



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Rampion Two Offshore Wind Farm

Appendix D/F2 to the Natural England Deadline 2 Submission
Natural England's Comments on [REP1-036], [REP1-012], [REP1-025] and
[REP1-030] in relation to Physical Processes and Benthic Ecology

For:

The construction and operation of the Rampion 2 Offshore Windfarm located approximately 13km off the Sussex coast in the English Channel.

Planning Inspectorate Reference EN010117

20 March 2024

Natural England's Advice on the additional submissions relating to Marine/Coastal Physical Processes and Benthic Ecology

In formulating these comments, the following documents have been considered:

- [REP1-036] - 8.34 Benthic - Subtidal benthic characterisation survey report appendices
- [REP1-012] - 7.17 In Principle Sensitive Features Mitigation Plan
- [REP1-025] - 8.25.6 Applicant's Post Hearing Submission – Issue Specific Hearing 1 Appendix 6 – Further information for Action Point 7 – Horizontal Directional Drilling at Climping Beach
- [REP1-030] - 8.25.13 Applicant's Post Hearing Submission – Issue Specific Hearing 1 Appendix 13 – Further Information for Action Point 45 and 46 – Physical Processes and Benthic

1. Summary

Further information for Action Points (7,45,46)

1. Natural England has provided detailed comments on the further information for Action Points (7,45,46) in Table 1 below.
2. In summary Natural England's position remains that further information is required to address the points raised within our relevant representations. We advise that insufficient information and data, and assessment thereof, is available to understand the feasibility of HDD at the landfall and that future coastal change has been adequately accounted for.
3. In relation to the use of gravel bags to ground installation vessels in the nearshore we advised in our relevant/written representations that a full appraisal of all possible options in relation to nearshore grounding is required to ensure that the least environmentally impactful option is being progressed. We advise this has not been presented.
4. We also continue to advise that an Outline Decommissioning Plan should be submitted into the examination, which demonstrates consideration of external cable/foundation protection methodologies which from an environmental perspective represent the greatest chance of successful removal to return the seabed to its original state. Without this information we cannot fully understand the potential scale and significance of

impacts on designated sites (Climping Beach Site of Special Scientific Interest (SSSI), Kingmere Marine Conservation Zone (MCZ) and Offshore Overfall MCZ), Habitats of Principle Importance, Annex I habitats and potential black seabream nesting habitats.

Subtidal benthic characterisation survey report appendices

5. We note that the subtidal benthic characterisation report has been submitted in response to the relevant representation comments of the MMO/Cefas therefore we defer to them on whether this is sufficient to address their concerns.

In Principle Sensitive Features Mitigation Plan

6. We note that there do not appear to be any tracked changes to 7.17 In Principle Sensitive Features Mitigation Plan, and the revision log suggested the changes are updates to Figures 2.1 and 5.1. As described in the Applicants Responses to Relevant Representations [REP1-017] the changes to Figure 5.1 involves increasing the resolution and the change to Figure 2.1 involves ensuring all MCZ's are shown. Therefore, aside from addressing our comment on Figure 2.1, our comments on this document remain the same as stated in our written/relevant representations. In future it would be helpful if both a clean and tracked change versions of named plans are provided so it is clear what has been changed.

2. Detailed Comments

Table 1 Summary of Key Issues; Document Reviewed - [REP1-030] - 8.25.13 Applicant's Post Hearing Submission – Issue Specific Hearing 1 Appendix 13 – Further Information for Action Point 45 and 46 – Physical Processes and Benthic

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Para Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
Section 2 - Consideration of a commitment to use rock bags (in relation to cable protection)					
1	2.1.3 & 2.1.4	4	Bullet Points 1-3	Natural England notes that cable protection types included in the DCO are listed in Section 2.1.3 as: rock protection, concrete mattresses, and rock bags. However, the DCO itself includes other bagged solutions filled with stone, rock or gravel, grout etc and protective shells/sheaths. We therefore seek clarity on whether this indicates a refinement of the proposed cable protection methods by the Applicant?	We advise that if the proposed cable protection methods have been refined, that this should be reflected in the DCO, Environmental Statement Assessment and the relevant plans. And would welcome consideration of cable protection options which reduce direct and indirect impact to protected habitats and species.
2	2.1.4	5	Bullet Points 2-3	Natural England welcomes the Applicant's new commitment to seek products for cable protection and scour prevention (i.e., rock bags or concrete mattresses) which do not contain plastics (C-288) and await the updated Outline Scour Protection and Cable Protection Plan to ensure its inclusion within this plan. We note that in the commitments register it appears C-288 will only apply to the offshore substations. We assume this is an error and advise this is updated. With regards to removal at decommissioning it remains our advice (as stated in our relevant/written	We advise that an updated Outline Scour Protection and Cable Protection Plan is provided to demonstrate the inclusion of this commitment. Our advice remains that an Outline Decommissioning Plan should be submitted into the examination. We advise that the consideration is given within this to utilising the cable protection methodology which from an environmental perspective represent the

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				representations) that it would be helpful if an Outline Decommissioning Plan was included at this stage, with the details agreed with stakeholders, including Natural England, based on best practice at the time of decommissioning.	greatest chance of successful removal to return the seabed to its original state
Section 3 - Assessment of gravel bag beds					
3	General Comment			Natural England advises that our concerns raised in our relevant/written representations regarding the assessment in the Environmental Statement (ES), particularly around magnitude of impact and sensitivity of biotopes remain relevant to this note.	We advise that our relevant/written representation comments also apply to this assessment.
4	3.2.3	6		Natural England is concerned that there is the potential for abrasion of the chalk platform just seawards of Mean Low Water Spring (MLWS) or in proximity to it, through the placement of gravel bag beds on the seabed. This abrasion could cause permanent loss of irreplaceable chalk habitat and downwearing of the chalk platform which in turn could affect wave patterns approaching Climping Beach and alter the beach morphology/coastal erosion.	We advise the Applicant should include potential vertical elevation change (due to the placement of gravel bag beds on the seabed) in this impact assessment. We advise any downwearing of chalk is also considered in relation to permanent loss of this Section 41 Habitat of Principal Importance of the Natural Environment and Rural Communities (NERC) Act 2006.
5	3.2.3	6		Horizontal Directional Drilling length: Natural England notes the mention of the option to 'install an up 1,000m duct extension, which could be used to extend the position of the duct exit point further from mean low water springs (MLWS)'. Our advice remains from our relevant/written representations that a full appraisal of all possible options in relation to the nearshore grounding	We advise a full appraisal of all possible options in relation to nearshore grounding, with a commitment to using the methodology that minimises the environmental impacts is provided.

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				issue, with a commitment to using the methodology that minimises the environmental impacts the most should be carried out. This should include the possibility of extending the Horizontal Directional Drill (HDD) further out. The total impacts of the HDD exit pit should be compared to the total impact of grounding out the vessel or the use of gravel bags. This is required so that the full environmental impacts can be considered and assessed.	
6	3.2.5	7		<p>Use of Gravel Beds: Natural England understands that there would be 'up to three gravel bag beds in total for each of the export cable pull in operation and each would remain in the same position for up to approximately six weeks before being moved to their next location for a subsequent export cable pull in operation....Following installation, the gravel bags would be fully removed from the inshore area, so they would be regarded as temporary in nature'. We remain concerned that the repetitive force and abrasion of the boat over the same bags and the relocation of the bags multiple times within the operation may lead to the bags degrading. This could therefore cause challenges ensuring that all the gravel material is removed.</p> <p>We also note that the commitment in the register (C-283) says 'Gravel bags laid on the seabed to protect the cable barge during construction of Rampion 2, will be removed prior to the completion of construction, where practicable'. Therefore, there does not seem to be a clear commitment to full removal. Gravel material</p>	<p>We advise that consideration of the durability of the bag material over the operation needs to be considered, as the conclusions rely on the gravel being fully removable.</p> <p>Additionally, we advise the release of plastics into the environment should also be considered. Natural England does not endorse the introduction of plastics into the marine environment. We advise that C-288 – which relates to minimising the release of plastics and using suitable alternatives where possible should also apply to the use of gravel bags.</p> <p>We advise that commitment C-283 is updated to reflect the Applicants commitment to full removal. If there is any residual risk that full removal will not be possible then this needs to be considered in the assessment. We advise that consideration is given to</p>

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				<p>remaining would represent a change to the benthic habitat.</p> <p>Additionally, the abrasion of the boat on the gravel bags has the potential to release plastics into the environment.</p> <p>We advise that the comparison of using rock bags on export cables that had been laid prior to connection on Rampion 1 at the offshore substation is unlikely to have the same impacts as them being used to ground a boat, and given the offshore location these may well have been deployed in different benthic conditions.</p>	<p>measures to monitor the integrity of the bags for damage and to ensure that they remain removable. We advise that consideration is also given to the protocol to be enacted if unforeseeable damage does lead to material becoming loose. We advise this information is included in the Outline Cable Specification and Installation Plan.</p> <p>We advise that reference to the situation at Rampion 1 does not appear to be comparable.</p>
7	3.2.6 - 3.3.6	7-8		<p>Scale and magnitude of impacts: The magnitude of impact on known chalk habitat and other known subtidal habitats within the Offshore Export Cable Corridor during gravel bag placement is classified as '<i>minor</i>'. However, the footprint of the proposed gravel bag beds is 142,800m², an area equivalent to 20 Wembley football pitches, which we disagree is small scale. We do not support this being contextualised as '<i>0.06% of the total seabed area within the proposed order limits</i>' and as '<i>very localised</i>' compared to the overall extent of these features within the eastern English Channel, in relation to Habitats of Principal Importance, Annex I habitats and potential black seabream nesting locations. This is an oversimplistic assessment, given that habitats are present in different proportions within the boundary and are rare. Furthermore, it is not stated whether the</p>	<p>We advise that the Applicant should provide an estimate of seabed (chalk) downwearing due to abrasion through placement of the gravel bag beds. We advise that the magnitude of impact should be reassessed, recognising that the damage could be permanent.</p> <p>We advise that monitoring should be secured in the IPMP.</p> <p>We advise that gravel bag deployment is microsited to avoid the features stated. We advise that this should be included alongside the final plan for cable routing micrositing. We advise this will need to be presented in the</p>

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				<p>seabed itself is likely to be abraded during placement of the proposed gravel bags and, if so, by how much. An estimate of any anticipated downwearing of the seabed (chalk) and/or compaction/deterioration of chalk structure should be provided. Any abraded chalk seabed cannot be replaced and would therefore be considered a permanent loss of habitat, and not temporary disturbance (see comment 4 above). We do not consider any loss of biotopes representing subtidal chalk (particularly where the loss could be permanent), <i>Sabellaria spinulosa</i>, stoney reef, peat and clay exposures, or black seabream nests as minor in magnitude. It should also be recognised that the bags would be in place for six weeks in each location and six months in total, during which sufficient damage could be done for recovery to take a significant period of time or damage to be permanent (as opposed to temporary).</p> <p>We advise monitoring should be secured through the In Principle Monitoring Plan (IPMP) to ensure that impacts are in line with what is predicted in the Environmental Statement.</p> <p>Additionally, we advise that there should be a commitment in place to microsite around Habitats of Principal Importance, Annex I Habitats and black seabream nests wherever possible when considering the locations where the bags are deployed.</p>	<p>final Cable Specification and Installation Plan, which would need to be signed off in consultation with Natural England.</p>

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8	3.3.4-3.3.10	8-9		Piddocks with a sparse associated fauna in sublittoral very soft chalk or clay are considered to have a 'very low resilience to abrasion'. We advise that if the underlying chalk is damaged this would be permanent and that this would represent a permanent loss of a Habitat of Principal Importance. This may also prevent recovery of the overall biotope.	We advise that it is considered that any damage to chalk is permanent and therefore recovery of this Habitat of Principal Importance is not possible.
9	General comment and table 3.1	10		Permanent Habitat loss: Natural England notes that the only impacts that have been considered are abrasion / disturbance of the surface of the substratum or seabed. We advise that where recovery is not possible (ie. for chalk) then permanent habitat loss and disturbance that goes below the surface level in the case of downwearing needs to be considered. Across biotopes we note consideration of these aspects would lead to a likely increase in overall sensitivity.	We advise that the impacts need to be considered further, and the sensitivity amended as appropriate, which may affect the overall assessment conclusion.
10	3.5.1	11		Significance of impacts: The significance of the residual effect is deemed 'minor adverse' (i.e. not significant in EIA terms). We note that the worst case identified in table 3.1 in relation to sensitivity is low, and not medium as stated in 3.5.1. This should be corrected. We advise that it cannot be concluded that the impacts will be short-term and recoverable in relation to some benthic receptors, such as chalk.	We advise that this is updated to reflect the worst-case scenario. We advise that there should be a commitment in place to microsite around Habitats of Principal Importance, Annex I Habitats and black seabream nests wherever possible when considering the locations where the bags are deployed.
11	General Comment			The Applicant has not stated whether the grounding vessel will need to be anchored and if so, any anticipated seabed/biotope impacts.	We advise details are provided of any anchoring requirements and associated seabed impacts.

Table 2 Summary of Key Issues: Document Reviewed - [REP1-025] - 8.25.6 Applicant's Post Hearing Submission – Issue Specific Hearing 1 Appendix 6 – Further information for Action Point 7 – Horizontal Directional Drilling at Climping Beach

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12	1.3.5, 1.3.14	5		<p>The Applicant's outline design of HDD options is based, in part, on estimates of the likely rate and pattern of future coastal evolution and retreat taken from the Environment Agency (2020a and 2020b) reports. Since these reports were produced in 2020, Climping Beach has experienced further erosion and coastal morphological change following a series of major storms/storm surges. This is likely to continue through the lifespan of the Project. Therefore, we query whether these latest storm events, coastal morphological change and future climate change related impacts have been considered in the Applicant's assessment of asset integrity and (direct and indirect) impacts to the beach profile, coastal retreat and sensitive Sites of Special Scientific Interest (SSSI) features.</p> <p>The undeveloped land behind the beach in the Climping area is part of the Weald to Wave nature recovery corridor Home Weald To Waves, which is a land-owner lead initiative to restore nature. The undeveloped land at Climping backing the evolving beach is one the last areas in Sussex where there are opportunities to establish transitional wetland habitats such as saline lagoons, and wetland habitat behind a shingle ridge. Natural England advises that the continued natural evolution of the beach is key to the potential restoration of coastal habitats in this area. Therefore, it is important</p>	<p>We advise that the Applicant needs to demonstrate that this rapidly changing coastal morphology and latest storm events have been fully considered in their asset integrity assessment, environmental impact assessment and proposed mitigation measures.</p> <p>We advise that it is important that the placement of Rampion 2 infrastructure robustly considers future coastal change, to avoid potential deburial and the need for further protection in the nearshore area (which would impact coastal processes and benthic habitats). We also advise that the infrastructure in this area should be sited in appropriate locations/and/or sufficient buried to avoid prevention of potential future coastal habitat restoration in this area.</p>

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				that the Rampion 2 infrastructure robustly considers future coastal change.	
13	1.3.3, 1.3.7	4,6		In relation to the HDD proposed at the landfall (particularly in relation to Climping Beach SSSI, NERC Act/ Habitats of Principal Importance and Annex I habitats) this document does not address our concerns regarding not knowing the full viability and extent of HDD. We note the Applicant states that the ' <i>target depth is least 5-10 m</i> ', but that at present the depth of the HDD is not confirmed as this will depend on further data to be gathered post consent. We note that ground investigation works have not been undertaken at the landfall and that this is not proposed to be undertaken until after the consenting stage. The absence of this information is a limitation to our confidence in HDD as a mitigation measure, and it prevents ' <i>detailed ground models and a 'Coastal Erosion and Future Beach Profile Estimation Assessment'</i> '. We advise we are concerned that it is stated that these documents ' <i>will identify the need for further mitigation or management measures submitted prior to the commencement of Works No 6 or 7</i> ', as this implies further measures may be required that have not been considered in the ES at the consenting phase.	<p>We refer you back to our relevant/written representation advice that, to understand the likely effectiveness of the mitigation measures (including HDD), geotechnical data is provided at the consenting stage to inform a Cable Burial Risk Assessment (CBRA), and outline Cable Specification and Installation Plan (CSIP) that both clearly take into account lessons learnt from Rampion 1.</p> <p>In relation to Climping Beach SSSI as stated in our terrestrial ecology relevant/written representations, Natural England advises that Climping Beach SSSI should be avoided, in the first instance, before wholly relying on the embedded mitigation measure of trenchless techniques.</p> <p>We are also concerned should these cables require repair and replacement over the lifetime of the project as this has proven challenging in other coastal environments.</p>