeguarding area untouched by the Proposed Development, it is therefore not considered that any minerals sterilisation that would occur would prevent future generations from meeting their own needs.</p>
14.24	<p>14.24. Paragraph 24.9.36 sets out that the DCO Limits falls within the building stone Mineral Safeguarding Area, east of Cowfold. Paragraph 24.9.38 states that there are no quarries in close proximity to the onshore DCO Limits, and paragraph 24.9.39 concludes that the magnitude of effect is therefore 'low', and the effect of the Project would be 'Minor Negative', and 'Not Significant' in EIA terms.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
14.25	<p>14.25. However, no MRA for safeguarded building stone has been undertaken. The ES only gives recognition of the resources that exist within parts of the DCO Limits, and notes there are no sites in close proximity to the Project. No quantitative assessment has been provided, or indication of how much building stone may be sterilised. Without these assessments, it is difficult to assess the significance of the impact for building stone and whether it has been underplayed.</p>	<p>For the reasons noted in references 14.4 and 14a (above), it is not possible to undertake a formal Minerals Resource Assessment at this stage of the Proposed Development. For these reasons, and due to there being no comparative building stone extraction sites close to the cable route, it is also not considered appropriate to undertake a quantitative assessment for building stone.</p> <p>For building stone, the JMLP (Paragraph 6.6.2) states that there were 2.7 million tonnes of permitted sandstone reserves (at the time of publication) and annual sales were in the region of 24,000 tonnes (using 2016 data). The 2021/22 JLMP Monitoring Report updates these figures to 2.53 million tonnes of permitted sandstone reserves and annual sales of 22,000 tonnes. The JMLP also identifies (paragraph 6.6.4) that there is no evidence that suggest a need to allocate any additional sites or site extensions to meet the projected demand for sandstone. Section GC-C-08 of the Chapter 24: Ground conditions, Volume 2 of the Environmental Statement [APP-065] uses the West Sussex County Council (WSSCC) Minerals and Waste Safeguarding Guidance (2020) to consider Building Stone. This Guidance states that a consideration needs to be made about whether any proposal would lead to a sterilisation of building stone, due to the extent of the safeguarded area and the low level of demand. The low level of demand is shown by there only being four active building stone quarries in the county which produce around 22,000 tonnes per annum, from a permitted reserve of around 2.53 million tonnes. Although the Minerals Safeguarded Area for building stone does overlap with the proposed DCO Order Limits, this is not close to any of the existing four quarry sites. It has not been possible to</p>

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14.26	<p><i>Soft Sand</i></p> <p>14.26. Soft Sand is an important aggregate mineral that cannot be substituted by other minerals. It is used in construction activities and is extracted at a number of quarries in West Sussex, as identified in Figure 24.3 (Volume 3, Chapter 24 (figures)). The majority of the resource in West Sussex is within the South Downs National Park and, therefore, heavily constrained.</p>	<p>date to obtain shapefile data for the building stone safeguarding area within WSCC, however from reviewing the maps within the WSCC Joint Minerals Local Plan, the building stone MSA is greater than the soft sand safeguarding area. The overlap between the proposed DCO Order Limits and the building stone safeguarding is estimated as being around 11ha. Following the WSCC (2020) Minerals and Waste Safeguarding Guidance, there is evidence of low demand for building stone compared to the extent of both permitted reserves and the safeguarding area identified.</p> <p>The assessment of building stone sterilisation is therefore considered to accord with the guidance available and shows that any minerals sterilisation of Building Stone would not prevent future generations from meeting their own needs.</p>
14.27	<p>14.27. NPPF Paragraph 213e requires that Mineral Planning Authorities seek to maintain a landbank of at least seven years for aggregate minerals. Although safeguarding minerals is about future generations and not current demands, it is important to note that the current landbank for soft sand in West Sussex is now four years, based on an annual provision rate of 330,000 tonnes per annum (West Sussex LAA, January 2024), and for the South East in general, just above seven years (South East England Aggregate Working Party – Annual Report 2022 (December 2023)). This indicates the growing scarcity of this resource and importance of avoiding needless sterilisation.</p>	<p>The Applicant notes this comment and identifies that the reference to the National Planning Policy Framework should be to Paragraph 219f.</p>
14.28	<p>14.28. The ES assessment (at paragraphs 24.9.46–24.9.47) indicates that up to 2.9ha of land underlain by safeguarded mineral that may be sterilised by the Project, and based on historical records, up to 1.16 million m³ of soft sand may be sterilised. Assuming a bulk density of 1.7 tonnes/m³ for the Folkestone Formation, a total of 682,352 tonnes of soft sand may be sterilised, which equates to just over two years of supply based on the current annual provision rate for West Sussex. The ES (paragraph 24.9.47) states that the Applicant has not undertaken any assessment of economic viability of the resource.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
14.29	<p>14.29. The ES states that the sensitivity of the soft sand resource is 'medium' and during the construction phase, the magnitude of change is 'high' (para 24.9.47–24.9.50, APP-065), and that the Project will therefore lead to 'major negative' effect, considered to be 'significant' (para 24.10.11 and Table 24-24, APP-065). This is of concern must be taken into account in decision-making.</p>	<p>For soft sand, it is agreed that the worst-case calculation provided within Section GC-0C-08 of Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] shows a potential sterilisation figure of 1.16 million tonnes, and that this would be a significant, negative effect in environmental impact assessment (EIA) terms. It is also relevant that this conclusion is subsequently utilised within the Planning Statement [APP-036] when considering the overall need case for the Proposed Development. It is agreed that, given the conclusions found in Chapter 24: Ground conditions, Volume 2 of the ES [APP-065] in relation to minerals safeguarding, the Secretary of State will be</p>

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14.30	14.30. No MRA for safeguarded soft sand has been undertaken. The ES only gives a high-level assessment of the resource, with no detailed quantitative assessment provided, or any other considerations set out within the West Sussex safeguarding guidance. Without these assessments, it is difficult to assess the significance of the impact on the soft sand resource.	required to consider these findings in the context of the overriding need case for the Proposed Development. For the reasons noted in references 14.4 and 14a (above), it is not possible to undertake a formal Minerals Resource Assessment for soft sand at this stage of the Proposed Development. However, a proportionate quantitative assessment has been provided in Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] , based on the level of detail that is available at this stage of the Proposed Development. The Applicant notes that this calculation is based on using the maximum design scenario parameter stated in Table 24-13 of Chapter 24: Ground conditions, Volume 2 of the ES [APP-065] which comprises of a 40m wide onshore cable corridor located within the onshore part of the proposed DCO Order Limits and not the 35m stated in West Sussex County Council's Relevant Representation [RR-418] . This provides a worst-case scenario for the soft sand resource which may be sterilised, including the severance of deeper sand deposits for the operational life span of the Proposed Development, and therefore a worst-case determination can be made on this issue.
14.31	14.31. WSCC has previously requested that the Applicant considers the issue of severance, particularly for soft sand, as highlighted in Table 24-4 of the ES , at the meeting of 16 June 2023. No such assessment or consideration has been given. If the cable route results in severance of parcels of land underlain by the safeguarded resource, this could effectively sterilise the economic viability that would enable extraction.	<p>Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] does consider the issue of severance in relation to deeper soft sand deposits than would be directly affected by the depth of the pipeline, by considering the full extent of sand deposits in the Minerals Safeguarding Area (MSA) to a thickness of 40m.</p> <p>In relation to field severance, given the Applicant's position in relation to Brick Clay and Building Stone, this could only be applicable to Soft Sand. Where the onshore cable corridor runs through the soft sand MSA, the corridor adjoins the A283 from Lower Chancton Farm to where it exits the MSA to the east. No severance can therefore occur in this area because, if severance was to be relevant, this would already be created by the A283. This only leaves a stretch of land to the west of Lower Chancton Farm. Here, the MSA only exists as a relatively narrow band measuring between 100-160m wide and 600m in length (approximate figures). The A283 to the north provides an existing constraint on some of this land, with other soft sand quarries in the area utilising an approximate 35 wide buffer from roads of this type. A woodland area to the western boundary of this land would also provide a constraint to extraction. These constraints would see the area of land available become a narrow band measuring between 65-125m wide and 470m in length (approximate figures). Due to its location at the edge of the MSA, and as described in Paragraph 24.9.45 of Chapter 24: Ground conditions, Volume 2</p>

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14.32	<p><i>Outline Code of Construction Practice and Materials Management Plan</i></p> <p>14.32. The ES, at paragraph 24.9.48, states that the Applicant intends to mitigate against mineral sterilisation through the preparation of a MMP that will be produced prior to construction and to be secured through the OCoCP (PEPD-033). The OCoCP and the information contained within about the MMP is limited, with no reference to mineral safeguarding (particularly soft sand), prior extraction, local policies, or evidence of discussions with local mineral operators that have the required equipment to process any safeguarded minerals that are extracted. The potential volumes of material that could be recovered are unknown and there are no clear mechanisms in place to secure prior extraction or to demonstrate that prior extraction is not practicable or environmentally feasible.</p>	<p>of the ES [APP-065], this is unlikely to be considered as a sufficiently large plot of land to allow a viable extraction site to be developed. Therefore, severance is not considered to be relevant in this area.</p> <p>The response in references 14.4 and 14a outlines that whilst a Minerals Resource Assessment cannot be provided at this stage which fully adheres to the guidance in the West Sussex County Council Minerals and Waste Safeguarding Guidance, a proportionate and robust assessment of minerals sterilisation, based on a worst case scenario, has been carried out for soft sand in Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065]. Due to the level of information available at present, the assessment cannot provide full details of the quantities or quality of minerals which would be sterilised, and subsequently cannot confirm exactly how much mineral could be subject to re-use within the Proposed Development, or possible prior extraction. Due to this, no discussion with local operators who could process and manage any such minerals, can be progressed at this time. Chapter 24: Ground conditions, Volume 2 of the ES [APP-065] and the Outline Code of Construction Practice [PEPD-033] therefore provide as much information about mitigation as possible given the information that is available at this stage of the Proposed Development.</p>
14.33	<p>14.33. Without a robust MRA, the Secretary of State, as the decision maker for the Project, would not be able to consider whether there is an overriding need for the Project that outweighs the safeguarding.</p>	<p>The Applicant considers that a proportional, robust assessment of the Proposed Development's interaction with minerals has taken place, based on the level of information that is available at this stage of the Proposed Development and using a worst-case scenario basis. This is documented in Chapter 24: Ground conditions, Volume 2 of the Environmental Statement [APP-065] and provides sufficient information to allow a consideration of the overriding need for the Proposed Development against the effects on minerals safeguarding.</p>
14.34	<p>Operational Phase - Impacts Positive</p> <p>14.34. No positive impacts during the operational phase are identified.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
14.35	<p>Neutral</p> <p>14.35. No neutral impacts during the operational phase are identified.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
14.36	<p>Negative</p> <p>14.36. The issue of mineral safeguarding is covered above under Construction Phase. It is important to note that sterilisation of minerals would also occur through the operational phase, as identified in the ES (Paragraph 24.9.49). Furthermore, severance of any parcels of land would also result in sterilisation through the lifetime of the Project. To avoid the issue of duplication, the issues set out above apply.</p>	<p>The Applicant's response to these points are set out in references 14.22 to 14.31.</p>

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14.37	Required Mitigation 14.37. The proposed mitigation measure is a commitment, secured through the OCoCP, for the Applicant to produce a MMP that is prepared prior to construction and which seeks to maximise reuse of excavated materials. At present, the submitted OCoCP is severely lacking.	The Applicant's response on the subjects of prior extraction and materials reuse are set out in references 14.31 and 14.32 .
14.38	14.38. Commitment ID-69 within the OCoCP states that: "Construction strategies will be implemented that will seek to maximise the reuse of excavated clean materials from the onshore cable construction corridor where practicable and feasible. Prior to the stage of construction, an MMP will be developed which outlines where excavated non-waste materials will be reused in line with the CL:AIRE (2011) Definition of Waste Code of Practice (DoWCoP). The MMP will include a declaration by a Qualified Person that the MMP has been completed in accordance with the DoWCoP and that best practise is being followed."	Noted, the Applicant has no further comments on this matter at this time.
14.39	14.39. Beyond Commitment ID-69, there is nothing else relevant to mineral safeguarding. The OCoCP and the information contained within is limited, with no reference to mineral safeguarding (particularly soft sand), relevant policies, prior extraction, or evidence of discussions with local mineral operators that have the required equipment to process any safeguarded minerals that are extracted. There is no reference to assessments of potential volumes of material that could be sterilised or recovered, and there are no clear mechanisms in place to secure prior extraction or to demonstrate that prior extraction is not practicable or environmentally feasible. The focus of the OCoCP is on excavated waste materials; however, any aggregates (soft sand) would not be a waste and should not be needlessly sterilised.	<p>Commitment C-6 in Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] and the Outline Code of Construction Practice [PEPD-033] sets out that sensitive sites, including mineral resources and Minerals Safeguarding Areas (MSAs), will be avoided as a first principle.</p> <p>However, due to the location of the relevant Minerals Safeguarding Areas (MSAs), in particular the soft sand resource, it is not possible for the onshore cable route to avoid the MSAs, however the design of the onshore cable route has taken the MSAs into account and minimises the extent of impact on the MSAs by running in as direct a line as possible, or for soft sand, running adjacent to the A283 (an existing constraint to extraction).</p> <p>As noted in the Applicant's response in reference 14.22, an assessment of the potential volumes of minerals that will be sterilised is set out in Chapter 24: Ground conditions, Volume 2 of the ES [APP-065], particularly for soft sand resources where a worst-case volume has been identified.</p> <p>The Applicant's response to the points raised in regards to the practicality of prior extraction and the commitment to the reuse of excavated materials is included in references 14.4 and 14a and references 14.31 and 14.32.</p>
14.40	14.40. The Applicant should undertake a MRA that is consistent with the WSCC Safeguarding Guidance to evidence the impacts of the proposal on safeguarded minerals. This will enable understanding the potential volume of safeguarded minerals (building stone, clay, and soft sand) that may be sterilised, and the extent to which prior extraction could take place. The outcomes of this should then feed in to the OCoCP, which would be the mechanism through which prior extraction could be secured, where practicable and feasible.	The Applicant's response in relation to completing a minerals resource assessment is included in references 14.4 and 14a .
14.41	14.41. Without any assessments undertaken, it will not be possible for the Secretary of State to ensure that appropriate mitigation measures have been put in place to safeguard mineral resources, as required by EN-1.	It is agreed that, given the conclusions found in Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] in relation to minerals safeguarding, the Secretary of State will be required to consider these findings in the context of the overriding need case for the Proposed Development.

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15. Historic Environment (ES Chapter 25)		
15.1	<p>Summary</p> <p>15.1. The submitted ES chapter and supporting technical documents demonstrate that, even following mitigation, the Project would result in significant effects upon the historic environment during both construction and operation. Some of these effects are a consequence of the scale of the proposals in and of themselves, and the area of land affected. However, WSCC finds that the historic environment has not consistently been given sufficient weighing in decision making processes nor in consideration of alternative route options and substation locations. In a number of key areas, insufficient evidence has been submitted in support of the application for the significance of the affected heritage assets to be fully understood, as is required by the national policy statements. The ES has identified a number of significant residual effects to the historic environment. In several of these cases, WSCC finds that these effects are likely to constitute an unacceptably high magnitude of impact to the historic environment.</p>	<p>The onshore cable route selection and Proposed Development design has been an iterative process, which took into consideration the potential for archaeological remains of high heritage significance to be present across all alternative routes, as evidenced by available baseline data and reflected in the archaeological notification areas. This was balanced against other criteria as described in Chapter 3: Alternatives, Volume 2 of the Environmental Statement (ES) [APP-044]. The assessment presented in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] is based on a worst-case scenario. Therefore, the Applicant considers that further investigation would not change the outcome of the assessment. Taking a landscape approach and considering all available desk-based and geophysical survey data, Chapter 25: Historic environment, Volume 2 the ES [PEPD-020] identifies a high potential for archaeological remains of high heritage significance at certain locations along the onshore cable route.</p> <p>Commitments C-225 (updated by the Applicant within the Outline Code of Construction Practice [PEPD-033] (submitted at the Pre-Examination Procedural Deadline A on 16 January 2024)) and C-79 in the Commitments Register [REP1-015] (updated at the Deadline 1 submission) provide for mitigation through design and archaeological recording. This will be secured through the Outline Onshore Written Scheme of Investigation (WSI) [APP-231], which also sets out the methodological approach for archaeological investigations which ensures further investigation will be undertaken prior to construction. The Outline Onshore WSI [APP-231] is secured by Requirement 19 of the Draft Development Consent Order [PEPD-009]. Further engagement</p>

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15.2	<p>15.2. Construction works both offshore and onshore will introduce temporary negative change into the settings of a large number of onshore designated heritage assets during the construction phase. For a number of these assets, a degree of permanent harm will continue during operation of the WTGs and offshore substations. Whilst there might be limited options for further reducing harm via embedded mitigation, the scale of harm must nevertheless be accurately reflected in assessments, which is not consistently the case.</p>	<p>is currently being undertaken with the WSCC Archaeologist and Historic England on the Outline Onshore WSI [APP-231] and a revised version will be submitted at Examination Deadline 3.</p> <p>The Planning Statement [APP-036] outlines the position with regards the planning balance with regard to the benefits of the Proposed Development and the harm to heritage assets that is identified in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], as per paragraphs 4.7.66 and 5.4.10 of the Planning Statement [APP-036].</p> <p>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 has produced and submitted a Seascape, Landscape and Visual Design Principles Clarification Note (Document Reference 8.35) (submitted at Deadline 1), which provides further commentary on these design principles.</p> <p>The basis and assessment methodology used to determine effects on heritage assets and resulting harm, is described in Sections 26.7 and 26.8 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] and is in line with relevant policy and guidance.</p> <p>Where effects to heritage assets through change to their setting as a result of the offshore above-sea level structural elements, this will be for the duration of the operation and maintenance phase of</p>

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15.3	<p>15.3. The Project would result in harm to the significance of Grade II listed Oakendene manor, arising through negative change within its setting during construction and operation of Oakendene substation and associated construction activities. The magnitude of harm during construction has been under-assessed. The Applicant identifies a major adverse residual effect (operation) but equates this to 'less than substantial harm'. WSCC finds that, partly due to the absence of appropriate VPs and visualisations, the precise magnitude of harm to Oakendene Manor cannot currently be assessed. Insufficient consideration has been afforded to the historic environment in consideration of substation location alternatives.</p>	<p>the wind turbine generators (WTGs) and offshore substations (expected to be around 30 years). On completion of the decommissioning phase, any adverse effects and harm would be reversed. The effects arising through change to setting of heritage assets are therefore long term and reversible (as identified in paragraph 25.10.1 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]). See Section 25.11 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] and Section 4.9 in of Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045], which provides details of the decommissioning phase for both offshore and onshore.</p> <p>The assessment had identified no significant effects on heritage assets arising from change to setting as a result of the WTGs and offshore substation. Where effects are identified, these would result in less than substantial harm.</p> <p>The Applicant agrees with West Sussex County Council's comment, "<i>The Project would result in harm to the significance of Grade II listed Oakendene manor, arising through negative change within its setting during construction and operation of Oakendene substation and associated construction activities.</i>" This statement is in line with the assessment provided in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020].</p> <p>However, the Applicant disagrees with the rest of the West Sussex County Council's comment in reference 15.3.</p> <p>Whilst West Sussex County Council's comment refers only to viewpoints and visualisations, it is noted that the assessment of effects on settings during the construction phase and operation and maintenance phase considered not only views but also other relevant factors including changing land use and noise (for example during the construction phase).</p> <p>The basis and assessment methodology used to determine effects on heritage assets and resulting harm, is described in Sections 26.7 and 26.8 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] and is in line with relevant policy and guidance.</p> <p>The assessment was undertaken in accordance with relevant guidance, and the methodology described in Section 25.8 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. It was not possible to secure landowner access for a photograph viewpoint directly from Oakendene Manor but a viewpoint was obtained from a Public Right of Way (PRoW), with a</p>

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		<p>view of the onshore substation site and Oakendene Manor (Figure 18.12, Chapter 18: Landscape and visual impact assessment – Figures (Part 2 of 6), Volume 3 of the ES [APP-099]). This informed the assessment, along with baseline information on the Oakendene historic parkland and the topography of the onshore substation site (see Appendix 25.5: Oakendene parkland historic landscape assessment, Volume 4 of the ES [APP-211]). The assessment also took account of the measures proposed in Outline Landscape and Ecology Management Plan [APP-232], detailing the indicative landscape plan and design principles, which have been formed with consideration to the setting of Oakendene Manor and will be secured through Requirements 12 and 13 of the Draft Development Consent Order [PEPD-009]. Design principles within the Design and Access Statement [AS-003] are secured through Requirement 8 of the Draft Development Consent Order [PEPD-009].</p> <p>The assessment of effects on Oakendene Manor is provided in paragraphs 25.9.543 to 25.9.547 (for the construction phase) and 25.10.7 to 25.10.10 (for the operational and maintenance phase) of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. For the construction phase a Low magnitude of change is assessed, resulting in a Moderate adverse residual effect which would be Not Significant.</p> <p>For the operation and maintenance phase, a Medium magnitude of change is assessed, resulting in a Major adverse residual effect which would be Significant. The assessment provides the following qualifying statement with respect to the degree of harm to Oakendene Manor, “<i>As noted at paragraph 25.8.18, adverse change of less than a high magnitude to a designated heritage asset or non-designated heritage assets of equivalent heritage significance will normally be considered to comprise less than substantial harm. In this case, a medium magnitude of change would constitute less than substantial harm. This is because the listed building itself will be physically unaltered and important elements of its setting, including its relationship with the immediately surrounding gardens and the view to the south, will be preserved.</i>” (paragraph 25.10.10 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]).</p> <p>In addition, the Applicant refers West Sussex County Council to Section 25.11 Assessment of effects: Decommissioning phase of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], specifically the following statement regarding the onshore substation, “<i>Removal of infrastructure will mitigate any visual and audible impacts arising during the operation and maintenance phase (as described in Section 25.10). Where mitigatory planting</i></p>

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15.4	<p>15.4. There will inevitably be significant negative impacts to known and potential archaeological remains, the majority of which will arise from permanent physical impacts during the onshore construction groundworks. Following mitigation, the ES identifies significant residual effects on potential Neolithic flint mining, mortuary and settlement remains (including where these may be related to the scheduled prehistoric flint mine on Harrow Hill), and on Bronze Age and early medieval archaeological remains where these may be of national importance, within Zone 2: South Downs. The EIA assessment process does not capture the full extent of the impacts to archaeological remains which would arise from the Project, which will entail the loss of significant quantities of archaeological features of regional and local significance.</p>	<p><i>is retained, any effects on heritage significance through change to setting of heritage assets, as assessed for the operation and maintenance phase, will persist following decommissioning.</i></p> <p>Whilst it is accepted that a viewpoint from Oakendene Manor would complement the assessment, the addition of a viewpoint is unlikely to alter the assessment outcomes, reported in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. However, in response to the request for further information made by West Sussex County Council, the Applicant confirms that they are in the process of seeking to agree land access to Oakendene Manor to undertake viewpoint photography directly from the manor house, in line with viewpoint HE 01, as identified in Figure 25.5h, Chapter 25: Historic environment – Figures (part 2 of 6), Volume 3 of the ES [APP-099]. Further photography will be undertaken from other locations within the vicinity of Oakendene and reviewed to determine appropriateness for generating further visualisations for submission. The Applicant will further engage with West Sussex County Council, and Horsham District Council, in this process and supply visualisations of additional viewpoint photography at a deadline subsequent to completion of this work, where required.</p> <p>It is noted that with regard to Oakendene Manor, Horsham District Council has stated in their Relevant Representation [RR-148] that: <i>“HDC confirms that, having reviewed the location of designated above-ground heritage assets within the vicinity of the development and evaluated the contribution that their settings make to the significance of the asset, the impact of the development, including the substation, on these would be less than substantial at the lower end of the scale of that category in all cases of the historic environment and individual heritage assets.”</i></p> <p>This response is consistent with the conclusions of the assessment within Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p> <p>The Applicant agrees with the West Sussex County Council’s general comment on impacts to known and potential archaeological remains and residual effects on those heritage assets identified in the Environmental Statement (ES).</p> <p>However, the Applicant disagrees the latter statement <i>“The EIA assessment process does not capture the full extent of the impacts to archaeological remains which would arise from the Project, which will entail the loss of significant quantities of archaeological features of regional and local significance.”</i></p>

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		<p>The maximum parameters of the Proposed Development are provided in Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement [APP-045], with those relevant to the assessment of historic environment effects provided in Section 26.7 of Chapter 25: Historic environment, Volume 2 of the ES [APP-066]. Potential construction effects to archaeological remains are informed by the Onshore Works Plans [PEDP-005].</p> <p>The design parameters, in combination with all available historic environment baseline data, has informed the assessment of effects. Where there are limitations in the availability of survey data and other baseline information to support the assessment of potential and significance of archaeological remains, a reasonable worst-case has been assumed in the assessment. The Outline Onshore Written Scheme of Investigation [APP-231] (secured by Requirement 19 of the Draft Development Consent Order [PEPD-009]), sets out the methodological approach for archaeological investigations undertaken prior to construction to provide further information.</p>
15.5	<p>15.5. The DCO Limits cross an area of prehistoric downland between Km 12 and 17 (formerly onshore cable route LACR-01d) of exceptionally high archaeological significance, potential and sensitivity; a multi-period prehistoric landscape characterised by nationally significant scheduled Early Neolithic flint mining and associated activity. This route option was flagged at consultations as posing an unacceptably high risk of the risk harm to the historic environment and WSCC feels that greater weight should have been afforded to avoiding this very significant historic environment constraint in consideration of the alternatives. Even following a comprehensive and bespoke programme of archaeological mitigation, as proposed by the Applicant within the Outline Onshore Written Scheme of Investigation (OOWSI; APP-231) and secured in the draft DCO requirements, it is not clear that mitigation can be guaranteed to reduce the magnitude of harm to acceptable levels.</p>	<p>The Applicant notes WSCC comment in reference 15.5 and confirms that Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] identifies a high potential for archaeological remains of high heritage significance within the area of the South Downs.</p> <p>Please refer to the Applicant's response to reference 15.1, with respect to the position regarding mitigation and planning balance.</p>
15.6	<p>15.6. Despite comprehensive non-intrusive survey and assessment work, insufficient field evaluation was undertaken to inform the DCO application, and none within LACR-01d. The significance of the affected heritage assets (buried archaeology and geoarchaeology) cannot therefore currently be fully understood on the basis of the available evidence, not the presence of nationally significant remains ruled out, especially within the most archaeologically sensitive area of the Order Limits. In the absence of this information, it is not possible for decision makers to fully and accurately assess the impacts of the Project upon the historic environment.</p>	<p>The assessment presented in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] is based on a worst case scenario, which identifies a high potential for archaeological remains of high heritage significance within the area of the South Downs (in which longer alternative cable route (LACR)-01d, as defined in the Further Supplementary Preliminary Environmental Information Report (PEIR) (Rampion Extension Development Limited, 2023), falls).</p> <p>Archaeological field evaluation has been undertaken within the South Downs in the form of a geophysical survey and the results are described in the Appendix 25.4: Onshore Geophysical Survey Report, Volume 2 of the ES [PEPD-031, PEPD-113 - PEPD-119]. Specifically, the South Downs is covered by Fields 050-117. Survey in this area identified just two features identified as definite or probable archaeology:</p> <ul style="list-style-type: none"> • (52_1) possible ditch forming part of an enclosure; and • (85_1) a possible barrow.

Ref	Local Impact Report Comment	Applicant's Response
		<p>Other features were identified as having a possible archaeological origin, including multiple dispersed pit-type anomalies (e.g. 75_1) or areas of enhanced magnetism with unclear origins (e.g. 73_2, 74_3 and 75_2), weaker linear bands (e.g. 66_1, 66_2, 74_1) and weak curving anomaly (e.g. 62_1), which could be of archaeological origin. However, the geophysical survey did not indicate the presence of extensive or complex archaeological remains in which to targeted archaeological trial trenching, and so it is proposed to include this area within further evaluation to be undertaken prior to construction as specified in the Outline Onshore Written Scheme of Investigation [APP-231]. Where the geophysical survey is limited in detecting more ephemeral remains, such as artefact scatters/accumulations, the Outline Onshore Written Scheme of Investigation [APP-231] provides for a suite of evaluation techniques to investigate the presence and nature of such remains which might be impacted by the Proposed Development.</p> <p>Please refer to the Applicant's response in reference 15.1, with respect to embedded environmental measures, and their position regarding mitigation and planning balance.</p>
15.7	<p>15.7. The proposed archaeological mitigation measures and control documents are welcomed but require some amendments. Given the likelihood of nationally significant archaeological remains, WSCC is concerned by the absence of a commitment to undertake field evaluation pre-consent within the identified area of exceptionally high archaeological potential in particular. There is a need for greater certainty over the feasibility of and methodology for the 'avoidance by micro siting' approach, which the Applicant proposes as mitigation in the event of previously undiscovered remains of high or national significance.</p>	<p>The Applicant welcomes West Sussex County Council's (WSCC) comments on the Outline Onshore Written Scheme of Investigation (WSI) [APP-231]. The Applicant has received high level comments on the WSI from WSCC, which will inform an update of the WSI to be submitted at Deadline 3. Where further detailed comments from WSCC are provided to the Applicant, these will inform the updated document at Deadline 3 or a later iteration submitted at a subsequent deadline, depending on when these are provided.</p> <p>See Applicant's response in reference 15.1 with regards to timing of further evaluation and mitigation and how this work is secured. In line with updates to commitment C-225 and comments from WSCC Archaeologist, a flow chart will be appended to the Outline Onshore WSI [APP-231] to include procedures following discovery of previously unknown archaeological remains. This will be included in the updated Outline Onshore WSI [APP-231] to be submitted at Examination Deadline 3.</p>
15.8	<p>15.8. The extent to which embedded mitigation (design and landscaping) can guarantee/secure delivery of the predicted reductions in harm to designated assets is uncertain. The high-level design principles are welcomed but further certainty and detail is required to understand how these will translate into reduced harm to Oakendene manor.</p>	<p>The understanding of the historic environment interests of Oakendene Manor informed the design principles identified to reduce and minimise the impact on the setting of the building and these are secured in the Design and Access Statement (DAS) [AS-003]. The detailed design of the onshore substation must be undertaken in accordance with these design principles and provided for approval of the planning authority as per the</p>

Ref	Local Impact Report Comment	Applicant's Response
		requirements of the Draft Development Consent Order [PEPD-009] including 8 (2) which states that the design for approval, “ <i>must accord with the principles set out in the relevant part of the design and access statement</i> ”. Requirement 12 (3) of the Draft Development Consent Order [PEPD-009] also requires accordance with the DAS for provision of the landscaping details for the onshore substation. The Applicant will update the Design and Access Statement [AS-003] following issues raised at Issue Specific Hearing 1 in February 2024, which will be submitted at Deadline 3.
15.9	15.9. Additional funds will be required to meet some of the mitigation obligations of the Project due to this size and scale, in particular in relation to archaeological archiving requirements and adequate delivery of public benefit and education programmes.	Noted. The Applicant has no further comments at this stage.
15.10	15.10. WSCC acknowledges the revised documents submitted at the Procedural Deadline, which are reflected in this section. The updated geophysical survey has identified four previously unknown groups of anomalies of probable archaeological origin which do not correspond to known heritage assets. One of these, undated possible enclosures or settlement identified within an agricultural field west of Poling, is assessed as suffering significant residual adverse effects arising from construction of the onshore cable corridor. Due to the lack of prior field evaluation, its significance cannot be confirmed and may be higher (or lower) than assessed within the ES. In the event of high or nationally significant remains, design solutions to secure the preservation in situ of these remains would need to be explored. This additional harm to the historic environment should be considered in the decision-making process. the revised documents do not otherwise materially alter the content of this chapter.	<p>The Applicant agrees with West Sussex County Council’s comment. Where there are limitations in the availability of survey data and other baseline information to support the assessment of potential and significance of archaeological remains, a reasonable worst-case has been assumed in the assessment. The Outline Onshore Written Scheme of Investigation (WSI) [APP-231] (secured by Requirement 19 of the Draft Development Consent Order [PEPD-009] provided at Deadline 2 submission), sets out the methodological approach for archaeological investigations undertaken prior to construction to provide further information, which will inform the appropriate mitigation strategy.</p> <p>The Planning Statement [APP-036] outlines the position with regards the planning balance with regard to the benefits of the Proposed Development and the harm to heritage assets that is identified in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020], as per paragraphs 4.7.66 and 5.4.10 of the Planning Statement [APP-036].</p>
15.11	15.11. Where applicable, detailed comments on individual heritage assets or groups of assets, as well as comments relating to the various supporting documents, are set out within Appendix D.	Noted. The Applicant will provide responses where relevant to Appendix D.

Table 15: Summary of Impacts – Historic Environment

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
15a	Harm to or loss of known and potential archaeological remains	C	Neutral - There will be a neutral impact on archaeological	Avoid – Any archaeological remains of high significance identified	PS EN-1 (Paragraphs. 5.8.8, 5.8.9 and	The Applicant welcomes West Sussex County Council’s (WSCC) comments relating to archaeological remains (heritage assets with archaeological interest), which is identified as a receptor in

Ref	Local Impact Report Comment	Applicant's Response
	<p>(heritage assets with archaeological interest) located within the DCO Limits. Arising from groundworks associated with the construction of the onshore cable route and enabling works, trenchless crossings, access routes, grid connections and substations, and environmental mitigation works.</p>	<p>features and deposits within the Order Limits which will not be physically impacted by construction works. Negative - Construction will physically remove or truncate any archaeological features located within the footprint of construction groundworks. Impacts will be permanent, resulting in the loss of archaeological interest. This will result in a total loss of significance for the majority of affected archaeological features. In the case of deposits of geoarchaeological interest, partial removal of deposits may result in loss of significance and/or the ability to retrieve valuable information which might contribute to understanding.</p> <p>within the Order Limits should be preserved in situ. The ability to deliver such mitigation by avoidance via 'micro-siting'/design changes should be secured. A clear methodology for preservation in situ must be set out to ensure the protection of any such heritage assets from construction impacts. An ongoing management plan is required to ensure their future protection. The methodology for preservation in situ should be included within the Outline Written Scheme of Investigation (OOWSI; APP-231), which would then ensure it is secured by DCO requirement (dDCO Requirement 19 (1)). A change to the wording of dDCO requirement 19 (6) is also recommended (see Appendix B). Further clarification is required regarding the ability of the Project to ensure preservation in situ can be delivered, even in the event of multiple, extensive or complex archaeological remains. Mitigate: Secure and implement an agreed scheme of archaeological mitigation to partially offset the loss of archaeological remains. Overarching mitigation measures should be: • secured via the Onshore</p> <p>5.8.10). NPS EN-3 (Paragraphs 2.6.145-146.) The NPPF 2023 Section 16, (Paragraphs 200, 201, 209, 210, 211 and 214). In the event that archaeological remains of national significance are present; The NPPF para. 206, footnote 72.</p> <p>Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020].</p> <p>Please refer to the Applicant's response in references 15.1, 15.5 and 15.7. Further to those responses, the Applicant notes that where preservation of archaeological remains is identified to be an appropriate mitigation measure, the details of the methodology will be determined by specific factors, including the nature/extent of the archaeology, its burial context and the construction method options. This will be informed by the programme of evaluation work secure in the Outline Onshore Written Scheme of Investigation (WSI) [APP-231]. Whilst the exact detail of the methodology used cannot be determined at this stage, updates to the WSI will be provided at Deadline 3 including a flow chart which will be appended to the Outline Onshore WSI [APP-231] to include procedures following discovery of previously unknown archaeological remains. This will set out the relevant professional guidance which should be adhered to when establishing the appropriate methodology. Regarding the recommendation to change to the wording of Requirement 19 (6) of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission), see Applicant's response to reference 15.146.</p> <p>Where WSCC refers to "supplementary method statements", the Applicant understands these to be the same documentation as the site-specific WSIs which are provided for in the Outline Onshore Written Scheme of Investigation (WSI) [APP-231].</p> <p>Public outreach is covered in Section 7 of the Outline Onshore Written Scheme of Investigation (WSI) [APP-231], which sets out the need for proportionate programme of public outreach, with suggested activities of what this might entail. Measures relating to the project archive is dealt with throughout the document where relevant, including Section 4.6 Standards for archaeological work and Section 4.9 Post-excavation work, reporting and dissemination and within the inclusion of the Sussex Archaeological Standard 2019 in Appendix B of the Outline Onshore Written Scheme of Investigation (WSI) [APP-231].</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>Outline Written Scheme of Investigation provided by the applicant (OOWSI (APP-231)); approved by the WSCC County Archaeologist; and secured within the Development Consent Order (APP-19), in line with Draft DCO (dDCO) Requirement 19 (1). The OOWSI must be supported by appropriate supplementary method statements at the appropriate stage in the programme (dDCO Requirement 19). The content of the OOWSI should be updated as set out below. Mitigate: In accordance with Commitment C-261 (APP-254), secured by dDCO requirement 19 (3), the results of the mitigation should be made available to the public and disseminated to a wide range of audiences, to secure public knowledge and education benefits from the mitigation. Additional funds (S106) may be required to deliver a programme proportionate with the scale of the Project. Obligation: Additional funds (S106) may be required to expand archive storage facilities, to ensure archiving obligations can be fulfilled given the likely size of the Project archive. The need for, scope and</p>	<p>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 Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3. .</p>

Ref	Local Impact Report Comment			Applicant's Response			
15b	Harm to historic landscapes which intersect with the DCO Limits	C (onshore cable corridor and landfall), O (Oakendene substation) Negative impacts to historic landscapes within the onshore cable corridor and compounds will occur during construction only. Impacts to historic parkland at Oakendene substation will be permanent.	Neutral - For those elements of historic landscapes which are not sensitive to change, and/or are assessed as of low heritage significance, it is likely that a neutral impact will arise from the Project. Negative - Where existing features of the historic landscape are crossed by the onshore parts of the Proposed Development, sections will be removed, altering the existing historic landscape character.	methodology of the programme of mitigation, and all associated documentation must be approved by the WSCC County Archaeologist.	<p>Reduce: Where the cable corridor crosses sensitive historic landscapes, such as Prehistoric Downland landscape between KM 12 and 17, every effort should be made to ensure that construction activities within this part of the cable corridor are of the shortest duration possible in accordance with Commitment C-19, in order to reduce the severity and duration of negative impacts. As per the comments in the LVIA section of this report, greater certainty should be provided on the duration, phasing, and sequencing of construction activities, and how this will be programmed to ensure reinstatement can be maximised/expedited. An amendment to dDCO requirement 22 is suggested. Mitigate: Reinstatement works should ensure that historic landscapes are restored to their original state, or as close as can practically be achieved, following completion of construction. This should be undertaken in accordance with C-81,</p>	NPS EN-1 (Paragraphs. 5.8.8, 5.8.9 and 5.8.10). NPS EN-3 (Paragraphs. 2.6.145-146). NPPF 2023 Section 16, paragraphs 200, 201, 209, 210, 211 and 214.	<p>The Applicant welcomes West Sussex County Council's comments relating to historic landscapes, which is identified as a receptor in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020]. The Applicant provides the following response in relation to relevant embedded measures and mitigation.</p> <p>Loss of vegetation has been minimised during the construction phase including areas of vegetation to be retained which is presented in the Outline Code of Construction Practice [PEPD-033] – Appendix B – Vegetation Retention Plans. Paragraph 3.3.12 of the Design and Access Statement [AS-003] includes the design principle that existing vegetation will be protected and retained. The compliance with principles in the Design and Access Statement [AS-003] is secured through Requirement 9 of Draft Development Consent Order [PEPD-009]. The Outline Code of Construction Practice [PEPD-033] is secured through Requirement 22 of the Draft Development Consent Order [PEPD-009].</p> <p>Section 4.7 of Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement (ES [APP-045]) provides a summary of the indicative construction programme that has informed the assessments within the ES. Schedule 1, part 3, requirement 10 of the Draft Development Consent Order [PEPD-009] secures that the detail of the stages (equivalent to phases) of works are to be submitted and approved by the relevant planning authorities.</p> <p>Whilst the phasing/sequencing of works has yet to be determined, the nature of these effects are described in Commitment C-19 of the Commitments Register [REP1-015] (provided at Deadline 1 submission) outlines '<i>The onshore cable will be constructed in discrete sections. The trenches will be excavated, the cable ducts will be laid, the trenches back-filled and the reinstatement process commenced in as short a timeframe as practicable</i>'.</p> <p>As more detailed control documents are developed there will be greater certainty around phasing, duration and timing of the</p>

Ref	Local Impact Report Comment			Applicant's Response		
				<p>196, 199 and other relevant Commitments. As per the comments in the LVIA section of this report, greater certainty should be provided in the Outline Landscape and Ecology Management Plan (OLEMP; APP-232) to ensure these measures are adequately secured.</p> <p>Mitigate: Where permanent loss of historic landscapes will arise, recording should be undertaken prior to their loss as appropriate, in accordance with Commitment C-80.</p>		<p>assessed effects which currently occur within the construction phase.</p> <p>See Applicant's response to proposed amendment to Requirement 22 in Appendix B.</p> <p>It is expected that replanting would be successful through the implementation of stage specific Code of Construction Practice CoCP) and stage specific Landscape and Ecological Management Plan (LEMP) secured and via Requirements 12, 13 and 22 of the Draft Development Consent Order [PEPD-009].</p> <p>As per Requirements 12 and 22 of the Draft Development Consent Order [PEPD-009], no stage of the authorised project within the onshore DCO Order Limits are to commence until, for that stage, a written Landscape and Ecology Management Plan and associated work programme (which accords with the relevant provisions of the Outline LEMP [APP-232] and Outline Code of Construction Practice [PEPD-033]) has been submitted to and approved by the relevant planning authority.</p> <p>An Arboricultural Impact Assessment has been submitted with the DCO Application (see Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the ES [APP-194]). Section 4.7 of the Outline Code of Construction Practice [PEPD-033] includes a commitment (C-285) to produce an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) based on the detailed design. The provision of the AMS and TPP is secured as part of the Code of Construction Practice secured in Requirement 22 of the Draft Development Consent Order [PEPD-009].</p>
15c	<p>Harm to the significance of onshore designated heritage assets arising from change within their settings due to construction and operation of offshore arrays</p>	<p>C, O Negative change to settings will arise during construction and continue during operation of offshore arrays</p>	<p>Neutral - For designated heritage assets where; - setting does not make a meaningful contribution to heritage significance, or - the degree of change to setting will not result in meaningful harm to the significance of the heritage asset, A neutral impact is identified. Negative - The</p>	<p>Reduce: In line with the comments made within the SLVIA section of this report, a robust set of offshore design principles, including commitments to the layout and extent of WTGs and offshore substations, are required to reduce the adverse effects upon West Sussex heritage assets arising from changes within their wider settings.</p>	<p>NPS EN-1 (Paragraphs: 5.8.8, 5.8.9, 5.8.10, 5.8.14 and 5.8.15. NPS EN-3 (Paragraphs. 2.6.145-146). NPPF 2023 Section 16, (Paragraphs 200, 201, 205, 206, 207, 208, 210, 212, 213 and 214).</p>	<p>The Applicant welcomes West Sussex County Council's comments relating to onshore designated heritage assets arising from change within their settings due to construction and operation of offshore arrays, which are identified as receptors and assessed in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].</p> <p>Please see Applicant's response in reference 15.2.</p>

Ref	Local Impact Report Comment		Applicant's Response
		<p>construction and operation of the offshore Wind Turbine Generators (WTGs) and offshore substations will introduce negative change into the wider settings of a large number of onshore heritage assets. For those assets that derive significance from that aspect of their setting which includes the site of the proposed offshore arrays, construction and operation of the WTGs and offshore substations will reduce the contribution that setting makes to their significance. In many cases this will amount to harm to the individual assets.</p>	
15d	<p>Harm to the significance of onshore designated heritage assets arising from change within their settings during construction of onshore cable corridor and enabling works</p>	<p>C</p> <p>Neutral - For designated heritage assets where; - setting does not make a meaningful contribution to heritage significance, or - the degree of change to setting will not result in meaningful harm to the significance of the heritage asset, A neutral</p> <p>Reduce: Where appropriate, measures to reduce harmful changes to settings of heritage assets arising from construction activities should be implemented, in accordance with the relevant Commitments, especially C-19-27 and C-81. Where construction works will occur in proximity to sensitive heritage assets, efforts</p>	<p>NPS EN-1 (Paragraphs: 5.8.8, 5.8.9, 5.8.10, 5.8.14 and 5.8.15). NPS EN-3 (Paragraphs. 2.6.145-146). 2023 Section 16, (Paragraphs 200, 201, 205, 206, 207, 208, 210, 212, 213 and 214).</p> <p>The Applicant welcomes West Sussex County Council's (WSSCC) comments relating to onshore designated heritage assets arising from change within their settings during construction of onshore cable corridor and enabling works, which has been assessed in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].</p> <p>The Applicant confirms that construction of the Proposed Development will be undertaken in line with embedded environmental measures as listed in Commitments Register [REP1-015], which also details the securing mechanism for commitments C-19 to C-27 and C-81.</p>

Ref	Local Impact Report Comment			Applicant's Response		
15e	Harm to Grade II Listed Oakendene Manor and historic parkland arising from construction and	C / O Harmful changes within the setting of Oakendene Manor	Negative - Grade II listed Oakendene Manor (NHLE 1027074) has high	Harm to the significance of Oakendene Manor is to a large degree an inevitable consequence of	NPS EN-1 (Paragraphs: 5.8.8, 5.8.9, 5.8.10, 5.8.14 and	The Applicant disagrees with West Sussex County Council's comments relating to the degree of harm to Oakendene Manor, the uncertainty in the assessment and the adequacy of visualisations. Please see Applicant's response in reference 15.3 .
			<p>impact is identified. Negative - There will be temporary, negative changes to the settings of heritage assets during construction, including visual impacts, increases in noise levels, lighting, change in use, loss of access/amenity. These in some cases will result in temporary harm to the significance of onshore designated heritage assets.</p>	<p>must be made to limit the duration of time that the assets will suffer the adverse changes to the settings. As per the comments in the LVIA section of this report, greater certainty should be provided on the duration, phasing, and sequencing of construction activities, and how this will be programmed to ensure reinstatement can be maximised/expedited. An amendment to dDCO requirement 22 is suggested in order to secure C-19. In regard to C-26, commitments to reduce adverse effects arising from changes in noise levels should be secured via the OCoCP in line with comments made within the Noise section of this report. Embedded mitigation measures (Commitments C-82) reflect efforts to reduce harm via high-level design principles. As per the comments in the LVIA section of this report, further details and greater certainty should be provided regarding measures to deliver the design principles within the Design and Access Statement (DAS, AS-003).</p>	<p>Please see Applicant's response in reference 15b (above) regarding "duration, phasing, and sequencing of construction activities" and WSCC recommendation to amend requirement 22.</p> <p>As per Commitments Register [REP1-015], commitment C-26 is secured by the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission), Schedule 1, Part 3, Requirement 22 and Code of construction practice (5) (h).</p> <p>Regarding WSCC's comment relating to the design principles and the Design and Access Statement [AS-003], please refer to the Applicant's response in references 9b, 15.8 and 15b.</p>	

Ref	Local Impact Report Comment				Applicant's Response
operation of onshore substation at Oakendene	will arise during the construction phase, including impacts arising from construction compounds. The change to the setting of the manor will be permanent and will continue during the operation of the substation.	heritage significance, to which its current historic parkland setting makes a substantial positive contribution. Construction of the substation within the historic parkland of Oakendene manor will constitute a permanent adverse change in setting (change in use/character), Construction works associated with Oakendene substation, and compounds will cause visual and auditory changes within the setting of the manor, as well as loss of tranquillity, during the construction phase. These adverse changes to the setting of Oakendene manor will amount to a significant degree of harm to the significance of the grade II listed manor house. changes which arise during construction would persist. The ES assesses a medium magnitude of change, following implementation of embedded mitigation	the choice of this substation location and as such cannot be fully mitigated. Due to the proximity and nature of the structure, options for embedded mitigation by design are likely to be limited. Reduce: Embedded mitigations should be carried out in accordance with the Commitments Register and draft design principles. The high-level historic environment design principles set out within the DAS are welcomed. However, uncertainty remains over how these will be secured or delivered. In line with the LVIA section of this report, the design principles should be revised to provide further details and greater certainty should be provided regarding measures to secure a sympathetic layout, appearance, scale and design/finishes.	5.8.15). NPS EN-3 (Paragraphs. 2.6.145-146). NPPF 2023 Section 16, paragraphs 200, 201, 205, 206, 207, 208, 210, 212, 213 and 214.	<p>The Applicant also disagrees with West Sussex County Council's comment regarding contribution for the former historic parkland to the asset's heritage significance and refers to Appendix 25.5: Oakendene parkland historic landscape assessment, Volume 4 of the Environmental Statement (ES) [APP-211], which concludes that "<i>The setting of Oakendene Manor is considered to make a moderate contribution to its heritage significance.</i>"</p> <p>The Applicant notes Horsham District Council's comment in their Local Impact Report reference 13.8, "<i>The information contained in Category 6: Environmental Statement. Volume 4, Appendix 25.5: Oakendene parkland: historic landscape assessment (APP-211) describes the history of the house and its parkland. Section 6 describes the significance of the parkland setting in reinforcing the special interest of the listed building. The historic parkland is stated as being of low heritage significance. And makes a moderate contribution to the heritage significance of Oakendene Manor. HDC is satisfied this is an accurate conclusion.</i>"</p> <p>The Applicant notes the assessment in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] which identifies less than substantial harm to Oakendene Manor.</p> <p>The onshore substation design was an iterative process informed by the information set out in Appendix 25.5: Oakendene parkland historic landscape assessment, Volume 4 of the ES [APP-211]. The understanding of the historic environment interests of Oakendene Manor then informed the design principles identified to reduce and minimise the impact on the setting of the building and these are secured in the Design and Access Statement [AS-003]. The detailed design of the onshore substation must be undertaken in accordance with these design principles and provided for approval of the planning authority as per the requirements of the Draft Development Consent Order [PEPD-009] including 8 (2) which states that the design for approval, "<i>must accord with the principles set out in the relevant part of the design and access statement</i>". Requirement 12 (3) of the Draft Development Consent Order [PEPD-009] also requires accordance with the Design and Access Statement for provision of the landscaping details for the onshore substation. The Applicant is considering an update to the Design and Access Statement [AS-003] following issues raised at Issue Specific Hearing 1 in February 2024.</p> <p>Chapter 3: Alternatives, Volume 2 of the ES [APP-044] details the process of site selection and the consideration of alternatives.</p>

Ref	Local Impact Report Comment	Applicant's Response
15f	<p>Risk of harm to heritage assets of high or national significance within areas of exceptionally high archaeological potential and significance – Prehistoric Downland landscape between Km 12 and 17 (formerly route section LACR-01d)</p>	<p>measures. This is a significant adverse effect in ES terms. In light of the absence of appropriate suitable visualisations, a greater magnitude of change (potentially equivalent to substantial harm, as defined by the NPPF) cannot currently be ruled out. Insufficient consideration has been afforded to the historic environment in consideration of alternatives.</p> <p>Negative – High risk of harm to nationally significant heritage assets where the cable corridor intersects with an area of exceptionally high archaeological significance, potential and sensitivity; a multi-period prehistoric landscape characterised by Early Neolithic flint mining features.</p> <p>Avoid: Consideration of alternative routes appears to give insufficient weighting to this significant historic environment constraint. The risk of harm to nationally significant heritage assets is to a certain degree an embedded risk arising from this route choice. Any archaeological remains of high significance identified within the Order Limits should be preserved in situ. The ability to deliver such mitigation by avoidance via 'micro-siting'/design changes should be secured. A clear methodology for preservation in situ must be set out to ensure the</p> <p>NPS EN-1 (Paragraphs 5.8.8, 5.8.9 and 5.8.10). NPS EN-3 (Paragraphs 2.6.145-146). NPPF 2023Section 16, (Paragraphs 200, 201, 209, 210, 211 and 214). In the event that archaeological remains of national significance are present; NPPF para. 206, footnote 72</p> <p>Further information is also provided Deadline 1 Submission – 8.25.2 Applicant's Post Hearing Submission – Issue Specific Hearing 1 Appendix 2 - Further information for Action Point 4 – Wineham Lane [REP1-021]. The onshore substation selection process took into consideration the potential effects on historic environment receptors, including Oakendene Manor.</p> <p>The Applicant welcomes West Sussex County Council's (WSCC) comments relating to heritage assets of high or national significance, which have been assessed in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020].</p> <p>The onshore cable route selection process took into consideration the potential for archaeological remains of high heritage significance to be present across all alternative routes, as evidenced by available baseline data and reflected in the archaeological notification areas. This was balanced against other criteria as described in Chapter 3: Alternatives, Volume 2 of the ES [APP-044].</p> <p>The assessment presented in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] is based on a worst-case scenario. Therefore, the Applicant considers that further investigation would not change the outcome of the assessment. Taking a landscape approach and considering all available desk-based and geophysical survey data, Chapter 25: Historic environment, Volume 2 the ES [PEPD-020] identifies a high potential for archaeological remains of high heritage significance within the area of the South Downs.</p> <p>Please see the Applicant's response in reference 15a regarding relating to mitigation by avoidance.</p>

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	<p>protection of any such heritage assets from construction impacts. An ongoing management plan is required to ensure their future protection. The methodology for preservation in situ should be included within the Outline Written Scheme of Investigation (OOWSI; APP-231), which would then ensure it is secured by DCO requirement (dDCO Requirement 19 (1)). A change to the wording of dDCO requirement 19 (6) is also recommended (see Appendix B). Further clarification is required regarding the ability of the Project to ensure preservation in situ can be delivered, even in the event of multiple, extensive or complex archaeological remains.</p> <p>Mitigate: Secure an agreed scheme of archaeological mitigation to partially offset the loss of archaeological remains. Overarching mitigation measures should be secured via the OOWSI, to be approved by the WSCC County Archaeologist. The programme of mitigation must be secured within the Development Consent Order, as set out by dDCO Requirement 19. The OOWSI must be supported by stage-specific Written Schemes</p>	<p>Regarding the recommendation to change to the wording of Draft Development Consent Order [PEPD-009] Requirement 19 (6), see Applicant's response in reference 15.146.</p> <p>See Applicant's response in reference 15.6 relating to baseline and assessment, and further evaluation work.</p> <p>The Applicant confirms that the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] provides for "for further investigation (in order to sufficiently understand the significance of the affected assets), assessment, mitigation, post excavation analysis, reporting, publication and archive deposition, as appropriate." Where further updates are required by WSCC, the Applicant requests detailed comments to be provided for consideration.</p> <p>See Applicant's response in reference 15a relating to provision of public outreach and Section 106 funding.</p>

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		<p>of Investigation (SSWSIs) at the appropriate stage in the programme (as per dDCO Requirement 19). The content of the OOWSI should be updated as set out below. The agreed measures should include provision for further investigation (in order to sufficiently understand the significance of the affected assets), assessment, mitigation, post excavation analysis, reporting, publication and archive deposition, as appropriate. In the case of prehistoric downland landscape between Km 12 and 17, additional investigative methodologies and mitigation will be required, proportionate to the significance of the affected heritage assets. The results of the archaeological mitigation should be made available to the public and disseminated to a wide range of audiences, to secure public knowledge and education benefits from the mitigation. This is secured via dDCO requirement 19 (3). The need for, scope and methodology of the programme of mitigation, and all associated documentation must be approved by the WSCC County Archaeologist. Obligation: Additional</p>

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	<p>funds (S106) may be required to deliver additional non-intrusive field surveys outside of the immediate footprint of construction impacts, in order to enhance understanding and knowledge of this nationally significant prehistoric landscape. If appropriate, this work would be required in addition to the essential mitigation set out within the OOWSI order to further offset the potential harm to nationally significant heritage assets.</p>	
15.12	<p>Policy Context National Policy Statements <i>Overarching National Policy Statement (NPS) for Energy (EN-1)</i> 15.12. NPS EN-1 for Energy sets out guidance and requirements for nationally significant energy infrastructure projects.</p>	Noted, the Applicant has no further comments on this matter at this time.
15.13	<p>15.13. Paragraphs 5.8.8 and 5.8.9 require that “the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance”. As per the NPPF, there is a requirement to have consulted the relevant Historic Environment Record (HER), and where appropriate to carry out desk-based assessment and further field evaluation.</p>	Noted, the Applicant has no further comments on this matter at this time.
15.14	<p>15.14. Paragraph 5.8.10 states that the applicant must demonstrate that “the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.”</p>	Noted, the Applicant has no further comments on this matter at this time.
15.15	<p>15.15. Paragraphs 5.8.14 and 5.8.15 outline a presumption in favour of the conservation of designated heritage assets. Where proposals “will lead to substantial harm to or total loss of significance of a designated heritage asset”, consent should be refused, except where required in order to deliver substantial public benefits. These benefits must “outweigh” that loss or harm.</p>	Noted, the Applicant has no further comments on this matter at this time.
15.16	<p><i>NPS EN-3 for Renewable Energy Infrastructure (EN-3)</i> 15.16. NPS EN-3 for Renewable Energy sets out guidance and requirements for nationally significant energy infrastructure projects and covers the onshore and offshore impacts to the historic environment.</p>	Noted, the Applicant has no further comments on this matter at this time.

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15.17	15.17. Paragraphs 2.6.145-146 of NPS EN-3 states that “The avoidance of important heritage assets, including archaeological sites and historic wrecks, is the most effective form of protection”	Noted, the Applicant has no further comments on this matter at this time.
15.18	National Planning Policy Framework (December 2023) 15.18. The National Planning Policy Framework (NPPF) was published on 27 March 2012, and last updated in December 2023.	Noted, the Applicant has no further comments on this matter at this time.
15.19	15.19. The ES and technical appendices were issued prior to this latest update and so paragraph references are now superseded, and this section should be updated to reflect the relevant changes.	Noted, the Applicant has no further comments on this matter at this time.
15.20	15.20. Chapter 16 (paragraphs 200–214) of the NPPF address the conservation and enhancement of the historic environment; these set out the local planning authority’s responsibilities when dealing with proposals which have the potential to impact on heritage assets.	Noted, the Applicant has no further comments on this matter at this time.
15.21	15.21. Paragraph 200 states the requirement for an applicant to “describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance...”	Noted, the Applicant has no further comments on this matter at this time.
15.22	15.22. Paragraph 200 also sets out the requirement for field evaluation; “Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.” This key requirement of paragraph 200 of the NPPF is missing from the summary in Table 25.2 of the ES chapter.	The Applicant notes the reference to the National Planning Policy Framework (NPPF). The policy quoted by West Sussex County Council falls within paragraph 194 of the NPPF revised 2021. This paragraph is summarised in Table 25-1 of Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.23	15.23. Paragraph 205 requires that when considering impacts to designated heritage assets, “great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”	Noted, the Applicant has no further comments on this matter at this time.
15.24	15.24. Paragraph 206 states that “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.” It also states that substantial harm to or loss of grade II listed buildings registered parks or gardens should be “exceptional”.	Noted, the Applicant has no further comments on this matter at this time.
15.25	15.25. Footnote 72 outlines “Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.”	Noted, the Applicant has no further comments on this matter at this time.
15.26	15.26. Paragraph 208 sets out that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.”	Noted, the Applicant has no further comments on this matter at this time.
15.27	15.27. Paragraph 209 states that the effect proposals upon the significance a non-designated heritage asset is a material consideration, and that “a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”	Noted, the Applicant has no further comments on this matter at this time.

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15.28	15.28. Paragraph 211 outlines the requirement to “record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact”. It also sets out the requirement to make this evidence and any associated archives publicly accessible. Paragraph 211 also enshrines the principle that preservation by record does not fully offset harm of loss, as “the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.”.	Noted, the Applicant has no further comments on this matter at this time.
15.29	WSSC Policy 15.29. There are no WSSC policies relevant to the Project.	Noted, the Applicant has no further comments on this matter at this time.
15.30	Construction Phase – Impacts Positive 15.30. No positive impacts have been identified during the construction phase.	The Applicant agrees with West Sussex County Council's comment, which aligns with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.31	Neutral Designated Heritage Assets 15.31. Construction of the WTGs, offshore substations, onshore cable route, landfall, construction compounds and substations will introduce change into the wider settings of a large number of onshore designated heritage assets. The ES assesses (APP-066) that for many of these assets, their settings do not make a meaningful contribution to their heritage significance, which may be derived primarily from their architectural value in the case of many listed buildings. For other assets, the degree of visual change within the wider setting will be so minor that it will not result in meaningful harm to the significance of the heritage asset. This will constitute a neutral impact on the local historic environment.	The Applicant welcomes West Sussex County Council's comments, which aligns with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.32	Archaeology 15.32. For those archaeological features and deposits within the DCO Limits that will not be physically impacted by construction works (those located outwith the footprint of construction and reinstatement groundworks), a neutral impact is identified.	The Applicant welcomes West Sussex County Council's comments, which aligns with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.33	Historic Landscapes 15.33. For those elements of historic landscapes that are not sensitive to change and/or are assessed as of low heritage significance, it is likely that a neutral impact will arise from the Project.	The Applicant welcomes West Sussex County Council's comments, which aligns with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.34	Negative Designated Heritage Assets 15.34. The baseline settings assessment work, which includes the Settings Assessment Scoping Report (APP-213), Oakendene Parkland Historic Landscape Assessment (APP-211), and an Onshore Heritage Asset Baseline Report (APP-214), is generally comprehensive and compliant with best practice and industry standard methodology for heritage settings assessment. However, WSSC does not always concur with assessments of significance, harm and residual significance of effect within the ES chapter are not always accurate (see Appendix D for further detail).	The Applicant welcomes West Sussex County Council's comments regarding the baseline settings assessment work. The Applicant notes West Sussex County Council's disagreement regarding the assessment of significance, harm and residual significance of effect in some instances within Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] and has responded accordingly to those comments provided by West Sussex County Council in Appendix D .
15.35	15.35. Temporary harm to designated heritage assets, arising from change within their settings, will arise during construction for all aspects of the Project.	The Applicant agrees with West Sussex County Council's comment, which aligns with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].

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15.36	15.36. WTGs and Offshore Substations - Construction of the WTGs, offshore substations and offshore cable corridor will introduce negative change into the wider settings of a large number of onshore heritage assets. A substantial number of assets derive some of their significance from that aspect of their setting, which includes the site of the proposed offshore arrays; in many cases, it includes panoramic coastal and sea views. Construction of the WTGs and offshore substations will introduce intrusive visual changes into the settings of these assets, which will reduce the contribution that setting makes to their significance. In many cases, this will amount to a non-negligible degree of harm to the individual assets.	The Applicant agrees with West Sussex County Council's comment, which aligns with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] .
15.37	15.37. WSCC finds that the ES does not always accurately reflect the scale of harm to the historic environment arising from the WTGs and offshore substations, due to the methodology by which residual effects to heritage assets within the moderate harm category are uniformly assessed as 'not significant' in EIA terms. WSCC is concerned that this methodology may, in some cases, serve to downplay the cumulative effects of WTGs and offshore substations on onshore designated heritage assets. Whilst there might be limited options for further reducing harm via embedded mitigation, the scale of harm must nevertheless be accurately reflected in order to allow decision makers to make informed judgements.	The Applicant does not agree with West Sussex County Council's comments. Please see Applicant's response in reference 15.2 .
15.38	15.38. Onshore Cable Route and Landfall - There will be temporary harm to the significance of onshore designated heritage assets arising from negative change within their settings during construction of the onshore cable corridor and enabling works. The degree of harm is assessed as Low or Very Low in all cases. Whilst this may in some cases downplay the severity of harm, these effects will be temporary in duration. Nevertheless, impacts are assessed as Low (Moderate adverse residual significance of effect) for 33 assets during construction phase.	<p>The Applicant refers West Sussex County Council to the assessment methodology used to determine effects on heritage assets and resulting harm described in Section 26.8 of Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020], which is in line with relevant policy and guidance (listed in Section 26.2 of the same chapter) and therefore does not "downplay" the degree of harm identified. The assessment takes into consideration the temporary nature of the construction works and the nature of the change which will be to the setting of the heritage assets identified in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p> <p>The degree of harm to heritage assets is identified as less than substantial, where the magnitude of adverse change is assessed as Very Low or Low resulting in a Not Significant effect.</p>
15.39	15.39. Whilst no physical harm to designated heritage assets is proposed, there is a high potential for as-yet undiscovered archaeological features that may demonstrably be a continuation of, and/or of equal significance to, nearby scheduled monuments within the prehistoric downland landscape between Km 12 and 17. Any such assets identified within the DCO Limits following field evaluation would be subject to the same policies as designated assets, in accordance with NPS-EN1 (paragraph. 5.9.6) and the NPPF (paragraph 200 Footnote 72). Any harm to such heritage assets would carry equivalent policy weighting to harm to scheduled monuments.	<p>The Applicant agrees with West Sussex County Council's comments which aligns with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020].</p> <p>The Planning Statement [APP-036] outlines the position with regards the planning balance with regard to the benefits of the Proposed Development and the harm to heritage assets that is identified in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], as per paragraphs 4.7.66 and 5.4.10 of the Planning Statement [APP-036].</p> <p>The Planning Statement [APP-036] states "<i>It is considered that the substantial public benefits of the Proposed Development outweigh the residual harm to the heritage assets outlined in the ES.</i>"</p>

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15.40	15.40. Oakendene Substation - The construction of Oakendene substation and construction compounds will result in temporary harm to the significance of Grade II listed Oakendene Manor (NHLE 1027074), arising from adverse changes within its setting.	The Applicant agrees with West Sussex County Council's comments which align with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.41	15.41. Oakendene Manor has high heritage significance, derived primarily from its architectural and historic interest. The current setting of Oakendene Manor, largely comprising the surviving historic parkland of the manor, makes a substantial positive contribution to the asset's significance. Although assessed as of relatively low heritage significance in its own right, the parkland retains a number of surviving parkland features and boundaries, visible in long-range views from the manor, with anomalies identified from Lidar and geophysical survey potentially representing remains of additional, earlier phases of parkland features. The setting of the manor is largely free from modern intrusion, especially within views south and south-east from the manor.	The Applicant largely agrees with West Sussex County Council's comments which generally align with the assessment outcomes in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020]. However, the Applicant notes that the land which once formed the historic parkland associated with Oakendene Manor is no longer in parkland use and contains an industrial estate. The Applicant disagrees with West Sussex County Council's comment regarding contribution for the former historic parkland to the asset's heritage significance and refers to Appendix 25.5: Oakendene parkland historic landscape assessment, Volume 4 of the ES [APP-211], which concludes that " <i>The setting of Oakendene Manor is considered to make a moderate contribution to its heritage significance.</i> " Please refer to the Applicant's response in reference 15e .
15.42	15.42. The significance of Oakendene Manor and the contribution made by setting are assessed within the Onshore Heritage Asset Baseline Report (APP-214) and Oakendene Parkland Historic Landscape Assessment (APP-211). It is the view of WSCC that the contribution of setting to the significance of the manor has been underassessed in the application. In particular, contributions made by long views of the historic parkland, changes in parkland design over time and changing desires for privacy versus open views, and the role of designed versus organic views, need further consideration.	<p>The Applicant disagrees with West Sussex County Council's comments. Please refer to the Applicant's response in reference 15e.</p> <p>The Applicant also notes that the Oakendene Parkland Historic Landscape Assessment was issued to West Sussex County Council in April 2023 in advance of the Development Consent Order (DCO) Application submission, which includes the same document at Appendix 25.5: Oakendene parkland: historic landscape assessment, Volume 4 of the Environmental Statement [APP-211]. Receipt of the document was acknowledged by West Sussex County Council pre-Application in April 2023 but no comments were provided to the Applicant.</p>
15.43	15.43. There will be significant visual changes within the setting of the asset, and the LVIA section of the LIR (Section 9) finds that the visual impacts of the construction of Oakendene substation have been downplayed. The proximity means that the substation will inevitably be visible or partially visible in views from the manor house, including key long-distance and possibly designed views south-east across the historic parkland from the manor. The RVAA (APP-171) assessed significant visual impacts for Oakendene Manor, when assessed as a residential property. It is difficult to see how this does not also indicate a major adverse effect from a heritage settings perspective, given the acknowledged contribution of the historic parkland setting to the significance of the manor. There will also be significant visual intrusion within long-range views towards the manor from the PRoW to the south-east. These changes to the setting of Oakendene Manor will amount to harm to the significance of the asset, and the ability to understand and appreciate that significance.	<p>The Applicant disagrees with West Sussex County Council's comments. Please refer to the Applicant's responses in Section 9, which are relevant to landscape and visual impact assessment (LVIA).</p> <p>The scope of LVIA assessment is presented in Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement (ES) [APP-059], which considers a wide range of landscape and visual effects has been completed in accordance with relevant guidance for that aspect. The historic environment assessment presented in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] considers the effect on heritage significance of relevant heritage assets.</p>

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15.44	15.44. Construction activities associated with Oakendene substation, including the construction compounds and trenchless crossing compounds, will cause temporary visual changes within the setting of the manor during the construction phase, above and beyond the permanent impacts caused by the substation structure itself. Construction of the substation and construction activities associated with TC-27/27a and TC-28 will likely result in highly intrusive changes within the setting of Oakendene Manor during this period. Construction compounds and accesses will likely result in the presence of plant and equipment including cranes, concrete batching plants, staff welfare facilities, stockpiles/storage of materials, vehicular parking, and will result in increased human and vehicular activity.	The assessment of effects on Oakendene Manor during the construction phase is provided in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.45	15.45. Although construction is predicted to last four years at this site, this duration is not currently secured within the dDCO Requirements.	The construction programme is provided in Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement [APP-045] and provides a robust basis for assessment. However, it would not be practical or enforceable to secure this through a DCO requirement.
15.46	15.46. The retention of a small number of individual parkland trees and the existing hedgerow along the eastern boundary of the substation, as indicated in the Indicative landscaping plan for the DAS, will afford some limited screening during the construction phase in views south-east from Oakendene Manor. However, the proposed new and enhanced planting as indicated on the Indicative Landscaping Plan, will not be present during construction phase to reduce impacts. Topography and temporary removal of hedgerows will mean visual changes in views north-west towards the manor from PRoW 1786 will suffer major adverse change.	The Applicant disagrees with West Sussex County Council's assessment of "major adverse change". For the construction phase, the assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] identifies a Moderate adverse residual effect that would be Not Significant. This assessment takes account of the following, " <i>Whilst embedded measures provide for planting to mitigate the visibility of the substation from the heritage asset, this will not be established for the construction phase and therefore will not mitigate the initial loss of trees to the southeast of the asset and the change to views southeast from the asset.</i> " (paragraph 25.9.546).
15.47	15.47. Additional impacts during construction include loss of tranquillity and increases in noise level; an impact that WSCC finds has been underassessed within the ES (see Section 10 of the LIR). The noise and vibration assessment (APP-106, APP-178) predicts an increase above background levels of 4 or 5 decibels during construction; whilst the ES assesses this as not significant, WSCC is concerned that this change nevertheless constitutes a significant decrease in tranquillity. It seems likely to constitute a meaningful adverse change within the setting of Oakendene Manor during the period of construction, which is predicted to last four years.	The assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] takes into account the changes in the noise environment, see paragraph 25.9.543. Please see Applicant's response in reference 15.3 .
15.48	15.48. As per previous consultation responses, WSCC remains concerned that heritage assets were not afforded sufficient consideration in the selection of viewpoint (VP) locations within the Landscape and Visual Impact Assessment (LVIA) chapter (APP-059). NPS EN-1 (paragraph 5.8.9) states that "Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact." Visualisation from VPs located in the general vicinity of a heritage asset are not always sufficient to assess the degree of change within its setting and may not capture key views.	Please see Applicant's response in reference 15.3 .
15.49	15.49. Visualisations at Oakendene substation (APP-099, VP SA3, Figures 18.12a-e) are not representative of key views to and from the manor. In the viewpoint analysis (APP-168) for VP SA3, the only mention of Grade II listed Oakendene Manor is that "The white buildings of Oakendene Manor are evident in the middle distance" (Table 1.4). In the sensitivity description of Table 1.4, no mention is made of heritage or the manor. VP SA3 is located on a Public Right of Way between the upper slopes of Taintfield Wood and the Oakendene substation site. The visualisations show views north encompassing the manor house.	Please see Applicant's response in reference 15.3 . The relevant assessment for effects on heritage assets, including Oakendene Manor, are in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.50	15.50. No other VPs are represented that reflect changes within the setting of Oakendene manor, in particular views south-east from the manor. Statements within the ES cannot always be corroborated as a result; for example, south-east	Please see Applicant's response in reference 15.3 .

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	<p>facing views of the construction compounds from Oakendene Manor are described as 'heavily filtered' but WSCC cannot currently confirm this due to the lack of supporting visual evidence.</p>	<p>Access to land at Oakendene Manor was not available prior to Development Consent Order (DCO) Application submission and efforts are being made to complete this during the Examination as a result of consultation with West Sussex County Council (WSCC). Whilst it is accepted that a viewpoint from Oakendene Manor and associated land would complement the assessment, the addition of further viewpoints is unlikely to alter the conclusions reported in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020]. However, in response to the request for further information made by WSCC, the Applicant confirms that they are in the process of seeking to agree access to Oakendene Manor to undertake viewpoint photography directly from the manor house, in line with viewpoint HE 01, as identified in Figure 25.5h, Chapter 25: Historic environment – Figures (Part 2 of 6), Volume 3 of the ES [APP-099]. Further photography will be undertaken from other locations within the vicinity of Oakendene and reviewed to determine appropriateness for generating further visualisations for submission.</p>
15.51	<p>15.51. The ES assessed a low magnitude of change to Oakendene during construction, resulting in a moderate adverse residual effect which would be Not Significant. Given the above impacts, the magnitude of impact has been underassessed, apparently solely on the basis of the temporary duration of the construction phase. WSCC concludes that a medium magnitude of change (temporary) would be more appropriate. Even accepting that the temporary duration can reduce the magnitude of harm somewhat, an assessment of low does not appear to be in keeping with the scale of predicted changes within the setting of the manor during construction.</p>	<p>The Applicant disagrees with West Sussex County Council's comments. Please see Applicant's response in reference 15.3.</p> <p>The assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] accurately reflects the predicted change within the setting of the manor and how this will affect its heritage significance (in paragraphs 25.9.543 to 25.9.547 for the construction phase and 25.10.7 to 25.10.10 for the operation and maintenance phase).</p>
15.52	<p>15.52. WSCC finds that construction effects on Oakendene Manor will constitute a significant negative impact to the local historic environment, albeit on a temporary basis.</p>	<p>The Applicant disagrees with West Sussex County Council's (WSCC) comments. Please see Applicant's response in references 15.3 and 15.51.</p> <p>To clarify, the basis for the assessment comprises the maximum parameters for the Proposed Development, which includes the duration of the construction phase. The temporary and permanent nature of any predicted change therefore informs the assessment of effect. This is in line with the assessment methodology set out in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].</p> <p>Whilst there is disagreement between the Applicant and WSCC on the predicted magnitude of change and significance of effect, the Applicant seeks agreement from WSCC that the resulting harm would be less than substantial, based on the available evidence. WSCC comments made at Issue Specific Hearing 1 in February 2024 suggest that there is agreement of less than substantial harm to Oakendene Manor, subject to delivery of mitigation (see</p>

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15.53	<p><i>Archaeology</i></p> <p>15.53. There is the potential for harm to archaeological features within the entirety of the onshore DCO Limits, including the onshore cable route and landfall; Oakendene substation, extension to the National Grid substation and other associated construction and reinstatement works.</p>	<p>reference 4(v) in Deadline 1 Submission – 8.31 Applicant's Post Hearing Submission – Issue Specific Hearing 1 [REP1-033].</p> <p>Whilst there is a varying potential for archaeological remains to be present across the proposed onshore part of the proposed DCO Order Limits (as assessed in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020]), resulting harm will be limited to the location of construction impacts within the proposed DCO Order Limits. Without more detailed design information, the assessment has assumed that construction effects could theoretically occur anywhere within the proposed DCO Order Limits. However, the commitment to avoidance by design means that in practice this potential will be reduced.</p>
15.54	<p>15.54. The archaeological potential and significance within the DCO Limits, as currently understood, is described within the ES Chapter and relevant technical appendices. A number of non-intrusive baseline surveys have been undertaken in support of the Project. These include archaeological desk-based assessment (APP-200-201), Lidar (APP-200-201), geophysical (magnetometry) survey (PEPD-031) and desk-based geoarchaeological and palaeoenvironmental assessment (APP-202). The ES assessment and supporting non-intrusive surveys are generally thorough, well-written and comprehensively assessed, making good use of the available information to draw logical inferences on likely archaeological potential and significance.</p>	<p>The Applicant welcomes West Sussex County Council's comments and agreement regarding the Environmental Statement assessment (in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020]) and supporting documents [APP-199 to 202, APP-211, PEPD-031 and PEPD-113 to PEPD-119].</p>
15.55	<p>15.55. Geophysical survey has been undertaken, with the aim being to survey the entirety of the land within the DCO Limits. Whilst WSCC recognises the sustained efforts to achieve maximum survey coverage, the fact remains that due to a range of constraints, including land access and suitability/accessibility for survey, only approximately 71% coverage of the DCO Limits has been achieved to date (PEPD-031). This means that nearly a third of the DCO Limits has not been subject to geophysical survey. This makes the absence of subsequent trial trenching more problematic and reduces the confidence level of predictions of archaeological potential with unsurveyed areas of the DCO Limits.</p>	<p>Magnetometry geophysical survey has continued following Development Consent Order (DCO) Application submission (August 2023) with survey results up to December 2023 provided in the updated Appendix 25.4: Onshore geophysical survey report, Volume 4 of the Environmental Statement (ES) [PEPD-031] submitted at Pre-Examination Procedural Deadline A. Appendix 25.4: Onshore geophysical survey report, Volume 4 of the ES [PEPD-031] includes 88% of land within the proposed DCO Order Limits considered suitable for survey (424 hectares (ha) in total). Areas noted as unsuitable for survey comprise areas that cannot be surveyed due to permanent adverse ground conditions; e.g., the presence of trees and/or infrastructure. Provision for use of other geophysical survey techniques, where appropriate, will be made in an update to the Outline Onshore Written Scheme of Investigation (WSI) [APP-231]. Consultation is ongoing with the West Sussex County Council Archaeologist and Historic England on the update to the Outline Onshore WSI [APP-231] and this will be submitted at Examination Deadline 3.</p> <p>The Applicant also notes that whilst the scope of the geophysical survey was to achieve coverage of all surveyable land with the proposed DCO Order Limits, that not all areas will be subject to intrusive construction activities which may lead to archaeological impacts. The scope of the geophysical survey has taken a cautious approach based on available design information which</p>

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15.56	15.56. To date, an extremely small amount of intrusive field evaluation (trial trenching) has been undertaken. Only two sites were selected by the Applicant for pre-application field evaluation, selected based on preliminary geophysical survey results that were potentially indicative of archaeological features of high significance. A total of only ten evaluation trenches have been excavated within the DCO Limits; at Brook Barn Farm (APP-212). A further 12 trenches excavated at Crossbush, targeted on the site of a Napoleonic barracks, no longer fall within the DCO Limits.	<p>assumes that intrusive construction activities <i>may</i> occur anywhere within the relevant work areas (Onshore Works Plans [PEPD-005]) in the proposed DCO Order Limits.</p> <p>The assessment of archaeological potential in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] has considered a combination of desk-based research, site walkovers, geophysical survey and targeted trial trenching. Where there are limitations in the availability of survey data and other baseline information to support the assessment of potential and significance of archaeological remains, a reasonable worst-case has been assumed in the assessment.</p>
15.57	15.57. Despite the importance of early field evaluation having been raised by WSCC since the scoping stage, no other archaeological trial trenching has been undertaken. Not even the prehistoric downland landscape between Km 12 and 17, which passes through multiple Archaeological Notification Areas (ANAs) and is a known Neolithic flint mining landscape of national significance and exceptionally high archaeological potential, has been subject to trial trench evaluation to inform the understanding of archaeological potential and significance.	<p>Noted, the Applicant has no further comments on this matter at this time.</p> <p>As West Sussex County Council observes at reference 15.56, the Applicant has undertaken trial trenching in locations selected based on preliminary geophysical survey results that were potentially indicative of archaeological features of high significance. In the absence of such indications from the geophysical survey elsewhere and given the elevated risk of unexploded ordnance on the South Downs, the Applicant determined that speculative intrusive works would carry disproportionate cost and risk. A programme of evaluation work secured in the Outline Onshore Written Scheme of Investigation [APP-231] would be undertaken after consent.</p>
15.58	15.58. The NPS EN-1 (paragraphs. 5.8.8–5.8.10) and the NPPF (paragraph 200, Footnote 72) require that developers must be able to describe the significance of the affected heritage assets. Due to the absence of field investigations, the significance of the affected heritage assets (buried archaeology and geoarchaeology) cannot be fully understood on the basis of the available evidence, even having adopted a 'worst-case scenario' approach as the ES has attempted to do.	<p>The Applicant has provided a substantive amount of baseline information to inform the assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020], which adheres to the relevant policy requirements.</p> <p>Where the potential for archaeology is suspected, but not confirmed, the significance of this has been assessed precautionarily. This includes the assumption of as yet unrecorded highly sensitive remains on the South Downs, the loss or disturbance of which is assessed as a major adverse (significant) effect.</p> <p>The Applicant recognises that further evaluation work will be required to inform the exact details of the mitigation strategy, which is reflected in the embedded environmental measures in the Commitments Register [REP1-015] (updated at the Deadline 1 submission) and principally the Outline Onshore Written</p>

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		<p>Scheme of Investigation (WSI) [APP-231], which is to be updated during the examination following further consultation with West Sussex County Council.</p>
15.59	15.59. Field evaluation within the DCO Limits, proposed by the Applicant to take place post-consent, is highly likely to identify additional archaeological remains. The presence of nationally significant archaeological remains within any areas of the DCO Limits cannot currently be ruled out.	Noted, the Applicant has no further comments on this matter at this time.
15.60	15.60. In the absence of this information, it is not possible for statutory consultees to provide fully informed responses nor for decision makers to accurately assess the impacts of the Project upon the historic environment.	<p>The Applicant disagrees with West Sussex County Council's comments, see response to reference 15.58.</p> <p>While residual significant effects have been identified in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020], given the magnitude of change and the potential for recording, this is considered to comprise less than substantial harm.</p> <p>The Planning Statement [APP-036] balances this less than substantial harm to heritage assets against the significant benefits of the Proposed Development and concludes that these impacts would be acceptable.</p>
15.61	15.61. The scale of the Project and the area of land affected means that there will inevitably be significant negative impacts upon known and potential archaeological remains.	Please refer to Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] for full details of the assessment of effects on archaeological receptors.
15.62	15.62. Most of the harm to archaeological remains will arise during construction of the onshore cable route and construction works associated with landfall, trenchless crossings, haul roads, access roads and construction compounds. There is also potential for impacts to archaeology via habitat reinstatement, hedgerow notching, tree planting and landscaping, and other enabling and mitigation works.	Noted, the Applicant has no further comments on this matter at this time.
15.63	15.63. Most of the negative impacts will arise from direct physical removal or disturbance of buried archaeology during topsoil stripping, sub-surface excavations and other intrusive groundworks.	Noted, the Applicant has no further comments on this matter at this time.
15.64	15.64. Although trenchless crossings may reduce overall impacts on archaeology when compared with open trenched construction methods, there remains the potential for direct physical impacts depending upon the drilling profile, which maybe shallower for some crossings, as well as on geoarchaeological deposits buried at depth. Entry and exit pit groundworks will result in direct physical impacts (although relatively limited in spatial extent). Indirect impacts may also arise from changes to water tables. There is the potential for bentonite outbreaks to result in harm to below-ground archaeology, which could occur without the ability to detect or assess the harm.	Noted, the Applicant has no further comments on this matter at this time.
15.65	15.65. These impacts will be permanent and will reduce or remove the possibility that these heritage assets can be further interpreted in the future, resulting in loss of archaeological interest. This will result in a total or partial loss of significance for the majority of archaeological features located within the footprint of these groundworks.	The Applicant notes that extent of loss of archaeological interest will be dependent on the nature of the archaeological remains and the extent of construction effects. It is also noted that whilst an agreed scheme of archaeological investigation, recording and dissemination, following any mitigation by detailed design (such as narrowing of the construction corridor, refinement of the onshore cable route within the proposed DCO Order Limits), would still result in loss or truncation of archaeological remains the

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15.66	15.66. In the case of deposits of geoarchaeological interest, partial removal of deposits may result in localised loss of significance and/or loss of the ability to retrieve valuable information, which might contribute to understanding. There is also the potential for direct physical removal of Pleistocene or Palaeolithic archaeological finds, sites or features, if present.	archaeological interest would be preserved by record before the loss occurs. The Applicant agrees with potential for impacts to deposits of geoarchaeological interest and archaeological remains, however, embedded environmental measures outlined in the Commitments Register [REP1-015] (updated at the Deadline 1 submission), and the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] provide for an appropriate and proportionate programme of evaluation, and subsequent mitigation by avoidance/reducing effects through design, and preservation by record.
15.67	15.67. Following mitigation (embedded and secured), the ES identifies significant residual effects during the construction phase on: Potential Neolithic flint mining, mortuary and settlement remains (including where these may be related to the scheduled prehistoric flint mine on Harrow Hill), Bronze Age and early medieval archaeological remains, which may be of national importance, within Zone 2: South Downs, and Potential remains of undated enclosures or settlement identified via geophysical survey within an agricultural field west of Poling.	Noted, the Applicant has no further comments on this matter at this time.
15.68	15.68. However, due to the nature of the EIA framework, its focus on significant residual effects and the degree to which prior mitigation is used to reduce the residual magnitude of impact, the full extent of the impacts to archaeological remains which will arise from the Project are not necessarily effectively captured.	See Applicant's response in reference 15.58 .
15.69	15.69. In the event that field evaluation of these or other known and possible archaeological features within the onshore cable corridor identifies their significance as high, their total or partial loss may constitute an unacceptably high magnitude of harm.	See Applicant's response in reference 15.60 .
15.70	15.70. Prehistoric Downland Landscape between Km 12 and 17 - In addition to the above archaeological impacts, which apply to onshore cable corridor and all areas of the DCO Limits where there will be construction impacts, one area has the potential for major adverse impacts to archaeological remains. Onshore cable route option LACR-01d, which was taken forward as the chosen option into the DCO Limits, crosses an area of the South Downs National Park that comprises a rich and complex prehistoric landscape, containing multi-period archaeology characterised by Early Neolithic flint mining. The approximate area lies between Kms 12 and 17, and is shown on Figure 4 of the OOWSI (APP-231).	Noted, the Applicant has no further comments on this matter at this time.
15.71	15.71. The landscape and individual heritage assets should be considered to be of national significance and high sensitivity to change. This cable route option was highlighted at pre-application consultation in February 2023 as posing an unacceptably high risk of harm to the historic environment due to its exceptionally high known heritage significance and archaeological potential. There is an identified risk of harm or substantial harm to potentially nationally significant archaeological remains within this section of the cable route.	The approach to identifying and characterising archaeological receptors that may be impacted is set out in Section 25.4 of Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] . See Applicant's response in reference 15f .
15.72	15.72. Any such assets identified within the DCO Limits following field evaluation would be subject to the same policies as designated assets, in accordance with NPS-EN1 (paragraph. 5.9.6) and the NPPF (Footnote 68). Any harm to such heritage assets would carry equivalent weighting to harm to scheduled monuments.	See Applicant's response in reference 15.39 .

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15.73	<p>15.73. Assessment of the significance of this prehistoric downland landscape within the ES does not always sufficiently reflect the exceptional rarity and potential research value. Although the individual significance of the heritage assets is assessed within the ES chapter and Appendix 25.8 (APP-214), their group value as components of a prehistoric landscape scale is not captured. The assigned ES values for significance and degree of harm are generally broadly correct (within the limitations of ES assessment methodology), and the overall residual significance of effect is therefore calculated as substantial (adverse). However, the accompanying narrative assessment of significance, which allows for a more qualitative and holistically evidenced assessment, is vital for understanding the significance of the affected heritage assets. Ensuring that this assessment accurately and fully captures all aspects of heritage significance is vital to allow decision makers to properly weigh any harm to heritage assets against the benefits of the Project.</p>	<p>See Applicant's response in reference 15.39.</p> <p>The Applicant welcomes West Sussex County Council's (WSSCC) agreement with the accuracy of assessment of significance and harm. The narrative should therefore be considered sufficient to accurately define the significance of the heritage asset and therefore the degree of harm, as agreed by WSSCC. The narrative which supports the assessment will be advanced through further field evaluation, as provided for in the Outline Onshore Written Scheme of Investigation (WSI) [APP-231].</p>
15.74	<p>15.74. The archaeological significance of this prehistoric downland landscape is evidenced further in the response by the Sussex Archaeological Society to the consultation on this route option (see Appendix D).</p>	<p>The Applicant notes the summary information provided in Appendix D. Please see Applicant's response in reference 15.5.</p> <p>Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] and associated appendices in Volume 4 of the ES [APP-199 to 202, APP-211, PEPD-031 and PEPD-113 to PEPD-119] identify the historic environment baseline relevant to this section of onshore cable route.</p>
15.75	<p>15.75. No archaeological field evaluation has been undertaken for this section of the cable route by the Applicant, as requested through the consultation and Evidence Plan Process (EPP). Assessments are informed solely by geophysical survey, lidar survey and desk-based study. Whilst these provide valuable information on archaeological context, potential and likely significance, they have inherent limitations. In the absence of 'ground-truthing' by field evaluation, archaeological potential has not been confirmed or characterised, and the significance of the affected heritage assets cannot be fully understood on the basis of the available evidence.</p>	<p>Please see Applicant's response in references 15.4, 15.6 and 15f.</p>
15.76	<p>15.76. The geophysical survey has identified multiple dispersed pit-type anomalies or areas of enhanced magnetism with unclear origins within the vicinity of known Neolithic flint mining sites. Although none have been assessed as of definite or probable archaeological origin within the report, WSSCC has concerns regarding the methodology used to interpret the survey data (see Appendix D for further detail).</p>	<p>The Applicant confirms that the geophysical survey was undertaken by a qualified and experienced contractor and the data interpretation and report was undertaken by a highly experienced specialist in archaeological geophysics. The interpretation was undertaken using all other available baseline data as presented in the Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020]. Whilst the anomalies were identified as having an unclear origin, due to their location, they were acknowledged in the relative sections of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] which discusses archaeological potential relating to Neolithic flint mines, "<i>Whilst the dispersed nature of the pit-type anomalies does not resemble the dense pattern of shafts in the scheduled flint mining sites, an archaeological origin for these anomalies cannot be ruled out, and where these anomalies do not correspond with features on historic mapping, a prehistoric date is also possible.</i>" It should also be noted that there was also extensive and intense World War 2 (WW2) military training activity across this downland landscape, as well as late post medieval and modern extraction</p>

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15.77	15.77. The archaeological potential of the area indicates that the types of features that might be present potentially include (but are not limited to) previously unidentified Early Neolithic flint mining shafts or associated remains, evidence of on-site flint processing and associated activities, flint working floors, surfaces or hollows, hearths and trace evidence of Neolithic structures. Given the ephemeral nature of certain of these feature types, standard archaeological evaluation techniques are unlikely to be sufficient to reliably identify and characterise the archaeological features in this area.	activity, also evidenced in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. Please see Applicant's response in reference 15.6 .
15.78	15.78. This is reflected within the OOWSI, which proposed a programme of fieldwalking and test pit evaluation prior to standard trial trenching (see Mitigation section for further detail). However, the results of such a programme of investigation are not currently available to aid understanding of significance. It is the understanding of WSCC that further field evaluation is proposed until post-consent, which WSCC finds unacceptable and is contrary to the requirements of paragraphs 5.8.8-5.8.10 of NPS-EN1 and paragraph 200 of the NPPF (with regard to the need to describe the significance of any affected heritage assets, and where necessary undertake field evaluation).	Please see Applicant's response in references 15.6, 15.58, 15.60 and 15.73 .
15.79	15.79. The OOWSI sets out a robust suite of bespoke investigation and mitigation measures for this area (see Mitigation section for further detail). In the event that archaeological remains of high or national significance are identified within the cable corridor, WSCC is not satisfied that it will be possible to appropriately mitigate, as archaeological excavation is unlikely to reduce the potential harm to acceptable levels in the case of nationally significant archaeological features. In the event that Neolithic flint mining shafts are present within the cable corridor, excavation of a feature of this size, scale and complexity would present a myriad of logistical, health and safety and financial challenges.	The Applicant welcomes West Sussex County Council agreement that the "OOWSI sets out a robust suite of bespoke investigation and mitigation measures for this area". Please see Applicant's response in reference 15.6 .
15.80	15.80. Commitment C-225 states; "Where previously unknown archaeological remains of high heritage significance are identified through surveys along the cable route, and where these locations have not been possible to avoid during earlier design stage, consideration will be made for engineering solutions (e.g. narrowing of the construction corridor) to minimise direct impacts. Where impacts are not avoidable, an appropriate programme of mitigation will be undertaken to ensure preservation by record." Whilst this commitment states an aim to ensure preservation by record, it does not sufficiently demonstrate that harm to high or nationally significant remains can be avoided, nor preservation in situ secured by DCO requirement.	The embedded environmental measures for the Proposed Development were established and adapted through the pre-DCO Application consultation process. Following a meeting on 27 October 2023 with West Sussex County Council (WSCC) Archaeologist, commitment C-225 has been updated by the Applicant within the Outline Code of Construction Practice [PEPD-033] (submitted at the Procedural A Deadline) and the Commitments Register [REP1-015] (updated at the Deadline 1 submission) to the following: <i>C-225: "Where previously unknown archaeological remains of high heritage significance are identified through surveys along the cable route, and where these locations have not been possible to avoid during earlier design stage, consideration will be made for engineering solutions (e.g. narrowing of the construction corridor, divert cable route within DCO Order Limits, re-siting stockpiles) to avoid impacts in the first instance minimise direct impacts. Where impacts are not avoidable, these will be minimised where possible through design solutions and an appropriate programme of mitigation will be undertaken to ensure preservation by record. Such measures will be reviewed in consultation with relevant stakeholders (WSCC Archaeologist and Historic England). An onshore outline WSI provides detail of appropriate methodologies to be implemented during the evaluation and mitigation stages of the archaeological works."</i>

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		See also Applicant's response in references 15.7 and 15a.
15.81	15.81. It is the position of WSCC that greater weight should have been afforded to avoiding this very significant historic environment constraint. Consideration of alternative route options within Chapter 3 appears to give insufficient weighting to the risk of harm to nationally significant heritage assets when weighed against other constraints. Route LACR-01d was selected on the basis of 'engineering, environmental, cost and land acquisition factors' (APP-044 para. 3.4.67), despite it being acknowledged that 'Multiple responses to the third Statutory Consultation exercise raised concern over the remains of high heritage significance' (APP-044 para. 3.4.66). Options LACR-01c and LACR01d appear to have been weighted equally in terms of harm to the historic environment on the basis that both have 'high potential for archaeological remains of high significance and both would be required to be subject to detailed evaluation and mitigation' (APP-044 paragraph 3.4.67).	See Applicant's response in references 15.1 and 15f.
15.82	15.82. This argument misses the increased risk with LACR-01d (although still a possibility with LACR-01c) of encountering archaeological remains of equivalent significance to the nearby Scheduled Monuments (Prehistoric flint mine and part of a round barrow cemetery at Blackpatch 1015880; Itford Hill style settlement on Cock Hill 1015881; 1017446; Prehistoric flint mine and a Martin Down style enclosure on Harrow hill 1015239). The NPPF (paragraph 206, footnote 72) states that "Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.". It is not clear that this has been sufficiently considered within the route selection process.	The Applicant disagrees with West Sussex County Council's (WSCC) comments. The quote provided by WSCC in reference 15.81 that explains that alternatives routes had ' <i>high potential for archaeological remains of high significance and both would be required to be subject to detailed evaluation and mitigation</i> ' evidences the comparable risk in policy terms. The potential for archaeological remains of high heritage significance on alternatives routes, also relates to known scheduled monuments, which forms part of the wider archaeologically sensitive landscape in this area of the South Downs.
15.83	15.83. Given it has been identified as an area of exceptionally high archaeological potential and significance, WSCC finds the lack of field evaluation for this section of the cable corridor in particular wholly unacceptable. In the absence of this information, it is not currently possible to describe the significance of the affected heritage assets. WSCC takes that view that LACR-01d, in particular, poses the probability of an unacceptably high magnitude of harm to the historic environment as a result of the Project.	Please see Applicant's response in references 15.5, 15.6, 15f, 15.58, 15.60 and 15.73.
15.84	<p><i>Historic Landscape Character</i></p> <p>15.84. Construction activities will result in changes to historic landscapes. Where existing features of the historic landscape are crossed by the onshore parts of the Project, sections will be removed, altering the existing Historic Landscape Character (HLC).</p>	Noted, the Applicant has no further comments on this matter at this time.
15.85	15.85. In general, these landscapes are assessed as low value. However, some parts of Zone 2 – South Downs are assessed as medium value, comprising surviving areas of unenclosed downland with steep scarp slopes, rich in prehistoric earthworks. The magnitude of change on these historic landscapes is likely to be low when assessed on a landscape scale, and the effects will not be permanent. Nonetheless, this will constitute a negative impact to the local historic environment.	Noted, the Applicant has no further comments on this matter at this time.
15.86	15.86. Construction of the substation and compounds at Oakendene Substation will result in negative impacts to the HLC of the area, specifically Oakendene historic parkland. This will arise largely through physical loss of a large part of the surviving parkland through construction of the substation and removal of historic landscape features. During the construction phase, temporary changes to the landscape and parkland will arise through construction of the two compounds, and adverse visual and noise impacts due to construction works. These temporary construction impacts are predicted to last for four years; a significant time duration.	Noted. Please see Applicant's response in references 15b, 15.41 and 15.42.

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15.87	15.87. The parkland is assessed as of low heritage significance in its own right, although some historic parkland features are present. However, it forms the historic parkland setting of Oakendene Manor and its significance is enhanced by its historic relationship with the manor house. It is the view of WSCC that the significance of the parkland may have been underassessed within the Oakendene parkland historic landscape assessment (APP-211). In particular, the contribution of individual trees which, whilst arguably falling slightly short of the criteria for Veteran Trees (see Arboricultural section of the LIR), nevertheless can be individually identified on the 1st edition OS mapping of 1875 and are likely to have formed part of deliberate planting within the historic parkland. There may also be conflation of informal naturalistic-style parkland, which nevertheless is considered a designed parkscape, with 'informal' parkland, which may have organically evolved as a result of field boundary changes.	Please see Applicant's response in references 15b, 15.41 and 15.42.
15.88	15.88. The possible earlier origins of the parkland should be further considered, as potentially indicated Lidar features are identified within the parkland and historic earthwork banks are surviving within Taintfield Wood.	Please see Applicant's response in references 15b, 15.41 and 15.42.
15.89	Operational Phase - Impacts Positive 15.89. No positive impacts have been identified during the operational phase.	Noted, the Applicant has no further comments on this matter at this time.
15.90	Neutral Designated Heritage Assets 15.90. Following reinstatement, negative changes within the settings of heritage assets arising within from the onshore cable route and landfall will not persist. Therefore, there will be a neutral impact upon these designated heritage assets during operation.	Noted, the Applicant has no further comments on this matter at this time.
15.91	15.91. Some minor changes to settings might arise during operation, due to maintenance and repair activities, and use of operational accesses. However, these are not likely to translate to meaningful changes to the significance of any identified heritage assets.	Effects arising from changes to setting of heritage assets as a result of operation and maintenance of the onshore landfall and onshore cable corridor were scoped out of the assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] .
15.92	Archaeology 15.92. Additional negative impacts to archaeological remains are not anticipated during the operational phase for the majority of receptors.	The Applicant agrees with West Sussex County Council's comment. Direct effects on heritage assets within the proposed DCO Order Limits during the operation and maintenance phase were scoped out of the assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] .
15.93	Historic Landscape Character 15.93. Following reinstatement, it is not anticipated that negative impacts to historic landscape character will be ongoing within the onshore cable route and landfall.	Noted, the Applicant has no further comments on this matter at this time.
15.94	Negative Designated Heritage Assets 15.94. WTGs and Offshore Substations - Harm to the significance of onshore designated heritage assets due to negative changes within their settings is anticipated to arise due to the presence of the WTGs and offshore substations. This negative impact will be ongoing and will continue during the operational phase of the Project.	Noted, the Applicant has no further comments on this matter at this time.
15.95	15.95. Onshore Cable Route and Landfall - For the onshore cable route and landfall, there should be no ongoing or permanent negative impacts to designated heritage assets arising from change within their settings. However, prior to completion of reinstatement works, including full growth and maturation of planting schemes, negative impacts arising	See Applicant's response in references 15.91, 15.3, 15.8, 15e, 15.41, 15.42 and 15.44. See also Applicant's response in references 11.1, 11.5, 11d, 11.29 and 12.4.

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	during construction may persist into the initial stages of the operation of the Project. Visualisations for VP SA3 indicate the differences between year 1 and year 15. This is likely to be even more marked in views south-east from Oakendene Manor, as the new 'specimen' tree planting will take over 15 years to mature.	
15.96	15.96. Oakendene Substation – As discussed above, construction of the substation at Oakendene will cause negative change within the setting of Grade II Listed Oakendene Manor (NHLE 1027074), amounting to harm to its significance. Significant residual effects are identified for Oakendene Manor during the operation of the Project.	The Applicant notes the assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] which identifies less than substantial harm to Oakendene Manor.
15.97	15.97. During operation, some of the negative changes that arise during construction, in particular changes due to construction traffic and noise levels, would be removed. However, the majority of the negative impact will be permanent, and harm will be ongoing during the operational phase, even following the implementation of embedded environmental measures.	Noted, the Applicant has no further comments on this matter at this time.
15.98	15.98. The substation design as proposed through the DCO application, is a visually intrusive industrial structure, entirely at odds with the current rural parkland setting. In and of itself, the permanent change in use and character of the part of the historic parkland that will be occupied by the substation, will reduce historic interest by fragmenting the parkland and weakening the relationship between the manor and its historic landholdings.	Noted. Please see Applicant's response in reference 15.41 .
15.99	15.99. The ES chapter assesses a medium magnitude of change for this heritage asset following embedded mitigation measures, resulting in a major adverse residual effect (significant in EIA terms).	The Applicant notes that this is assessment outcome for Oakendene Manor during the operation and maintenance phase in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].
15.100	15.100. The ES methodology equates this effect to less than substantial harm; however, see Appendix D for further comment on methodology. 'Less than substantial harm, at the upper end of the scale' may be a more appropriate assessment. As discussed above, due to the absence of visualisations from the key location described above, it is not possible to accurately assess the precise degree of visual change within the asset's setting, and thus the precise magnitude of harm cannot be calculated.	Please see Applicant's response in references 15.3 and 15e .
15.101	15.101. It is not clear that this harm has been afforded sufficient consideration within the Alternatives chapter (APP-044), which assessed that overall environmental effects were equal for both Oakendene and Wineham Lane North substation site options. However, the historic environment effects are significantly higher for the Oakendene site. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 Act requires that "special regard be given to the preservation of listed buildings or their settings, and that any harm should require clear and convincing justification". This requirement, as well those of NPS-EN1 and the NPPF in relation to harm to listed buildings, appear not to have been afforded sufficient consideration in the Oakendene substation site selection process.	Please see Applicant's response in references 15.3 and 15e .
15.102	15.102. The proposed planting of new trees, woodland and scrub, as indicated in the Indicative landscaping plan for the Design and Access Statement (DAS, AS-003), will mature during the operational phase and this embedded mitigation will eventually help somewhat screen the substation. The negative and stark visual intrusion of the substation will, in theory, be somewhat reduced and softened in key views to and from the manor. However, as above, the lack of appropriate VPs and visualisations mean that the precise degree of change to the setting of Oakendene Manor during the operational phase remains unknown. Visualisations from VP SA-3 indicate that a major change within long-distance views south-east from Oakendene Manor is likely, even once the proposed planting has fully matured. The maximum effect of the planting will not be achieved until the trees are matured. This may take in the region of 20 years (see Arboricultural section of the LIR), which is towards the end of the likely lifetime of the Project.	Please see Applicant's response in references 15.3 and 15e .

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15.103	15.103. Regardless of the effects of planting and screening, the presence and operational activities of the substation within the historic parkland setting of Oakendene Manor will constitute a permanent adverse change in setting, and the majority of the identified harm to significance will derive from this impact.	Please see Applicant's response in references 15.3 and 15e .
15.104	<i>Archaeology</i> 15.104. Additional negative impacts to archaeological remains are not anticipated during the operational phase for the majority of receptors, as these will have occurred during the construction phase. The possible exception to this might be in the event that archaeological remains of high significance are identified that require preservation in situ. In this case, measures would need to be in place to ensure no negative impacts occur during operation.	Noted, the Applicant has no further comments on this matter at this time.
15.105	<i>Historic Landscape Character</i> 15.105. Following completion of reinstatement works, including maturation of planting, there should be no ongoing or permanent negative impacts to historic landscapes within the footprint of the cable corridor, compound and enabling works.	Noted, the Applicant has no further comments on this matter at this time.
15.106	15.106. Until this point, including prior to full growth of planting schemes, negative impacts arising during construction may persist into the initial stages of the operation of the Project.	Noted, the Applicant has no further comments on this matter at this time.
15.107	15.107. Reinstatement must be undertaken to an exceptionally high standard within sensitive historic landscapes, in particular the prehistoric downland landscape between Km 12 and 17, to avoid ongoing or permanent negative impacts during operation.	Noted, the Applicant has no further comments on this matter at this time.
15.108	15.108. Impacts to the historic parkland at the Oakendene substation site will be permanent, constituting loss of the park of the historic parkland of the manor following construction of the substation.	Please see Applicant's response in references 15b, 15.41 and 15.42 . The Applicant notes Section 25.11 Assessment of effects: Decommissioning phase of Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020], specifically the following statement regarding the onshore substation, "Removal of infrastructure will mitigate any visual and audible impacts arising during the operation and maintenance phase (as described in Section 25.10). Where mitigatory planting is retained, any effects on heritage significance through change to setting of heritage assets, as assessed for the operation and maintenance phase, will persist following decommissioning."
15.109	15.109. The Outline Project Environmental Management Plan (OLEMP; APP-232) indicates that embedded mitigation in the form of landscaping and planting will be in keeping with the historic parkland. Although this will help reduce harm to the historic parkland during the operational phase once it has matured, there will nevertheless be a permanent negative impact to the historic landscape during operation of the Oakendene Substation.	Please see Applicant's response in reference 15.108 .
15.110	Required Mitigation 15.110. The Project will result in harm to the historic environment. The ES proposes a suite of mitigation measures (embedded and essential) in order to reduce and partially offset this harm. These are set out within the ES, the Commitments Register, the OOWSI and dDCO.	Noted, the Applicant has no further comments on this matter at this time.
15.111	15.111. WSCC welcomes the mitigation measures put forward by the Applicant through the DCO application documents. The Applicant must refine and develop the OOWSI to ensure that an appropriate and proportionate scheme of mitigation can be secured and delivered in order to partially offset the predicted harm to the historic environment. As per dDCO Requirement 19 (1), the OOWSI must be supplemented by appropriate Stage and/or Site-specific method statement documentation (SSWSIs).	Consultation is ongoing with the West Sussex County Council Archaeologist and Historic England on the update to the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] and this will be submitted at Examination Deadline 3.

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15.112	15.112. Required mitigation measures, as well as areas that need further consideration, are outlined below.	Noted, the Applicant has no further comments on this matter at this time.
15.113	<p>Designated Heritage Assets <i>WTGs and Offshore Substations</i></p> <p>15.113. In line with the comments made within the SLVIA section of this report, a robust set of offshore design principles, including commitments to the layout and extent of WTGs and offshore substations, are required to reduce the adverse effects upon West Sussex heritage assets arising from changes within their wider settings.</p>	Please see Applicant's response in reference 15.2 .
15.114	<p>Oakendene Substation</p> <p>15.114. The identified harm is to a large degree an inevitable consequence of the choice of this substation location and, as such, cannot be fully mitigated. The ability of landscaping to mitigate the harm is limited due to the proximity of the substation to Oakendene Manor. Due to the nature of the structure, options for embedded mitigation by design are likely to be limited by the required functionality and equipment.</p>	Please see Applicant's response in references 15.3 and 15.b .
15.115	15.115. The ES chapter assesses a medium magnitude of change for this heritage asset, following mitigation measures. In order to ensure the predicted reduction in harm, the proposed embedded mitigation measures set out in the Commitments Register must be secured by DCO Requirement; their delivery is not currently sufficiently secured.	Mitigation works at the onshore substation at Oakendene are secured through Requirement 8 of the Draft Development Consent Order [PEPD-009] . This is acknowledged by West Sussex County Council at reference 15.116 .
15.116	15.116. As per the LVIA section of this report, the design, layout, and provision of landscaping at the substation will be crucial to minimising and mitigating harm to Oakendene Manor and historic parkland. The high-level design principles set out in the DAS for the onshore substation and for the historic environment are welcomed and will generally aid in minimising the impacts of the Project upon Oakendene Manor. Incorporation of elements of the historic landscape into design and planting proposals are welcomed. The wording of Requirement 8 (2), which specifically states that the detailed design for the onshore substation must take account of the effect on heritage assets, is acknowledged.	Noted, the Applicant has no further comments on this matter at this time.
15.117	15.117. However, the design principles lack certainty, with wording such as 'seek to' failing to provide sufficient commitment. In the absence of an Architectural Strategy, it is unclear how and to what extent these design principles will be delivered via the detailed design. As per the comments in the LVIA section of this report, the design principles within the DAS should be revised to provide further details and greater certainty regarding measures to secure a sympathetic layout, appearance, scale and design/finishes.	Please see Applicant's response in references 9.6, 9a, 9.80 and 15.8 .
15.118	Archaeology Field Investigations 15.118. The NPPF (paragraph 200) and NPS EN-1 (paragraphs 5.8.8-5.8.10) require that developers must be able to describe the significance of the affected heritage assets. Despite comprehensive non-intrusive survey and assessment work, as discussed above, insufficient field evaluation was undertaken to inform the DCO application. The significance of the affected heritage assets (buried archaeology and geoarchaeology) cannot currently be fully understood on the basis of the available evidence, even having adopted a 'worst-case scenario' approach as the ES has attempted to do. In the absence of this information, it is not possible for decision makers to fully and accurately assess the impacts of the Project upon the historic environment.	Please see Applicant's response in reference 15.6 .
15.119	15.119. A comprehensive staged programme of archaeological and geoarchaeological field investigations is therefore required to: <ul style="list-style-type: none"> • advance understanding of significance; • understand the impacts of the Project upon that significance; and • identify the need for and scope of any further archaeological mitigation required. 	Please see Applicant's response in reference 15a .
15.120	<p>Timing of Archaeological and Geoarchaeological Investigations</p> <p>15.120. WSCC advised during the pre-application phase that trial trench evaluation and geotechnical investigations and monitoring should be undertaken for the entirety of the onshore construction footprint prior to DCO application, with the results used to inform the ES assessment. This remains the position of WSCC.</p>	The Applicant confirms that where feasible, targeted archaeological trial trenching was undertaken pre-Application where other baseline and survey data provided sufficient evidence to target such works. Large-scale evaluation trenching, as

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		<p>proposed by West Sussex County Council, was not possible due to significant land access restrictions, together with other constraints such as unexploded ordnance (UXO) risks (e.g. the South Downs), which would have required large-scale mitigation in advance of any intrusive archaeological investigations. The Applicant proposes an archaeological evaluation strategy to be undertaken in advance of construction, as set out in the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] (to be updated at Deadline 3) and secured by Requirement 19 of the Draft Development Consent Order [PEPD-009]. The works should be proportionate, taking into consideration the anticipated construction impacts.</p>
15.121	<p>15.121. The OOWSI proposes to undertake trial trench evaluation within the DCO Limits following DCO consent. The decision by the Applicant not to undertake evaluation pre-submission means that the accuracy of the geophysical survey results has not yet been 'ground truthed', and so it is currently not possible to conclusively rule out the presence of nationally significant remains anywhere within the DCO Limits (with the exception of the Brook Barn Farm site, where significance has already been partially characterised by limited initial field evaluation).</p>	<p>The Applicant notes that whilst the results of the geophysical survey will be "ground truthed" by intrusive investigations, the results of the geophysical survey, together with a comprehensive baseline set out in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] and associated appendices in Volume 4 of the ES [APP-199 to 202, APP-212, PEPD-031 and PEPD-113 to PEPD-119] has enabled an assessment of potential and significance to be undertaken to adequately inform the assessment within the ES. The potential for archaeological remains of national significance are predicted in localised instances within the onshore cable route.</p> <p>Additionally, whilst the limitations of geophysical survey techniques are acknowledged, Appendix 25.4: Onshore geophysical survey report, Volume 4 of the Environmental Statement (ES) [PEPD-031] identifies "a high confidence level that the methodology and survey strategy chosen were appropriate to assess the archaeological potential across the majority of the Survey Extent."</p>
15.122	<p>15.122. The Applicant's chosen approach therefore hinges on the ability to secure the preservation in-situ of any archaeological remains of sufficiently high significance identified post-consent via design changes ('micro-siting'). See Appendix B (DCO requirements) for further details.</p>	<p>Please see Applicant's response in references 15a and 15f.</p>
15.123	<p>15.123. However, the assessment has identified an especially high likelihood of nationally significant remains being present within the prehistoric downland landscape between Km 12 and 17. The absence of prior intrusive field evaluation for this section of the cable corridor, in particular, is wholly unacceptable. The potential is sufficiently high that post-consent field evaluation is not acceptable.</p>	<p>Please see Applicant's response in references 15.5, 15.6, 15f, 15.58, 15.60 and 15.73.</p>
15.124	<p>15.124. WSCC recommends that a programme of field investigations should be undertaken within the prehistoric downland landscape between Km 12 and 17 commencing immediately in order to assess the potential for nationally significant archaeology to be present and to characterise significance during the Examination.</p>	<p>Please see Applicant's response in references 15.1, 15.5, 15f and 15.39.</p>
15.125	<p>15.125. The programme of field evaluation should be in line with the methodologies set out within the OOWSI for this area and proportionate to the likely exceptionally high significance of the affected assets (see below for further detail).</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>

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15.126	15.126. Archaeological monitoring of geotechnical works should also be undertaken at the earliest opportunity, if applicable.	Noted, the Applicant has no further comments on this matter at this time.
15.127	15.127. The ES assessment should be updated to include the results of these field investigations, including undated assessments of significance of the affected heritage assets, magnitude of harm, and accurate calculation of residual effects post-mitigation.	Please see Applicant's response in references 15.1, 15.5, 15f and 15.39 .
15.128	15.128. If the results of field investigations within the prehistoric downland landscape between Km 12 and 17 were to be delivered during Examination and were incorporated into the ES assessment, this would provide an understanding whether or not the Project is likely to result in harm or substantial harm to nationally significant archaeology. This in turn would allow statutory consultees to provide fully informed responses. It would also allow the decision maker to make an informed judgement about whether the degree of harm to the historic environment is acceptable when weighed against the benefits of the Project.	Please see Applicant's response in references 15.1, 15.5, 15.6, 15f, 15.39, 15.60 and 15.73 .
15.129	<i>Scope of Archaeological Investigations</i> 15.129. Geophysical survey has been carried out, with c.71% coverage achieved. In line with Commitment C-97, survey coverage of the outstanding areas must be achieved where reasonably practicable in accordance with the existing WSI prepared for the Preliminary Environmental Information Report (PEIR) in 2021, then extended to include the current DCO Limits. The outstanding geophysical survey should be undertaken in accordance with paragraph 4.5.2 of the OOWSI.	Please see Applicant's response in reference 15.55 . Provision for further geophysical survey, where required, is made within the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] to be updated and submitted at Examination Deadline 3.
15.130	15.130. Evaluation trenching should be undertaken within areas that will be subject to construction impacts. The areas subject to evaluation must be approved by the WSCC County Archaeologist. The OOWSI sets out a proposed survey area (APP-231, Figure 3: Potential areas of proposed archaeological trial trenching). The proposed area excludes land based on criteria including absence of construction impacts, adverse ground conditions, and demonstrable negligible archaeological survival; WSCC agrees in principle with these criteria. Further engagement will however be required before the precise survey extents can be agreed.	The Applicant welcomes West Sussex County Council's agreement in principle of the criteria to exclude areas from proposed trial trenching. Further engagement with West Sussex County Council will be undertaken to agree precise survey extents.
15.131	15.131. WSCC agrees with the high-level methodology for evaluation trenching as set out within the OOWSI, with detailed methodologies to be set out within the Stage-Specific WSIs (SSWSIs). As set out in Requirement 19 of the draft DCO, the SSWSI for each stage of the Project must be submitted and approved. The SSWSIs must accord with the OOWSI.	The Applicant welcomes West Sussex County Council's agreement of the methodologies set out in the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] and the provision for Stage-Specific WSIs therein.
15.132	15.132. Given the lack of prior field evaluation, the expectation will be that, with the exception of areas of demonstrable prior impact or low potential, sampling strategies will reflect the need to comprehensively characterise archaeological potential and significance.	The Applicant has set out a summary of the existing baseline within Appendix A of the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] and also provides a visualisation of the assessment of archaeological potential and significance in Figure 2 of the WSI to inform the sampling strategy to be adopted across the Proposed Development.
15.133	15.133. To date, no geotechnical field investigations or geotechnical monitoring has been undertaken and, as such, the assessments of potential set out within the Onshore desk-based geoarchaeological and palaeoenvironmental assessment (APP-202) must be 'ground-truthed' as a matter of urgency. A programme of geoarchaeological investigations must be undertaken in order to confirm the extent, nature and significance of any surviving deposits with geoarchaeological potential (Palaeolithic, post-Palaeolithic or palaeoenvironmental) in areas where there may be developmental impact.	Noted, the Applicant has no further comments on this matter at this time.
15.134	15.134. The OOWSI sets out high-level proposals of monitoring of non-archaeological geotechnical works as well as geoarchaeological investigations. The detailed scope of geotechnical monitoring and geoarchaeological investigations must be set out within the SSWSI for each works stage.	Noted, the Applicant has no further comments on this matter at this time.

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15.135	15.135. As discussed above, the prehistoric downland landscape between Km 12 and 17 (formerly LACR-01d) is a known Neolithic flint mining site and prehistoric landscape of national significance and exceptionally high archaeological potential. No evaluation trenching has been undertaken to inform understanding of archaeological potential and significance.	Noted, the Applicant has no further comments on this matter at this time.
15.136	15.136. There is a high potential for archaeological features associated with Neolithic flint mining to be present within the prehistoric downland landscape between Km 12 and 17, and some of these feature types may be especially delicate or ephemeral. These include lithic scatters, evidence of on-site lithic processing and associated activities; flint working floors, surfaces or hollows; hearths; trace evidence of Neolithic structures etc. Such evidence, which may be located in the immediate vicinity of flint mining shafts, might potentially be of exceptional rarity and significance.	Noted, the Applicant has no further comments on this matter at this time.
15.137	15.137. Standard evaluation trenching is unlikely to be able to reliably identify and characterise the archaeological features in this area. Mechanical removal of overburden is likely to remove surviving trace evidence of flint scatters, which might, due to ploughing activity, survive only within the plough soil or at the interface with the chalk bedrock. There are likely to be considerable logistical barriers to effective trial trench evaluation, due to difficulties excavating trenches in the desired locations and in machining to the correct levels on steep hillslopes.	Noted, the Applicant has no further comments on this matter at this time.
15.138	15.138. This has been discussed during pre-applications consultation and is reflected within the OOWSI (referred to therein as 'non-standard evaluation methods'). The OOWSI proposes additional investigation methods, comprising field walking survey and test-pitting, which will be required within this area prior to standard evaluation trenching.	Noted, the Applicant has no further comments on this matter at this time.
15.139	15.139. The OOSWI sets out a proposed area within which these additional evaluation techniques might be applied (APP-231, Figure 4: Potential areas of fieldwalking and test pitting). WSCC broadly agrees with this area. However, it may be necessary to extent the investigations in the event that the initial results of these investigations indicate a continuation of these feature types beyond the limits depicted on Figure 4. In the event that a similar potential for ephemeral early prehistoric features and/or lithic scatters is identified elsewhere, these additional methodologies will also need to be used, if appropriate, and the scope set out within the appropriate SSWSI.	Noted, the Applicant has no further comments on this matter at this time.
15.140	15.140. In addition to the above, evaluation of this area must allow for the presence of deeply stratified colluvial deposits and the associated potential for earlier archaeological features and deposits. There is a need to investigate the archaeological and palaeoenvironmental potential of dry valleys or other areas where a considerable depth of overburden is likely. This might include, as required, mechanically excavated trenched transects, borehole survey or auger survey. The OOWSI should be amended to include provision for the following additional 'non-standard evaluation methods'.	Noted, the Applicant has no further comments on this matter at this time.
15.141	15.141. Detailed methodologies for the 'non-standard evaluation methods' will be set out within the SSWSIs. Where appropriate, specialist input should be sought when developing the detailed sampling strategies and methodologies for the 'non-standard evaluation methods' within the SSWSIs. Sampling strategies for test pitting should involve an iterative approach as opposed to set sampling percentages to allow proportionate and targeted assessment.	Noted, the Applicant has no further comments on this matter at this time.
15.142	<i>Mitigation by Avoidance ('preservation in situ')</i> 15.142. A clear and robust methodology for the preservation in situ of nationally significant remains (if present) must be set out by the Applicant and secured within the DCO Requirements, to ensure this form of mitigation can be delivered as per Commitment C-225. This is required to demonstrate to a sufficient degree of confidence that harm to nationally significant remains can be avoided, in the event they are identified during the post-consent evaluation fieldwork.	Please see Applicant's response in references 15a, 15f and 15.80 .
15.143	15.143. Embedded mitigation measure C-225 states, "Where previously unknown archaeological remains of high heritage significance are identified through surveys along the cable route... consideration will be made for engineering	Commitment C-225 has been updated by the Applicant within the Outline Code of Construction Practice [PEPD-033] and the Commitments Register [REP1-015] .

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	solutions (e.g. narrowing of the construction corridor) to minimise direct impacts. Where impacts are not avoidable, an appropriate programme of mitigation will be undertaken to ensure preservation by record”.	
15.144	15.144. Whilst the OOWSI makes brief reference to the option of ‘avoidance by micrositing’ or ‘mitigation through design’ (e.g. APP-231 paragraph 4.4.7), no details of the methodology for achieving this are provided. Commitment C-225 is not currently sufficiently secured.	In line with updates to commitment C-225 and comments from West Sussex County Council Archaeologist, a flow chart will be appended to the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] to include procedures following discovery of previously unknown archaeological remains. This will be included in the updated Outline Onshore WSI [APP-231] to be submitted at Examination Deadline 3.
15.145	15.145. A clear methodology and/or pathway for preservation in situ should be included within the OOWSI. This should include provision for prior field evaluation to understand the significance of the heritage assets and ensure that preservation is appropriate and proportionate. It should also include reference to a management plan to ensure their ongoing protection.	Please see Applicant's response in reference 15a .
15.146	15.146. Draft DCO Requirement 19 (6) secures the long-term preservation and management of “archaeological remains...left in situ on any site” via a site-specific archaeological management plan. However, it makes no specific reference to how mitigation by avoidance might be secured from a design perspective, and it is not otherwise secured in the draft DCO Requirements. The preservation in-situ of nationally significant remains, including their prior field evaluation and necessity of a management plan, should be secured via changes to the wording of DCO Requirement 19 (6).	Following updates to commitment C-225, there will also be updates to the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] , as described in the Applicant's response in reference 15a . Commitment C-225 in Commitments Register [REP1-015] will be secured in the Outline Onshore WSI [APP-231] (to be updated at Deadline 3) and the Outline Onshore WSI [APP-231] is secured in Requirement 19 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission).
15.147	15.147. Design solutions and micro-siting are referenced in the application documents and OOWSI as a means for securing preservation in situ of nationally significant heritage assets. However, the engineering and design feasibility of avoidance by micro-siting is not currently clear or guaranteed, especially in the event of the discovery multiple, extensive or complex archaeological remains. WSCC requires further clarification to demonstrate that the Applicant can ensure successful delivery of mitigation by avoidance, even in the event of Neolithic flint mining shafts being identified.	Please see Applicant's response in references 15a and 15f .
15.148	15.148. <i>Further Mitigation</i> 15.148. The results of the field evaluation stages will inform the need for and scope of further mitigation. The purpose of the mitigation phase will be to partially offset the loss of any archaeological remains identified within the onshore construction footprint, in accordance with Commitments C-79 and C-80. The type and scope of this mitigation will be proportionate to the significance of the features in question.	Noted, the Applicant has no further comments on this matter at this time.
15.149	15.149. The OOWSI proposes a range of archaeological mitigation methods, which, in general, will allow for appropriate and proportionate mitigation to be secured via the delivery of SSWSIs. The methods comprise: • further geoarchaeological monitoring and investigation; • excavation; • strip, map, and sample excavation; and • archaeological monitoring.	Noted, the Applicant has no further comments on this matter at this time.
15.150	15.150. The types of mitigation proposed, and the high-level methodologies set out within the OOWSI, are broadly acceptable. The OOWSI states that detailed methodologies for mitigation will be set out within SSWSIs.	Noted, the Applicant has no further comments on this matter at this time.
15.151	15.151. The agreed measures include, as appropriate, provision for assessment, mitigation, post-excavation analysis, reporting, publication, and archive deposition.	Noted, the Applicant has no further comments on this matter at this time.

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15.152	<p><i>Archiving, Publication, Outreach and Public Dissemination</i></p> <p>15.152. In accordance with Commitment C-261, to secure public knowledge and education benefits from the mitigation, the results of the archaeological mitigation should be made available to the public and disseminated to a wide range of audiences. Requirement 19 (3) of the dDCO will secure this obligation.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
15.153	<p>15.153. Additional funds (via Section 106 agreement) will be required to deliver some of these obligations; see below.</p>	<p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in NPS-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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p>
15.154	<p>15.154. The OOWSI should be updated to include further details of archiving and outreach proposals.</p>	<p>See Applicant's response in reference 15a. Where further updates are required by West Sussex County Council, the Applicant requests detailed comments to be provided for consideration.</p>
15.155	<p>Historic Landscape Character</p> <p>15.155. Where the cable corridor crosses sensitive historic landscapes, such as the prehistoric downland landscape between Km 12 and 17, every effort should be made to ensure that construction activities within this part of the cable corridor are of the shortest duration possible, in accordance with Commitments C-19, 20 and 22. As per the comments in the LVIA section of this report, greater certainty should be provided on the duration, phasing, and sequencing of construction activities, and how this will be programmed to ensure reinstatement can be maximised/expedited. An amendment to dDCO Requirement 22 is suggested (see Appendix B).</p>	<p>Please see Applicant's response in reference 15b. The Applicant has provided a response where relevant in Appendix B.</p>
15.156	<p>15.156. Embedded environmental measures and design principles will help to reduce the impacts of the construction of Oakendene substation upon the historic parkland. These include retention of the 19th century extent of parkland, as well as retention of some key trees and hedgerows, features, and boundaries, in accordance with C-81, 196, 199. As per the comments in the LVIA section of this report, greater certainty should be provided in the Outline Landscape and Ecology Management Plan (OLEMP; APP-232) to ensure these measures are adequately secured. The DAS states that new planting will reflect and be in keeping with historic parkland features. Selection of new parkland tree species should strike a balance between remaining in keeping with existing planted species and ensuring the visual impacts and screening effects within views from Oakendene Manor are maximised. Consideration of using non-native species should potentially be given if they would better strike this balance.</p>	<p>The Applicant has no further comments on this matter at this time.</p>
15.157	<p>Requirements and Obligations</p> <p>15.157. In order to secure the preservation in situ of nationally significant remains (if present within the Order Limits), an amendment to the wording of Requirement 19, sub-paragraph (6) is recommended. The suggested amendments to the wording of the DCO requirements is set out in Appendix B.</p>	<p>The Applicant has provided a response where relevant in Appendix B.</p>
15.158	<p>15.158. In order comply with Requirement 19 (3), relevant NPS-EN1 and NPPF policies and the scope of the OOWSI, there will be a need to ensure adequate provision for suitable long-term storage of the archaeological archive generated from the Project. Due to the scale of the Project, the anticipated size of the resulting archive will likely be above and beyond the standard rates of collection for local museums. Worthing Museum is the only collecting facility that might be</p>	<p>Please see Applicant's response in reference 15a.</p>

Ref	Local Impact Report Comment	Applicant's Response
	able to accommodate the Project archive; however, the existing facilities do not have sufficient capacity. There is a need for provision of additional storage facilities in order to comply with the archiving requirements.	
15.159	15.159. In addition to ensuring sufficient funds are ringfenced for the archive deposition fees, additional funds should be made available through a S106 agreement for the expansion of existing storage capacity (additional shelving units) at Worthing Museum. Further details are provided in Appendix F.	Please see Applicant's response in reference 15.153 .
15.160	15.160. Given the scale of the Project and the anticipated size of the resulting archive, the current staff capacity of Worthing Museum will not be able to accommodate accession and documentation of the Project archive. There will be a requirement for provision of a dedicated Documentation Officer for the time required to document the Project archive, to ensure the archiving obligations of the project can be met. Additional funds should be made available through a S106 agreement for this post (see Appendix F).	Please see Applicant's response in reference 15.153 .
15.161	15.161. There is potential for the discovery of treasure as part of the archaeological mitigation requirements. A budget should be made available for treasure acquisition by Worthing Museum in the event of treasure being discovered. This will ensure objects can be held in a recognised public repository and, therefore, available for ongoing exhibition and research as part of the wider project archive.	Please see Applicant's response in reference 15.153 .
15.162	15.162. There is a need to partially offset the anticipated degree of harm to the historic environment with a bespoke and comprehensive public benefit, interpretation, and outreach programme. A bespoke education and package is also required. The outreach programme and education and schools package must be able to meet the anticipated demand given the scale and high profile of the Project. WSCC proposes that this be designed by, or in conjunction with, Worthing Museum to ensure a coordinated approach that aligns with the archive storage proposals. Additional funds via a S106 agreement may be required (see Appendix F).	Please see Applicant's response in references 15.153 and 15a .
15.163	15.163. There may be a need to offset the potential harm to a nationally significant and highly sensitive Neolithic and prehistoric landscape (prehistoric downland between Km 12 and 17). The OOWSI sets out the non-standard evaluation methodologies and mitigation measures proposed for this area. However, additional surveys outside of the immediate footprint of construction impacts should be considered, in order to enhance understanding and knowledge of this landscape. Additional funds may be required via a S106 agreement for surveys and assessments of the Neolithic mining landscape to enhance knowledge and understanding on a landscape scale. Options might include enhanced-resolution Lidar survey, AP survey, targeted measured survey, and enhanced geophysical survey (e.g. ground penetrating radar) of some of the nearby scheduled monuments and areas of the highest significance. These non-intrusive surveys should be designed to fill gaps in existing knowledge and answer specific research questions. They should be considered within and, potentially, outside, the DCO boundary. An eventual outcome should be integrated interpretation with the results of the archaeological fieldwork undertaken.	Please see Applicant's response in reference 15.153 .
16. Water Environment (ES Chapter 26)		
16.1	Summary 16.1. Any temporary or permanent drainage details should be submitted to WSCC, as Lead Local Flood Authority (LLFA), to evidence that suitable drainage solutions can be delivered during both construction and operation. WSCC understands Requirements 17, 18 and 22 respectively provides securement for these aspects through the DCO.	This is noted and agreed. The Applicant has no further comments on this matter at this time.
16.2	16.2. WSCC is not the responsible authority for flood risk resulting from coastal or fluvial flooding and so, WSCC defers to other stakeholders, including the Environment Agency, on these matters. However, all aspects of flood risk are important to the communities of West Sussex; therefore, this section of the LIR gives an overview on all sources of flooding.	This is noted and accepted. The Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
16.3	16.3. Concern has been raised by WSCC, Parish Councils and residents about the lack of appropriate assessment and mitigation regarding the risk of surface water flooding at the Oakendene substation location.	<p>Flood risk at the onshore substation site is considered to ensure the Proposed Development is able to operate as planned, as referred to in Section 6.5 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement (ES) [APP-216]. The indicative onshore substation site layout has been developed accordingly, taking risk of flooding into account. The Applicant is confident the precautionary approach in the Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216] and Design and Access Statement [AS-003] will ensure the onshore substation will not be at flood risk, nor increase flood risk elsewhere (addressed through the adherence to National Grid Target Guidance (C-230) secured via the Design and Access Statement [AS-003] and Requirement 8 within the Draft Development Consent Order [PEPD-009]. The Operational Drainage Plan must accord with the Outline Operational Drainage Plan [APP-223] and will be secured via Requirement 17 within the Draft Development Consent Order [PEPD-009]. The assessment of flood risk and outline design was prepared in accordance with West Sussex County Council (WSCC) and Horsham District Council (HDC) advice, as recorded in meeting minutes (22 June 2022) included in Annex A of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216].</p> <p>Following the Issue Specific Hearing 1 (February 2024), a meeting was held by the Applicant with WSCC and HDC on 27 February 2024 with a view to understanding the basis for the Principal Area of Disagreement (PAD) raised in relation to flood risk and drainage at the onshore substation site at Oakendene, which also raised concerns in relation to (perched) groundwater flood risk at the Oakendene substation. Further information, most-notably photographs of recent flood events (generally dated November 2023, during a notably wet autumn) thought to be taken at locations around the onshore substation site at Oakendene, were shared onscreen with the Applicant (formally provided to the Examination by CowfoldvRampion in its Residents Impact Statement [REP1-089] at Deadline 1).</p> <p>The Applicant has since reviewed these photographs further, and provided commentary against those that are relevant in CowfoldvRampion Report [Application Reference 8.37].</p> <p>The photographs are entirely consistent with the Environment Agency Risk of Flooding from Surface Water (RoFSW) mapping upon which we have based our assessment of flood risk as set out in Paragraph 5.7.14 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216] in agreement with WSCC and HDC. These photos therefore provide a means of validation of the appropriateness of using the Environment Agency RoFSW</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>mapping at this location, providing further confidence in the assessment.</p> <p>The Applicant undertook a site visit to the onshore substation site and watercourse on 2 February 2024. It is acknowledged that minimal rainfall (<1mm) fell during the preceding week (based on review of the Cowfold rainfall gauge), however, late winter to early spring is when groundwater levels would be expected to be seasonally high. The watercourse was noted to be in-channel and no standing water was observed across the onshore substation site. The reduced water levels compared to the Cowfold vs Rampion photos (dated from November 2023 to February 2024) indicate that it is not a groundwater flooding issue and is instead a surface water flood risk issue.</p> <p>Based on the discussions (the Applicant's meeting with WSCC and HDC on 27 February 2024), a way forward has been agreed with WSCC and HDC which all three parties anticipate will allay WSCC concerns, and so enable WSCC's three Principal Areas of Disagreement to be converted to Statements of Common Ground. Winter groundwater monitoring will be undertaken at the site as part of the detailed design stage, post-DCO award, the result of which will be used to inform the detailed drainage design. A new environmental measure (C-293) will be added to the Commitments Register [REP1-015] to reinforce this commitment to winter groundwater monitoring which will be incorporated into the Draft Development Consent Order [PEPD-009] for Deadline 3.</p>
16.4	16.4. WSCC expects any proposals to have appropriate surface water drainage infrastructure that prioritises the use of Sustainable Drainage Systems (SuDS) and does not increase existing surface water flood risk elsewhere.	<p>Commitments C-73 and C-140 outline the provisions for sustainable drainage systems (SuDS) measures, as set out in Table 8-1 of Appendix 26.2 Flood Risk Assessment, Volume 4 of the Environmental Statement (ES) [APP-216] and also the Commitments Register [REP1-015]. As concluded in Paragraphs 10.2.1 and 10.2.5 of Appendix 26.2 Flood Risk Assessment, Volume 4 of the ES [APP-216], with the proposed flood risk management measures in place the proposals will not be subject to an unacceptable level of flood risk, nor will they increase flood risk elsewhere.</p> <p>Surface water drainage through the construction phase of the Proposed Development will be managed through the Outline Code of Construction Practice (CoCP) [PEPD-033] and via the Construction Phase Drainage Plan (as outlined in Table 3-1 which will accompany the stage specific CoCP to be submitted post-consent and approved by the local authority). Paragraph 5.10.9, states that "<i>Details of construction phase drainage will be developed by the Contractor(s) and will be presented in a</i></p>

Ref	Local Impact Report Comment	Applicant's Response
16.5	16.5. All works, apart from permanent infrastructure, will be temporary in nature. The onshore cable route will be reinstated and, therefore, impacts on surface water run-off and flooding would be temporary in nature.	<p><i>Construction Phase Drainage Plan and approved as part of the stage specific CoCP. Details of the Construction Phase Drainage Plan will be subject to consultation with WSCC and other relevant consenting authorities prior to the start of construction". This will be secured as part of the Construction Phase Drainage Plan via Requirement 22 (c) of the Draft Development Consent Order [PEPD-009].</i></p> <p>The Outline Operational Drainage Plan [APP-223] outlines the approach to manage surface water drainage through the operational phase of the Proposed Development, following the drainage hierarchy and puts forwards a range of relevant SuDS features. The final Operational Drainage Plan must accord with the Outline Operational Drainage Plan [APP-223] and is secured via Requirements 17 and 18 of the Draft Development Consent Order [PEPD-009].</p> <p>This is noted and agreed by the Applicant. For clarity, Commitments C-19, C-229, C-133, and C-128 as provided in the Commitments Register [REP1-015] all outline provisions for reinstatement as soon as reasonably practical. These commitments are be secured as part of the Construction Phase Drainage Plan via Requirement 22 (c) of the Draft Development Consent Order [PEPD-009].</p>
16.6	16.6. More detail is required regarding the exact location of each individual watercourse crossings, with tailored, site-specific methodologies, plans and drawings; again; this understood to be secured through DCO.	<p>Watercourse crossing locations and type are documented within Appendix 4.1: Crossing schedule, Volume 4 of the Environmental Statement (ES) [APP-122] and Figure 26.2a-t of Chapter 26: Water environment - Figures (Part 1 of 2), Volume 3 of the ES [APP-117] and methods of construction are described in the Outline Construction Method Statement [APP-255]. These will be discussed with West Sussex County Council (WSCC) and the Environment Agency at the detailed design stage and via the consenting / permitting process, which the Applicant has not sought to disapply via the Development Consent Order. Appropriate embedded environmental measures with respect to crossings (e.g. C-5, C-17, C-18, C-122, C-138, C-139, C-229, C-234, C-236, C-245 and C-246) are documented in the Commitments Register [REP1-015], referenced as part of the Outline Code of Construction Practice [PEPD-033] and secured by Requirement 22 in the Draft Development Consent Order [PEPD-009] provided at Deadline 2 submission.</p>
16.7	16.7. Further, the timing of the works would need to be considered fully so that localised flood risk is not increased and to ensure that habitat is not lost, or pollution increased. Although the works are temporary, flow rates can change considerably depending on the time of the year, flood risk can increase, and ground conditions can vary significantly.	<p>The Applicant notes concern regarding the timing of works and potential for time of the year to impact to flow rates in the watercourses (as well as ground conditions) during the construction phase.</p>

Ref	Local Impact Report Comment	Applicant's Response
16.8	16.8. The area between Poling and Hammerpot (in Arun District) is an area of permanent winter floodplain and prone to winter ground water flooding. Special consideration may be required for the construction methods and timing for the works in the Poling and Hammerpot area.	<p>Commitment C-117 specifically covers this matter in regard to the programme of construction works in the floodplain to avoid disturbance of water birds and to avoid interaction with known flooding periods. Commitment C-117 is secured in the Outline Code of Construction Practice [PEPD-033] through Requirement 22 of the Draft Development Consent Order [PEPD-009] provided at Deadline 2 submission.</p> <p>Section 5.10.9 of the Outline Code of Construction Practice (CoCP) [PEPD-033] sets out the requirements for the Construction Phase Drainage Plan, stating: <i>"Details of construction phase drainage will be developed by the Contractor(s) and will be presented in a Construction Phase Drainage Plan and approved as part of the stage specific CoCP. This will be developed following detailed drainage investigations and hydrological assessments to determine potential location-specific risks in relation to the water environment and identify appropriate measures to avoid or reduce risk. Details of the Construction Phase Drainage Plan will be subject to consultation with WSCC (and other relevant consenting authorities including the Environment Agency) prior to the start of construction."</i> These measures will ensure that surface water will be managed onsite to drain the site appropriately and mitigate against the potential for waterlogged ground, whilst ensuring that discharges remain at pre-development rates (to ensure there will be no detrimental impact to downstream flood risk) and avoiding impact on the local environment as set out in C-117 referenced above in this response.</p> <p>In terms of the timing of construction works in areas identified at elevated risk of groundwater flooding, this will be addressed through the emergency response plan for flood events, as discussed further in the Applicants response in reference 16.8 below.</p> <p>The Applicant notes concern with regard to the winter flooding in between Poling and Hammerpot. This section of the onshore cable route passes through the floodplain of the Black Ditch watercourse (tributary of the River Arun) and is at risk of flooding from both groundwater and fluvial sources.</p> <p>This area is identified at elevated risk of groundwater flooding, as noted in Paragraphs 5.5.4, 5.5.5 and 5.5.11 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement (ES) [APP-216]. Fluvial flood risk on this section of the onshore cable route (Black Ditch) is detailed in Paragraphs 5.2.17 to 5.2.19 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216]. As stated in Paragraph 5.2.19, the route</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>between Hammerpot and Poling is predominantly situated in Flood Zone 1, outside of the Black Ditch fluvial floodplain. Paragraphs 8.2.6 and 8.2.7 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216] outline the mitigation approach to groundwater flood risk during construction, stating: <i>“A risk-based approach to groundwater flooding during the construction works has been taken to address the risk of groundwater flooding. It will be the responsibility of RED and the appointed contractor to monitor the Environment Agency groundwater flood warning system to inform the timing of construction works in areas identified at elevated risk of groundwater flooding. This will be incorporated and enacted through the emergency response plan for flood events.”</i> and;</p> <p><i>“Where extreme groundwater flooding is encountered or forecast via the Environment Agency warning system (groundwater flooding at the surface for several weeks), it is recommended no works within the affected areas will take place.”</i></p> <p>In instances where the onshore cable route intersects Flood Zones 2 and 3, embedded environmental measure C-117 includes provisions for the timing of works, stating that: <i>“Works on areas identified as floodplain (Flood Zones 2 and 3) will be programmed to avoid the period between October and February inclusive to avoid disturbance of waterbirds, and where possible, will be programmed to occur in late summer/ early autumn, to avoid interaction with known flooding periods to minimise the potential for displacement of floodwater.”</i></p> <p>It is anticipated that the measures already set out in the application will be sufficient to manage the identified risks from groundwater / winter flooding in this area, and that no additional measures would be necessary.</p>
16.9	<p>16.9. Construction compounds should be located to avoid areas identified as being at risk of flooding, and appropriate drainage should be provided to ensure that silting of watercourses does not occur. WSCC raises concerns that the assessment of alternative locations for construction compounds is missing and should be provided to stakeholders, to ensure the least impactful locations have been chosen.</p>	<p>The Applicant requires three temporary construction compounds 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 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 cable corridor and key construction activities, and be on level clear ground.</p> <p>Four sites were identified near Washington that could serve as the middle compound, and three were shown in the first statutory consultation in 2021.</p>

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		<p>Considering consultation feedback as well as the technical and environmental appraisal of each compound site, the site on The Pike near Washington Village was selected. This compound site is: sufficiently large (3.9 hectares) for the required use; close to the A24 dual carriageway, reducing the need for construction traffic to traverse villages and rural roads; outside of the South Downs National Park and flood zones; directly on the onshore cable construction corridor; close to the site of two trenchless crossings (including the long crossing under the A24 and Washington playing fields) allowing for construction efficiencies, reducing overall impact; and level with limited vegetation within the site, but well screened around the perimeter.</p> <p>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 shortlisted developments, Volume 4 of the Environmental Statement [APP-128]).</p> <p>The temporary construction compounds at the onshore substation site and the National Grid Bolney substation extension works are required to support the construction of these elements of the works.</p> <p>At all construction compounds, a wide range of environmental measures have been embedded into the Proposed Development to minimise the potential for changes in watercourse conveyance from blockages or the mobilisation of silt laden runoff entering the watercourses. Environmental measures include C-28, C-73, C-130, C-133, C-135 and C-176, provided in Commitments Register [REP1-015] and secured by Requirement 22 of the Draft Development Consent Order [PEPD-009].</p> <p>In terms of the consideration of flood risk, the five selected sites were identified in paragraph 4.4.25 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement (ES) [APP-216], and the associated Flood Zones are identified in Table 4.2. The sequential approach to steering of development, including the temporary construction compounds, towards the areas of lowest risk wherever possible, is set out in paragraph 9.1.2 for the Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216]. This approach resulted in all compounds being steered towards locations in Flood Zone 1 (with the exception of a slither of the Oakendene West compound overlapping slightly with Flood Zone 2 associated with the Cowfold Stream). This approach of avoidance of areas at flood risk for siting</p>

Ref	Local Impact Report Comment			Applicant's Response		
						<p>the compounds is reflected in the figures included in the FRA, which show the compounds as outside of areas of tidal flood risk (Figure 26.2.3a and b), fluvial flood risk (Figure 26.2.4, Climping compound), and generally outside of areas of surface water flood risk (Figure 26.2.5a). The surface water flood risk at the Oakendene substation compound, through which a higher flood risk flow pathway currently flows, is presented in detail in Figure 26.2.6a. The flood risk associated with this flow pathway and the other minor areas indicated to be at surface water flood risk at the other compounds will be addressed through the commitments to temporary drainage measures included in the Outline Code of Construction Practice [PEPD-033], secured through Requirement 22 of the Draft Development Consent Order [PEPD-009].</p>
Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
16a	Impact upon watercourses due to crossing of the cable route.	C	Negative	Reduce: reduce the number of watercourse crossings, if possible, during detailed design. Mitigate: Liaison with WSCC (as the LLFA) at an early stage will be essential as both the detailed design and then construction work progresses. The removal of any temporary crossings installed within existing ditch lines will be needed at the end of the construction period and reinstatement back to original condition will be required.	NPS EN-1 (Paragraph 5.7) NPPF (Section 14)	<p>Watercourse crossing locations and type are documented within Appendix 4.1: Crossing schedule, Volume 4 of the Environmental Statement (ES) [APP-122] and Figure 26.2a-t of Chapter 26: Water environment – Figures (Part 1 of 2), Volume 3 of the ES [APP-117] and methods of construction are described in the Outline Construction Method Statement [APP-255]. An attempt has been made to minimise the number of proposed crossings, and the locations and methodologies will be discussed with West Sussex County Council and the Environment Agency at the detailed design stage and via the consenting / permitting process, which the Applicant has not sought to disapply via the Development Consent Order. Appropriate embedded environmental measures with respect to crossings (e.g. C-5, C-17, C-18, C-122, C-128, C-138, C-139, C-229, C-234, C-236, C-245 and C-246) are documented in the Commitments Register [REP1-015], referenced as part of the Outline Code of Construction Practice [PEPD-033] and secured by Requirement 22 in the Draft Development Consent Order [PEPD-009] updated at Deadline 2 submission.</p> <p>Any temporary crossings will be in place for the minimal time possible, as documented in embedded environmental measure C-128.</p>
16b	Potential changes in local flood risk	C	Negative	Avoid: Measures should be put in place to avoid working in known	NPPF (Section 14) NPS EN-1 (Paragraph	A sequential approach has been taken in the first instance to direct the Proposed Development to areas of lowest flood risk, as

Ref	Local Impact Report Comment			Applicant's Response		
	due to construction activities.			floodplain areas and in areas at risk of surface water flooding during periods of extended wet weather and during heavy rainfall. Mitigate: As set out in the Outline Code of Construction Practice (OCoCP) (APP-224), ensure working methods includes the use of silt trap, or similar, where necessary.	5.7) NPS EN-5 (Paragraph 2.3).	detailed in Section 9.2 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement (ES) [APP-216] and in accordance with commitment C-75 provided in Table 8-1 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216] and in the Commitments Register [REP1-015] . Where the Proposed Development is sited unavoidably in the floodplain, a number of additional environment measures have been included to ensure that there is no loss of floodplain storage and detrimental impact to flood risk, as captured in Table 8-1 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216] and in the Commitments Register [REP1-015] . Measures include C-130, C-131, C-132, C-119, C-175, C-123 and C-9. In addition, measures C-73, C-121, C-129, C-28, C-30, C-73, C-119, C-175, C-126, C-130, C-179, C-181 and C-182 are included which will ensure no detrimental impact to existing surface water run-off rates and maintain existing flow conveyance of the drainage regime. They are secured by way of Requirement 22 of the Draft Development Consent Order [PEPD-009] . These measures are also mentioned in the Outline Code of Construction Practice [PEPD-033] , and West Sussex County Council's reference to this document is welcome.
16c	Potential for increased surface water and ground water flooding in the Oakendene area	C/O	Negative	Concern has been raised that the current FRA and proposals for the Oakendene substation do not truly reflect the winter flooding that occurs at this location. This may be because local groundwater conditions have not been considered. Avoid: Work in known areas of flood risk should be avoided. Mitigate: Provide more robust assessment for surface water and groundwater flooding, and provide any detailed mitigation.	NPPF (Section 14) NPS EN-1 (Paragraph 5.7). NPS EN-5 (Paragraph 2.3).	Please refer to the Applicants response in reference 16.3 above.
16d	Risk of surface water flooding due to incorrectly constructed haul roads.	C	Negative	Mitigate: Temporary haul roads and accesses could, if not constructed correctly, cut off surface water flow paths. Ensure detailed design considers surface water flow routes and that temporary haul roads and accesses are constructed as designed.	NPPF Section 14 NPS EN-1 (Paragraph 5.7).	Commitment C-181 included in Table 8-1 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement (ES) [APP-216] and in the Commitments Register [REP1-015] states that "Access roads will have cross drainage provided necessary at topographic low points." This will ensure that the existing natural surface water flow paths will be retained.

Ref	Local Impact Report Comment	Applicant's Response
16e	<p>Potential impact to surface water flow routes from stockpiling of any material</p> <p>C Negative</p> <p>Avoid: Placing stockpiles of excavated material and any site materials within known surface water flow routes. Mitigate: Ensure design considers surface water flow routes and that stockpiles of excavated material and any site materials are stored outside of known surface water flow routes; this should be secured through the OCoCP.</p>	<p>NPPF Section 14. NPS EN-1 (Paragraph 5.7).</p> <p>Commitments C-130, C-131, C-132, C-179, C-180 and C-133 outlined in Table 8-1 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement [APP-216] and in the Commitments Register [REP1-015] provide provisions to ensure that soil stockpiles do not impact the existing natural surface water flow paths.</p>
16.10	<p>Policy Context National Policy Statements</p> <p>16.10. Flood risk and climate change is addressed as a generic impact in Section 5.7 of NPS EN-1 and Section 2.3 of NPS EN-5. They note that while flooding is a natural process, its effects and severity can be increased both as a consequence of decisions about the location, design, and nature of settlement and land use, and as a potential consequence of future climate change. While flooding cannot be wholly prevented, its adverse impacts can be avoided or reduced through good planning and management. They explain that climate change may lead to increased flood risks.</p>	<p>This is noted by the Applicant. Requirements of National Policy Statement (NPS) EN-1 and NPS EN-5 are set out in Section 2.2 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement (ES) [APP-216]. Climate change is considered in detail in Section 5.7 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216], with reference to NPS EN-1 and NPS EN-5.</p>
16.11	<p>16.11. Paragraph 5.7.3 of NPS EN-1 notes that “where new energy infrastructure is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and, where possible, by reducing flood risk overall”.</p>	<p>Please see reference 16.10.</p>
16.12	<p>16.12. Paragraph 2.3.2 of NPS EN-5 notes “as climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change”.</p>	<p>Please see reference 16.10.</p> <p>Specifically, paragraphs 5.7.28 to 5.7.32 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement [APP-216] detail potential climate change impacts to groundwater flood risk. Paragraph 5.7.32 concludes by stating;</p> <p><i>“The onshore cable itself is considered resilient to flooding and the onshore substation is underlain by clay. As a result, no allowance for climate change is required with respect to this permanent onshore infrastructure.”</i></p>
16.13	<p>National Planning Policy Framework (December 2023)</p> <p>16.13. NPPF Section 14 notes that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p>	<p>This is noted by the Applicant. Reference to the National Planning Policy Framework (NPPF) is provided in Section 2.2 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement [APP-216] and application of the Sequential Test (demonstrating a sequential approach to the development) is provided in Section 9.2.</p>
16.14	<p>WSSC Policy</p> <p>16.14. The requirement of the West Sussex LLFA Policy for the Management of Surface Water and the West Sussex LLFA Culvert Policy should be noted during the design process.</p>	<p>Reference is made to the West Sussex County Council (WSSC) policies in Table 2-3 of Appendix 26.2: Flood Risk Assessment (FRA), Volume 4 of the Environmental Statement [APP-216]. These policies were considered in the development of the applicant's proposals. The final Operational Drainage Plan must accord with the Outline Operational Drainage Plan [APP-223]</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>and is secured via Requirements 17 and 18 of the Draft Development Consent Order [PEPD-009], which themselves require approval by the LLFA and thus a further opportunity for WSCC to ensure that their policies in relation to the management of surface water and culverts would be adhered to.</p> <p>In relation to the Culvert Policy in particular, as noted in Section 2.3.8 of the FRA, <i>"It is worth noting that some leniency would be expected with respect to the suitability of any culverts proposed by the Proposed Development (as opposed to clear span bridges) associated with the temporary construction haul road / running track on the basis of their temporary nature (with full removal and restoration undertaken to restore the watercourse to its previous state upon completion of construction works). Based on a meeting held with Arun District Council, Horsham District Council, and WSCC in June 2022 (the meeting minutes of which are provided in Annex A, which provide more detail), the stakeholders were generally accepting of this approach to use temporary culverts. This is provided efforts are taken to meet the 17 culvert design requirements set out in the Culvert Policy."</i></p>
16.15	16.15. The Policy for the Management of Surface Water sets out WSCC's requirements for drainage strategies and surface water management provisions associated with any application for development.	Please refer to the Applicant's response in reference 16.14 .
16.16	16.16. For all developments, WSCC would expect the principles of the policy and drainage strategy to be considered. For all major developments, WSCC would expect adherence to the full scope of the policy. The drainage strategy should consider the topics set out in the tables and be consistent with the SuDS policies in Sections 5 and 6.	<p>Please refer to the Applicant's response in reference 16.14.</p> <p>The Outline Operational Drainage Plan [APP-223] documents how it has followed the drainage hierarchy and puts forwards a range of relevant sustainable urban drainage systems (SuDS) features. The final Operational Drainage Plan must accord with the Outline Operational Drainage Plan [APP-223] and is secured via Requirements 17 and 18 of the Draft Development Consent Order [PEPD-009]. The preliminary findings of both the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement [APP-216] and Outline Operational Drainage Plan [APP-223] were previously discussed with West Sussex County Council at targeted stakeholder consultation meetings (on 1 April 2022 and 22 June 2022).</p>
16.17	16.17. The Culvert Policy is an explanation of agreed WSCC and District and Borough Council policy regarding the culverting of ordinary watercourses. It is also a guide to good practice and design principles.	Please refer to the Applicant's response in reference 16.14 .
16.18	16.18. Culverting of a watercourse, or the alteration of an existing ordinary watercourse, requires land drainage consent under Section 23 of the Land Drainage Act 1991 (and as amended). Most District and Borough Councils in West Sussex are currently responsible for processing ordinary watercourse consent applications; however, granting of consent rests with WSCC.	The requirement for Ordinary Watercourse consent (OWC) is outlined by the Applicant in commitments C-182, C-126 and C-17, provided in Table 8-1 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement (ES)

Ref	Local Impact Report Comment	Applicant's Response
		<p>[APP-216] and Table 26-10 in the Chapter 26: Water environment, Volume 2 of the ES [APP-067].</p> <p>As stated in commitment C-182: <i>“Work within banktop of any other watercourse (not Main River and outside of IDB) will require consent from the LLFA”</i>. Whilst C17 states: <i>“Appropriate environmental permits or land drainage consents will be applied for works from the Environment Agency...or from the LLFA (for Ordinary Watercourse crossings)”</i>. Commitment C-126 states: <i>“Minor watercourses (where open cut techniques are proposed for the permanent cable crossings) will also have temporary crossings for the haul road to provide vehicular access along the route. A mixture of culverts and / or clear span bridges could be employed based on crossing specific requirements (size of watercourse and flood risk). These will be subject to permits and consents with the Environment Agency and Lead Local Flood Authority (LLFA).”</i></p> <p>Although the OWC is outside of the scope of the Draft Development Consent Order [PEPD-009], the Applicant will adhere to each of the OWC requirements in accordance with legislation as noted in the above measures.</p> <p>In paragraph 26.2.8 of Chapter 26: Water environment, Volume 2 of the ES [APP-067] the need for an OWC is also acknowledged by the Applicant.</p> <p>As per the formal consenting process, OWC applications would be applied for via West Sussex County Council (WSCC) as the LLFA. How this is managed internally by WSCC, delegating processing to District or Borough councils informally or otherwise, is a matter between WSCC and the District and / or Borough Councils.</p>
16.19	<p>Construction Phase – Impacts Positive 16.19. No positive impacts on the water environment have been identified during the construction phase.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
16.20	<p>Neutral 16.20. No neutral impacts on the water environment have been identified during the construction phase.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>

Ref	Local Impact Report Comment	Applicant's Response
16.21	<p>Negative 16.21. The incorrect design, construction and monitoring of temporary culverting of watercourses, temporary haul roads and placement of material stockpiles, could adversely affect the environment and temporarily increase local flood risk. The availability of land should not be considered as justification for not prioritising the use of SuDS during construction. The land required for SuDS during construction, alongside other site requirements, should have been adequately considered when establishing the Projects DCO Limits.</p>	<p>With respect to watercourse crossings, a number of embedded environmental measures have been included within the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement [APP-216] to ensure that temporary haul roads and associated crossings do not result in a detrimental impact to flood risk. Specifically, environmental measure C-73 states that: “Where the development intersects overland flow pathways or areas of known surface water flooding appropriate measures will be embedded into the design”. In addition, environmental measure C-181 states that “Access roads will have cross drainage provided where necessary at topographic low points”. Commitments C-128, C-145, C-176, C-177 and C-178 outline further provisions made in relation to temporary watercourse crossings. These environmental measures are secured by the Outline Code of Construction Practice [PEPD-033] via the Construction Phase Drainage Plan (as outlined in Table 3-1 which will accompany the stage specific CoCP to be submitted post-consent and approved by the local authority). As set out in paragraph 5.10.9: “Details of construction phase drainage will be developed by the Contractor(s) and will be presented in a Construction Phase Drainage Plan and approved as part of the stage specific CoCP. Details of the Construction Phase Drainage Plan will be subject to consultation with WSCC and other relevant consenting authorities prior to the start of construction”. This will be secured as part of the construction phase drainage plan via Requirement 22 (c) of the Draft Development Consent Order [PEPD-009].</p> <p>With respect to SuDS, provision of SuDS has been actively prioritised when establishing the DCO Order Limits and reflected in Commitment C-73, secured through the Outline Code of Construction Practice [PEPD-033] via Requirement 22 of the Draft Development Consent Order [PEPD-009].</p>
16.22	<p>Operational Phase – Impacts Positive 16.22. No positive impacts on the water environment have been identified during the operational phase.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
16.23	<p>Neutral 16.23. No neutral impacts on the water environment have been identified during the operational phase.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
16.24	<p>Negative 16.24. Concern has been raised that the submitted Flood Risk Assessment (APP-216) and proposals for the Oakendene substation, do not truly reflect the winter flooding that occurs at this location. This may be because local groundwater conditions have not been considered. Therefore, there is the potential for increased surface water and ground water flooding in the Oakendene area due to the Project.</p>	<p>This matter was raised as a Principal Area of Disagreement (PAD) in West Sussex County Council's (WSCC's) PAD Summary Statement [AS-008] and was discussed in the first issue specific meeting on 7 February 2024. As discussed in the Applicant's response in reference 16.3 above, a meeting was held by the Applicant with WSCC and Horsham District Council (HDC) on 27 February 2024, with a view to understanding the basis for the PAD</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>raised in relation to flood risk and drainage at the site, during which the additional information previously referred to, including photographs, were presented by WSCC and HDC to the Applicant. These photographs were included in the CowfoldvRampion Local Impact Report. The Applicant has since reviewed these photographs, and provided commentary against those that are relevant in CowfoldvRampion Report [Application Reference 8.37].</p> <p>Based on the discussions on 27 February 2024, a way forward has been agreed with WSCC and HDC which all three parties anticipate will allay WSCC concerns, to enable the PAD to be converted to Statements of Common Ground. These will be reported on in due course.</p> <p>Also see item Table 16c above in relation to groundwater flooding matters and the Applicant's response in reference 16.3 above where this matter is discussed in relation to surface water in further detail.</p>
16.25	<p>Required Mitigation 16.25. Any works in, under, over or within eight metres of any ordinary watercourse, which is not a main river, will require consent from WSCC as LLFA. Any permanent or temporary culverting works will need to be carried out in accordance with the requirements of the Land Drainage Act 1991 and WSCC's Culvert Policy.</p>	<p>The requirement for Ordinary Watercourse consent (OWC) is outlined by the Applicant in commitments C-182, C-126, and C-17, provided in Table 8-1 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement (ES) [APP-216] and Table 26-10 in the Chapter 26: Water environment, Volume 2 of the ES [APP-067].</p> <p>As stated in commitment C-182: <i>"Work within banktop of any other watercourse (not Main River and outside of IDB) will require consent from the LLFA". Whilst C17 states: "Appropriate environmental permits or land drainage consents will be applied for works from the Environment Agency...or from the LLFA (for Ordinary Watercourse crossings)". Commitment C-126 states "Minor watercourses (where open cut techniques are proposed for the permanent cable crossings) will also have temporary crossings for the haul road to provide vehicular access along the route. A mixture of culverts and / or clear span bridges could be employed based on crossing specific requirements (size of watercourse and flood risk). These will be subject to permits and consents with the Environment Agency and Lead Local Flood Authority (LLFA)."</i></p> <p>Although the OWC is outside of the scope of the Draft Development Consent Order [PEPD-009], the Applicant will adhere to each of the OWC requirements in accordance with legislation as noted in the above measures.</p> <p>In paragraph 26.2.8 of Chapter 26: Water environment, Volume 2 of the ES [APP-067] the need for an OWC is also acknowledged by the Applicant.</p>

Ref	Local Impact Report Comment	Applicant's Response
16.26	16.26. Temporary culverting of watercourses must be monitored during the life of the Project and removed as soon as is practically possible once construction is complete. The Applicant must ensure the decommissioning of all temporary construction elements has been properly considered during the detailed design stage.	<p>As set out in Section 2.4 of the Outline Code of Construction Practice [PEPD-033], the Applicant will have overall responsibility for monitoring the performance of contractors, and further specific roles will include environment managers and advisors and Ecological Clerk of Works (ECoW). The ECoW will supervise operations on site during the construction phase including temporary culverting. The ECoW will have responsibility for overseeing the measures detailed in the Code of Construction Practice and its supporting plans.</p> <p>Provision for removal of temporary watercourse crossings is outlined in commitment C-128 of the Commitments Register [REP1-015], stating that: <i>“Any temporary crossings will be in place for the minimal time possible.”</i></p>
16.27	16.27. Given the local topography of the central portion of the cable route, surface water flood risk should be considered within any emergency response plan for this area. Therefore, long lengths of open cable route trenching, which could become a flow route for surface water during periods of heavy rainfall, should be avoided.	<p>Table 4-6 in Section 4.8 of the Outline Code of Construction Practice [PEPD-033] outlines commitments relevant to emergency planning procedures which includes commitment C-118: <i>“Emergency Response Plans (ERP’s) for flood events will be prepared for all construction activities, working areas, access and egress routes in floodplain areas (tidal and fluvial)”</i>. The requirements of the ERP are outlined in Section 8.2 of the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement [APP-216]. Paragraph 8.2.3 includes provisions for surface water flood risk outlining that: <i>“the circumstances under which different responses will be implemented should be specified, with an escalation of response associated with increasing levels of danger. For example, a ‘be prepared’ alert may be raised upon receipt of an Environment Agency Flood Alert or a Met Office Severe Weather Warning for heavy rain, followed by an ‘evacuate’ order upon receipt of an Environment Agency Flood Warning, or at the discretion of the site Health, Safety, Security and Environment (HSSE) Manager, based upon an appraisal of local conditions”</i>. It is envisaged that these measures will be sufficient to address surface water flood risk to construction activities and personnel. This is secured as part of the emergency response plan via Requirement 22 (j) of the Draft Development Consent Order [PEPD-009].</p>
16.28	16.28. WSCC requires the Applicant to ensure known overland surface water flow routes are marked on construction phase plans so that site supervision staff are aware of possible risk. Temporary haul roads and accesses should be constructed so as not to cut-off existing overland surface water flow paths as this could increase surface water flood risk off-site.	<p>A number of embedded environmental measures have been included within the Appendix 26.2: Flood Risk Assessment, Volume 4 of the Environmental Statement [APP-216] to ensure that temporary haul roads and associated crossings do not result in a detrimental impact to flood risk. Specifically, environmental measure C-73 states that: <i>“Where the development intersects overland flow pathways or areas of known surface water flooding appropriate measures will be embedded into the design”</i>. In addition, environmental measure C-181 states that <i>“Access roads</i></p>

Ref	Local Impact Report Comment	Applicant's Response
16.29	16.29. Winter monitoring of groundwater levels at Oakendene substation should be carried out. For clarity, the existing watercourses around the site should be added to the Indicative SuDS Plan.	<p><i>will have cross drainage provided where necessary at topographic low points". Commitments C-128, C-145, C-176, C-177 and C-178 outline further provisions made in relation to temporary watercourse crossings. These environmental measures have been secured by the Outline Code of Construction Practice (CoCP) [PEPD-033] via the Construction Phase Drainage Plan (as outlined in Table 3-1 which will accompany the stage specific CoCP to be submitted post-consent and approved by the local authority), which, as set out in paragraph 5.10.9, states that "Details of construction phase drainage will be developed by the Contractor(s) and will be presented in a Construction Phase Drainage Plan and approved as part of the stage specific CoCP. Details of the Construction Phase Drainage Plan will be subject to consultation with WSCC and other relevant consenting authorities prior to the start of construction". This is secured as part of the construction phase drainage plan via Requirement 22 (c) of the Draft Development Consent Order [PEPD-009].</i></p> <p>As noted in reference 16.24, the Applicant has agreed for winter monitoring of groundwater levels to be undertaken post-Development Consent Order award, to inform the detailed drainage strategy and assessment of any further specific mitigation measures. A new environmental measure (C-293) will be added to the Commitments Register [REP1-015] to reinforce this commitment to winter groundwater monitoring which will be incorporated into the Draft Development Consent Order [PEPD-009] for Deadline 3.</p>
17. Emergency Services (ES Chapter 27)		
17.1	<p>Summary 17.1. West Sussex Fire and Rescue Service (WSFRS) has provided commentary regarding the onshore elements of the Project only, as it is not legally bound to offer emergency response services for offshore incidents. Therefore, the Applicant should consider this in their emergency planning for foreseeable events and emergencies that may arise offshore involving operational staff and equipment. For instance, a wind turbine fire or incidents where an engineer becomes trapped or injured during the construction or operational phases.</p>	<p>As noted in the Draft Development Consent Order [PEPD-009] under Schedule 11 to the licensed activities in the offshore part of the Proposed Development, no part of the authorised scheme may commence until compliance with the applicable MGN654 "<i>Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues</i>" has been demonstrated and approved by the relevant authorities.</p>
17.2	17.2. West Sussex Fire Authority was constituted under section 4 of the Fire and Rescue Services Act 2004. It is responsible for making sure that the West Sussex Fire & Rescue Service (WSFRS) performs efficiently and in the best interest of the public and community it serves.	The Applicant has no further comments on this matter at this time.
17.3	17.3. To date, the Applicant has not provided specific information within the DCO application with regards to concerns raised by WSFRS through the pre-application consultation. Although this element does not form a Principal Area of Disagreement, WSFRS does wish to highlight the potential local impacts of the Project and requires the dDCO to secure consultation with WSFRS during detailed design, the pre-construction phase, and as part of the planning for the operations and management plan. This will ensure that control measures are put in place to mitigate the risks and uncertainties raised.	The Draft Development Consent Order [PEPD-009] under Schedule 1 Part 3 of the Order states that prior to commencement of works at the onshore substation detailed design information shall be submitted to and approved in writing by the relevant planning authority in consultation with the West Sussex Fire and

Ref	Local Impact Report Comment	Applicant's Response
		Rescue Service and Work No. 16 must be carried out in accordance with the approved details.
17.4	17.4. These risks include potential impact to emergency response times during the construction phase (due to construction activities impacting both public or private road network), as well as an operational phase risk of the presence of the onshore substation and enabling works at Bolney National Grid Substation.	Please see above response 17.3 .
17.5	17.5. WSFRS acknowledges the revised documents submitted by the Applicant at the Procedural Deadline, including the dDCO (PEPD-010) and OCoCP (PEPD-033), which are reflected within this section of the LIR.	The Applicant has no further comments on this matter at this time.

Table 17: Summary of Impacts – West Sussex Fire and Rescue

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
17a	Potential for extended response times for WSFRS' attendance at incidents due to road closures and access restrictions.	C	Negative	Mitigate: The Applicant must provide a schedule of works and regular updates to WSFRS when it is expected that road closures and restricted access routes will be implemented during the construction phase. Ideally this should be provided well in advance of the construction period.	WSFRS Community Risk Management Plan (CRMP) The Fire and Rescue National Framework for England	Section 8.4 within the Outline Construction Traffic Management Plan [PEPD-035a] has been updated and submitted at the Deadline 1 submission to include a section on the communication strategy which outlines that road users are to be notified of any proposed road closures, diversions, and/or alternative access arrangement at least one month prior to commencement. This includes stakeholders directly affected such as Local Planning Authorities and Parish Councils and bodies identified as Statutory Consultees.
17b		O	Negative	Mitigate -The Applicant must share and engagement with WSFRS during the development of emergency plans associated with Oakendene substation and Bolney substation extension and associated works. Mitigate - WSFRS will require information on the intended access to the substation, the alternative access if the	WSFRS Community Risk Management Plan (CRMP) The Fire and Rescue National Framework for England	The Applicant refers to its response in reference 17.3 and is looking forward to engaging with WSFRS during the development of the substation sites.

Ref	Local Impact Report Comment	Applicant's Response
	layout requirements require, and the supply of water for firefighting	
17.6	<p>Policy Context National Policy Statements 17.6. No reference is made to these aspects within the relevant National Policy Statements.</p>	The Applicant has no further comments on this matter at this time.
17.7	<p>The Fire and Rescue National Framework for England 17.7. Fire and rescue authorities in England have a duty to have regard to the Fire and Rescue National Framework for England, which sets priorities and objectives in connection with the discharge of their functions. It imposes four key responsibilities on Fire and Rescue Services which are: community fire safety; fighting fires; dealing with road traffic accidents; and responding to other emergencies. Every fire and rescue authority must have regard to the Framework in carrying out their functions. The priorities in this Framework are for fire and rescue authorities to: Make appropriate provision for fire prevention and protection activities and response to fire and rescue related incidents; Identify and assess the full range of foreseeable fire and rescue related risks their areas face; Collaborate with emergency services and other local and national partners to increase the efficiency and effectiveness of the service they provide; and Be accountable to communities for the service they provide and develop and maintain a workforce that is professional, resilient, skilled, flexible and diverse.</p>	The Applicant has no further comments on this matter at this time.
17.8	<p>WSFRS Community Risk Management Plan 17.8. This is a statutory requirement for all fire and rescue services to produce a Community Risk Management Plan (CRMP), which identifies and assesses all foreseeable fire and rescue related risks in its communities and ensures that arrangements are put in place to prevent and respond to these risks.</p>	The Applicant takes notice of this and has no further comments on this matter at this time.
17.9	<p>Construction Phase – Impacts Positive 17.9. No positive impacts have been identified for the construction phase.</p>	The Applicant has no further comments on this matter at this time.
17.10	<p>Neutral 17.10. No neutral impacts have been identified for the construction phase.</p>	The Applicant has no further comments on this matter at this time.
17.11	<p>Negative 17.11. Due to the significant geographical coverage of the Project and the number of road crossings to facilitate the cable route approximately 39km across the County, it is foreseeable that public and private access routes will be disrupted. Therefore, this creates the potential for extended response times for WSFRS' attendance at incidents during the construction phase due to these road closures and access restrictions. At all times, WSFRS will require emergency access to property and infrastructure.</p>	<p>The Crossing Schedule within the Outline Code of Construction Practice [PEPD-034] demonstrates that all but one public highway will be crossed by trenchless crossing methods. Shermanbury Road and three private roads are the only ones planned for temporary closure.</p> <p>The Outline Construction Traffic Management Plan [PEPD-035a] contains provisions for maintaining emergency access to properties even during temporary closures of private means of access.</p>
17.12	<p>Operational Phase - Impacts Positive 17.12. No positive impacts have been identified for the operational phase.</p>	The Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment	Applicant's Response
17.13	Neutral 17.13. No neutral impacts have been identified for the operational phase.	The Applicant has no further comments on this matter at this time.
17.14	Negative 17.14. Failing to provide WSFRS with Emergency Planning procedures and details for the Oakendene and Bolney sites could endanger the safety of responding firefighters in the event of an incident. This failure will also impact WSFRS' effectiveness to manage and resolve an incident.	The Applicant has no further comments on this matter at this time.
17.15	Required Mitigation 17.15. Better understanding of the implications upon potential extended response times for emergency service attendance at incidents during the construction phase must be explored with WSFRS during the pre-construction phase (if consent is granted). Emergency access to property and infrastructure is required by WSFRS at all times. It is acknowledged that the revised OCoCP (PEPD-033) makes additional reference to maintaining emergency access to properties at all time during construction works, via the use of road plating.	The Applicant has no further comments on this matter at this time.
17.16	17.16. Whilst understanding the allowance for flexibility in the proposals at this stage, clarification of whether Gas Insulated Switchgear or Air Insulated Switchgear technology will be taken forward and the requirement for fire detection for enclosed environments, must be further discussed with WSFRS through detailed design (if consent is granted). As with previous responses on the Project, the design must adequately account for fire service vehicles and equipment to access all areas whilst considering minimum safe approach distances for fires involving electrical installations. Emergency water supplies must also be provided. It is acknowledged that the revised dDCO makes allowance for consultation with WSFRS on detailed design elements for the substation through Requirement 8 (detailed design approval onshore substation).	As identified by WSFRS, Requirement 8 (and 9) of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2 submission) requires approval for the onshore substation detailed design.
17.17	17.17. Emergency access must be maintained to ensure the safety of the Bolney National Grid Substation Site during construction and operation of the enabling works.	Construction access to the existing National Grid Bolney substation extension will be via access A-68, which is separate from the main access to the onshore substation (access A-67), which means that access to the existing substation will be maintained during construction of the extension.
18. Public Rights of Way (ES Chapter 28)		
18.1	Summary 18.1. Due to the large scale of this Project and the linear nature of the proposals, the scale of the impact on Public Rights of Way (PRoW) is very high. With just under 60 individual interventions across the PRoW network crossed by the Project, this highlights the impact on users both exercising their legal rights for utility or recreational purposes. Whilst mitigation is proposed, the impact is negative due to the interruption for users and also the alternative route options proposed are predominantly a further distance than the existing legal routes available.	The Applicant notes that the impacts on users of Public Rights of Way (PRoWs) have been assessed in Chapter 17 Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058] . The measures for each PRoW have been outlined in the Access, Rights of Way and Streets Plan [APP-012] and the Outline Public Rights of Way Management Plan [APP-230] , secured by the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Requirement 20. The Applicant is committed to minimising impacts on PRoWs and notes that closure and diversion is generally short term. The Applicant will provide further detail on the programme for temporary closure, diversion and reinstatement in accordance with Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Requirement 20 (1) (a) and (b).
18.2	18.2. The Applicant has proposed measures to mitigate these effects, through the Outline Public Rights of Way Management Plan (OPRoWMP), which is secured through a Requirement in the DCO. Although it does set out clear mitigation for the network, this will negatively impact lawful path users within the County due to the large extent of temporary closures and diversions. To reduce disruption to lawful users as much as possible, WSCC would need to see a strong commitment to a phased construction programme and its securement through the DCO.	
18.3	18.3. Due care needs to be taken when considering different status of PRoW impacted by the Project. Different status allows different types of users and each of those users should be accommodated when implementing any temporary routes.	

Ref	Local Impact Report Comment	Applicant's Response
18.4	18.4. With regard to proposed diversions, these must be suitable for lawful users and managed by the landowner/contractor to make sure they remain safe and accessible for the duration of the temporary closure.	
18.5	18.5. Compensation will be required to mitigate against the identified impacts on the users of the PRow network in both the short, medium, and long term. These funds will allow improvements to be undertaken on the network, improving access and availability. This should be focussed on future PRow improvements within a 5km buffer zone of the landfall, cable route and onshore substations (including extension to the National Grid substation). There should also be a commitment for any temporary gates, where appropriate, used for site safety and managing temporary diversions to be offered to WSCC, as the Local Highway Authority, for future structure improvement across the PRow network (replacing stiles with gates) to improve public access.	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 National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.
18.6	18.6. These benefits brought about by the S.106 contributions will help WSCC meet the seven clear objectives of the Rights of Way Management Plan (2018-2028).	

Table 18: Summary of Impacts – Public Rights of Way

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
18a	Impact on lawful users to exercise their public rights of access across the PRow Network	C	Negative	<p>Avoid: Permanent closure of any PRow and long-term closures with no alternatives</p> <p>Reduce: Temporary closure duration where possible and neighbouring path closure to reduce impact on users</p> <p>Mitigate: Implementation of the OPRoWMP and where paths are to be closed with no alternative routes (28 PRow), alternative routes sought and secured where possible to avoid complete severance</p> <p>Compensate: Through the S.106 secure funds for PRow improvements within a 5km buffer zone of landfall, cable route and substation.</p>	NPS EN-1 (Paragraph 5.13) WSCC Rights of Way Management Plan 2018-2028	<p>There are no permanent closures of public rights of way (PRow) as part of the Proposed Development. The Applicant has sought to minimise the duration of closures and notes that the closures referred to are addressed under the classification of 'Temporary Closures with diversion via existing route: Short-term' in paragraphs 5.5.8 to 5.5.10 of the Outline Public Rights of Way Management Plan (PRoWMP) [APP-230] secured through Requirement 20 of the Draft Development Consent Order (DCO) [PEPD-009] (updated at Deadline 2). This notes that the closures will be for a few days at a time and alternative routes are available in the locality as described in these paragraphs of the Outline PRowMP. The Applicant considers this is a proportionate approach to the short-term closures.</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is</p>

Ref	Local Impact Report Comment	C	Negative			Applicant's Response
18b	Impact on amenity of the PRow network for duration of works	C	Negative	<p>Avoid: Permanent closure of any PRow and any long-term closures without alternative routes being available to lawful users</p> <p>Reduce: Temporary closure duration where possible and implement phasing of works to reduce impacts at locations where multiple paths within certain localities require temporary closure</p> <p>Mitigate: Implementation of the OPRoWMP and avoid complete severance of network by providing alternative routes where possible (28 PRow currently have no alternative which should be aimed to be reduced where feasible)</p> <p>Compensate: Under S106 provision of temporary gates, where suitable, no longer needed are provided to the Local Highway Authority to be used to replace stiles across network improving access and amenity for the future use of the PRow. Also S106 contribution toward PRow improvements within 5km buffer zone of landfall, cable route and substation.</p>	<p>NPS EN-1 (Paragraph 5.13) WSCC Rights of Way Management Plan 2018-2028</p>	<p>committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p> <p>The Applicant refers to the response in reference 18a in this table.</p>

Ref	Local Impact Report Comment					Applicant's Response
18c	Impact on users of PRow proposed to be temporarily diverted	C	Negative	<p>Avoid: Any alternative routes not being suitable for all lawful users of the route</p> <p>Reduce: The length of the PRow temporary diversion to make alternative as commodious as possible</p> <p>Mitigation: Implement of the OPRoWMP and seek the most convenient alternative route possible for lawful users</p> <p>Compensate: Under S106 provision of temporary gates, where suitable, no longer needed are provided to Local Highway Authority to be used to replace stiles across network improving access and amenity for the future use of the PRow. Also S106 contribution toward PRow improvements within 5km buffer zone of landfall and cable route.</p>	NPS EN-1 (Paragraph 5.13) WSCC Rights of Way Management Plan 2018-2028	<p>The Applicant has described the proposed diversions in the Outline Public Rights of Way Management Plan (PRoWMP) [APP-230] and will provide stage specific PRoWMP in accordance with the Outline PRoWMP secured through Requirement 20 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p>
18d	Impact upon PRow proposed to be temporarily diverted with no alternative route	C	Negative	<p>Avoid: All 28 paths referenced as temporarily closed with no alternative</p> <p>Reduce: Number of paths severed for the duration of the works should be reduced where possible to reduce severance of network</p> <p>Mitigate: Seek alternative routes suitable for lawful users with landowners where possible for the 28 PRow</p> <p>Compensate: PRow surface improvements after construction works are</p>	NPS EN-1 (Paragraph 5.13) WSCC Rights of Way Management Plan 2018-2028	Please see response in reference 18a in this table.

Ref	Local Impact Report Comment				Applicant's Response	Applicant's Response
18e	Impact on coastal access for duration of the construction works (forms part of King Charles III England Coast Path National Trail)	C	Negative	<p>completed, to improve the amenity and public user experience. Condition surveys will be necessary and photographic proof provided to clearly show the standard of paths prior to works taking place.</p> <p>Avoid: Complete closure of coastal PRowWs at once as will sever access to beach and along it. This is particularly important as the coastal route forms part of the King Charles III England Coast Path which is a National Trail and should be protected as such. Reduce: Impact on users of the PRow network by avoiding closures where possible Mitigate: Avoiding closures and alternative routes to reduce impact and access and amenity for users of the coastal routes Compensate: Suitable alternative routes where necessary and S106 toward PRow improvements within 5km buffer zone of landfall and cable route</p>	NPS EN-1 (Paragraph 5.13) WSCC Rights of Way Management Plan 2018-2028	There is no closure of the England Coast Path at the landfall at Climbing. As per Table 4-1 of the Outline Public Rights of Way Management Plan [APP -230] , footpath 829 is crossed by a trenchless crossing. This is secured by Works No.6 and 7 in the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Schedule 1 Authorised Project.
18f	Impact to the South Downs Way (forms part of the National Trail)	C	Negative	<p>Avoid: Complete severance of SDW and feeder routes. This is particularly important as the South Downs Way is a National Trail and should be protected as such. Reduce: Impact</p>	NPS EN-1 (Paragraph 5.13) WSCC Rights of Way Management Plan 2018-2028	The Applicant has assessed the impact on South Downs Way (SDW) at Bridleway 2092 and 2063 and identified significant effects when considering the very high sensitivity. Temporary diversions have been identified on sheets 15 and 19 of the Access, Rights of Way and Streets Plan [APP-012] and will provide stage specific Public Right of Way Management Plan as per the Draft Development Consent Order [PEPD-009]

Ref	Local Impact Report Comment	Applicant's Response
18g	Impact to the Downs Link (DL) C	<p>for users of the SDW by not severing access completely and phasing works Mitigation: Implementation of principles of PRowMP and having suitable alternative routes in place for all lawful users Compensate: Provision of funds through S.106 for PRow improvements within 5km buffer zone and also temporary gates from project to help improve future access to and along this National Trail</p> <p>Avoid: Complete severance of access to and along DL for duration of construction works. The Downs Link is a route available to multiple modes of public access from Shoreham, north to Rudgwick and continues into Surrey. This route is a key public access route for utility and recreational purposes and severance and interruption of it will have considerable negative impacts on regular users and visitors to the County. Reduce: Impact on utility and recreational users of the DL Mitigation: Implementation of the PRowMP and providing suitable alternative routes for all lawful users Compensation: Provision of funds</p> <p>NPS EN-1 (paragraph 5.13) WSCC Rights of Way Management Plan 2018-2028</p> <p>(updated at Deadline 2) Requirement 20 including specifics for the SDW under 20 (b) i to iii.</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p> <p>The Applicant has assessed the impact on the Downs Link at Bridleway 3514 as a significant effect. A temporary diversion has been identified on sheet 28 of the Access, Rights of Way and Streets Plan [APP-012]. The Applicant will provide stage specific Public Right of Way Management Plan as per Requirement 20 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p>

Ref	Local Impact Report Comment	Applicant's Response
18h	<p>Visual impact for PRow users at the substation and National Grid substation extension</p> <p>C/O</p> <p>Negative</p>	<p>through S.106 for PRow improvements within 5km buffer zone and also temporary gates from the Project to help improve future access to this promoted route and wider network</p> <p>Avoid: Where possible negative visual impact for users Reduce: Visibility of new infrastructure from the PRow network where possible Mitigation: Visual screening where possible to reduce the impact on users of the local network Compensation: Provision of funds through S.106 for PRow improvements within 5km buffer zone and also temporary gates from project to help improve future access to this promoted route and wider network</p> <p>NPS EN-1 (Paragraph 5.13) WSCC Rights of Way Management Plan 2018-2028</p> <p>The Applicant has provided an assessment of the visual impacts at the onshore substation in Table 18-34 of Chapter 18: Landscape and visual impact assessment, Volume 2 of the ES [APP-056], for footpath references 1786 and 1788 with significant effects concluded during operation. The Design and Access Statement [AS-003] identifies the design principles to achieve screening of the substation, this is secured through Requirement 8 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>There are no significant effects at the National Grid Bolney substation extension during operation. The Design and Access Statement [AS-003] identifies the design principles to achieve screening of the onshore substation extension works, this is secured through Requirement 9 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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 effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p>
18.7	<p>Policy Context National Policy Statements 18.7. The Overarching NPS for Energy, EN-1 includes guidance on the socioeconomic and tourism matters that need to be considered (Section 5.13), which include: The effects on tourism; The effects of the proposed project on maintaining coastal recreation sites and features; Cumulative effects.</p>	<p>The Applicant has no further comments at this time on matters raised in paragraphs 18.7 to 18.8 of the West Sussex County Council Local Impact Report.</p>
18.8	<p>18.8. In addition, EN-1 indicates that the assessment should describe the existing conditions in the areas surrounding the Project.</p>	

Ref	Local Impact Report Comment	Applicant's Response
18.9	<p>WSSC Policy <i>Rights of Way Management Plan 2018-2028</i> 18.9. The West Sussex Rights of Way Management Plan outlines ways in which improvements, such as provision of new routes and major works, could be achieved over and above routine maintenance.</p>	<p>The Applicant has no further comments at this time on matters raised in paragraphs 18.9 to 18.11 of the West Sussex County Council Local Impact Report.</p>
18.10	<p>18.10. The purpose of the plan is to demonstrate how WSSC, working alongside key partners, will manage the PRoW network to provide a framework through which local interest and community groups can contribute to the management and development of the PRoW network.</p>	
18.11	<p>▶ 18.11. The WSSC Vision for PRoW in West Sussex is: To enable people to enjoy the countryside on foot, by horse and by bicycle, for health, recreation and to access services, while recognising the need to balance this with the interests of those who live and work in the countryside and the management of special landscapes; and Working in partnership with volunteers and key organisations, the Objectives of the Plan are to: Manage the existing PRoW network efficiently and maintain to an appropriate standard for use. Improve path links to provide circular routes and links between communities. Improve the PRoW network to create safe routes for both leisure and utility journeys, by minimising the need to use and cross busy roads. Provide a PRoW network that enables appropriate access with minimal barriers for as many people as possible. Promote countryside access to all sections of the community enabling people to confidently and responsibly use and enjoy the countryside. Support the rural economy. Support health and wellbeing.</p>	
18.12	<p>Construction Phase – Impacts Positive 18.12. The Project is not considered to offer any positive impacts to the local PRoW network during construction.</p>	<p>The Applicant refers to the conclusions of the assessment of effects on public rights of way (PRoW) users in Chapter 17 Socio-economics, Volume 2 of the Environmental Statement [APP-058] where significant effects are identified on the South Downs Way only following the implementation of embedded environmental measures in the Outline Public Rights of Way Management Plan [APP-230] secured through Requirement 20 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
18.13	<p>Neutral 18.13. The Project is not considered to offer any neutral impacts to the local PRoW network during construction.</p>	
18.14	<p>Negative <i>Impact on accessibility and amenity of PRoW network</i> 18.14. A significant number (58) of individual interventions on the PRoW network proposed as part of the Project will negatively impact accessibility and amenity of the lawful user.</p>	
18.15	<p>18.15. Users will be impacted by way of complete severance of key routes, such as the South Downs Way and the Downs Link, together with many other less high-profile PRoW. Furthermore, there will be additional distances for users to follow in cases where temporary alternative routes are being proposed. Further details are given on the routes which are of concern.</p>	<p>Please see responses in references 18f and 18g. The temporary diversion of the South Downs Way may add 250-300m to users' journeys; for the Downs Link this may be 50-100m.</p>
18.16	<p>18.16. 17 PRoW (listed below along with their Access Point reference) are proposed to be used as vehicular access to the work site; this will adversely impact users. Whilst private vehicular access must always give way to lawful public users on the sections that would not be closed, there must be a commitment as part of the DCO submission for this to be confirmed and suitable mitigation of potential conflict by way of signage relevant to all users.</p>	<p>The Outline Public Rights of Way Management Plan [APP-230] will be updated at the Deadline 3 submission to state that where it is safe to do so construction traffic will give-way to PRoW users. However, very occasionally PRoW users may have to wait for a short period of time whilst the shared route is in use by construction traffic as it may not always be possible or safe for HGVs to give way (e.g. HGVs turning into a side road or along a narrow track).</p>

Ref	Local Impact Report Comment	Applicant's Response
18.17	<p>18.17. Further to this, vehicular use may cause damage to the surface of any PRow being used; therefore, condition surveys will be required prior to access being undertaken and any damage done must be reinstated to the same or better standard than before access was undertaken. A14 – BW2163 A25 – BW2211 A27 – BW2091 A26 – BW2174 & FP2263 A27 – BW2173 A28 – RB2092 A43-b – BW2711 A44 – FP2514 A45 – BW2594 A46 – BW2589/1 A49 – FP2519 A50 – FP2372 A51 – BW2372/2 A56 – BW1774 A58 – BW1730 A60 – BW1730</p>	<p>It may be lawful for construction traffic to give way to public users but it may not always be practicable to do so (e.g. turning in from a highway or blocking the onward path).</p> <p>Section 5.4.5 within the Outline Public Rights of Way Management Plan [APP-230] states 'The advance inspection survey carried out prior to commencement of the construction phase will also include written descriptions and location maps noting where any existing issues with PRow. Where appropriate, the advance inspection survey will be utilised to note opportunities for enhancement of PRow following the completion of the construction phase. For example, there may be improvements that are required to some access tracks as part of the temporary construction access works to get vehicles to construction areas associated with the onshore elements of the Proposed Development. Discussions with landowners will be undertaken to see if they would like the improved services retained rather than the route being restored to its pre-construction state. However, this will need to be discussed with the Local Planning Authority, Local Highway Authority and landowner, as well as be subject to a separate planning process. It is however acknowledged, that the contractor's remit is only to return PRow back to the original standard they were in before commencement of the construction phase.'</p> <p>This proposal for condition surveys has been included as an embedded environmental measure (C-163, Commitments Register [REP1-015], secured via Requirement 20 within the Draft Development Consent Order [PEPD-009] updated at Deadline 2.</p>
18.18	<p><i>Impact on coastal access throughout duration of the construction works</i> 18.18. At the point of landfall and the surrounding area impacted by the cable route, there will be considerable interruption to lawful users' ability to access the coast. This is a well-used amenity and the local PRow network is key for many to gain access to this popular and important environment.</p>	<p>Please see responses in reference 18e. There will be no disruption to access to the coast.</p>
18.19	<p><i>Impact on accessibility to and along South Downs Way</i> 18.19. The South Downs Way is a National Trail and a nationally recognised multi-user route. Severance of this and feeder routes during construction will negatively impact people's ability to travel between communities and exercise their recreational rights of access.</p>	<p>Please see response in reference 18f. A temporary diversion will add 250-300m.</p>
18.20	<p>18.20. The proposed temporary closures offering temporary alternative routes will also negatively impact users by increasing the distance users will have to travel to get to their destinations.</p>	
18.21	<p><i>Impact on accessibility to and along the Downs Link</i> 18.21. As a key multi-user route in West Sussex, the Downs Link provides access for walkers, horse riders and cyclists for both utility and recreational use.</p>	<p>Please see response in reference 18g. A temporary diversion will add 50-100m.</p>
18.22	<p>18.22. Temporary severance and temporary alternative routes impacting the Downs Link itself and feeder routes will adversely impact lawful users' ability to exercise their legal rights and access between communities and services.</p>	
18.23	<p><i>Visual impact along whole network whilst works are taking place</i> 18.23. During the construction phase, there will be a negative impact on lawful users of the PRow due to the considerable construction works proposed to take place.</p>	<p>The Applicant has assessed the effects of construction including the use of the temporary construction compounds on users' enjoyment of onshore recreation including use of public rights of</p>

Ref	Local Impact Report Comment	Applicant's Response
18.24	18.24. This will vary in distance from the PRow network but will negatively impact the amenity of the routes for users and their enjoyment of what is usually, in most cases, a rural environment.	way in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] and recognises the adverse nature of the effects during construction.
18.25	18.25. These comments relate to the compounds along the proposed route and also the substation site at the northern end of the Project. The existence of the compounds during construction will adversely impact the environment for walkers visually through the construction phase as will the substation sites, which will continue to adversely impact visual enjoyment of the local area through the operational phase as well.	
18.26	<p>Operational Phase - Impacts Positive</p> <p>18.26. The Project is not considered to offer any positive impacts to the local PRow network during operation.</p>	Please refer to the response in reference 18h .
18.27	<p>Neutral</p> <p>18.27. The Project is not considered to offer any neutral impacts to the local PRow network during operation.</p>	
18.28	<p>Negative</p> <p><i>Continued visual impact of PRow local to the substation site</i></p> <p>18.28. During the operational phase, the visual impact of the new infrastructure at the substation and national grid extension sites on the lawful users will continue. This will be a negative impact on what was previously a rural environment. The paths that appear to be most impacted are as follows: FP1T, FP36Bo, FP8T, FP34Bo, FP1790, FP1791, FP1792, and FP2380.</p>	
18.29	<p>Required Mitigation</p> <p>18.29. The OPRoWMP sets out mitigation to reduce the impact on lawful path users. It is considered that whilst some mitigation is offered, there should be a strong commitment to seek temporary alternative routes, where possible, to prevent complete severance of the network, particularly with regard to the South Downs Way (National Trail) and the Downs Link (which is a WSCC promoted route).</p>	Please refer to the response in references 18a, 18f and 18g .
18.30	18.30. There are 18 routes that are referred to as requiring temporary closure with no temporary alternative routes. These are all small-scale closures of the routes but have a large impact on accessibility. The routes are listed below and a commitment should be made to provide an alternative route in these cases to mitigate the impact on users.FP2202/1 - 08a - 08b FP2199 - 10a - 10b FP2198 - 11a - 11b FP2176 - 12a - 12b FP2190 - 13a - 13b FP2174/1 - 16a - 16b BW2208/1 - 17a - 17b FP2260/1 - 18a - 18b FP2262 - 19a - 19b BW2103 - 26a - 26b BW2107 - 27a - 27b BW2109 - 29a - 29b FP2520 - 41a - 41b FP1781 - 46a - 46b FP1776/1 - 47a - 47b FP1782 - 48a - 48b FP1783 - 49a - 49b BW1730 - 50a - 50b	The Applicant clarifies that these are short term closures (a few days at a time) with diversions to be provided by existing footpaths as per paragraphs 5.5.8 to 5.5.10 in the in the Outline Public Rights of Way Management Plan [APP-230] secured through Requirement 20 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) which includes commitments to providing signage as per Section 5.4 of the document.
18.31	18.31. In terms of long-term visual impacts, with particular reference to the above ground infrastructure of the onshore substation and National Grid substation extension, a commitment should be made to mitigate this as much as possible by offering relevance landscaping to restrict visibility of infrastructure by lawful users of the PRow network.	Please refer to the response in reference 18h .
18.32	18.32. In terms of compensation, a S106 principles offer has been made with regard to the PRow network for improvements within a 5km buffer zone of the onshore works. This is welcomed and will allow improvements to be made to the local PRow network impacted by the Project in the long-term. Acknowledgement through this fund of the impacts to the amenity value of PRow users, should also be included to ensure long-term enjoyment of the local network. Further to this, a commitment should be made to allow WSCC PRow Team to utilise any temporary gates, where appropriate, to help improve access across the PRow network by replacing existing stiles with gates, where possible. This would meet objectives set out in the West Sussex Rights of Way Management Plan (2018-2028) and would help to offset the adverse effects of the Project.	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 National Policy Statement (NPS) 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

Ref	Local Impact Report Comment	Applicant's Response
19. Public Health (ES Chapter 28)		
19.1	Summary 19.1. The focus of this LIR section is on the potential health impacts on communities affected by the Project during the construction and operational phases.	in relation to how residual effects can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.
19.2	19.2. The conclusions on these impacts have been drawn primarily from the nature of activities described in the ES and existing evidence on their potential to influence health outcomes. WSCC notes that in many aspects of the Population and Human Health chapter (APP-069), the interpretation of effects may have been enhanced if there was a more consistent description of the proximity between receptors and the Projects construction and operational elements.	Noted, the Applicant has no further comments on this matter at this time.
19.3	19.3. It is essential to ensure that key design and construction decisions do not result in unacceptable or adverse impacts on residents within West Sussex over the four-year onshore construction period. Given the duration of the onshore construction programme, there is a lack of construction phasing information, which should be presented more clearly to enable local communities and WSCC to understand if the impacts have been appropriately addressed and mitigated through the outline control documents. The proposed Construction and Communications Plan (CCP) as part of the Outline Code of Construction Practice (OCoCP) (APP-224), as very broadly outlined, is welcomed, and should build upon similar arrangements adopted for Rampion 1 (and experience gained and lessons learnt).	The potential population and health effect is not simply related to the proximity of a receptor to the Proposed Development's construction and operational elements.
19.4	19.4. Operational impacts are considered across the wider route to be lesser potential impacts to human health; however, the above ground infrastructure at the substation and substation extension site must be better documented in terms of engagement with the affected communities and how the outcome of those engagements have influenced the Applicant's assumptions, chosen locations for these infrastructure elements, and on the proposed mitigation measures to reduce these impacts.	While the overall duration of the onshore construction programme is medium term, the majority of construction activities are temporary and transient in nature and would not persist for any material length of time.
19.5	19.5. Relevant technical sections of this LIR should be referred to for feedback on supplementary mitigations required to minimise the harm to receptors who will be affected by the Project.	Engagement and consultation with local communities is reported in the Consultation Report [APP-027] .
		On the basis that public health is preventative in nature, any proposed mitigation measures required to minimise harm are focused on the environmental determinants of health such as air quality, noise and transport.

Table 19: Summary of Impacts – Public Health

Ref No	Description of Impact	Construction (C) / Operation (O)	Negative /Neutral / Positive	Required mitigation and how to secure it (Avoid, Reduce, Mitigate, Compensate)	Policy Context	Applicant's Response
19a	Potential impacts to local communities during the construction of the Project	C	Negative	Please refer to the relevant technical sections of this LIR for recommendations	The Overarching NPS for Energy (EN-1) (Paragraph 4.4) The Noise Policy	While the general direction of population and health effects during construction are negative, no changes would be significant in nature.

Ref	Local Impact Report Comment	Applicant's Response
19b	<p>Potential impacts to local communities during the operational phase of the Project</p> <p>○ Negative (above ground infrastructure only)</p>	<p>on additional mitigations.</p> <p>Statement for England (March 2010) (Paragraph 1.7, 1.8, 2.22-2.25.)</p> <p>Creating healthy and sustainable places (framework for West Sussex).</p> <p>It should be noted that there would be positive population and health effects from changes in socio-economic factors (employment and gross value added (GVA)), albeit these are not significant.</p> <p>While the general direction of population and health effects during operation are negative, no changes would be significant in nature.</p>
19c	<p>Potential exposure to EMF from the operation of the onshore cables</p> <p>○ Neutral</p>	<p>Agreed that the effects from potential exposure to electromagnetic field (EMF) are neutral on the basis that they remain within public health exposure guidelines.</p>
19.6	<p>Policy Context National Policy Statements</p> <p>19.6. The Overarching National Policy Statement for Energy (EN-1), section 4.4, outlines the potential effects of construction and operation of energy infrastructure on health and well-being. It encourages that whilst evaluating the health effects of these projects on the wider population, consideration is also given to how they might impact differentially on vulnerable populations.</p>	<p>Appendix 28.3: Equalities Impact Assessment, Volume 4 of the Environmental Statement [APP-221] considers the potential differential impacts on vulnerable populations.</p>
19.7	<p>19.7. The Noise Policy Statement for England (2010) addresses noise in relation to health/quality of life and requires that noise management decisions, whilst taking into account the fundamental principles of sustainable development, aim for avoidance of significant adverse impacts from noise on health, and where possible, positive contributions to public health objectives.</p>	<p>This is noted by the Applicant and is consistent with the population and health assessment methodology in Chapter 28: Population and human health, Volume 2 of the Environmental Statement [APP-069].</p>
19.8	<p>WSSCC Policy</p> <p>19.8. Creating healthy and sustainable places: A public health and sustainability framework for West Sussex. This framework provides public health guidance to decision makers about creating healthy and sustainable places and communities in West Sussex. It includes a toolkit that aims to provide background evidence, signposting to information and tools to assist users to achieve healthier places across West Sussex</p>	<p>This is noted by the Applicant and consistent with the population and health assessment methodology in Chapter 28: Population and human health, Volume 2 of the Environmental Statement [APP-069].</p>
19.9	<p>19.9. West Sussex Joint Strategic Health assessment (JSNA): sets out the health and wellbeing need of the population of West Sussex. It encompasses a range of work, including detailed needs assessments relating to specific subjects or communities, evaluations of new programmes or activities, local surveys, and a range of briefings and ad hoc analyses.</p>	<p>The data contained in the JSNA is consistent with the data used to inform the population and health baseline in Chapter 28: Population and human health, Volume 2 of the Environmental Statement [APP-069].</p>
19.10	<p>Construction Phase – Impacts Positive</p> <p>19.10. No positive impacts have been identified during the construction phase.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
19.11	<p>Neutral</p> <p>19.11. No neutral impacts have been identified during the construction phase.</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>
19.12	<p>Negative</p> <p>19.12. It is essential to ensure that key design and construction decisions do not result in unacceptable or adverse impacts on residents within West Sussex over the four-year onshore construction period.</p>	<p>While the overall duration of the onshore construction programme is medium term, the majority of construction activities are temporary and transient in nature and would not persist for any material length of time.</p>

Ref	Local Impact Report Comment	Applicant's Response
19.13	19.13. In periods of overnight drilling, nearby receptors will be impacted, which could impede on the residents' quality of sleep, affecting health and wellbeing. Stage-specific Construction Method Statements (CMS) and the OCoCP need to satisfy these concerns regarding noise, vibration and lighting at the construction compounds and cable drilling sites. Impacts must be kept to a minimum through secured mitigation, including detailed plans on phasing of the onshore works to ensure construction timescales are minimised.	While there will be some disturbance from overnight drilling (which is unavoidable as drilling activities must be continuous), the proposed mitigation measures would avoid and reduce disturbance at nearby receptors. Furthermore, the disturbance would not occur for a duration sufficient enough to have any material impact on health and wellbeing.
19.14	19.14. The exact duration of noise, vibration, light, air quality exposure and visual disturbance to the environment and impacts on PRow resulting from construction activities and the measures that will be taken to address exceedances is unclear. Despite claims that the projected adverse impacts will be limited to relatively short periods of time, WSCC cannot dismiss the need for additional measures to mitigate affected parties. It is crucial to have these in place as precautionary measures.	The population and health assessment in Chapter 28: Population and human health, Volume 2 of the Environmental Statement [APP-069] intends to provide context to all impacts discussed, including the duration of time for which they will persist. Targeted secondary mitigation to reduce impacts on specific receptors is proposed for the determinants of health where appropriate and have been taken into consideration when assessing potential health and wellbeing effects.
19.15	19.15. WSCC is also concerned that there is a potential for what has been defined as temporary exceedances to noise thresholds to have undesirable effects particularly on more susceptible receptors. There is evidence suggesting associations between acute exposure to excessive night-time noise and an increased risk of adverse cardiovascular events.	<p>The noise and health evidence base is complex and should generally be interpreted through source-specific studies. Generally, noise and health literature relates to transport sources (such as aircraft, road and rail).</p> <p>While trenchless crossing (for example horizontal directional) drilling is not a commonly studied noise source, the noise is continuous in nature and care should be taken when applying an evidence base from a different source where the noise is less continuous (e.g. aircraft).</p> <p>While the possibility for acute health impacts from extreme noise events is acknowledged, the general association between noise and cardiovascular events relates mostly to long-term exposure.</p> <p>Where exceedances of the night time lowest observable adverse effect level (LOAEL) of 45dB L_{Aeq,8hr} would occur in some instances, the mitigation proposed is sufficient to accord with the requirements to minimise adverse impacts as per the Noise Policy Statement for England.</p>
19.16	19.16. Construction traffic, namely Heavy Good Vehicles (HGV) movements, should where possible, avoid routes through the Cowfold and Storrington Air Quality Management Areas (AQMA). For the occasions where this cannot be avoided, WSCC seeks assurance that all mitigation has been taken to reduce impacts on air quality and disruption to residents.	This objective is reflected in commitments C-157 and C-158 within the Commitments Register [REP1-015] .
19.17	<p>Operational Phase – Impacts Positive</p> <p>19.17. No positive impacts have been identified during the operational phase.</p>	Noted, the Applicant has no further comments on this matter at this time.
19.18	<p>Neutral</p> <p>19.18. WSCC welcome the acknowledgement of electromagnetic fields (EMFs) associated with the onshore cabling and</p>	The design of the underground transmission infrastructure would not exceed the International Commission on Non-Ionizing

Ref	Local Impact Report Comment	Applicant's Response
	potential impacts on the public's health from potential exposure for both 275 kV and 400 kV infrastructure. WSCC expects the Applicant to maintain the EMF levels below the recommendations for both transient and residential exposure as appropriate, as embedded environmental measures within the design (and outlined in Table 28-13 of Chapter 28 of the ES).	Radiation Protection (ICNIRP) guidelines for electromagnetic field (EMF) exposure.
19.19	<p>Negative</p> <p>19.19. The built and natural environment are recognised as major determinants of health and wellbeing; they are a key aspect and can unlock many opportunities to create healthy and sustainable places to live, work and play. Developments must consider the health and wellbeing of residents and communities of West Sussex whilst developing project design. It is accepted that the scale and nature of the utilitarian built infrastructure involved, is such that avoidance of landscape and visual impacts to the communities surrounding the Project is difficult to achieve. In this regard, proposed embedded mitigation measures are, in principle, welcomed as generally well-considered measures to reduce and mitigate landscape and visual impacts. However, WSCC is concerned that visual impacts of the Oakendene substation may have been underestimated (see Section 9 of the LIR for further details).</p>	<p>The onshore substation at Oakendene would only be visible through gaps in intervening vegetation from two public rights of way (PRoWs) (PRoW 1786 between east of Taintfield Wood and A272; and PRoW 1788 between west of Taintfield Wood Oakendene Industrial Estate).</p> <p>It was determined from a health and wellbeing perspective in Chapter 28: Population and human health, Volume 2 of the Environmental Statement [APP-069] that, while significant in a visual context, such intermittent views would not deter the use of these routes (or other routes) for physical activity and recreation and therefore would not impact population and health.</p>
19.20	19.20. During operation, the key potential for noise impacts arises from the proposed Oakendene substation and siting of large electrical plant, which would inevitably result in permanent elevated localised noise levels in a rural area where background noise levels are relatively low.	<p>The Applicant agrees that the onshore substation at Oakendene is the main source of operational onshore noise, which would be permanent. However, as stated in Chapter 28: Population and human health, Volume 2 of the Environmental Statement [APP-069], during the daytime period, there would be no change in ambient sound level at all receptors. During the night time period, the maximum change in ambient sound level will be 0.1dB $L_{Aeq,T}$, with all other receptors experiencing no change in ambient sound level. This change is considered to be below the "no observed adverse effect level" (NOAEL), which is described as noise exposure below which no effect at all on health or quality of life can be detected.</p>
19.21	19.21. WSCC is concerned that operational noise impacts of the substation have been underestimated and that a number of residential properties in close proximity to the site, may experience adverse noise impacts, in particular during the night-time. Concerns are also raised that there has been no assessment of potential noise impacts on the amenities of neighbouring Public Rights of Way (PRoW), see Section 10 of the LIR for further details).	<p>Chapter 28: Population and human health, Volume 2 of the Environmental Statement (ES) [APP-069] draws from and builds upon key outputs from the noise and vibration assessment and therefore the potential noise impacts are addressed in further detail in Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018].</p> <p>With regards to the potential changes in noise exposure on public rights of way (PRoWs), this is not considered relevant to the population and health assessment. This is on the basis that such changes would be transient in nature, and even if the potential presence of long-term noise changes on these routes would deter use (subjective impact), there are nearby comparable and accessible alternative PRoWs which can be used for recreation and physical activity,</p>

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19.22	<p>Required Mitigation 19.22. WSCC seeks assurances that the emergency response plans, secured through the dDCO, will include timely actions that are taken in the event of damage to utilities, which is a potential risk due to trenching a large swathe through the County. Owing to the potential for, and significant issues associate with, utility outages, delays in the mobilisation of support to the communities affected, especially to those who are vulnerable in the communities, needs to be planned and mitigated for.</p>	<p>The Outline Code of Construction Practice [PEPD-033], secured through Requirement 22 of the Draft Development Consent Order [PEPD-009] has been updated to reference damage to utilities in the emergency planning section.</p>
19.23	<p>19.23. The Application does not evidence engagement with the affected communities and how the outcome of those engagements have influenced the Applicant's assumptions used as a basis for the assessment findings and decisions on mitigation measures to reduce these impacts. Specifically, impacts on communities near the proposed site of the onshore substation and the temporary construction compound sites.</p>	<p>Engagement and consultation with local communities is reported in the Consultation Report [APP-027].</p>
19.24	<p>19.24. WSCC requests that additional mitigations are considered to address any exceedances and to ensure the public is protected if these exposures occur for longer than is currently anticipated. Considering the nature of noise effects, co-designing mitigations with affected communities may be beneficial.</p>	<p>On the basis that public health is preventative in nature, any proposed mitigation measures required to minimise harm are focused on the environmental determinants of health such as air quality, noise and transport.</p> <p>Noise-related targeted secondary mitigation to reduce effects on specific receptors is proposed where appropriate and have been taken into consideration when assessing potential health and wellbeing effects in Chapter 28: Population and human health, Volume 2 of the Environmental Statement [APP-069].</p>
19.25	<p>19.25. As part of the DCO process, WSCC wishes to engage proactively with the Applicant to reduce the areas of concern and seek to achieve the best possible outcomes for the local communities and other sensitive receptors that would be most affected by the construction and long-term operational impacts of the Project.</p>	<p>The Applicant welcomes further engagement with West Sussex County Council to reduce areas of concern and seek to achieve the best possible outcomes for the local communities and other sensitive receptors.</p>
19.26	<p>19.26. Please refer to other sections of the LIR to identify mitigation of identified adverse effects, namely Section 9 (LVIA), Section 20 (Noise and Vibration) and Section 13 (Traffic and Transport).</p>	<p>Noted, the Applicant has no further comments on this matter at this time.</p>

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Appendix A Pen Portraits
Table 1: Local Impact Report Lead Authors Pen Portraits

Name	Examination Role	Job Title	Expertise
Michael Elkington BA (Hons), DipTP, DipSM, MRTPI	WSCC Core Team	Head of Planning Services, WSCC	A Chartered Town Planner and Full Member of the Royal Town Planning Institute, with 35 years of experience in land-use planning, primarily in planning policy and development management. Mike has worked in local government at district and county level, joining WSCC in 2000. He has been WSCC's head of service for planning since 2008. In relation to WSCC's role as a host authority for Rampion 2 Offshore Wind Farm, Mike is the Senior Responsible Officer (SRO) for WSCC, which includes overseeing the Authority's engagement in the DCO process as a statutory consultee, briefing senior members and officers, and recommending sign-off for key documents. He was previously the SRO for WSCC in relation to the Rampion 1 OWF, which included signing-off the discharge of DCO Requirements.
Amy Harrower BSc (Hons), MSC, MIEMA CEnv	WSCC Core Team	Rampion 2 DCO Project Officer for WSCC	Chartered Environmental Consultant and Full Member of the Institute of Environmental Management and Assessment (IEMA), with 15 years of experience in EIA and 10 years in NSIPs and the DCO process. Contracted by WSCC to provide specialist input into the NSIPs that WSCC are host authority for, including Gatwick Norther Runway Project (NRP), Rampion 2 OFW and A27 Arundel Bypass. Amy is lead officer for the Rampion 2 Project, managing and collating WSCC officer responses to the Project through the DCO process. Before her contract to WSCC in 2020, Amy worked for an environmental consultancy specialising in EIA and onshore consenting for NSIPs.
Rupy Sandhu	WSCC Core Team	Principal Planner, WSCC	Principal Planner with 14 years of experience in Planning Policy, having worked at WSCC since 2012. Rupy forms part of the Core Team, as well as specialising in minerals and waste planning matters related to the Project.
Nicholas Scott	WSCC Core Team	Principal Rights of Way Officer, WSCC	Subject matter expert having worked in the field of Public Rights of Way for just under 20 years.

Noted, the Applicant has no further comments on this matter at this time.

Name	Examination Role	Job Title	Expertise
Ian Gledhill BSc MCIHT	WSCC Core Team	Principal Planner, County Highways team, WSCC	Principal Planner in the County Highways team at WSCC. 17 years of experience across various roles of development related transport planning and highway design. Ian has represented WSCC at planning appeals and planning committees. Ian is reviewing the highways and transport related implications of the Project.
Kevin Macknay IEng MICE ACIWEM	WSCC Core Team	Drainage and Flood Lead Professional, WSCC	Incorporated Engineer, a Member of the Institution of Civil Engineers (ICE) and Associate Member of the Chartered Institution of Water and Environmental Management, with over 40 years of experience in highway and drainage design. Until recently Kevin led the Flood Risk Management Team with WSCC for the last 12 years, prior to that he was Drainage Asset Manager and Engineering Manager based at one of WSCC's three Area Offices.
Graham Roberts BSc (Hons), MSc, MCIEEM	WSCC Core Team	County Ecologist, Environment and Heritage Team, WSCC	County Ecologist and Full Member of the Chartered Institute of Ecology and Environmental Management (IEEM), with 36 years' experience as a local government ecologist. Graham has held the post of County Ecologist at WSCC for the past 21 years.
Jordan Walker MArborA	WSCC Core Team	County Arboriculturist, Environment and Heritage Team, WSCC	Subject matter expert for arboriculture with 13 years of industry experience, six of which relevant to planning and arboriculture. Jordan joined WSCC in 2022.
James Neave	WSCC Core Team	Principal Planner, County Planning, WSCC	Principal Planner with 18 years of experience in Development Management, working within West Sussex since 2005. James has represented WSCC at planning appeals and planning committees and was the lead officer that dealt with the discharge of DCO Requirements for Rampion 1.
Carolyn Carr	WSCC Core Team	Economic Development Strategic Lead, WSCC	Subject matter expert on socio-economics, including supply chain, employment and skills, and the visitor economy, and responsible for County Council Economy Plan with than 15 years' experience.
Chloe Hunnisett BA, MA, MCIFA	WSCC Core Team	County Archaeologist, WSCC	Subject matter expert for archaeology and historic environment. Archaeologist and heritage professional with 17 years' experience in the sector. Chloe has a background in

Noted, the Applicant has no further comments on this matter at this time.

Ref	Local Impact Report Comment				Applicant's Response
	Name	Examination Role	Job Title	Expertise	Noted, the Applicant has no further comments on this matter at this time.
				archaeological fieldwork and worked as a Heritage Consultant and project manager for 10 years. Chloe specialises in archaeological mitigation and the settings of heritage assets. Member of the Chartered Institute for Archaeologists.	
	Dave Widger	AECOM (external consultants)	Director of Economic Development - AECOM	Subject matter expert for socio-economics with 23 years in the sector. Worked on several major DCO and Hybrid Bill applications including A303 Stonehenge, High Speed 2, and Luton Airport.	
	Jon Howells	AECOM (external consultants)	Regional Director, Economic Development - AECOM	Subject matter expert for socio-economics with 15 years in the sector. Jon has acted as discipline lead for socio-economics on several renewable energy NSIPs including Longfield Solar Farm, Sunnica Energy Farm, Gate Burton Energy Park and the Viking CCS Pipeline. He also has extensive experience in representing Local Authorities at Local Plan examination on economy and employment matters, and is currently working with the neighbouring Brighton & Hove City Council and Lewes District Council on economic evidence base studies.	
	Tanneth Melhuish	WSSC Core Team	Chartered Legal Executive, Environment Legal Team, WSSC	Chartered Legal Executive and Full Member of the Chartered Institute of Legal Executives and has worked within the Environment Legal Team at WSSC for 19 years. Legal expertise extends to rights of way, common land & village greens, highways, planning, minerals and waste sites, CPO's and DCO's.	
	Barry Newell. RGN, DipHEP, DipN, PgD MH&SC, PgCert IPC, NEBOSH, Level 7 Health Protection.	WSSC Core Team		Head of Public Health EPRR & Health Protection Nurse. Over 40 years Nursing and 18 years Public Health/ Health Protection in NHS and Local Government.	
	James Mcgrath	West Sussex Fire and Rescue Service (WSFRS)	Station Manager - Risk & Improvement	James has 20 years' experience with WSFRS. His current role is to understand organisational and operational risk to WSFRS. His previous role for WSFRS was a Gatwick Liaison Officer.	

Ref	Local Impact Report Comment	Applicant's Response
Appendix B – draft Development Consent Order Comments		

Table 1: Review of the draft Development Consent Order [Revision B] dated January 2024 and accompanying Explanatory Memorandum It builds upon the commentary in the LIR topic specific impacts table.

Provision	Comment	Applicant's Response
General page numbering	It would be very useful if the contents page could have page numbering for each relevant section, this would make it much easier to navigate	Unfortunately, the Statutory Instrument template does not allow for numbering of pages in the contents page.
Part 3, article 11 and article 13 (2)	The works are indicated to have deemed consent if the Planning Authority does not respond within the stated timeframe. However, the wording within 13(b) requires the Planning Authority to consult with the Highway Authority. In the situation that the Planning Authority does not respond and the works are consented, this places the Highway Authority in an unreasonable position of having to take forward works it has not had an opportunity to review. If this requirement is to remain, the requirement for deemed consent should be removed or further justification provided by the Applicant for this. If deemed consent is to be retained, a longer time frame (suggested 45 days) should be included given the multi-authority consultation. WSSC, as Local Highway Authority (LHA), would require full cost recovery through a legal agreement to undertake the role of consultee for this, due to the amount of work required to fulfil this role.	<p>In relation to Article 11, the consent is to be sought from the street authority which will, in the majority of circumstances, be the local highway authority. There is no requirement to seek input from a third party and a 28-day period for approval before consent is deemed granted is considered acceptable.</p> <p>In relation to Article 13, the requirement to seek approval relates to where the proposed access is in addition to those set out in Schedule 5. It is acknowledged that the 28-day period requires consultation between the local planning authority with the highway authority and as a consequence the Applicant agrees a longer period is appropriate and a 45-day period for approval has been included in this article in the Draft Development Consent Order [PEPD-009] (as updated as Deadline 2).</p>

Ref	Local Impact Report Comment	Applicant's Response
Part 3, article 15 (5)	WSPCC does not consider there to be a pressing need for deemed consents to be included. If deemed consents are to be included, the Applicant would need to provide further justification.	<p>In terms of cost recovery, the amendments made to the Draft Development Consent Order [PEPD-009] (updated at Deadline 2), included for a payment of a fee to be made on application for discharge of a requirement to the discharging authority.</p> <p>Given that the Proposed Development is a nationally significant infrastructure project, for low carbon infrastructure which it is a critical national priority to deliver (in accordance with NPS EN-1) it is considered that it is necessary that certainty is provided over the ability to programme and deliver the works necessary for implementation. The inclusion of a deeming provision is therefore justified if a decision is not reached within the specified period. This is also consistent with the approach taken in the DCO granted for the East Anglia One North and Two offshore wind farms, which were granted before the critical national priority was described in a national policy statement.</p>
Schedule 1 Part 3 Requirements		
Requirement 1- Time limits	Please set out and define what constitutes practical completion. This is important with regard to triggering the start of the aftercare period for hedgerows, trees, habitat creation, etc. (When does Year 1 of the Monitoring & Management Protocol commence?).	<p>The term practical completion does not require to be defined or included in Requirement 1 as it deals solely with the point at which the Proposed Development must commence.</p> <p>In relation to the aftercare for hedgerow, trees and habitat creation, these matters will be secured through Requirements 12 and 13 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2); the management period will be triggered by completion of the planting in the relevant stage; an amendment to clarify this has been made to Requirement 12 in Part 3 of Schedule 1 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
Requirement 7 – onshore design parameters	Add detailed to the title. Add 'The onshore works must not exceed the parameters assessed in the environmental statement and detailed below'. Where are other relevant onshore cable design parameters – working widths, haul route maximum width detailed? All should be developed in accordance with a design principles document and construction method statements. No mention of any time limits for removal of construction compounds and site restoration.	<p>The approach to the onshore design parameters has been amended to reflect that (1) requirement 6 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) relates to cable parameters, and the heading above this requirement has been amended accordingly; and (2) former requirements 7(3) and (4) now form part of requirement 6 securing cable parameters. The heading above requirement 6 has been amended to 'Cable Parameters'.</p> <p>In terms of the onshore cable design, details for the working width of the cable corridor, which includes a haul road, are secured through the stage specific Code of Construction Practice (CoCP), to be submitted on a staged basis pursuant to Requirement 22 and to be in accordance with the Outline Code</p>

Ref	Local Impact Report Comment	Applicant's Response
Requirement 10 – programme of Works	This Requirement should include: The term 'commence' as used in paragraph (1) above includes any site preparation work, ecological mitigation and temporary hardstanding.	<p>of Construction Practice (CoCP [PEPD-033]); as the widths will vary at different locations along the route due to the need to respond to environmental constraints such as hedgerows, and where construction techniques such as HDD require a wider area it is not appropriate to capture this level of detail on the face of the Order. The CoCP will be subject to approval under the terms of Requirement 22 and must be implemented as approved. A breach of Requirement 22 will amount to an offence.</p> <p>Site restoration is addressed through the CoCPs and through the Construction Method Statement (CMS) secured through Requirement 23 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2); see Requirement 23(2)(h) which requires a protocol for restoration and reinstatement of land used temporarily for construction. The Construction Method Statement which must accord with the Outline Construction Method Statement [APP-255], (which is to be approved and certified pursuant to Article 50), is subject to approval and must be implemented as approved.</p> <p>Following review of the definition of Commence in response to the request made at Issue Specific Hearing 1 (ISH1), the Applicant has revised this definition in the draft DCO and it no longer carves out onshore site preparation works for the onshore works.</p> <p>Requirement 10, which provides for submission of a programme identifying stages of works, now provides for a programme of stages for each of works comprising onshore site preparation works and construction works proper to be submitted and approved prior to commencement of either the onshore site preparation works or other works comprising the authorised project. Consequential amendments have been made to other requirements to reflect this change.</p>
Requirement 12 – provision of landscaping	This Requirement should list the scope of the Plan that need to be included, as a minimum, location, number, species, size and planting density of any proposed planting including any trees; and implementation timetables for all landscaping works.	No change is considered necessary as the Landscape and Ecology Management Plan (LEMP) must accord with the Outline Landscape and Ecology Management Plan [APP-232] which has been submitted with the application and will be certified pursuant to Article 50.
Requirement 13 – implementation and maintenance of landscaping	A detailed landscape and ecology maintenance, management and monitoring protocol (MMMP) should be secured under Requirement 13 (Implementation and maintenance of landscaping).	Requirement 12 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) requires submission and approval of a LEMP which must accord with the Outline Landscape and Ecology Management Plan [APP-232] (submitted with the application and to be certified under Article

Ref	Local Impact Report Comment	Applicant's Response
Requirement 14 Biodiversity Net Gain	This Requirement needs to explain the purpose and content of the proposed BNG strategy, and the mechanism to approve the delivery of both off-site and on-site BNG. Although it is proposed that significant elements of BNG will be delivered prior to the commencement of construction, plus more during the early stages of construction, the approval process for this BNG is not clear	<p>50). The Outline Landscape and Ecology Management Plan [APP-232] includes at section 2.6 provision for the stage specific LEMPs to include landscape management provisions including maintenance and monitoring for years 1 to 10. Consequently, the requested maintenance, management and monitoring protocol (MMMP) will be comprised within the stage specific LEMP.</p> <p>Requirement 12(4) of the Draft Development Consent Order [PEPD-009] requires the stage specific LEMPs to be implemented as approved, and Requirement 13(1) of the Draft Development Consent Order [PEPD-009] requires all landscape works to be carried out in accordance with the LEMP for the relevant stage. Consequently, there is no need to amend Requirement 13 of the Draft Development Consent Order [PEPD-009] as requested.</p> <p>Requirement 14 of the Draft Development Consent Order [PEPD-009] provides for the Biodiversity Net Gain (BNG) strategy to accord with the information comprised in Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the Environmental Statement (ES) [APP-193] which is to be certified pursuant to Article 50. This document confirms that the Proposed Development will deliver at least 10% biodiversity net gain for the onshore and intertidal areas. The document confirms that the gain can be delivered in a range of different ways and notes various options that can be explored for delivery of the gain which will be dependent on the extent of the loss arising from the project and the availability of land and/or credits in its locality. Given the strategy set out in Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193] it is not considered necessary to add any more detail to the Requirement.</p> <p>In terms of approval, Requirement 14 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) confirms that the stage specific biodiversity net gain strategy must accord with the information comprised in Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193] and must be submitted to and approved by the relevant planning authority in consultation with the statutory nature conservation body.</p> <p>Article 13 deals with the location of accesses and secures that this must be approved by the relevant planning authority in consultation with the highway authority as would be the case in respect of a planning application; Requirements 15 and 16</p>
Requirement 15 – highway accesses outside of the SDNP	The wording within this appears contradictory to that within Part 3, 13, where the access details are submitted to the Planning Authority who then consult with the highway authority. Schedule 1, Part 3, requires only that the details are submitted to the highway authority. This specifies WSCC as approving this Requirement. However, as with any other non-NSIP energy-related	

Ref	Local Impact Report Comment	Applicant's Response
	<p>development, this should state approval by the relevant planning authority, in consultation with WSCC as LHA. Furthermore, WSCC would require full cost recovery through a legal agreement to undertake the role of consultee for this requirement, due to the amount of work required to fulfil this role.</p>	<p>secure the detailed design of the access with the relevant highway authority. As such this approach is not considered inconsistent.</p>
	<p>Requirement 15 (2) After the wording 'to Department for Transport Design Manual for Roads and Bridges design standards...' it's suggested that the additional wording 'or as otherwise agreed with the highway authority' is included. This then affords some flexibility in the design given that the DMRB is not always appropriate. An additional paragraph is required covering the removal of any temporary works, including the reinstatement of any temporary vehicular access. This needs to tie in with the OCoCP vegetation retention plans.</p>	<p>At the pre-examination procedural deadline, the Draft Development Consent Order [PEPD-009] (updated at Deadline 2), Schedule 14 (which sets out the procedure for discharge of certain approvals pursuant to Article 46) was amended to reflect that fees are payable on application for discharge in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications and Site Visits) (England) Regulations 2012 or any subsequent regulations which replace them. As with any other non-NSIP energy related development, it is not intended that there should be full reimbursement of costs for consultees in respect of discharge of requirements secured through the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The amendment requested by the first point has been made.</p>
	<p>Requirement 16 – highway accesses in the SDNP As per the comments above, it is recommended that after the wording 'to Department for Transport Design Manual for Roads and Bridges design standards...' that the additional wording 'or as otherwise agreed with the highway authority' is included. This then affords some flexibility in the design given that the DMRB is not always appropriate. An additional paragraph is required covering the removal of any temporary works. This needs to tie in with the OCoCP vegetation retention plans.</p>	<p>The Outline Code of Construction Practice (CoCP) [PEPD-033] includes section 4.10 which secures removal and reinstatement of temporary infrastructure including accesses, and as noted above Requirement 22 requires stage specific CoCPs which accord with the Outline Code of Construction Practice [PEPD-033]. The stage specific CoCP also secures habitat reinstatement in this same section. Consequently, there is no requirement for an additional paragraph in this Requirement.</p>
	<p>Requirement 17 and 18 Surface and foul water drainage The title of this Requirement should make it clear that it also relates to the operational phase. This specifies Lead Local Flood Authority (LLFA), i.e. WSCC, approving this Requirement. However, as with any other non-NSIP energy-related development, this should state approval by the relevant planning authority, in consultation with the LLFA. WSCC, as LLFA, would require full cost recovery through a legal agreement to undertake the role of consultee for this requirement, due to the amount of work required to fulfil this role.</p>	<p>The same applies in relation to Requirement 16 as for Requirement 15 of the Draft Development Consent Order [PEPD-009] as noted above.</p> <p>This heading has been amended to Operational drainage management.</p> <p>It is considered appropriate for the Lead Local Flood Authority (LLFA) to be the discharging authority for drainage matters and this is consistent with the approach taken to these matters in numerous made Development Consent Orders. A fee is payable to the discharge authority on application for discharge for each stage.</p>

Ref	Local Impact Report Comment	Applicant's Response
Requirement 19 – onshore archaeology Sub-paragraph (6)	<p>This specifies being approved in writing by the relevant planning authority in consultation with WSCC. As stated in Section 6.11 of the LIR, WSCC would only wish to be a consultee on DCO Requirements that are a statutory function (LLFA or LHA) and, therefore, WSCC should not be named as having a role in this Requirement. There is a need to avoid harm to any nationally significant archaeological remains identified post-consent within the DCO Limits. The preservation in situ of any such archaeological remains must be achieved via design changes/micrositing where required, and a robust methodology for this micro-siting process must be secured via DCO requirements to ensure it is viable. WSCC require the addition of the wording: “In the event of the discovery of nationally significant archaeological remains within the onshore Order limits, their preservation in situ must be secured in accordance with the methodology set out within the outline onshore written scheme of investigation. The significance of any such archaeological remains and their suitability for preservation in situ must first be assessed via field evaluation. Should archaeological remains be left in situ on any site, a site-specific archaeological management plan must be submitted to and approved in writing by the relevant planning authority. Any further works, including removal and reinstatement, must be carried out in accordance with the approved site-specific archaeological management plan, unless otherwise approved by the relevant planning authority</p>	<p>Reference to a requirement for consultation with West Sussex County Council has been removed from Requirement 19 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>West Sussex County Council's request for additional text to be included in this requirement is noted, however the Outline Onshore Written Scheme of Investigation (WSI) [APP-231] sets out the approach to be taken to mitigation. As required by Requirement 19, site specific Written Schemes of Investigation (SSWSI) are to be submitted for each stage prior to commencement of the Proposed Development within each stage, which will be tailored to the particular circumstances of each stage and sites of archaeological potential within it. The Outline Onshore WSI [APP-231] will be updated at Deadline 3 to clarify the commitment to avoidance as set out in commitment C-225 in the Commitments Register [REP1-015].</p> <p>The mitigation described in the SSWSI will be specific to the stage and will be subject to approval in advance of works being undertaken.</p>
Requirement 20 – Public Rights of Way	<p>This specifies WSCC (as LHA) as approving this Requirement, in consultation with the relevant planning authority. However, as with any other non-NSIP energy-related development, this should state approval by the relevant planning authority, in consultation with WSCC as LHA. Furthermore, WSCC would require full cost recovery through a legal agreement to undertake the role of consultee for this requirement, due to the amount of work required to fulfil this role</p>	<p>It is considered appropriate for the Public Rights of Way to be subject to approval of the local highway authority (or South Downs National Park Authority in respect of the National Trail). This is consistent with other Development Consent Order (DCOs) where management of rights of way are required. A fee is payable to the discharging authority pursuant to the provisions in Schedule 14 (as applied by Article 46) of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
Requirement 22 – Code of Construction practice	<p>This Requirement needs to also secure: construction sequencing/phasing to secure C-19 community engagement plan construction hours should specifically be included in this requirement need for an outline NVMP document (see Noise section of the LIR which provides details on what this outline should include). WSCC, as LHA and LLFA, would require full cost recovery through a legal agreement to undertake the role of consultee for this requirement.</p>	<p>Requirement 22 specifies that the stage specific CoCP must accord with the Outline Code of Construction Practice (CoCP) [PEPD-033] and the latter includes at section 2.6 provision for the Applicant to produce a Construction Communications Plan, which is akin to a community engagement plan. Whilst this document is not included on the list at Requirement 22 in relation to the content of the CoCP, the list is not intended to be exhaustive.</p> <p>The list already includes provision for a noise and vibration management plan; this is detailed in section 5.4 of the Outline Code of Construction Practice [PEPD-033].</p> <p>Construction hours are included in the Outline Code of Construction Practice [PEPD-033]. Stage specific CoCPs are</p>

Ref	Local Impact Report Comment	Applicant's Response
Requirement 23 – onshore construction method statement	Method statements needed for all crossings and must clarify the methodologies to demonstrate that detailed trenchless HDD proposals would result in 'no new or materially different environmental effects arising compared to those assessed in the ES'	<p>required to be produced, submitted and approved pursuant to Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) and they must accord with the Outline CoCP; hence they must include hours of working. The approved CoCPs must then be implemented, and failure to comply with the terms will be an offence. However, there is scope for a stage specific CoCP to include different construction working hours to accommodate particular circumstances, if necessary, which would not be possible if hours were specified on the fact of the DCO. It is therefore considered that the inclusion of construction hours in the CoCP is appropriate and provides adequate protection for the local authorities and communities.</p>
Requirement 24 CTMP - (2)(a)	Reference should be included to traffic avoiding the Storrington AQMA. This specifies WSCC (as LHA) as approving this Requirement, in consultation with the relevant planning authority. However, as with any other non-NSIP energy-related development, this should state approval by the relevant planning authority, in consultation with WSCC as LHA. Furthermore, WSCC would require full cost recovery through a legal agreement to undertake the role of consultee for this requirement, due to the amount of work required to fulfil this role.	<p>The Outline Construction Method Statement [APP-255] already provides at section 3.4 that '<i>The detailed design including location and methodology for the trenchless crossing will be determined following site investigation and confirmed within stage specific Onshore Construction Method Statements. This will include confirmation that there is no new or materially different environmental effects arising compared to those assessed in the Environmental Statement (ES)</i>'.</p> <p>Table 19-9 within Chapter 19: Air quality, Volume 2 of the ES [APP-060] concludes that there will be no significant traffic travelling through the Storrington High Street Air Quality Management Area (AQMA) and that Annual Average Daily Traffic (AADT) along the Storrington High Street AQMA are below the Institute of Air Quality Management (IAQM) and EPUK 92017) screening criteria for road links in AQMA's, therefore potential effects are negligible. As a consequence it is not considered necessary to specify Storrington AQMA in the requirement. However, construction traffic routeing secured through the Construction Traffic Management Plan (REP1-010) (secured by requirement 24 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2)) secures that construction traffic will avoid settlements including Storrington wherever possible.</p> <p>It is considered appropriate for this requirement to be discharged by the local highway authority and is consistent with the approach adopted in previous DCOs.</p> <p>Please see response above in terms of the fee payable to the discharging authority.</p>

Ref	Local Impact Report Comment	Applicant's Response
Requirement 32 – Operational travel plan	The Requirement should include reference to the Operational Travel Plan being agreed in consultation with WSCC as LHA. WSCC would require full cost recovery through a legal agreement to undertake the role of consultee for this requirement.	An amendment has been made to Requirement 32 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2), to secure consultation with West Sussex County Council.
Schedule 2, Streets Subject to Works	It is not exactly clear why some accesses/roads are included and others are not. It is appreciated that some of the accesses are existing (i.e. those on Ferry Road and the A283) but are included anyway. It would be beneficial to understand on what basis certain accesses have been included and others have not. At a number of those existing but excluded accesses, works will still be required to form visibility splays or to temporarily widen to accommodate construction traffic.	Streetworks include works that may be required to achieve necessary visibility splays (vegetation trimming etc.), associated with the provision of temporary construction accesses. There are some exceptions where street works are not required for temporary construction access, these are where the visibility is sufficient and any works associated the access would be undertaken off the street network on private land.
Schedule 2, Streets Subject to Works	Access A-46 onto Spithandle Lane is indicated as a new access but no works are indicated within this schedule as being associated with it.	Operational and light construction accesses do not require streetworks. Access A-46 is proposed to be light construction and operational only, the existing access at this location (to Doves Farm) does not require alteration and therefore not subject to any street works within the Proposed DCO Order Limits.
Schedule 3, Streets to be Temporarily Closed	The proposed closure of the B2116 Shermanbury Road contradicts that included in table 7-1 of the Outline Construction Traffic Management Plan. The entry for this location in the table implies the road would remain upon but would require traffic management; the road would therefore remain open.	The onshore cable route will be installed through open trench construction, which will be facilitated through either a temporary road closure or traffic management (e.g. Shuttle working traffic signals).
Schedule 4, Public Rights of Way	See Table 2 below regarding PRow comments in this Schedule.	The Applicant refers to the responses in Table 18 and will review the comments made here on the indicative closures and indicative diversions shown on the Access, Rights of Way and Streets Plan [APP-012] and provide an update to the plan, Schedule 4 and the Outline Public Rights of Way Management Plan [APP-230] if necessary at a further deadline.
Schedule 13 Hedgerows	This may require amending subject to the submission of documents suggested to correct the errata highlighted by WSCC to the Applicant and further hedgerow anomalies stated.	The Applicant notes that updates to Schedule 13 were provided in revision B of the Draft Development Consent Order [PEPD-009] submitted at Procedural Deadline A to address the West Sussex County Council's comments and will engage with West Sussex County Council if there are any further comments.
Schedule 14 – procedure for discharge of certain approvals (2) Further information	15 business days for further information is not long enough, given the need for consultation with other parties. Further clarification on process of consultation with other parties should be included and the provision of information by consultees. Does not make clear if requirement schemes will be expected to be in accordance with any 'measures for success' or 'objective standards' and whether this will form part of the ES/DCO application. Please see attachment regarding the 'measures for success' as developed for Rampion 1.	It is considered that the period of 15 business days is sufficient for a discharging authority to identify whether it has sufficient information to discharge a requirement. However, it is acknowledged that where the discharging authority is required to consult a third party there is scope for delay and therefore in these circumstances a period of 20 business days has been

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accommodated in amendments to the [Draft Development Consent Order \[PEPD-009\]](#) updated at Deadline 2.

It is not considered necessary for a 'measures of success' document to be secured through the draft DCO.

Table 2: Schedule 4, Public Rights of Way Comments

PRoW No.	Identifier References	Comments	Reasoning
Schedule 4 Part 1			
FP174	01a – 01b	Needs full closure between junction with 173 to junction of 829	Paths must be closed highway to highway so as not to create dead end routes
FP173	02a – 02b	Needs full closure between junction with FP174 and Ferry Road	Paths must be closed highway to highway so as not to create dead end routes
FP168	03a – 03b and 04a – 04b	Needs full closure of FP168 between Church Lane and FP206	Paths must be closed highway to highway so as not to create dead end routes
FP2163/1	06a – 06b	Needs full closure of FP2163/1 between each end of the routes junctions with Lyminster Road	Paths must be closed highway to highway so as not to create dead end routes
FP2202/1	08a – 08b	Needs full closure between junction with BW2163 and Lyminster Road.	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.

The Applicant refers to the responses in **Table 18** and will review the comments made here on the closures and indicative diversions shown on the [Access, Rights of Way and Streets Plan \[APP-012\]](#) and provide an update to the plan, Schedule 4 and the [Outline Public Rights of Way Management Plan \[APP-230\]](#) if necessary at a further deadline.

PRoW No.	Identifier References	Comments	Reasoning
FP2199	10a – 10b	Needs full closure between junction with FP2200 to the junction of FP2201	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP2198	11a – 11b	Needs full closure between junction with FP2199 and the A27	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP2176	12a – 12b	Needs full closure between junction with FP2198 and the A27	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP2190	13a – 13b	Needs full closure between junction with BW2208 and the A27	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP2174/1	16a – 16b	Needs full closure between junction with FP2188/1 and junction with BW2208	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
BW2208/1	17a – 17b	Needs full closure between junction with BW2209 and junction with BW2264	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP2260/1	18a – 18b	Needs full closure between junction with BW2209 and junction with FP2262	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a

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PRoW No.	Identifier References	Comments	Reasoning
			commitment to explore alternative routes further to reduce impact on users.
FP2262	19a - 19b	Needs full closure between junction with BW2209 and junction with FP2260/1	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
BOAT2092	25a - 25b	Needs full closure between junction with RB2693 and junction with FP2104. Also this route is not a BOAT it is a Restricted Byway (RB)	Paths must be closed highway to highway so as not to create dead end routes
BW2103	26a - 26b	Needs full closure between junction with RB2092 and junction with BW2106	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
BW2107	27a - 27b	Needs full closure between junction with RB2902 and junction with BW2106	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
BW2018	28a - 28b	Needs full closure between junction with RB2902 and junction with BW2106	Paths must be closed highway to highway so as not to create dead end routes
BW2109	29a - 29b	Needs full closure between junction with RB2902 and junction with BW2106	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
BW2711	36c - 36d	Needs full closure between junction with Washington Road and junction with Spithandle Road (THIS ALSO RELATES TO BW2711 - 36a - 36b)	Paths must be closed highway to highway so as not to create dead end routes

PRoW No.	Identifier References	Comments	Reasoning
FP2520	41a - 41b	Needs full closure between B2135 to its junction with FP2519	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP1841	45a - 45b	Needs full closure between its junction with A281 and junction with FP2808	Paths must be closed highway to highway so as not to create dead end routes
BW1774	45c - 45d	Needs full closure between its junction with A281 and junction with BW2800	Paths must be closed highway to highway so as not to create dead end routes
FP1781	46a - 46b	Needs full closure between its junctions with FP1776/1 at its north and southern ends	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP1776/1	47a - 47b	Needs full closure between junction with FP1781 and junction with FP1782	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP1782	48a - 48b	Needs full closure between its junction with BW1730 and junction with FP1784	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
FP1783	49a - 49b	Needs full closure between its junction with BW1730 and junction with FP1784	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a commitment to explore alternative routes further to reduce impact on users.
BW1730	50a - 50b	Needs full closure between its junction with FP1787 and junction with Kent Street Lane	Paths must be closed highway to highway so as not to create dead end routes. However, due to small closure having big impact, WSCC would expect a

Ref	Local Impact Report Comment	Applicant's Response
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PRoW No.	Identifier References	Comments	Reasoning
			commitment to explore alternative routes further to reduce impact on users.
Schedule 4 Part 2			
BW2711	36a – 36b	If this is to be closed at same time as the same path referenced in Part 1 then this alternative route will be ineffective as the whole length including this will need to be closed to retain public continuity.	Paths must be closed highway to highway so as not to create dead end routes
Schedule 4 Part 3			
BW3514	43a – 43b	An alternative appears to be shown on the sheet (28) numbered T21	Clarification required whether this is the alternative or this is yet to be agreed

Appendix C – Traffic and Transport Comments

Ref	Issue	Recommended Action	Applicant's Response
1.2.5	The three bullet points refer to matters to be agreed as part of Stage Specific Construction Traffic Management Plans. However, the subjects covered are matters that are included within and are understood to be agreed as part of the Outline Construction Traffic Management Plan.	Confirm where the matters covered within the three bullet points are to be agreed. If these matters are not being agreed as part of the OCTMP, this must be made quite clear within these documents.	The Outline Construction Traffic Management Plan [REP1-010] will be updated at Deadline 3 to provide clarity on where information associated with each item is included within the Outline Construction Traffic Management Plan [REP1-010] for agreement.
3.6.1 and 3.6.3	The 4-year construction programme quoted is contradicted within 3.6.3, which implies 4.5 years with further references to these being minimum durations.	Identify the duration of the construction programme.	The anticipated worst-case total construction duration for all onshore infrastructure to be complete, operational and for full landscape reinstatement is approximately four years. This is detailed in Section 4.7 of the Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement [APP-045]. The Outline Construction Traffic Management Plan [REP1-010] will be updated at Deadline 3 to reflect this wording.
3.6.4	There are locations where restrictions will be required on the timing of deliveries made by HGVs to prevent these coinciding with other traffic movements.	The need to restrict deliveries/HGV movements at agreed locations must be referenced within the OCTMP. The precise details can form part of Stage Specific CTMPs.	The Applicant had no further comment on this matter at this time.
4.1.2	The final sentence of this paragraph concerning vehicle movements is noted. It is not apparent how this will be controlled, as once the construction access is in place, the presumption is that it will be used for all required purposes.	Intended use of individual construction accesses should be detailed as part of Stage Specific CTMPs. This requirement should be referenced in the OCTMP.	This is noted and the Applicant will update the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 to reflect his request.

Ref	Local Impact Report Comment	Applicant's Response	
4.1.4	The intended use of the 'Light Construction Accesses' is noted. It should be clearly set out in the OCTMP that these accesses are not being used by HGVs. The design should not accommodate HGVs.	The OCTMP should include a restriction on the vehicles intended to use the 'Light Construction Accesses'.	This is noted and the Applicant will update the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 to reflect his request.
4.2.1	The large number of accesses are noted. The details contained within figures 7.6.4 in Appendix B of the OCTMP are reviewed in detail within Table 1a below.	Actions are included within Table 1a below.	The Applicant has provided a response to each point below.
4.2.2	A key concern highlighted by WSCC is the significant number of accesses indicated as being required. The Applicant would be requested to revisit and where possible reduce the number of construction accesses particularly those onto high-speed rural roads	The Applicant should review the construction access options and reduce the number of accesses where possible.	Please see the Applicant's response in reference 13.5 . At this point, it is not possible to reduce the number of construction accesses further.
4.4.1	The application of DMRB standards (intended for trunk roads) is not always necessary or desirable. Manual for Streets may be more appropriate in certain lower speed locations.	The wording within this point should be altered to allow for flexibility in terms of the design standards to be applied.	This is noted and the Applicant will update the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 to reflect his request.
4.6.1	Those light construction accesses covered within the first bullet point will need to be identified as such, otherwise suitable visibility splays will be required. From 4.6.3, it is known which accesses will fall within this category.	The OCTMP and Stage Specific CTMPs are to identify those accesses that are to be used infrequently for the purposes of checking the progress of trenchless crossings.	This is noted and the Applicant will update the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 to reflect his request.
4.8.2	As noted within 4.4.1, it is not always necessary or desirable to comply with the DMRB especially on lightly trafficked, low speed roads. Some flexibility should be included to enable other design standards to be applied in agreement with WSCC.	Additional wording is to be included to enable alternate design standards to be used in agreement with WSCC.	This is noted and the Applicant will update the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 to reflect his request.
4.8.4	There are locations where it's questioned whether the necessary standard of visibility can be achieved due to constraints imposed by the existing road layout. The accesses have been further reviewed in Table 1a below.	The Applicant is to review visibility splays at all accesses and identify those locations where the required visibility splays cannot be achieved. If the necessary visibility splay standard cannot be met, the applicant will need to identify suitable alternate measures to safely manage traffic entering and exiting the access.	<p>The Applicant is currently preparing preliminary designs for each of the proposed compound locations (A-05, A-39 and A-63) and Oakendene substation (A-62), which will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination.</p> <p>Noting, West Sussex County Council's comment 4.4.1 and 4.8.3, the Applicant will review all proposed access junctions to</p>

Ref	Local Impact Report Comment		Applicant's Response
4.8.5	Incorrect speed limits are quoted within Table 4-3. For A-15 and A-16 the speed limit on the Lyminster Bypass is indicated as 30mph. The planning drawings for the proposed road however indicate the speed limit will be 50mph in the indicative access locations. For A-42, the speed limit is 60mph rather than 50mph. For A-44, A-45, A-46 and A-47 the speed limit is 60mph rather than 40mph. For A-25, A-27, A-43 the speed limit is also 60mph rather than 30mph.	The Applicant is to review the speed limits and consequently the visibility splay requirements quoted within Table 4-3 and update accordingly.	confirm the appropriate visibility splay standard for each location (DMRB or Manual for Streets) through an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3. The requirement for the implementation of traffic management measures will be confirmed as part of stage specific Construction Traffic Management Plans as per Requirement 24 of the Draft Development Consent Order [PEPD-009] .
4.9.1, Table 4-4	Whilst the list of vehicle types and its classification is noted, ordinarily the definition of an HGV is a vehicle with a gross weight of 3.5 tons or more; the Table implies an HGV is 7.5 tons or more. For the purposes of the Table, the standard definition of an HGV should be included.	The Table is to be updated to refer to HGVs as those vehicles with a gross weight of 3.5 tons or more.	This update was included within the Outline Construction Traffic Management Plan [REP1-010] submitted at Deadline 1.
5.4.4, first and second bullet points	The commitment to avoid major settlements where possible is welcomed. However, routing plans still show HGVs using the A272 through Cowfold and the A281 through Henfield. It is accepted that these are A roads and therefore should be used over other road classifications and that it would be necessary for some HGVs to use these routes. It would be appropriate for the OCTMP to identify the scenarios (i.e. where materials are coming in from local sources or to access specific cable route accesses) in which HGVs are permitted to use routes particularly through Cowfold and Henfield, and situations where HGVs should not approach or leave via these routes (e.g.	OCTMP to be updated to indicate appropriate use of routes by HGVs for given scenarios.	The Applicant will review this request and provide an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 where appropriate.

Ref	Local Impact Report Comment	Applicant's Response
5.4.4, 6th bullet	HGVs associated with the Oakendene substation). It is not always necessary or desirable to comply with the DMRB especially on lightly trafficked, low speed roads. Some flexibility should be included to enable other design standards to be applied in agreement with WSCC.	Additional wording to be included to enable alternate design standards to be used in agreement with WSCC This is noted and the Applicant will update the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 to reflect this request.
5.5.1, Table 5.2, number 1.	Reference is made to HGVs avoiding key settlements including the Cowfold AQMA. It is unclear what this means as the routing plans still indicate these routes being used without any controls or restriction. It is accepted in principle that some HGVs may need to use these routes given the lack of suitable alternatives.	Include more specific controls in terms of routing. The Applicant will review this request and provide an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 where appropriate.
6.5.8 and Table 6-2	6.5.8 refers to the movements in Table 6-2 as being for the entire construction programme rather than a peak week or year. Table 6.2 however does not say this. The Table references only that the movements quoted are 2-way totals per week. As such the Table could be taken as misleading. For the purposes of understanding the proposals, it would be more useful to have peak week 2-way vehicle movements referenced rather than movements for the project as a whole. This could replace Table 6-2 or a new Table be provided.	Update Table 6-2 to reflect the text in 6.5.8 and/or provide an additional Table with peak week traffic. This update was included within the Outline Construction Traffic Management Plan [REP1-010] submitted at Deadline 1. Table 5-3 now provides details of total heavy goods vehicle (HGV) flows for each access and Table 6-2 provides details of total light goods vehicle (LGV) flows for each access.
Table 6-2	No vehicle movements are indicated against some of the proposed construction accesses. Given this Table indicates construction accesses and vehicle movements, this is clearly incorrect and requires updating.	Table 6.2 should be updated and vehicle movements indicated against all construction accesses. This update was included within the Outline Construction Traffic Management Plan [REP1-010] submitted at Deadline 1. Table 5-3 now provides details of total HGV flows for each access and Table 6-2 provides details of total LGV flows for each access.
7.2.5, Table 7-1	It is unclear why an open cut trench is proposed for Michelgrove Lane, a single track road. On all other adopted (i.e. public highway) single track roads (e.g. Kent Street and Spithandle Lane), trenchless methods are proposed.	Include trenchless crossing for Michelgrove Lane. The Applicant does not believe that Michelgrove Lane is adopted (public highway) at the point that a trenched crossing is proposed. It is therefore treated as a private means of access with crossing arrangements as per section 5.7 of the Outline Code of Construction Practice [PEPD-033] .

Ref	Local Impact Report Comment	Applicant's Response
8.2.1, 8.2.2, 8.2.3	These sections refer to Michelgrove Lane and the open cut crossing. Again, whilst references are made to traffic management measures, none seem to reflect the actual location or the fact that there is no suitable alternate route.	<p>Include trenchless crossing for Michelgrove Lane or demonstrate how traffic is to be managed whilst the cable route is being installed</p> <p>As above, the Applicant does not believe that Michelgrove Lane is adopted at the crossing location, so there is no right of public vehicular access. At this location provision will be made to maintain access along Michelgrove Lane during the limited duration (a couple of days) where the road is open cut. This may involve steel plates or similar to allow vehicular access across the open cut road. Access or traffic management at this crossing in line with the principles detailed in Section 5.7 of the Outline Code of Construction Practice [PEPD-033] will be developed.</p> <p>Further down Michelgrove Lane, the Applicant is currently reviewing traffic management options, including the junction of A280 Long Furlong and Michelgrove Lane to facilitate the safe access and egress of construction traffic. These options will take account of traffic surveys being undertaken on the A280 Long Furlong and Michelgrove Lane, swept path analysis and visibility splay assessments.</p> <p>The outcomes of this review will be discussed with West Sussex County Council at the earliest opportunity with the aim of reaching an agreement in principle to the traffic management strategy. This would then be secured through inclusion within an update to the Outline Construction Traffic Management Plan [REP1-010] which will be certified pursuant to Schedule 16 of the Draft Development Consent Order [PEPD-009], and a stage specific Construction Traffic Management Plan secured pursuant to requirement 24 (1) (a).</p>
8.2.6	The B2116 is indicated to be subject to traffic management whilst the cable is being installed. The draft DCO indicates the B2116 will be the subject of a road closure. The OCTMP and draft DCO contradict each other.	<p>Update the OCTMP and/or draft DCO to be consistent.</p> <p>This is noted and the Applicant will update the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 to reflect his request.</p>
8.4.7	The core hours are noted. Mention should be made of the need to restrict deliveries/HGV activity in and around sensitive locations such as schools. This specifically applies to A37 (Washington village).	<p>Update the OCTMP to restrict HGV activity around school drop off and collection times at sensitive sites, especially in relation to A37. In the event other locations are identified, restrictions and controls can be included as part of phase specific construction traffic management plans</p> <p>The Applicant has no further comment on this matter at this time.</p>
8.4.21	The wording seems to imply that the highway condition survey would apply only to the access point. The extent of the condition survey may need to cover a length of highway used to provide local access from a classified road through to a development	<p>The wording should be clearer to reflect that the scope and extent of any condition survey would need to be agreed with WSCC prior to works commencing.</p> <p>The Applicant will review this request and provide an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 where appropriate.</p>

Ref	Local Impact Report Comment	Applicant's Response
8.4.23	<p>access. The scope, extent and requirement for any survey should be agreed with WSCC. These requirements may vary from location to location.</p> <p>Again, similar to 8.4.22, the extent of the restoration/making good would need to be agreed on a site-by-site basis. There may be further works to reinstate within the highway beyond just temporary accesses.</p>	<p>The wording should be updated to reflect that additional works other than the restoration of temporary accesses may be required once works are complete.</p> <p>The Applicant will review this request and provide an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 where appropriate.</p>

Table 1a: Construction and Operational Accesses

Ref	Issue	Recommended Action	Applicant's Response
Appendix B, Figure 7.6.4a – Temporary Construction and Operational Accesses	Proximity and need of accesses A01, A02, A03, and A04 – These four accesses are located in close proximity of each other. It is unclear why four accesses (three of which are indicated for construction purposes) are required.	Whilst the need to retain access options is recognised, a commitment should be included to avoid the use of all the accesses indicated. It is accepted that accesses would be required on the north (A03) and south (A01) side of Ferry Road but A02 appears unnecessary.	<p>The Applicant invites West Sussex County Council to review the Outline Construction Traffic Management Plan [REP1-010] with regards to the different levels and purposes of temporary accesses, specifically:</p> <ul style="list-style-type: none"> • A-01 – Temporary Construction and Operational Access; • A-02 – Light Construction Access; • A-03 – Light Construction Access; and • A-04 – Operational Access. <p>Access A-02 is required to access the onshore construction corridor of trenchless construction with light vehicles to monitor the progress of the trenchless construction. Access A-03 is required for the same reason for the section north of the watercourse (Ryebank Rife).</p>
Appendix B, Figure 7.6.4a – Temporary Construction and Operational Accesses	Whilst there are no in principle issues with A05, there is the potential for exiting HGVs to depart towards the A27 via Arundel. There is however advisory signage on Ford Road in Arundel saying that the road is unsuitable for HGVs.	Measures (either through the design preventing right turns or through signage) should be implemented as part of A08 to restrict HGVs from turning northwards on Church Lane. Routing plans should be updated to ensure Ford Road through Arundel is not indicated as an HGV route. Given the importance of this access in serving the compound, the design of the access should be submitted and agreed prior to the DCO being approved.	<p>As part of the update to the Outline Construction Traffic Management Plan [REP1-010] submitted at Deadline 1 Table 5-2 and Figure 7.6.6a was updated to remove heavy goods vehicle (HGV) routing north of the Access A-05.</p> <p>The Applicant is currently preparing preliminary design Access A-05 on Church Lane. This will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination.</p>
Appendix B, Figure 7.6.4a – Temporary Construction	Proximity and need of accesses A08, A09, and A10 – These accesses are located in proximity of each other. It's unclear why three accesses (two of	Whilst the need to retain access options is recognised, a commitment should be included to avoid the use of all the accesses indicated. There seems no reason why two accesses would be required for construction or operational reasons. Given the high speed nature of the A259,	The Applicant has developed its Construction Access strategy to ensure that the required access is provided to construct and maintain the scheme. As stated in the Outline Construction Traffic Management Plan [REP1-010] accesses have been

Ref	Local Impact Report Comment		Applicant's Response
and Operational Accesses	which are indicated solely for construction purposes (A08 and A09 with A09 and A10 are operational) are required.	accesses A08 and A09 should operate as left in, left out only accesses with the roundabouts to the east and west used for u- turning movements.	<p>developed with different levels and for different purposes.</p> <p>With regards to the accesses mentioned, the Applicant notes:</p> <ul style="list-style-type: none"> • Access A-08 is a light construction access that will be used to access the trenchless section of the construction corridor between the railway and River Arun to monitor the progress of the trenchless construction works. • Access A-09 is a temporary construction and operational access to facilitate construction access to the cable corridor to the east of the railway line until the second crossing of the railway line North of Brook Barn Farm. • Access A-10 is an operational only access, routing through existing roads of the Kingley Gate Development to access the northern section of this cable construction segment during the operation and maintenance phase of the Proposed Development.
Appendix B, Figure 7.6.4a – Temporary Construction and Operational Accesses	Accesses A14 (light construction and operational) and A15 (construction and operational) seem to serve the same purpose. There seems no reason why both accesses are needed.	Whilst the need to retain access options is recognised, a commitment should be included to avoid the use of both the accesses indicated. There seems no reason why both accesses are required; a single access for construction and operational purposes could be provided.	<p>All accesses will be developed for safe access and egress in collaboration with the local highways authority along established guidelines such as the Design Manual for Roads and Bridges (DMRB).</p> <p>The Applicant notes that the access A-14 has been included in the DCO Application for the case that the Lyminster Bypass is not developed as planned. In the event the bypass is developed as planned access 14 will not be required.</p>
Appendix B, Figure 7.6.4a – Temporary Construction and Operational Accesses	A25 (light construction and operational) is located on Blakehurst Lane quite a distance from the main cable route. Whilst the cable route can be accessed from A25 via private tracks within Angmering Park, other accesses would provide a more direct route. Blakehurst Lane is also a single-track road with there being concerns as to how traffic could be managed during construction.	Whilst the need to retain access options is recognised, the need for this access both for construction and operational purposes appears unnecessary given other available and more direct options.	<p>The Applicant confirms that access along A-25 relates to Works No. 15 as presented in the Onshore Works Plans [PEPD-005] and as such A-25 will not be used during the construction phase of the Proposed Development.</p> <p>A-25 provides operational access for infrequent light vehicles for which the access can accommodate.</p>
Appendix B, Figure 7.6.4b – Temporary	Access A24 (light construction and operational) is located on Swillage Lane, a single-track road. There are	There are no concerns with A24 being retained for operational purposes, but it would be desirable if all construction traffic uses A22 and A23.	The Applicant notes that A-23 has been identified for operational access purposes only as it is not suitable for construction vehicle traffic. The limited potential usage of light construction accesses

Ref	Local Impact Report Comment	Applicant's Response
	<p>Construction and Operational Accesses</p> <p>concerns with the ability to manage construction traffic.</p>	<p>such as A24 is set out in the Outline Construction Traffic Management Plan [REP1-010]</p>
Appendix B, Figure 7.6.4b – Temporary Construction and Operational Accesses	<p>A26 (construction and operational) makes use of Michelgrove Lane, a single-track road. There are concerns in terms of how construction traffic would be managed along this route. The design of the Michelgrove Lane/A280 junction is limited and not suited to HGV movements. Concerns include the restricted visibility to both the north and south in light of the posted speed limit and the restricted kerb radii on the northern side, making it likely that exiting HGVs would over-run the centreline when exiting to the north.</p>	<p>If this access is required, additional mitigation would be required to Michelgrove Lane. This could include HGVs laying up with drivers phoning ahead to ensure they will encounter no Rampion 2 vehicles exiting or arriving, or physical works to create passing places on Michelgrove Lane. Temporary traffic management measures would be required at the Michelgrove Lane/A280 junction to enable vehicles to safely exit. It is suggested that HGVs only turn left in and left out to minimise the impact of delivery traffic on A280 traffic flows.</p>
Appendix B, Figure 7.6.4c – Temporary Construction and Operational Accesses	<p>A33 and A35 (both construction) are onto the A283. The design and management of the accesses should be mindful of traffic flows on the A283 and the existing AQMA in Storrington</p>	<p>Traffic (particularly HGVs) should be restricted to arrive and depart to the west (to the A24) only.</p>
Appendix B, Figure 7.6.4c – Temporary Construction and Operational Accesses	<p>A37 is indicated for light construction use. Traffic using this access would use School Lane, which is narrow and has on-street parking. There is also a primary school in close vicinity and accessed from School Lane. Traffic could seemingly use A38, which is does not have the same access constraints.</p>	<p>If this access is required, management measures would be required to avoid conflicts with school related traffic. A38 should be used as an alternative if possible.</p>
Appendix B, Figure 7.6.4c – Temporary Construction and Operational Accesses	<p>A39 is to provide access into the Washington construction compound. The access is indicated to be on the inside of a bend restricting visibility for exiting vehicles. Forward visibility for vehicles turning right into the access is also restricted.</p>	<p>Appropriate visibility splays would be required. Additional mitigation will be required in light of the number of movements into and out of the compound given the high flows and speeds on the A283. Given the importance of this access in serving the compound, the design of the access should be submitted and agreed prior to the conclusion of the DCO examination</p>
		<p>The Applicant is currently reviewing traffic management options for the junction of A280 Long Furlong and Michelgrove Lane to facilitate the safe access and egress of construction traffic. These options will take account of traffic surveys being undertaken on the A280 Long Furlong and Michelgrove Lane, swept path analysis and visibility splay assessments.</p> <p>The outcomes of this review will be discussed with West Sussex County Council at the earliest opportunity with the aim of reaching an agreement in principle to the traffic management strategy. This would then be secured through inclusion within an update to the Outline Construction Traffic Management Plan [REP1-010] which will be certified pursuant to Schedule 16 of the Draft Development Consent Order [PEPD009], and a stage specific Construction Traffic Management Plan secured pursuant to requirement 24 (1) (a).</p> <p>As part of the update to the Outline Construction Traffic Management Plan [REP1-010] submitted at Deadline 1 Table 5-2 and Figure 7.6.6a was updated to show access to A-33 and A-35 being to and from the east, thereby avoiding the Air Quality Management Area (AQMA) in Storrington.</p> <p>The limited potential usage of light construction accesses such as A24 is set out in the Outline Construction Traffic Management Plan [REP1-010]. Accesses A-37 and A-38 allow for tracking of the trenchless crossing during construction. Both accesses are required to allow access to separate areas divided by the field boundary running north from A-37.</p> <p>The Applicant is currently preparing preliminary design Access A-39 on the A283. This access will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination.</p>

Ref	Local Impact Report Comment		Applicant's Response
Appendix B, Figure 7.6.4c – Temporary Construction and Operational Accesses	A43 and A43a are indicated as providing construction access onto the A283. Visibility to the east appears restricted by the road alignment. Specific measures would be required to control and restrict vehicle movements. The track leading northwards from the access is single-track.	Appropriate visibility splays would need to be demonstrated. Ideally traffic would arrive from the west and depart to the east thereby avoiding right turning traffic obstructing flows on the A283. Specific traffic management measures may be required if vehicles (HGVs) will be required to turn right. The existing access track would need to be widened.	<p>Noting, West Sussex County Council's (WSCC) comment 4.4.1 and 4.8.3, the Applicant will review all proposed access junctions to confirm the appropriate visibility splay standard for each location (Design Manual for Roads and Bridges (DMRB) or Manual for Streets) through an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3.</p> <p>Whilst it is noted that the requirement for the implementation of traffic management measures will be confirmed as part of stage specific CTMPs as per Requirement 24 of the Draft Development Consent Order [PEPD-009] the Applicant will include additional wording to reflect WSCC's comments within Appendix B of the Outline Construction Traffic Management Plan [REP1-010]. This will be included in an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3.</p>
Appendix B, Figure 7.6.4c – Temporary Construction and Operational Accesses	A46 (light construction and operational) is onto Spithandle Lane, a single-track road.	Measures will be required to manage, and ideally minimise, traffic using the single-track road.	<p>Whilst it is noted that the requirement for the implementation of traffic management measures will be confirmed as part of stage specific Construction Traffic Management Plans (CTMPs) as per Requirement 24 of the Draft Development Consent Order [PEPD-009] the Applicant will include additional wording to reflect West Sussex County Council's comments within Appendix B of the Outline Construction Traffic Management Plan [REP1-010]. This will be included in an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3.</p>
Appendix B, Figure 7.6.4c – Temporary Construction and Operational Accesses	The access tracks leading from the B2135 at A48 and A50 (construction and operational), A49 (light construction and operational), A50a (construction) are narrow. This could cause vehicles to queue back onto the highway.	Passing places should be provided on the access tracks to enable two vehicles to pass. Alternately traffic management measures may be required to avoid conflicting movements.	<p>Both accesses A-48 and A-50 are proposed to utilise existing junctions to reduce environmental impacts of construction. However, the red line boundary has been designed to provide a new construction access route, separate from the existing narrow access tracks (which is included within the red line boundary for later operational use). Construction vehicles will be able to pass one another on the purpose-built temporary route.</p> <p>At peak construction access A-48 will serve approximately 24 construction traffic movements per day (12 in and 12 out) or one vehicle in each direction per hour and access A-50 will serve approximately 40 construction traffic movements per day (20 in and 20 out) or 3-4 vehicles per hour. Based on these peak construction traffic flows, it therefore considered unlikely that vehicles will need to queue back onto the highway.</p>

Ref	Local Impact Report Comment		Applicant's Response
Appendix B, Figure 7.6.4d – Temporary Construction and Operational Accesses	There is the potential for HGV traffic arriving and exiting A53 (construction) to and from the west through Partridge Green.	The access should be designed to restrict vehicle movements and encourage vehicles to turn left towards the A281. Routing arrangements should be implemented to ensure vehicles arrive and depart to the east.	As part of the update to the Outline Construction Traffic Management Plan [REP1-010] submitted at Deadline 1 Table 5-2 and Figure 7.6.6c was updated to remove heavy goods vehicle (HGV) routing along the B2116 west of A-53. HGV construction traffic will therefore not be permitted to route through Partridge Green.
Appendix B, Figure 7.6.4d Temporary Construction and Operational Accesses	The access tracks leading from the B2135 at A56 and A57 (construction and operational) are narrow. This could cause vehicles to queue back onto the highway.	Passing places should be provided on the access tracks to enable two vehicles to pass. Alternately traffic management measures may be required to avoid conflicting movements.	<p>At peak construction access A-56 will serve approximately 40 construction traffic movements per day (20 in and 20 out) or 3-4 vehicles per hour and access A-57 will serve approximately 44 construction traffic movements per day (22 in and 22 out) or 3-4 vehicles per hour. Based on these peak construction traffic flows, it therefore considered unlikely that vehicles will need to queue back onto the highway.</p> <p>Notwithstanding this and whilst the requirement for the implementation of traffic management measures will be confirmed as part of stage specific Construction Traffic Management Plans as per Requirement 24 of the Draft Development Consent Order [PEPD-009], the Applicant will include additional wording traffic management / passing place may be required within Appendix B of the Outline Construction Traffic Management Plan [REP1-010]. This will be included in an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3.</p>
Appendix B, Figure 7.6.4d Temporary Construction and Operational Accesses	A62 is indicated to be used for construction purposes with this understood to provide access to the Oakdene west compound. Whilst the access is existing, the level of use is anticipated (particularly by HGVs) to significantly increase temporarily during construction. The increase in slow moving HGVs exiting onto the busy A272 is a concern.	Additional measures should be included to assist exiting HGVs. Signage may also be required to alert drivers on the A272 to the presence of exiting/turning HGVs. HGV movements should be timed to avoid the network peak hours where possible. Given the importance of this access in serving the compound, it is recommended that this is the subject of a Stage One RSA prior to the conclusion of the DCO examination.	<p>The Applicant is currently preparing preliminary design Access A-62 on the A272, including the consideration traffic management requirements. This will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination.</p> <p>At peak construction activity, access A-62 will cater for approximately 326 heavy goods vehicle (HGV) two-way movements and approximately 456 light goods vehicle (LGV) two-way movements across a one-week period. This is the equivalent of approximately 156 construction traffic two-way movements per day or 13 per hour (approximately 6 entering and 6 exiting the compound). It is therefore not considered necessary to prohibit construction traffic from using this access during peak traffic hours.</p>
Appendix B, Figure 7.6.4d	A63 is indicated to be used for construction purposes associated with	Additional measures should be included to assist exiting HGVs. Signage may also be required to alert drivers on the A272 to the presence of	The Applicant is currently preparing preliminary design Access A-63 on the A272, including the consideration traffic

Ref	Local Impact Report Comment		Applicant's Response
Temporary Construction and Operational Accesses	the new substation (Oakendene substation compound). The new access is anticipated to be used by a significant number of HGVs during construction. The increase in slow moving HGVs exiting onto the busy A272 is a concern.	exiting/turning HGVs. HGV movements should be timed to avoid the network peak hours where possible. Given the importance of this access in serving the compound, the design of the access should be submitted and agreed prior to the conclusion of the DCO examination. This should include submission of a Stage One RSA.	management requirements. This will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance and subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination. At peak construction activity, access A-63 (Oakendene Substation) will cater for approximately 326 heavy goods vehicle (HGV) two-way movements and approximately 564 light goods vehicle (LGV) two-way movements across a one-week period. This is the equivalent of 178 construction traffic two-way movements per day or 14-15 per hour (approximately 7 entering and 7 exiting the access junction). It is therefore not considered necessary to prohibit construction traffic from using this access during peak traffic hours.
Appendix B, Figure 7.6.4d Temporary Construction and Operational Accesses	A61 and A64 (construction and operational) use existing accesses onto Kent Street. Kent Street is single track and not designed to accommodate any substantial increase in traffic movements. Kent Street exits to the north onto the A272. Again, measures should be sought to assist HGVs exiting onto the A272.	Measures will be required to control and avoid conflicting vehicle movements along Kent Street. Passing places should also be provided within the existing public highway. Additional measures should be included to assist exiting HGVs. Signage may also be required to alert drivers on the A272 to the presence of exiting/turning HGVs. HGV movements should be timed to avoid the network peak hours where possible.	Given the single lane track nature of Kent Street, the Applicant is currently reviewing options for the implementation of traffic management along Kent Street and accesses A-61 and A-64 to provide safe access for construction and general traffic. This may involve measures such the implementation of a speed limit reduction, passing places, or managed access via banksmen. The outcomes of this review will be discussed with West Sussex County Council at the earliest opportunity with the aim of reaching an agreement in principle to the traffic management strategy. This would then be secured through a detailed Construction Traffic Management Plan for the stage of the authorised development comprising Kent Street which will be required to be submitted and approved by the highways authority before commencement within that stage in accordance with Requirement 24(1)(a) of the Draft Development Consent Order [PEPD-009] .
Appendix B, Figure 7.6.4d Temporary Construction and Operational Accesses	A67 (construction and operational) and A68 (construction) are both existing. There are no concerns with the accesses themselves, but measures will be required along Wineham Lane to mitigate the additional construction traffic. This may also require measures at the A272 Wineham Lane junction.	Measures will be required to control and avoid conflicting vehicle movements along Wineham Lane Additional measures should be included to assist exiting HGVs both at the Wineham Lane accesses but also at the A272 Wineham Lane junction. Signage may also be required to alert drivers on the A272 to the presence of exiting/turning HGVs. HGV movements should be timed to avoid the network peak hours where possible.	At peak construction the Proposed will generate approximately 40 heavy goods vehicle (HGV) movements per day, which is the equivalent of 3-4 vehicles per hour or one every 15-20 minutes. Based on these peak construction traffic estimates, it is unlikely that the majority of existing traffic will meet an HGV traveling between the A272 and construction site. It is also noted that Wineham Lane has a suitable carriageway width to allow general traffic to pass HGVs on the rare occurrences this occurs. Notwithstanding the above, the Applicant will review this request and provide an update to the Outline Construction Traffic

Ref	Local Impact Report Comment	Applicant's Response
Appendix B, Figure 7.6.6a Local Access Route	The plan indicates HGVs routing from the A27 southwards along Ford Road. There is advisory signage at the Arundel end of Ford Road advising that the road is unsuitable for HGVs	The plan should be amended with Ford Road removed as a potential HGV route; HGVs should arrive and depart via the A259 to the south only.
Appendix B, Figure 7.6.6c	The plan indicates HGV routing along the A272 through Cowfold from the west and using the A281 to the south. Some HGV activity through Cowfold is considered acceptable but in light of the Air Quality Management Area and existing traffic congestion, movements should be restricted. The majority of HGVs should arrive from the A23 to the east.	The plan should be updated to indicate HGV routing through Cowfold only where strictly necessary.
		<p>Management Plan [REP1-010] at Deadline 3 where appropriate.</p> <p>As part of the update to the Outline Construction Traffic Management Plan [REP1-010] submitted at Deadline 1 Table 5-2 and Figure 7.6.6a was updated to remove heavy goods vehicle (HGV) routing north of the Access A-05.</p> <p>The Applicant will review this request and provide an update to the Outline Construction Traffic Management Plan [REP1-010] at Deadline 3 where appropriate.</p>

Access Reference	RSA Required	Reason	Trigger
A05, A39, A62, A63, A64	Yes	Permanent access and/or temporary construction access into a fundamental element of the proposals (i.e. a site compound or substation).	Prior to the conclusion of the DCO examination.
A01, A09, A12, A13, A15, A16, A28, A33, A35, A40, A41, A42, A43, A47, A48, A50, A53, A56, A57, A67, A68	Yes	These all involve temporary construction access onto classified roads, some of which are rural in nature and high speed. It may be possible to reduce this list as designs are agreed through subsequent stage specific construction management plans.	As part of the detailed design for the accesses and as part of the stage specific construction management plans.
A37, A38, A43a, A61, A64	No	These all involve temporary construction access onto unclassified roads or roads subject to a 30mph speed limit. It is generally considered that any safety related aspects can be resolved through the detailed design and stage specific construction management plans. Should site specific issues arise through the detailed design, WSCC	N/A

Table 1b: Road Safety Audit Requirements

The Applicant notes these requirements and will update the **Outline Construction Traffic Management Plan [REP1-010]** at Deadline 3 to reflect this information.

It should also be noted that the Applicant is currently preparing preliminary designs for each of the proposed compound locations (A-05, A-39 and A-63) and Oakendene substation (A-62), which will be designed in accordance with Design Manual for Roads and Bridges (DMRB) guidance whilst a traffic management strategy is being developed for Kent Street (A-61 and A-64). Each of these will be subject to an independent Road Safety Audit. The aim is to reach agreement in principle on the layout and / or traffic management strategy of each of these access junctions prior to the end of the Examination.

Ref Local Impact Report Comment

Applicant's Response

Access Reference	RSA Required	Reason	Trigger
		reserves the right to request an RSA if appropriate.	
A02, A03, A04, A06, A08, A10, A11, A14, A17, A18, A20, A23, A24, A25, A27, A29, A30, A31, A32, A34, A36, A37, A38, A43b, A44, A45, A46, A49, A50a, A50b, A51, A53, A54, A55, A58, A59, A60, A65, A66, A69	No	All of these accesses are indicated as light construction, operational, or a combination of both light construction and operational. These accesses are indicated to be very lightly trafficked. The design of these accesses would mitigate their impact on the local highway network.	N/A
A20, A21, A22, A23	TBD	These accesses use side road onto the strategic road network. The need for an RSA should be determined by National Highways.	N/A

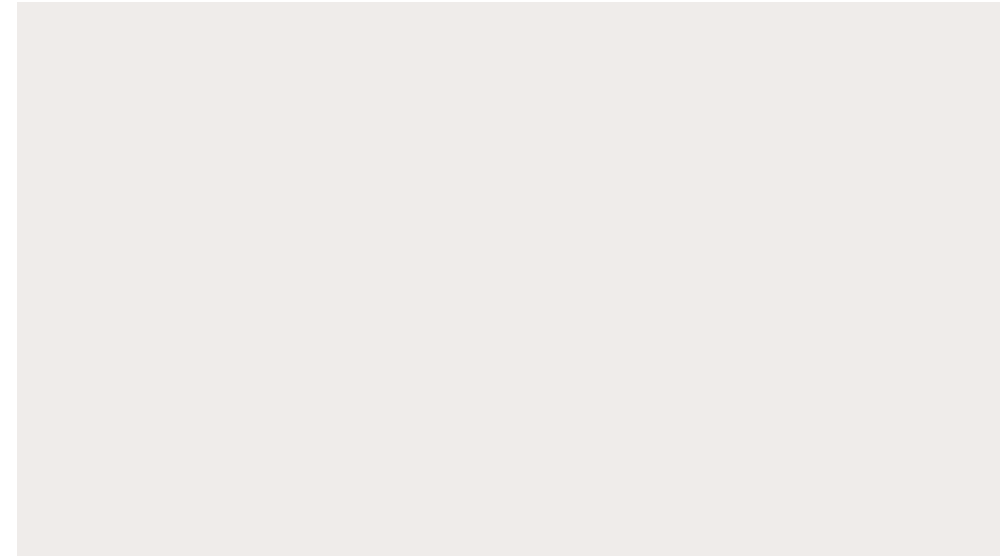


Table 2: Outline Construction Workforce Travel Plan (OCWTP) (APP-229)

Ref	Issue	Recommended Action	Applicant's Response
4.2.3	Given the indicated targets in Table 5- 1, the Transport Review Group and the number of members seems disproportionate. It is recommended that the TRG better reflects the limited nature of the targets.	Review the scale and extent of the TRG.	The Applicant will review this request and provide an update to the Outline Construction Workforce Travel Plan [APP-229] at Deadline 3 where appropriate.
Table 5-1	The rural location of most of the construction sites is appreciated. It is still considered that the targets could be more challenging especially for car passengers and bus/multi-occupancy vehicles. With the bus, the Applicant is indicating the possibility of a more significant service from Haywards Heath railway station but equally important is the provision of multi- occupancy vehicles as included in 6.7 of the OCWTP.	Revised the targets	The Applicant will review this request and provide an update to the Outline Construction Workforce Travel Plan [APP-229] at Deadline 3 where appropriate.
5.4.10	It is suggested that the surveys could be every 6 rather than 3 months. 3 months seems very frequent	Update the survey frequency.	This is noted and the Applicant will update the Outline Construction Workforce Travel Plan [APP-229] at Deadline 3 to reflect his request.
5.6.1, Table 5-2	It is suggested that the Action Plan includes an action to advise those driving to the site of recommended routes to avoid the use of narrow unclassified rural roads, where possible. This is more a measure to reduce impacts on rural communities.	Include additional Action in Table 5- 2.	The Applicant will review this request and provide an update to the Outline Construction Workforce Travel Plan [APP-229] at Deadline 3 where appropriate.

Ref	Local Impact Report Comment	Applicant's Response
5.6.2	As per 5.5.10, the timing should be adjusted to 6 monthly.	Update timing of monitoring report
7.2.10	The monitoring data should be submitted every 6 months rather than quarterly.	Update the timing of the monitoring report.
7.2.12	WSCC are unlikely to be able to host the meeting minutes. There seems no reason why these could not be stored on a website operated by the Applicant.	Remove reference to WSCC website and replace with another location.

Table 3: Outline Operational Travel Plan (OOTP) (APP-227)

Reference	Issue	Recommended Action
	WSCC have no comments regarding the OOTP. For the purposes of the project, those elements (namely the Oakendene substation) within WSCC are in rural locations that have very limited transport opportunities but will also attract a limited number of vehicle movements. WSCC have no comments regarding the OOTP in relation to the port-based activities.	

The Applicant thanks WSCC for confirmation on the [Outline Operational Travel Plan \[APP-227\]](#) and has no further comments to make at this stage.

Table 4: ES Volume 2, Chapter 23 Transport, revision A (APP-064)

Reference	Issue	Recommended Action
23.4.34	There are a number of sections within this document as well as others that assume that Newhaven will be the port base for maintenance activities associated with the offshore elements. The comment within this point identifies that this has not yet been determined, and it's unclear when this decision would be made. As such, the assumptions and assessment relating to Newhaven will potentially have to be revisited, along with other port locations being assessed prior to the examination concluding.	Applicant to provide certainty that Newhaven will be used or identify and assess other potential operational ports that could be used instead.

The operational base location will not be decided upon until after completion of the examination. Any development of facilities at the operational base has not been included within the DCO Application and hence will be subject to obtaining any relevant consents.

The Applicant considers that for the purposes of this assessment, the assumed location of the operations base at Newhaven and related estimated effects are reasonable and representative.

Further information regarding the Applicant's intentions for the additional facilities at Newhaven Harbour are provided in the response to Issue Specific Hearing 1, agenda item 50 in the [Applicant's post hearing submission - Issue specific hearing 1 \[REP1-018\]](#).

Table 5: ES Volume 4, Appendix 23.2: Traffic Generation Technical Note (APP-197)

Ref	Issue	Recommended Action	Applicant's Response
3.2	Study Area 2 is located outside of West Sussex. No comments will be offered on Study Area 2.	None required	The Applicant agrees that Study Area 2 is outside of West Sussex.
3.2.32	The exclusion of the Lyminster Bypass is unacceptable. The bypass will be operational prior to Rampion 2 commencing construction. It will therefore provide a usable route. In simple terms, it	Include the Lyminster Bypass within the appropriate assessments.	The assessments of the Proposed Development included within Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] and Chapter 32: ES Addendum [REP1-006] assumed that the Lyminster bypass was not complete and that all construction traffic uses the existing A284 to

Ref	Local Impact Report Comment		Applicant's Response
	would only result in the localised redistribution of vehicle movements away from the existing A284 to the new bypass. Construction access is also shown off the bypass so this will need to be suitably assessed.		access relevant construction sites or the temporary construction compound at Climping. Lyminster Bypass will be officially designated as the A284 and will reduce the volume of traffic passing through Lyminster and therefore reduce the impacts on local receptors. Given that Chapter 23: Transport, Volume 2 of the ES [APP-064] and Chapter 32: ES Addendum [REP1-006] provide a worst case assessment of potential effects no further assessment is considered necessary. .
5.1.4	The actual means by which traffic generation has been calculated is unclear. Beyond the first sentence of this paragraph, there is no supporting information detailing the assumptions applied or the resultant number of vehicle movements	Additional details must be provided in terms of the assumptions applied for construction traffic generation	<p>As specified in reference 5.1.5 above there are several inputs that the traffic generation is based upon for each access, these include:</p> <p><u>Cable Route:</u></p> <ul style="list-style-type: none"> • The length of cable route, served by each access is calculated. • Duration of activities; these are based on average industrial norms. • Material and Plant; The required volumes/number of materials (for example volume of cement bound sand) is estimated based on the design to date. This is used to calculate how many HGVs are required to bring the material to site based on typical HGV loads. The vehicles required (plant and workforce related) is calculated based on industrial norms and the estimated duration for the construction activities. <p><u>Substation:</u></p> <ul style="list-style-type: none"> • Similar to the cable route; volumes/numbers of materials and plant are calculated based on engineering design to date and the typical durations for construction activities. <p><u>Compounds</u></p> <ul style="list-style-type: none"> • The cable route associated with each cable construction compound (approximately 1/3 of the route for each compound) determines the volume of materials, plant and personnel that will be stored/pass through the compound. This determines the number of HGVs and LGVs.
5.1.6	Similar to 5.1.4, it would be helpful if the Note could be more transparent in terms of vehicle traffic generation.	Additional details must be provided in terms of the assumptions applied for construction traffic generation.	Please refer to response to reference 5.1.4 above.
5.8.10	The use of a peak week for the purposes of vehicle movements has been previously agreed. It would be helpful if some indication could be made as to the duration of the peak week levels of traffic (it is not certain that a peak traffic will	Clarify the duration of 'peak week traffic', provide details of average traffic flows away from the peak.	Appendix A of Chapter 32: ES Addendum, Volume 2 of the Environmental Statement [REP1-006] includes impact assessment tables showing Annual Average Daily Traffic construction impacts for each year of the construction programme for all identified receptors.

Ref	Local Impact Report Comment	Applicant's Response						
	occur over a single week) as well as average traffic movements.	The Applicant will provide an update to the Traffic Generation Technical Note [REP1-008] to include a table detailing the estimated peak construction period traffic for all access junctions at Deadline 3.						
<p>Table 6: ES Volume 4, Appendix 23.1, Abnormal Indivisible Loads Assessment (APP-196)</p> <table border="1"> <thead> <tr> <th>Reference</th> <th>Issue</th> <th>Recommended Action</th> </tr> </thead> <tbody> <tr> <td>2.2.4</td> <td>The AIL assessment assumes that Shoreham Port would be used as the starting point for AILs. However, the AIL Assessment indicates only that Shoreham is anticipated to be used; it doesn't state that it will be used.</td> <td>An AIL Assessment relevant for the port to be used should be secured and the existing Assessment updated.</td> </tr> </tbody> </table>			Reference	Issue	Recommended Action	2.2.4	The AIL assessment assumes that Shoreham Port would be used as the starting point for AILs. However, the AIL Assessment indicates only that Shoreham is anticipated to be used; it doesn't state that it will be used.	An AIL Assessment relevant for the port to be used should be secured and the existing Assessment updated.
Reference	Issue	Recommended Action						
2.2.4	The AIL assessment assumes that Shoreham Port would be used as the starting point for AILs. However, the AIL Assessment indicates only that Shoreham is anticipated to be used; it doesn't state that it will be used.	An AIL Assessment relevant for the port to be used should be secured and the existing Assessment updated.						
		The Applicant considers that for the purposes of this assessment, the assumed location of Shoreham is reasonable and representative.						

Appendix D – Historic Environment comments

Table 1: Detailed comments on Chapter 25, Historic Environment and chapter appendices

Ref	Issue	Recommended Action	Applicant's Response
ES Volume 2, Chapter 25: Historic environment (APP-066)			
25.8.15	<p>The ES may not always accurately reflect the scale of harm to the historic environment arising from the WTGs and offshore substations. The degree of harm to onshore designated heritage assets is assessed as minor adverse for 32 assets and moderate adverse for 13. WSCC requests clarity on the methodology by which residual effects to all heritage assets within the moderate harm category are uniformly assessed as 'not significant' in EIA terms. The ES methodology states that professional judgement is applied to determine whether a residual effect assessed as Medium ('potentially significant') is in fact 'significant'. WSCC is concerned that this methodology lacks transparency and may downplay the cumulative effects of WTGs and offshore substations on onshore designated heritage assets</p> <p>Assessment of substantial vs less than substantial harm to designated heritage assets. The ES methodology for equating residual effects to either substantial or less than substantial harm in NPPF terms lacks nuance. The methodology simply equates a major magnitude of adverse change to substantial harm; adverse change below this level would be uniformly assessed as less than substantial. In the case of designated assets where the degree of harm is not clearly identifiable as low (for example Oakendene Manor), a more nuanced assessment of harm is required. Assessment should consider and describe how and to what degree</p>	<p>Provide clarity on the process by which residual effects to designated heritage assets within the moderate harm category are uniformly assessed as 'not significant' in EIA terms.</p> <p>Review and provide clarity to stakeholders on the methodology for assessing substantial/less than substantial harm. Where appropriate, consider providing statements which utilise a more graduated scale of harm, such as stating whether harm is at the upper or lower end of substantial/less than substantial harm. Ensure these statements can be evidenced by appropriate visualisations</p>	<p>Please see Applicant's response in references 15.2, 15c, 15.31, 15.36, 15.37 and 15.52.</p> <p>The Applicant does not agree that further action is required.</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>the Project will affect the special qualities and significance of the asset and the ability to appreciate that significance.</p> <p>Assessment of magnitude of change post- mitigation and calculation of residual significance of effect WSCC disagrees with the degree to which proposed mitigation in the form of archaeological excavation ('preservation by record') will reduce the residual significance of effect on heritage assets. Archaeological mitigation in the form of preservation by record can partially offset the harm caused by construction effects. The need to reflect the effects of mitigation (by a reduction in the calculated magnitude of harm) within the ES assessment framework is acknowledged. But the harm has still occurred in the form of the permanent (partial or total) loss of irreplaceable archaeological remains; this principle is enshrined within the NPPF and supported by NPS-EN1 (para 5.9.16). The current ES assessment methodology does not reflect this position. Archaeological remains located within the construction corridor which will suffer direct physical impacts (total or partial removal and associated loss of significance) will suffer a high magnitude of adverse change in the absence of mitigation. The assertion that prior recording will reduce the magnitude of negative change from high to low is strongly contested.</p>	<p>Amend the ES assessment. Agreed/essential archaeological mitigation, preservation by record, should be assessed as reducing the magnitude of adverse change by only one level (e.g. from high to medium) in the case of total or majority loss of (substantial harm to) archaeological remains arising from direct physical construction impacts. Any archaeological feature which will be completely removed during construction cannot be assessed as a low magnitude of adverse change following mitigation, as this does not reflect the position that archaeology is an irreplaceable resource.</p> <p>The Applicant acknowledges that harm will occur to heritage assets, arising from the Proposed Development. This is reflected in the assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020], which is in line with relevant policy and guidance. Where the loss of archaeological interest of a heritage asset is not avoidable through design, this would be partially mitigated through preservation by record before the loss occurs.</p>
25.8.13	<p>Assessment of harm during construction phase When calculating magnitude of change within the settings of designated heritage assets during the construction phase, the ES factors in the temporary duration of these changes. WSCC accepts the principle that the temporary duration can reduce the magnitude of harm somewhat. However, this needs to be assessed on a case-by-case basis, especially in locations where construction will persist for longer durations, such as landfall, haul roads, construction compounds and substation and grid connection locations. WSCC considers the magnitude of construction impact is sometimes underassessed on the basis of the temporary duration of construction works.</p>	<p>Review assessments of magnitude of change during construction. Where appropriate for certain assets and longer duration impacts, amend to ensure the assessment accurately reflects the severity of adverse change which will be experienced during the construction phase.</p> <p>The assessment of each heritage asset takes into consideration the Proposed Development as described in Chapter 4: The Proposed Development, Volume 2 of the Environmental Statement (ES) [APP-045] and the relevant maximum parameters as listed in Table 25-22 in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], which includes elements of the Proposed Development which might be specifically perceived for different durations from different assets.</p>
<p>Onshore desk-based geoarchaeological and palaeoenvironmental assessment report (Volume 4, Appendix 25.3, APP-202)</p>		
General comment	<p>The desk-based geoarchaeological and palaeoenvironmental assessment report provides a good overview of the geology and sedimentology of the onshore Order Limits. It also provides a good summary of the potential for archaeological and palaeo-environmental remains</p>	<p>The Applicant welcomes WSCC's agreement that Appendix 25.3 Onshore desk-based geoarchaeological and palaeoenvironmental assessment report, Volume 4 of the Environmental Statement [APP-202] provides a good overview of the geology and sedimentology and a good summary of the potential for archaeological and palaeo-environmental remains.</p>
3.2.12	<p>The Palaeolithic archaeological potential of specific areas/features of Subzone 2a may be underassessed. Whilst overall the potential is low for the majority of this subzone, the Palaeolithic potential of</p>	<p>Further assessment of the Palaeolithic archaeological potential of the area of the order limits that overlies superficial deposits mapped</p> <p>The Outline Onshore Written Scheme of Investigation (WSI) [APP-231] provides for geotechnical investigations and</p>

Ref	Local Impact Report Comment		Applicant's Response
	<p>clay-with-flints deposits (mapped for an area of the order Limits in Zone 2), and of potential chalk solution features, is discussed in the report. However, these deposits are assessed as low potential for Palaeolithic archaeology within Table 5.1</p>	<p>as Clay-with-flints. Utilise results of geotechnical investigations and geoarchaeological investigations to refine understanding of the extent and potential of CWF deposits, and the presence of/potential for chalk solution features. Consider extending the proposed area of test-pitting (OOWSI, Figure 4) to the south of the woodland of Michelgrove Park, to cover the mapped CWF deposits, if proportionate. Assess potential for in situ Palaeolithic archaeology. Consider assessment methodology in the event that solution features are identified which might have high potential for Palaeolithic archaeology.</p>	<p>geoarchaeological investigations. The scope of these works will be detailed in a site-specific WSI.</p>
<p>Figures 1- 7, 11</p>	<p>Distance scales on figures are incorrect</p>	<p>Amend figures</p>	<p>Figures will be reviewed and corrected where necessary.</p>
<p>Onshore geophysical survey report (Volume 4, Appendix 25.4, APP-PEPD-031)</p>			
<p>3.2.23</p>	<p>Categorisation for interpreting geophysical anomalies does not give sufficient confidence ratings to anomalies with likely archaeological origins. The methodology restricts the category of Definite or probable Archaeology to anomalies where "Interpretation is supported by the presence of known archaeological remains or by other forms of evidence such as HER records, LiDAR data or cropmarks identified through aerial photography". This is not standard practise, and means that any anomalies not correlated with other sources of evidence are classified only as Possible Archaeology, regardless of the strength of response, form or possible function. E.g. an anomaly within Field 004 is described as a 'trapezoidal enclosure', 30m by 28m with a well-defined entrance and clear internal pit-like anomaly. It is nonetheless categorised as Possible Archaeology. However, it is noted that anomalies in Field 005 are categorised as Definite/Probable Archaeology in the recently updated. A key function of geophysical survey is archaeological prospection within previously- uninvestigated areas; therefore, the absence of prior recorded evidence should not be a factor in the degree of confidence assigned to geophysical anomalies.</p>	<p>Revise categories for geophysical anomaly interpretation. Reserve the Definite category for geophysical anomalies which correlate with HER entries. Assign geophysical anomalies which are likely to have an archaeological origin (even if not yet ground-truthed) as Probable Archaeology</p>	<p>The categories of interpretation are sufficient to identify the likely presence of archaeological remains, which will be determined through intrusive investigation. These are the same categories used for the previous iterations (of the report submitted to WSCC pre-Application in September 2022 and various interim geophysical survey results subsequent to this.</p>
<p>4.6.5 – 4.6.6</p>	<p>As stated in the report, results from fields 024, 026, 028, 031, 036, 039, 040, 042, 078, 082 to 084, 132, 137, 192, and 204 to 212, 234, 248 to 249, 267, 300-302, 304, 305, 318, 330, 332, 333, 337, part of 339, 345 to 347 should not be relied upon to indicate low archaeological potential due to known high levels of background response (landfill and green waste spreading) which may affect the survey data.</p>	<p>None</p>	<p>The Applicant notes that the assessment of archaeological potential takes into consideration not only the geophysical survey results but also the comprehensive baseline data summarised Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020].</p>

Ref	Local Impact Report Comment	Applicant's Response	Applicant's Response
4.6	Any adverse ground conditions which may be encountered during survey in some fields, such as waterlogging, vegetation, debris or other issues, are not recorded. This may have affected the accuracy of the survey data and in turn affect reliability and interpretive value of some results.	Record any fields where adverse ground conditions might have affected survey data.	The prevailing ground conditions at the time of survey were taken into consideration when undertaking interpretation of the survey data.
Response by Professor Martin Bell BSc, PhD, FSA, FBA (Sussex Archaeological Society) to Third Statutory		Noted, the Applicant has no further comments on this matter at this time.	
Response by Professor Martin Bell BSc, PhD, FSA, FBA (Sussex Archaeological Society) to Third Statutory Consultation exercise (2023): PEIR FSIR			
Rampion 2 Windfarm Land route alternative route LACR-1d			
<p>The alternative LACR-1d Rampion dryland cable route between Patching and Sullington Hill is of very great concern from an archaeological perspective. It passes through the middle of the most dense concentration of Neolithic and Bronze Age archaeology on the South Downs. In this area are many sites of national and international significance. Of particular archaeological sensitivity are both alternative routes on the west side of Blackpatch Hill and between here and Harrow Hill. 750m west of the route is the major complex of well-preserved Neolithic flint mines on Harrow Hill, where there is also a hillfort enclosure of the first millennium BC. Immediately to the east of the route are another major group of early Neolithic flint mines at Blackpatch, where at least 93 flint mine shafts are known. Eight of these were excavated by the pioneering archaeologist John Pull whose work is reflected in a special exhibition in Worthing Museum. The Blackpatch mines are some of the earliest monuments of the first farmers in Britain; a recent project has dated them to 3991-3797 cal BC. The flint mines were levelled by bulldozer in the 1950s and the only plan is drawn from a transcription of earlier air photographs. Lidar images indicate that the mines extend to within 150-200m of the eastern proposed cable corridor. Pull also excavated some burials in the area and reported possible traces of settlement. In 2005 Time Team did an excavation as part of a Channel 4 programme. They did not confirm evidence of a Neolithic settlement but did find ancient tree throw features, suggesting some of those excavated by Pull may have association with ritual deposition. Pull also identified burial mounds in the area and excavation of one of these by Time Team showed that it was Beaker / early Bronze Age; this site lies c 150m east of the proposed cable line. The close proximity of these sites to the cable line highlights the density of archaeological evidence in the area.</p>			
<p>Of equal significance is a major complex of middle and later Bronze Age settlements. Three have been partly excavated; New Barn Down (Curwen, SAC 63, 75) and Cock Hill (Ratcliffe-Densham SAC 91) are Scheduled Ancient Monuments and lie west of the proposed corridor. The partly excavated Cock Hill settlement lies on the west edge of the proposed cable route. However, the field associated with this settlement are bound to be within the cable corridor and traces of lynchet field boundaries are visible on Lidar, as are marl pits within the corridor which are thought to be associated with the settlement.</p>			
<p>Of greatest concern is Blackpatch Bronze Age settlement which lies in the middle of the eastern of the two possible cable routes (at TQ09200515). It was partly excavated in the 1950s (Ratcliffe-Densham SAC 91). Since then the site has been heavily ploughed but the earthworks are still clearly visible on Lidar images as are some of the pits and hollows which were thought to be contemporary with the settlement, perhaps ponds. Much of this settlement and field system evidence has been impacted by subsequent agriculture but important evidence is bound to remain below ground. The excavation of these three settlement sites took place between the 1930s and 1950s; they were pioneering, but small scale, and focused on the core of the settlement area. There is bound to be much more archaeology in the surrounding unexcavated areas, particularly as regards associated Bronze Age fields.</p>			
Consultation exercise (2023): PEIR FSIR			

Ref	Local Impact Report Comment	Applicant's Response
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Examination of air photographs and Lidar images of the proposed cable corridor show that throughout the area there are extensive traces of Celtic field systems which are present at least as far north as TQ 092109. The traces of ancient fields in this area have been transcribed from air photographs and Lidar by Historic England as part of the Changing Chalk HLF project led by the National Trust in partnership with Historic England and the National Park. The results of that analysis are not yet publicly available but should be consulted because they will provide significant additional evidence of the exact position of ancient field traces and other earthworks within the cable corridor.

The key point is that the ancient field traces are directly linked by banks to the three excavated middle Bronze Age settlements; they form a key part of that settlement landscape. Sites in this area formed case studies in pioneering research on prehistoric farming by the Curwens. The fields are likely to have originated by 1600 cal BC and a scatter of Iron Age and Roman pottery on the excavated sites suggests they remained in use until the fourth century AD. 'Half an hundred weight' of Iron Age pottery is reported by Ratcliffe-Densham (SAC 99, p 94) at TQ0996 1015 at the constriction point where the proposed cable corridor is just 150m wide. That must surely indicate a significant, but little understood, Iron Age and Romano-British site at this point. 1km south of the proposed corridor the discovery of Bronze Age metalwork (including Sussex Loops) and Iron Age coins at Patching Pumping Station suggests a probable site of later prehistoric ritual deposition on the floor of the now dry valley which leads south of the cable route.

At the north end of the proposed cable route on Sullington Hill attention should be drawn to the prominent cross dyke on the north escarpment; this is probably of Bronze Age date and may relate to the regulation of pastoral activity. There are barrows on the escarpment crest at Chantry Post but there may be other unrecorded barrows. The Lidar imagery shows at least two possible examples. It also shows faint traces of multiple pits on the east side of the crest of Sullington Hill. They might be for flint or marl digging but require further investigation.

Work on the cable trench will affect a corridor 50m wide within the wider corridor on which consultation is taking place. Whilst the flint mines and some of the Bronze Age settlement sites lie just outside the corridor on which consultation is taking place, the Bronze Age settlement and fields at Blackpatch will be significantly impacted as will the immediate surroundings of the Cock Hill settlement.

The key point is that the settlement and field system archaeology of this corridor area, and the immediately surrounding area, is so dense and significant that further, presently undetected, archaeological sites are bound to be present within the corridor. Any impact needs to be carefully assessed in advance of disturbance. The known settlement and field system evidence is particularly on the down spur crests and slopes, with less known evidence in the dry valley bottoms. However, a key lesson from excavations in advance of the Brighton Bypass and other excavations on the South Downs by M. Bell and M.J. Allen is that sediment sequences which accumulate in dry valleys provide some of the best evidence for buried field system traces, valley bottom settlement and evidence of the ecological history of the chalk downland. We do not, for instance, know where the people who excavated the internationally significant flint mines lived. A chance outcome of the New Barn Down Bronze Age settlement excavation was the discovery of a large and artefact-rich early Neolithic pit contemporary with the flint mines. This highlights the potential which this landscape

Ref	Local Impact Report Comment	Applicant's Response
	<p>has to reveal important and unexpected discoveries which could be very costly to investigate adequately, especially, for instance, if traces of Neolithic flint mining were found to extend into the affected area. The Sussex Archaeological Society's 2022 conference on flint mines served to highlight the exceptional significance of these sites but also showed how limited is our knowledge of the Neolithic ecology of the surrounding areas. This is relevant to active debate concerning the extent to which the chalk downland in early prehistory was forested or included more open grassland areas and that is relevant to current debates about nature conservation and rewilding. The dry sediments in the assessment corridor will contain important evidence of the prehistoric environment and are likely to have some of the best preserved and buried evidence for field systems associated with the known concentration of Bronze Age settlement.</p> <p>The Sussex Archaeological Society is supportive of plans for green energy generation, especially in an offshore context and where it does not impact on heritage or wildlife. The dryland cable routes do involve significant ground disturbance over a 50m wide corridor. It is to be regretted that the alternative route proposed through this consultation passes through such an archaeologically significant landscape and we hope that serious consideration will be given to a more westerly route originally proposed, if that can avoid areas of such significant archaeology. If the proposed alternative route is to be adopted then the very highest priority should be given to the thorough assessment of heritage assets within the corridor. In our view extensive excavations would be required and investigations should include sediment accumulations in dry valley fills and all evidence of early field systems within the affected area.</p> <p>References to SAC are to the relevant number of <i>Sussex Archaeological Collections</i></p> <p>Response prepared by Professor Martin Bell BSc, PhD, FSA, FBA</p> <p>President Sussex Archaeological Society</p> <p>20.3.23</p> <p>@reading.ac.uk</p>	

Ref	Local Impact Report Comment	Applicant's Response	
Appendix E – Socio-economics Comments			
Table 1: ES Chapter 17 Socio-economics (APP-058)			
Ref	Issue	Recommended Action	Applicant's Response
17.2.7	The West Sussex Transport Plan, which informed the assessment (para 17.2.7), spans 2011-2026. However, new plan, West Sussex Transport Plan 2022-2036 should have been taken into account.	Undertake a review of the latest Transport Plan and confirm whether there are implications for the assessment findings.	<p>The Applicant has reviewed the latest Transport Plan. The plan notes that the West Sussex County Council (WSSCC) Rights of Way Management Plan 2018-2028 sets out the County Council's approach to managing the Public Rights of Way (PRoW) network. The plan has several aims relevant to recreation, it seeks to</p> <ul style="list-style-type: none"> • Develop opportunities to improve and protect public rights of way through the RoWIP; • Provide new and improved pedestrian infrastructure, including expanding the utility of existing PRoWs, where this helps to

Ref	Local Impact Report Comment	Applicant's Response
Sections 17.5 and 17.9	<p>More clarity is requested on aspects of the assessment methodology. For collecting population estimates, it is unclear if the year (2020) is the date of publication of estimates or the date of collection. Also clarify why recent data has not been used, especially if 2020 data represents during the COVID19 pandemic, which is also not clarified. There is some uncertainty on the implications of data limitations set out at 17.5.4, and 17.5.5 of Chapter. Data limitations in respect of people seeking work and GVA data by sector are stated but the implications of these for the assessment are not set out, they are merely stated as limitations. The Applicant should confirm the implications of these limitations for the assessment and any impacts of them, so this is clearly understood when the assessment is interpreted. There is also a lack of clarity regarding stated issues relating to tourism employment, at 17.5.12. A cross reference is made to issues relating to another data limitation(s) but it is not clear which are being referred to. The Applicant should confirm what the issues referenced are and confirm the implication of this limitation for the assessment and any impacts on findings.</p>	<p>Provide clarifications in respect of these aspects of the assessment methodology so that these are clearly understood when the assessment is interpreted. In respect of induced impacts, an assessment of these should be provided.</p> <p>address barriers and connect routes for short distance trips, taking account of planned development; and</p> <ul style="list-style-type: none"> Improve satisfaction levels, public satisfaction with overall highways and transport condition, local bus services, pavements and footpaths, cycle routes and facilities, and PRow, as measured through the National Highways and Transport Network Public Satisfaction Survey. <p>The Applicant notes that 2020 population estimates were presented in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058]. This is because, at the time the chapter was produced (August 2023), more recent data was not yet available in the detail that was required (at the local / county district level). The Applicant has reviewed the latest data for 2022 based on the ONS Mid-Year Population Estimates. The latest data shows that in 2022 Sussex had a population of 1.7 million, 1.03 million of whom are of working age (i.e., aged 16-64). This is only slightly different to the data for 2020 presented in the Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] (1.73 million and 1.03 million respectively).</p> <p>Changes in demographics are not considered as a socio-economic effect in Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] (as they were scoped out in the scoping report) and therefore this data was presented as wider contextual baseline data rather than data that is specifically used in the assessment of a change on baseline conditions.</p> <p>Whilst it is acknowledged that more recent data is now available the inclusion of more recent data available would not materially alter the findings of the assessment.</p> <p>The Applicant can confirm that none of the baseline conditions data limitations noted in Section 17.5 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] [APP-058], would have a material effect on the assessment. These data limitations increase the uncertainty when assessing and quantifying impacts, but not to the extent that they would affect the significance conclusions. For example, the gaps in literature related to tourism impacts relates to a lack of ex post studies. Despite this the literature has strengthened over time. This has improved the confidence and robustness of tourism assessment findings related to offshore wind farms.</p>

Ref	Local Impact Report Comment	Applicant's Response
Section 17.6	<p>There is extensive reference within this section of the chapter specific features of the Project. This is inconsistent with the section being a review of the baseline without the Project, whereby only the location of its boundaries should be included to provide orientation. In some instances of this (for example, 17.6.65), an impact is described and/or construction methods that influence impact. Based on these considerations, it is difficult to distinguish baseline conditions from potential impacts wherever this occurs.</p>	<p>Refer to impacts and construction methods used in relation to resources and receptors within the Assessment of Effects.</p>
		<p>The data limitation in terms of sectoral gross value added (GVA) and employment refers to how sectors are defined. Using the SIC codes there is no clear definition for the renewable energy / offshore wind development sector. The effect of this on the assessment is that employment and GVA were assessed against total baseline GVA and employment of the study area rather than the renewable energy / offshore wind development sector. If impacts are considered in the context of the renewable energy / offshore wind sector in the local study area they will represent a higher proportion of employment however are still likely to be negligible.</p> <p>The baseline analysis in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement [APP-058] presents a review of the existing baseline without the project in place. However, reference to the Proposed Development is used to help put the baseline assets in to the context of the Proposed Development infrastructure, especially with regard to the study areas over which baseline information is presented, which varies by impact. The Applicant confirms that the baseline does not include the Proposed Development.</p>

Appendix F – Collated WSCC S106 Asks

WSCC recognises and welcomes the draft Section 106 principles document submitted by the Applicant in late 2023; however, this LIR presents other areas of concern and adverse impacts that would need addressing through a Section 106 agreement with WSCC. WSCC looks forward to further discussions with the Applicant in due course on these matters.

Table 1: WSCC S106 Asks (collated from all LIR topic specific sections)

Topic	Impact	Area for Discussion with the Applicant	Applicant's Response
Funding for an Environmental and Heritage Compliance Officer for duration of Project	<p>A significant number of sensitive environmental and heritage receptors are impacted within the DCO Limits. Mitigation and reinstatement measures are proposed by the Applicant requiring detailed compliance monitoring by the relevant planning authority. This requires a minimum involvement of 14 years, from construction, operations through to aftercare monitoring of reinstated</p>	<p>S106 funding for an Environmental & Heritage Compliance Officer for the duration of the Project, from construction pre-commencement to ten years post construction completion (or independent establishment of new landscape features and habitats). A Compliance Officer would enable a single point of contact between relevant authorities and contractors, faster communications between parties, dedicated knowledge of the Project, and compliance with the various control documents to be approved. In addition to monitoring compliance with approved control documents, the Compliance Officer would monitor and notify the relevant</p>	<p>The Applicant is grateful to West Sussex County Council for providing a collated list of Section 106 requests.</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in National Policy Statement (NPS) 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</p>

Ref	Local Impact Report Comment	Applicant's Response	
	<p>landscapes and habitats. Lessons learnt from Rampion 1 identified the need for an individual compliance officer to oversee the entirety of the project for continuity, and to develop working relations with the Applicant and contractors who have the overall responsibility in ensuring timescales and work requirements are met. This is vital should multiple local authorities be required to discharge requirements alongside consulting with other statutory bodies and other authorities.</p>	<p>authorities as appropriate regarding but not limited to: • Any on-site changes to agreed construction methodologies which have the potential to result to harm to the ecological, arboricultural or archaeological resource. Including but not limited to: changes in onshore construction works and methodologies (locations and extents of TC; drilling depths; entry/exit pits; transition joint bay locations and groundworks; angle of drilling); changes to locations or methodologies of groundworks and enabling works; changes affecting historic buildings or monuments; changes affecting habitats (including hedgerows, trees and woodlands); • Environmental incidents or near misses which have the potential to result to harm to the ecological, arboricultural or archaeological resource (such as bentonite outbreaks during TC construction); and Monitor and approve (in principle) remedial works, such as re- seeding of wildflower grassland or re-planting of trees.</p>	<p>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 Issue Specific Hearing 1 of providing Heads of Terms for Deadline 3.</p>
Landscape and Ecology Enhancement Fund	<p>West Sussex has a great diversity of landscapes and habitats associated with its rich geological diversity. The onshore cable route will directly impact a range of landscapes and habitats, most notably hedgerows and notable trees. Indirect impacts to the setting of habitats and landscape features such as veteran trees and hedgerows is also expected. Whilst some reinstatement works for trees, hedgerows and other habitats are proposed, alongside a biodiversity gain strategy, no enhancement measures are secured or guaranteed within or in immediate proximity of the DCO limits which is considered as essential requirements.</p>	<p>S106 funding for an enhancement fund to: • Fund measures to improve habitat connectivity across the landscape within 5km of the DCO Limits (such as tree planting and hedgerow restoration or creation). • Fund habitat restoration and creation within 5km of the DCO Limits (such as chalk grassland restoration through scrub control, enhanced management of riparian habitats, and habitat creation, including meadows, chalk grassland, conservation headlands, ponds and dew ponds). • Fund restoration and enhancement projects to improve the quality of ancient, veteran and notable trees within 5km of DCO Limits. • Fund workshops and officer time to promote and encourage the uptake of the above funding projects. This will include onsite visits, as well as in person/online workshops.</p>	
Socio-economics	<p>For tourism, the impact of both construction and operation of the Project is considered by WSCC to be potentially negative. Visitors may be deterred from undertaking visits, such as to coastal resorts, recreational routes, for water sports and to beaches. This would occur either due to the setting of these being changed by visual impacts from onshore and offshore works during construction, the visual presence of offshore infrastructure during operation, or from changes to the general perception of the</p>	<p>The Applicant must provide more robust evidence of how it plans to mitigate negative impacts on the visitor economy, both in terms of recreational activities and tourism, and enhance local economic benefit. This should include additional mitigation to address visual impacts on users and businesses, and financial mitigation which provides compensation for adverse impact and to support the sector more generally. WSCC is seeking to secure funding from the Applicant to support local visitor economy initiatives to mitigate impact. The Applicant's proposals for funding could be set out within a funding proposal and potentially a tourism strategy and action plan to be discussed and agreed with WSCC and relevant partners.</p>	

Ref	Local Impact Report Comment	Applicant's Response
	<p>area as a visitor location. This could result in loss of income and the jobs this supports.</p>	
Public Rights of Way	<p>Due to the large scale of this Project and the linear nature of the proposals, the scale of the impact on Public Rights of Way (PRoW) is very high. With just under 60 individual interventions across the PRoW network crossed by the Project, this highlights the impact on users both exercising their legal rights for utility or recreational purposes</p>	<p>Compensation will be required to mitigate against the identified impacts on the users of the PRoW network in both the short, medium, and long term. These funds will allow improvements to be undertaken on the network, improving access and availability. This should be focussed on future PRoW improvements within a 5km buffer zone of the landfall, cable route and onshore substations (including extension to the National Grid substation). Acknowledgement through this fund of the impacts to the amenity value of PRoW users, should also be included to ensure long-term enjoyment of the local network. There should also be a commitment for any temporary gates, where appropriate, used for site safety and managing temporary diversions to be offered to WSCC, as the Local Highway Authority, for future structure improvement across the PRoW network (replacing stiles with gates) to improve public access.</p>
Additional archaeological surveys	<p>The potential for harm to a nationally significant and highly sensitive Neolithic and prehistoric landscape. The need to offset this harm with wider opportunities to enhance understanding of this nationally significant landscape. Due to the highest sensitivity of the landscape and archaeological features in question, industry-standard mitigation practices may not sufficiently offset the harm. The submitted Outline Onshore Written Scheme of Investigation (OOWSI; APP-231) sets out non- standard evaluation methodologies for this area. However, additional surveys outside of the immediate footprint of construction impacts should be considered, in order to enhance understanding and knowledge of this landscape.</p>	<p>Surveys and assessments of Neolithic mining landscape to enhance knowledge and understanding on a landscape scale. Tied to specific outreach and public benefit deliverables. Options might include enhanced-resolution Lidar survey, AP survey, targeted measured survey, and enhanced geophysical survey (e.g. GPR) of some of the nearby scheduled monuments and areas of the highest significance. These non-intrusive surveys should be designed to fill gaps in existing knowledge and answer specific research questions. They should be considered within and, potentially, outside, the DCO boundary. An eventual outcome should be integrated interpretation with the results of the archaeological fieldwork undertaken.</p>
Archive deposition	<p>The need to ensure adequate provision and suitable long-term storage for the archaeological archive generated from the Applicants' programme of archaeological works.</p>	<p>Sufficient financial provision for archive deposition fees. These should be restricted funds to ensure the deposition of the project archive is safeguarded and ringfenced.</p>

Ref	Local Impact Report Comment	Applicant's Response
Archive provision and storage enhancement	<p>Given the scale of the Project and the anticipated size of the resulting archive, which will likely be above and beyond the standard rates of collection for the museum collections, the existing facilities do not have sufficient capacity to accommodate the Rampion 2 archive. There is a need for provision of additional storage facilities in order to comply with requirements for archiving. Provision for the infrastructure to accommodate the archive is required.</p>	<p>Expansion of the existing archive facilities at Worthing Museum, to ensure the Rampion Archive can be stored long-term, in suitable and stable conditions, as a unified archive (including Rampion 1 project archive). Storage capacity at Worthing Museum will require investment to accommodate estimated size of potential archive. Additional shelving units should be installed, to hold the archives in an area of the store that can be assigned for archive storage and access.</p>
Archive Documentation	<p>Given the scale of the Project and the anticipated size of the resulting archive, the current capacity of Worthing Museum will not be able to accommodate documentation of the Rampion 2 Archive. There will be a requirement for dedicated archive documentation provision, to ensure the archiving obligations of the Project can be met.</p>	<p>Provision of a dedicated Documentation Officer for the time required to document the Rampion archive. A breakdown of grade/salary calculations and estimated time requirements based on modelled cataloguing and data entry rates is being prepared by Worthing Museum in conjunction with SDNPA and WSCC.</p>
Treasure acquisition budget	<p>There is potential for the discovery of treasure as part of the archaeological mitigation requirements. Under the Treasure Act 1996 there is a legal obligation to report all finds of Treasure. Treasure belongs to the Crown, until it is disclaimed or acquired by a museum. On confirmation an item is Treasure, it is valued by the Treasure Valuation Committee with the valuation being the amount comprising the reward for finders/landowners. This is the amount a museum must fundraise in order to acquire an object valued as Treasure. Finders/landowners can only be encouraged to gift the object to a museum, but are not required to. The vast majority of museums in England have little to no acquisition budget and must instead fundraise to acquire objects identified as Treasure. Fieldwork at the potential scale of Rampion 2 given the geographic area has the potential to result in treasure finds.</p>	<p>A budget should be made available for treasure acquisition by Worthing Museum in the event of treasure being discovered. This will ensure objects can be held in a recognised public repository, and therefore available for ongoing exhibition and research as part of the wider project archive.</p>

Ref	Local Impact Report Comment	Applicant's Response
Outreach, interpretation and public benefit package	The need to partially offset the anticipated degree of harm to the historic environment with a bespoke public benefit, interpretation and outreach programme. Proposals must be proportionate to the scale of the scheme, likely beyond those outlined within the Onshore Outline Written Scheme of Investigation, and thus may require resources. The need to ensure that the outreach programme is fit for purpose and will be able to meet the anticipated demand, given the high profile of the scheme.	Design and secure funds for a comprehensive and innovative outreach package. Ensure knowledge gained through the destructive process of archaeological excavation and recording is maximised and disseminated to as wide a range of audiences as possible. WSCC proposes that the outreach package be led and designed by Worthing Museum, to ensure a coordinated approach which aligns with the archive storage proposals. A detailed breakdown of the proposed package, including costs and timescales, is being prepared by Worthing Museum in conjunction with SDNPA and WSCC.
Education and schools package	The need to partially offset the anticipated degree of harm to the historic environment with a bespoke education and schools package. The need to ensure that the education offering to schools is fit for purpose and will be able to meet the anticipated demand.	WSCC proposes that the schools and education package be led and designed by Worthing Museum, to ensure a coordinated approach which aligns with the archive storage and wider outreach proposals. A detailed breakdown of the proposed package, including costs and timescales, is being prepared by Worthing Museum in conjunction with SDNPA and WSCC.

Appendix G Arboriculture Comments

Table 1: Arboriculture comments regarding application documents

Ref	Issue	Application Document and reference	Applicant's Response
1	Access A-05. Significant pruning or felling expected to meet DMRB standards for highway accesses.	Construction Traffic Management Plan (PEPD-035a)	The Applicant welcomes Horsham District Council's comments and notes that following Issue Specific Hearing 1 (ISH1) in February 2024, the Applicant has committed to reviewing vegetation losses and the outcome of which will be provided at Deadline 3.
2	Access A-33. Existing gated access is not within Order Limits. Access on figures within various application documents are suggestive to cross existing hedgerows that are not shown within the OCoCP vegetation retention plans (ref. H 328 and H335 with AIA).	Construction Traffic Management Plan (PEPD-035a)	
3	Access A-39. W489 is shown as retained within the OCoCP vegetation retention plans. Visibility splays will likely require significant pruning and felling and it is not clear that retaining this woodland feature without impact is possible.	Construction Traffic Management Plan (PEPD-035a)	

Ref	Local Impact Report Comment	Applicant's Response
4	Access- A-50 (a or b, plans are not clear). H309 is shown as retained within the OCoCP vegetation retention plans. The only access into the field to south is outside of the order limits (when viewed on GIS with aerial imagery); H307 shown as retained and it's not clear how construction access will be facilitated.	Construction Traffic Management Plan (PEPD-035a)
5	A tree line between H284 and H277 is not shown/presented on vegetation retention plans.	Outline Code of Construction Practice (PEPD-033)
6	A single hedgerow and single treeline between H284 and H294 are not shown/presented on vegetation retention plans.	Outline Code of Construction Practice (PEPD-033)
7	H295 and H302 both include various sections of hedgerows which are grouped under one reference name. Both hedgerows are proposed for 'notched 14m' including many sections which do not appear to require notching. These hedgerow sections should be sensibly split to show what shall be retained or notched.	Outline Code of Construction Practice (PEPD-033)
8	It is not clear why both H312 and H317 require notching to 6m when H308 is proposed to be notched to 14m. This impact is not presented within the AIA.	Outline Code of Construction Practice (PEPD-033)
9	Five treelines appear to be present, though missing from vegetation retention plans. These are in the locations of HS558 HS1383, HS1389 (duplicated reference feature, both relevant to this comment) & HS5804 as identified from the scrub retention plans.	Outline Code of Construction Practice (PEPD-033)
10	A treeline is between H424 and H433 is not shown/presented on vegetation retention plans.	Outline Code of Construction Practice (PEPD-033)
11	Multiple hedgerows and treelines missing adjacent Kent Street	Outline Code of Construction Practice (PEPD-033)

Ref	Local Impact Report Comment	Applicant's Response
12	A hedgerow is missing adjacent the temporary construction compound, west of Oakendene estate (aligning with and screening the A272). It is not clear how access A-62 displayed within the CTMP can facilitate construction vehicles without impact to this hedgerow and adjacent trees.	Outline Code of Construction Practice (PEPD-033)
13	W3713, shown for retention within vegetation retention plans, is suggested to be impacted within the AIA (conflicting statements).	Outline Code of Construction Practice (PEPD-033)
14	Vegetation retention plans do not show/present a hedgerow referred to H54 within the AIA.	Outline Code of Construction Practice (PEPD-033)

Table 2-2 Applicant's Response to West Sussex District Council Written Representation [REP1-054]

Ref	Written Representation Comment	Applicant's Response
1.1	<p>1 Overview</p> <p>1.1 This document provides a response at Deadline 1 (28 February 2024) from WSCC on the following matters, as requested by the Examining Authority (ExA) in the Rule 8 letter (7 February 2024). These are: Content and Scope of the WSCC Local Impact Report (LIR); Comments on the Applicant's draft Statement of Commonality of Statements of Common Ground; and Responses to the ExA's request for a statement on the new National Policy Statements for Energy.</p>	<p>The Applicant has no further comments on these paragraphs of West Sussex County Council's Written Representation.</p>
2.1	<p>2 Content and scope of the LIR</p> <p>2.1 The WSCC LIR, submitted at Deadline 1, has been prepared in accordance with section 60(3) of the Planning Act 2008 (as amended) and has regard to the guidance in the Planning Inspectorate's Advice Note. Accordingly, it seeks to assist the ExA by presenting WSCC's assessment of the likely impacts of the Project based on local information, expert judgement, and evidence.</p>	
2.2	<p>2.2 The LIR also appraises the impacts likely to result from the Project and identifies whether the impacts are considered to be negative, positive or neutral, taking into account proposed mitigation measures. It also considers whether further work should be undertaken, including mitigation, to address negative issues identified, and raises any missed opportunities for enhancement measures.</p>	
2.3	<p>2.3 It should be noted by the ExA that it also appraises the DCO documents submitted by the Applicant at the submission stage, as well as those at the Procedural Deadline (16 January 2024). It also provides additional commentary on the points raised by WSCC during the Issue Specific Hearing (ISH 1) on 7 and 8 February 2024</p>	
2.4	<p>2.4 Due to the scope of the LIR described above, WSCC has not submitted a separate Written Representation at Deadline 1.</p>	
3.1	<p>3 Statement of Commonality (SoC) of Statements of Common Ground (SoCG)</p> <p>3.1 It should be noted that the SoC, as submitted at the Procedural Deadline, was not consulted upon with WSCC nor had any detailed engagement on the SoCG been undertaken at that stage. Therefore, WSCC has the following comments to make on the SoC: The range of colour codes to define the status of discussions between the Applicant and WSCC are confusing and open to interpretation. Whilst it is acknowledged that the Applicant has had to reflect and condense a lot of information in a summarised form to aid the ExA and other Interested Parties, it is suggested that simpler coding to match the SoCG status definitions, along with some short narrative, might be more appropriate; and For Landscape and Visual Impact Assessment, Noise, and Historic Environment topics, all have been defined by the Applicant as (lighter) yellow, meaning 'All matters under discussion'. WSCC would suggest these topics are more represented by the amber category, i.e., 'some matters under discussion/some matters not agreed'.</p>	<p>A clear narrative and reasoning has been provided for the selected colour codes in the Statement of Commonality for Statements of Common Grounds [PEPD-039]. This has been implemented across all Statements of Common Ground (SoCGs). West Sussex County Council has reviewed a live version of the Statement of Commonality for Statements of Common Grounds [PEPD-039] as part of the SoCG and SoCG Page turn meeting on 14 March 2024 and changes were made. An updated Statement of Commonality for Statements of Common Grounds [PEPD-039] has been provided at Deadline 2.</p>
3.2	<p>3.2 WSCC wishes to engage proactively with the Applicant to reduce the areas of concern and seek to achieve the best possible outcomes for the local communities and other sensitive receptors that would be most affected by the construction and long-term operational impacts of the Project.</p>	<p>The Applicant welcomes West Sussex County Council's wish to proactively engage, also looking to reduce the areas of concern and seek the best possible outcomes for the local communities and other sensitive receptors.</p>
4.1	<p>4 Statement on the new National Policy Statement for Energy</p> <p>4.1 The ExA has invited the Applicant and Interested Parties (Procedural Decision number 8, Annex D of the Rule 6 letter) to submit a written statement at Deadline 1 on the implications for the Project of the 2023 National Policy Statements (NPS).</p>	<p>Section 1.6 of National Policy Statement (NPS) EN-1 (Department for Energy and Net Zero (DESNZ), 2023a), which came into force in 2024, confirms that: '<i>for any application accepted for examination before designation of the 2023 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS</i>' and that the 2023 amendments will therefore have effect '<i>only</i></p>

Ref	Written Representation Comment	Applicant's Response
		<p><i>in relation to those applications for development consent accepted for examination, after the designation of those amendments'. The DCO Application was accepted for Examination in September 2023 and therefore the 2011 suite of NPS have effect.</i></p> <p>However, the Applicant considers that the 2023 NPSs designated in 2024 are important and relevant considerations that the relevant Secretary of State should consider within the framework of the Planning Act 2008, as required by Section 104(2)(d).</p> <p>At the request of the Examining Authority, the Applicant has submitted a NPS accordant tracker showing compliance with the 2011 and 2023 NPS (see Applicant's National Policy Statement Tracker (Document Reference: 8.38), which came into force in 2024, at Deadline 2.</p>
4.2	4.2 As stated in Section 1.6 of EN-1 (DESNZ, 2023), for the purposes of transitional provisions following the designation, <i>"The Secretary of State has decided that for any application accepted for examination before designation of the 2023 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS"</i> .	Please see the Applicant's response to reference 4.1 above.
4.3	4.3 Therefore, WSCC understands the position of the ExA is that the suite of 2011 versions of the NPSs for Energy will be used to examine the Project	Please see the Applicant's response to reference 4.1 above.
4.4	4.4 It should be noted that because of the transitional arrangements outlined above, and the timing of the submission of the DCO application ahead of the designation of the 2023 NPSs, WSCC has referred to the 2011 NPSs within the LIR submitted at Deadline 1. Accordingly, no commentary has been made in the LIR on the implications of the 2023 NPSs.	The Applicant has no further comments on this paragraph of West Sussex County Council's Written Representation.

3. References

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