



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

Rampion 2 Offshore Wind Farm

**Appendix N2 – Annex 1 to the Natural England Deadline 2 Submission**

**Natural England's Response to the Examining Authority's Written Questions arising out of Issue Specific Hearing 1 on Environmental Matters - Agenda Item 6 - South Downs National Park - Seascape and Visual Effects Q6, 1-3.**

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<sup>th</sup> March 2024

**Question 6-1 In relation to the Special Qualities of the National Park and Special Character of the Sussex Heritage Coast, provide justification for why the suggested amendments to the eastern array in the form of exclusion of Wind Turbine Generators and a reduction in the combined lateral spread of Rampion 1 and Rampion 2 are necessary?**

### **Part 1 Summary of advice**

1. Natural England's advice is that it is necessary to exclude Wind Turbine Generators (WTGs) from the Rampion Zone 6 eastern array area and reduce the lateral spread of turbines from Rampion 1 and Rampion 2 as per the Design Principles in the Rampion 1 DCO/DML (section 1.3a RR-265), because these principles served to mitigate major adverse impacts of Rampion 1 on the statutory purposes of the South Downs National Park (SDNP) and Sussex Heritage Coast (SHC).
2. The current design means that from the highly sensitive protected landscape between Beachy Head to Birling Gap the Rampion 2 WTGs will appear to be nearly twice the height of the Rampion 1 WTGs. The current design also means that the lateral spread of turbines from the Rampion 2 scheme will be double to triple the horizontal extent of Rampion 1 from most viewpoints within the SDNP (section 3.5e(i) RR-265).
3. Natural England considers a significant adverse effect on a defined special quality as a significant impact on the designation's statutory purpose. Natural England's assessment of the evidence is that:
  - the impacts to SDNP Special Quality 1 (diverse, inspirational landscapes and breath-taking views) from the Rampion 2 project are significant/major/moderate. This is due to the impacts on the stunning, panoramic views out to sea from several viewpoints.
  - the impacts to SDNP Special Quality 3 (tranquil and unspoilt places) from the Rampion 2 project are also significant/major. This is because a large part of the seaward horizon in views out of the SDNP and SHC will be enclosed by WTGs, which will also be visible from the tops of the downs. The ES records the experience of tranquillity as greatest from the tops of the downs, where many of the viewpoints offer direct views to the open seascape, which could also be affected at nighttime due to the WTG lighting.

### **Part 2 Detailed Comments**

4. The SDNP has seven special qualities (described in full in South Downs National Park, 2015). Natural England's seascapes advice is specifically related to effects on Special Quality 1: Diverse, inspirational landscapes and breathtaking views and Special Quality 3: Tranquil and unspoilt places.<sup>1</sup>
5. Natural England recognises that iterative design changes have been made between the PEIR and ES stages and that 4 relevant design principles have been used to inform these, namely field of view, proximity, separation gap and separation foreground. We also recognise that these have reduced, to an extent, the adverse effects from the scheme on the proportion of the SDNP contained within the SHC. However, despite the design changes, a large number of significant and adverse effects remain, which we advise will affect the Special Qualities (1 and 3) of the National Park and the special character of the SHC. Although they have been reduced, in our opinion they

---

<sup>1</sup> Note that other Special Qualities come into play in relation to onshore elements of the scheme. This note concentrates on the Special Qualities in relation to amendments to the offshore component of the Eastern Array.

have not been minimised to an acceptable level by the design changes. Furthermore, the design changes act mainly in the SHC area within the SDNP, and Natural England advises that significant effects remain along the eastern part of the SHC between Birling Gap and Beachy Head.

**1. Special Quality 1: Diverse, inspirational landscapes and breathtaking views.**

6. The detail under this Special Quality includes the following: *“There are stunning, panoramic views to the sea and across the Weald as you travel the hundred mile length of the South Downs Way from Winchester to Eastbourne, culminating in the impressive chalk cliffs at Seven Sisters. From near and far, the South Downs is an area of inspirational beauty that can lift the soul.”*
7. The Applicant’s assessment indicates that the array will result in Significant adverse effects on Special Quality 1 due to the impacts on the ‘panoramic views to sea’ experienced from the closest parts of the SHC, from a large number of landscape and visual receptors.
8. In addition Natural England’s advice is that despite the design/mitigation measures proposed, there would be further Significant effects along the eastern part of the SHC between Birling Gap and Beachy Head.

**2. Special Quality 3: Tranquil and unspoilt places**

9. The detail under this Special Quality includes the following: *“Although its most popular locations are heavily visited, many people greatly value the sense of tranquillity and unspoilt places which give them a feeling of peace and space. In some areas the landscape seems to possess a timeless quality, largely lacking intrusive development and retaining areas of dark night skies.”*
10. The Environmental Statement (ES) judges that Rampion 2 will introduce some changes to the tranquillity experienced in sea views, as a result of additional built/modern elements which interrupt or limit the aspect out to sea. These include effects on the coastal part of the SDNP within the SHC which are assessed by the Applicant as to be ‘Not Significant’ in relation to this special quality. Harm is only identified for this Special Quality in relation to construction effects. Natural England does not agree with this conclusion.
11. Natural England accepts that the Rampion 1 array does have an influence on opportunities to experience relative tranquillity from the coastal portion of the SDNP. However, the scale of that influence was significantly lowered by the effect of the Design Principals and Turbine Exclusion Zone contained within the Rampion 1 DML. As a result, opportunities to experience a sense of relative tranquillity (away from the main visitor hubs, for instance on The South Downs Way NT between Birling Gap and Cuckmere Haven) still exist. The turbines of Rampion 2 would negate this possibility as they would be significantly taller and closer to the shore than the existing array.
12. The Applicant also makes reference to the frequency that the Rampion 2 turbines would be visible. At a minimum a separation distance of the 19.5km (VP28 Cuckmere Haven Beach) the turbines of Rampion 2 are likely to be visible for 299 days a year; therefore not ‘infrequent’ as stated by the Applicant.
13. The Applicant’s justifications for the significance of effect rely on diminishing of tranquillity as a result of the distance of the array, the effect on the existing Rampion 1 and the influence of development on the coastal plain. We do not agree with these conclusions, as the sense of tranquillity and dark night skies are perceived as being beyond the busier coastal plain. It is also the case that from many of the viewpoints on the tops of the downs the development on the coastal plain is not visible, with views directly to the open seascape. They are not experienced as separated from the seascape by the urbanised areas of the south coast plain.
14. The Applicant has indicated that night-time lighting of Rampion 2 will ‘*result in relatively low change to the tranquillity experienced within the SDNP coastline*’ and has not offered a conclusion on the significance of the change to tranquillity at night-time ‘*around the tops of the downs*’ where

*'tranquillity is greatest'*. The effects of lighting on representative night-time viewpoints from 'tops of the downs' were assessed as Not Significant due to the lighting being perceived as an *'extension of a familiar feature'* i.e. Rampion 1. Natural England does not agree with this assessment, as the lateral spread of the Rampion 2 lighting will be perceived as a tripling of the extent of lighting that is already visible from Rampion 1.

15. Our advice on the two Special Qualities is as follows.

**Table 1 - Assessment on Special Qualities 1 and 3**

<b>Special Quality</b>	<b>Applicant's assessment of significance</b>	<b>Natural England's Assessment</b>
Special Quality 1	Significant (major)	Agree
Special Quality 3	Inland Core Areas - Not Significant (moderate)	For the Inland Core Areas we agree with the Applicant's judgement of not significant (moderate).
	Coastal parts and SHC – not significant (moderate).	For the Coastal Parts and SHC Area we disagree with the Applicant's judgement of not significant (moderate). We advise that the impact will be significant (major).

16. Overall, Natural England advises that given the large number of residual Significant adverse effects in relation to Special Quality 1 and 3, Rampion 2 will compromise the statutory purpose of the SDNP, and the special character of the SHC. Therefore, Natural England advises further amendments to the proposal design are needed.

**3. Further Justification for Natural England's advice in relation to the Eastern Array in the form of exclusion of Wind Turbine Generators and a reduction in the combined lateral spread of Rampion 1 and Rampion 2**

Exclusion of WTG in the Eastern Array

17. The WTGs of the Rampion 2 OWF maximum design scenario are too big and located too close to the coastline of the SHC portion of the SDNP. Their sheer size and the lateral spread, combined with the marked contrast in height with the existing Rampion 1 WTG will be visually incoherent, clutter-up the seascape setting of the SDNP and dramatically degrade views out to sea, particularly from Beachy Head to Birling Gap.

Why this is necessary

18. The Zone 6 area is the most sensitive with the potential for Significant adverse seascape and visual effects on the most sensitive views within the SHC/ SDNP. Natural England continues to advise that WTG should be excluded from the Rampion Zone 6 eastern array area. This will also adhere to the purpose of the Design Principles secured in the Rampion 1 DCO/DML as embedded landscape mitigation.

19. The placing of the much larger turbines of Rampion 2 in Zone 6 disregards the Rampion 1 design principle (iii), which is to locate the largest turbines, in any hybrid scheme, to the southwestern portion of the Order. In this development, the placing of turbines of a greater height directly adjacent to Rampion 1 effectively results in a hybrid scheme in key views from the SDNP and SHC, with these larger turbines located in the more sensitive eastern part of the development. The apparent differences in size between Rampion 1 and Rampion 2 WTGs will exacerbate the adverse seascape and visual issues for the SDNP and SHC. The Rampion 2 turbines will appear nearly twice the height of Rampion 1 WTGs and this contrast will be clearly visible from key sensitive locations at Beachy Head and Birling Gap.
20. The lateral spread of the Rampion 1 scheme is also increased from these most sensitive viewpoints. For this reason, Natural England is of the opinion that the turbines should be removed from the entirety of the Zone 6 area.

#### Reduction in the combined lateral spread of Rampion 1 and Rampion 2

21. The expansion of the influence of turbines westwards through development within the Rampion extension area will increase the industrialisation of the seascape setting of the SDNP, particularly for inland locations located to the west of Wilmington Hill. Their presence in the seascape setting of the SDNP will further degrade the quality of views out to sea which are already adversely influenced by the turbines of the Rampion 1 array and will lead to further loss of the natural beauty for which this landscape was designated.”

#### Why this is necessary:

22. NE recognises the efforts of the Applicant to reduce the horizontal field of view of the Rampion 2 array. However, it remains the fact that from most viewpoints in the designated landscapes, the horizontal extent of Rampion 2 is doubled or tripled, meaning that a large part of the seaward horizon will be enclosed by WTGs. Therefore, it is not clear how the Applicant has given due regard to the Rampion 1 Design Principle ‘need to limit, as far as possible, the horizontal degree of view of wind turbine generators from the SDNP and the SHC’.
23. As noted above, the placing of WTG in the Zone 6 area, also increases the lateral spread of the scheme from the key sensitive viewpoints in the SHC part of the SDNP.

### **Question 6-2 In relation to Special Qualities of the National Park and Special Character of the Sussex Heritage Coast, provide justification for why and what further assessment is required, and explain why the existing assessments are not adequate to consider these impacts.**

24. The existing assessments provided as part of the ES show that the implementation of the Rampion 2 Design Principles have achieved an element of mitigation for impacts to the Special Qualities of the SDNP and Special Character of the SHC. However, Natural England does not agree that the Design Principles that have informed the Rampion 2 design have acted to remove the significance of effects to the SDNP in relation to Special Quality 1 or for Special Quality 3. A key omission of the assessment is there is no direct assessment of the impact that the Rampion 2 Design Principles have on the SDNP special qualities. Natural England advise that a large number of Significant adverse effects remain, and that there is potential for further refinement of the design to achieve better mitigation to reduce the significant adverse effects on the statutory purposes of the SDNP.
25. The table below (table 2) details and justifies the further information requested by Natural England, which is required for Natural England to be able to advise in more detail on impacts to the statutory purposes of the SDNP and the special character of SHC. If required this response will be updated at Deadline 3 in response to additional information provided by the Applicant following Deadline 1 (Category

**Table 2 – Further Information Requested by Natural England**

<b>Further information requested by Natural England</b>	<b>Why this is required</b>	<b>Why the current assessment is not adequate</b>
<p>a. Detail on how the Rampion 1 Design Principles have influenced the Rampion 2 maximum design scenario.</p> <p>b. The Applicant’s justification for why the Rampion 1 mitigation measures do not directly apply to the Rampion 2 project.</p>	<p>Rampion 2 will negate much of the work to successfully negotiate design principles for Rampion 1 in Commitment C-61.</p> <p>The Applicant’s view is that while having due regard to the Design principles in the Rampion Design Plan, Rampion 2 is a different project that should respond to its own parameters and principles that respond to its location and surroundings.</p> <p>However, the location and surroundings are effectively the same as Rampion 1. Natural England is therefore of the opinion that Rampion 2 is a direct extension of Rampion 1 and they will be perceived together. The design principles should therefore ensure the two developments work together and should not result in greater Significant effects on the SDNP and SHC.</p> <p>Natural England do not accept that some Rampion 1 design principles are not appropriate and consider the Applicant’s justification is not adequate. Natural England has identified direct consequences of the Rampion 1 DCO Design Principles not being fully applied. For example, the Rampion 1 design principle (iii) was put in place to ensure that the largest WTGs (of a hybrid scheme) were not constructed in the most sensitive areas of the Rampion 1 order limits. For Rampion 2 this principle is not carried forward if the applicant is granted the flexibility it requests within the Rampion 2 order limits on the number of WTGs within each area (zone 6 / extension area). This flexibility is incompatible with the applicant applying due regard to the Rampion 1 design principles. Especially given the difference in height between Rampion 1 and Rampion 2 WTGs</p>	<p>The Applicant’s justification is that ‘<i>where appropriate, the intentions of the Design Principles established for Rampion 1 are followed through to the Rampion 2 design plan</i>’.</p> <p>Natural England does not agree that the intentions of the Design Principles have been followed. The Examining Authority has not been provided information on where it was not appropriate to apply Rampion 1 Design Principles to the Rampion 2 Project, and a rationale for why this is the case.</p>
<p>c. Evidence to demonstrate why constructing more WTG in the Zone 6 (Eastern Array Area)</p>	<p>Natural England has consistently advised the Applicant that there should be no turbines in Crown Estate Zone 6 due to the potential for major adverse effects on most sensitive views from within the SHC within the SDNP.</p>	<p>The ES contains no evidence to show how further turbines than shown in the presented MDS layout will not result</p>

Further information requested by Natural England	Why this is required	Why the current assessment is not adequate
<p>than described within the indicative layout would not present a 'greater worse-case effect'.</p>	<p>Constructing more turbines in this area than described in the indicative layout would therefore present a 'greater worse-case effect'.</p>	<p>in greater worse-case effects.</p> <p>It would be helpful to have an indication of the location of any additional turbines as it is not clear how they would be perceived in relation to the existing MDS layout when viewed from key sensitive viewpoints within the SHC, such as at Beachy Head and Birling Gap where they would be likely to result in a greater worst-case effect.</p>
<p>d. Evidence to show that a greater densification of WTG in either the Zone 6 Area or Extension Area will not materially increase the effect of the Proposed Development on coastal views from protected landscapes.</p>	<p>The SLVIA page 277 states that a greater densification of turbines in the Zone 6 Area or Extension Area '<i>will not materially increase the effect of the proposed development on coastal views</i>'. No evidence was provided to support this. Natural England do not agree with this statement because:</p> <ul style="list-style-type: none"> <li>• The density of turbines is an important element of how the array will be perceived from many of the viewpoints.</li> <li>• The presence of a reduced perceived density of turbines is crucial to achieving the 'separation foreground' Design Principle (SLVIA 15.7.49).</li> </ul>	<p>Natural England require confirmation on the agreed minimum spacing and a demonstration that it will not reduce further resulting in an even greater density. Natural England advise that there should be an agreed maximum number of turbines in each zone.</p> <p>Natural England require the Applicant to apply and demonstrate good design to achieve consistency in density and the required 'separation foreground'.</p>

Further information requested by Natural England	Why this is required	Why the current assessment is not adequate
<p>e. An explanation of the balancing exercise that was undertaken between the spatial extent of the Rampion 2 array and the apparent height of Rampion 2 WTGs.</p>	<p>Natural England agrees that the reduction in the spatial extent of the Rampion 2 array will result in a <i>'better balance in apparent WTG size'</i> compared to the original proposal (Table 15-7, page 65). The SLVIA does not describe any balancing exercise undertaken or contain a narrative to support this claim. Natural England would like to understand how this 'better balance' was determined.</p> <p>In any event, a <i>'better balance in apparent WTG size'</i> does not mean that the apparent Rampion 2 turbine sizes will not remain Significant in EIA terms from key viewpoints within designated landscapes. This is because:</p> <ul style="list-style-type: none"> <li>a) The apparent heights to blade tip of the nearest Rampion 2 WTGs do not fall below 0.4 degrees from any of the viewpoints included within the Environmental Statement that are situated within a designated landscape, indicating that the scale of effects from all viewpoints within designated landscapes have the potential to be significant (see Natural England RR-265)</li> <li>b) The apparent differences in size between the Rampion 1 and Rampion 2 WTGs will still exacerbate the adverse seascape and visual issues associated with the Rampion 2 project.</li> </ul>	<p>Natural England remains of the view that there will be Significant adverse effects in relation to the SHC part of the SDNP. This is due to apparent difference in turbine heights visible in close proximity from these sensitive receptors.</p> <p>While a better 'balance' has been achieved in relation to the PEIR design, there is no evidence to show the effect of the balancing exercise on spatial extent and apparent height of the Rampion 2 turbines.</p>
<p>f. A report on the cumulative visual effects, which includes an assessment of the visual effects from the perceived heights of the Rampion 2 WTGs in comparison to the Rampion 1 WTGs.</p>	<p>Natural England agrees with the Applicant that the perceived height of Rampion 2 turbines in comparison to Rampion 1 turbines <i>'is likely to be central to the potential for cumulative visual effects'</i>. (SLVIA para 15.6.27). However the SLVIA does not provide a clear assessment of these cumulative effects.</p>	<p>The visual effects of the perceived heights of Rampion 2 WTGs in comparison to Rampion 1 WTGs is a key issue for the viewpoints/special qualities within the SHC part of the SDNP.</p> <p>It is not clear how the SLVIA has formally assessed these cumulative visual effects.</p>
<p>g. Paragraph 15.7.29 states that <i>'the less HFoV that is affected, the lower the</i></p>	<p>Natural England recognise the efforts of the Applicant in reducing the horizontal field of view of the Rampion 2 array. The SLVIA states that this Design Principle reduces the magnitude of</p>	<p>Natural England does not agree with the conclusion that effects on panoramic views to the sea from the</p>



Further information requested by Natural England	Why this is required	Why the current assessment is not adequate
<p><i>magnitude of change</i>'. The Applicant should provide a detailed explanation of how the magnitude of change at representative viewpoints has been determined exactly, given the Preliminary Environmental Impact Report (PEIR) or Environmental Statement (ES) design option.</p> <p>h. A demonstration of how the design of Rampion 2 limits as far as possible the horizontal field of view (HfOV) of WTG from the SDNP and the SHC.</p>	<p>change for many viewpoints, with significant implications for the Applicant's own assessment of effects. However, given the substantial scale and lateral spread of development that the reduced array area still represents (bearing in mind the human eye physically cannot see the entirety of the Rampion 2 array in a single view from the majority of the representative viewpoints), clarification should be provided by the Applicant regarding how the actual decreases in magnitudes of change between design options have been determined.</p> <p>Natural England advises that addressing this issue is critical to understanding the judgements made in the SLVIA, as the horizontal extent of Rampion 2 will be double or triple the horizontal extent of Rampion 1 from most viewpoints within designated landscapes. This means that a very large proportion of the visible seaward horizon will be enclosed by Rampion 2. It is not clear from the SLVIA whether the significance of visual effects described have reduced simply because the Rampion 2 ES design now has a smaller Horizontal Field of View (in degrees).</p> <p>The Applicant has committed to applying due regard <i>'to Design Principles held in Rampion 1 Design Plan'</i> with proposed environmental measure C-61. Design Principle (a) (i) listed in Condition 11, Part 2, 11 3(a) (page 106) of the Rampion 1 DCO refers to the <i>'need to limit as far as possible the horizontal degree of view of wind turbine generators from the SDNP and the SHC'</i>. However, it has not been established whether the design of Rampion 2 now limits, as far as possible, the horizontal field of view of wind turbine generators from the SDNP and the SHC. Evidence on this matter is not presented within the SLVIA.</p>	<p>eastern part of the SHC area of the SDNP are not Significant. It is not clear how the decreases in magnitude of change have been determined. It does not show how these effects are reduced, and whether it is an actual reduction of effect or simply relative to the PEIR design.</p> <p>As a result it has not been established whether the design of Rampion 2 now limits, as far as possible, the horizontal field of view of wind turbine generators from the SDNP and the SHC.</p>
<p>i. A clear and direct assessment of the impact that the Rampion 2 Design Principles have on the special qualities of the SDNP.</p>	<p>Natural England does not agree that the Design Principles that have informed the Rampion 2 design have acted to adequately reduce the significance of effects to the SDNP in relation to Special Quality 1 or for Special Quality 3.</p> <p>There is no direct assessment of the impact that the Rampion 2 Design Principles have on the SDNP special qualities.</p>	<p>Natural England agrees that there has been a comparative reduction of effects between the PEIR and ES. However, Significant adverse effects on the special qualities of the SDNP remain. This indicates that the</p>

Further information requested by Natural England	Why this is required	Why the current assessment is not adequate
		<p>application of the Rampion 2 design principles is not sufficiently robust to reduce effects on special qualities 1 and 2.</p> <p>The Applicant relies on achieving a comparative reduction in effects in relation to the PEIR, rather than directly assessing the effectiveness of the Rampion 2 design principles.</p>
<p>j. Justification as to how the natural beauty of the SDNP, in those proportions of the National Park adversely effected by the scheme, will remain unchanged given the SLVIA conclusion that significant harm is likely to occur to Special Quality 1 - diverse, inspirational landscapes and breath-taking views.</p>	<p>Natural England agrees with the Applicant that the Rampion 2 project will result in significant harm to SDNP Special Quality 1, particularly the <i>'stunning, panoramic views to the sea'</i>.</p> <p>In paragraph 15.15.40 of the SLVIA the Applicant states that <i>'Whilst significant harm would be caused to this quality ('breathtaking views' and 'stunning, panoramic views to the sea'), this would not compromise the purpose of the designation, as the natural beauty of the SDNP will remain and opportunities will still be present for understanding and enjoyment of the special qualities of the SDNP, and Rampion 2 will not therefore undermine the statutory purpose of the SDNP or compromise the purposes of its designation.'</i></p> <p>We do not agree with this reasoning. The Applicant concludes that Rampion 2 will cause significant harm to Special Quality 1, so it is illogical to conclude that it will not compromise the statutory purpose of the SDNP, which is to conserve and enhance natural beauty.</p>	<p>Natural England does not agree with the conclusion that Rampion 2 will not compromise the purpose of the SDNP, given that the Applicant has identified significant harm to Special Quality 1. Significant harm to a Special Quality will inevitably compromise the statutory purpose of the SDNP.</p>
<p>k. A conclusion on the significance of the change to tranquillity (SDNP Special Quality 3 – tranquil and unspoilt places) at night-time <i>'around the tops of the downs'</i> where <i>'tranquillity is greatest'</i>.</p>	<p>The Applicant has assessed in Table 15-32 (page 397) that night-time lighting of Rampion 2 will <i>'result in relatively low change to the tranquillity experienced within the SDNP coastline'</i> and has not offered a conclusion on the significance of the change to tranquillity at night-time <i>'around the tops of the downs'</i> where <i>'tranquillity is greatest'</i>. It is understood from Appendix 15.5, which does not assess special qualities, that the representative night-time viewpoints from <i>'tops of the downs'</i> were assessed as not significant due to the lighting</p>	<p>Natural England does not agree with the Applicant's conclusion that effects on visual receptors at the <i>'tops of the downs'</i> as a result of lighting will not be significant. This is due to the increased lateral spread of Rampion 2 which will result in a threefold increase in the extent of lighting when</p>

Further information requested by Natural England	Why this is required	Why the current assessment is not adequate
	being perceived as an ' <i>extension of a familiar feature</i> ' i.e. Rampion 1. Natural England does not agree with this assessment, as the lateral spread of the Rampion 2 lighting will be perceived as a tripling of the extent of lighting that is already visible from Rampion 1. The Applicant should bring forward evidence-based conclusions regarding the significance of the predicted changes on the night-time tranquillity of these specific areas.	considered in addition to Rampion 1. The Applicant has not drawn conclusions regarding the effect of lighting on tranquillity experienced at night time from the 'tops of the downs.'

**Question 6-3 In relation to National Landscapes (Chichester Harbour and the eastern portions of the Isle of Wight), provide justification for why and what further assessment of the west ward expansion is required, and explain why the existing assessments are not adequate to consider these impacts.**

26. Natural England's advice is that the Examining Authority does not have information on (i) whether the Applicant's Design Principles have been applied to the consideration of effects on the CHAONB and loWAONB and (ii) whether navigation and aviation lighting will result in significant effects on the loWAONB, specifically Special Quality 5 which includes '*dark starlit skies*'. Natural England advises that further information on these matters is required to understand the impacts to the Chichester Harbour and Isle of Wight National Landscapes.

**Chichester Harbour AONB**

27. Chichester Harbour AONB has ten special qualities, which are set out in full in the Chichester Harbour Management Plan (2019-2024). Nine of these special qualities have been scoped into the Applicants assessment, as set out in Table 15.35 of the SLVIA. The Applicants assessment indicates that the array will result in significant effects on receptors within the CHAONB and its special qualities, namely;

- A significant (moderate) effect on MCA05 The Solent which is partially within the CHAONB;
- A significant (moderate) effect for visual receptors at Viewpoint 22 Eastoke Point; and
- A significant (major/moderate) effect on the '*unique blend of land and sea*' special quality (SQ1) and a significant (moderate) effect on the perceived '*significance of the sea*' and of '*distant landmarks across water*' (SQ3).

28. Natural England judges that westward expansion of WTGS will result in Significant effects on the seascape setting of CHAONB.

**Isle of Wight AONB**

29. The Isle of Wight AONB (loWAONB) has nine special qualities, which are set out in full in Appendix 1 of the Isle of Wight AONB Management Plan (2019-2024). Eight of these special qualities have been scoped into the Applicants assessment, as set out in Table 15.42 of the SLVIA. 7.4 The Applicants assessment does not identify any significant effects on landscape, seascape or visual receptors within the loWAONB, nor on its special qualities.

30. Natural England advised the Applicant of concerns regarding to Special Quality 5, which includes '*dark starlit skies*'. The Applicant finds that effects would not be significant "...because the aviation

lights will be viewed relatively near the horizon, or even below the skyline from elevated parts of the loW AONB, so while they may have effects by breaking into the darkness as point features of light, appearing visible in the seascape, they are not expected to result in obtrusive light that would harm the enjoyment of the 'dark starlit skies'. (SLVIA, Table 15-42)". Natural England considers that these conclusions cannot be drawn as the Applicant has not provided a formal assessment of effects on Special Quality 5 of the loWAONB 'dark starlit skies';

31. 7.6 Natural England had also advised the Applicant that there is the potential for significant adverse effects in relation to Special Quality 3 'long-distance views from coastal health and downland'. This is because views out to sea from portions of Landscape Character Type 1 (Chalk Downs) are a key component of this landscape. NE advises that the landscape and views from LCT 1 will be significantly altered by the turbines of Rampion 2. As a result, we conclude that this special quality of the loWAONB will be significantly affected thereby degrading the natural beauty of this portion of the designation. Therefore, Natural England disagrees with the Applicants assessment and considers that there would be significant effects on the eastern portions of the loWAONB at Bembridge Down and St. Boniface Down, resulting in further loss of natural beauty for these designations.

The following table (**Table 3**) summarises why further information is required.

<b>Further information requested by Natural England</b>	<b>Why this is required</b>	<b>Why the current assessment is not adequate</b>
<p>l. An assessment of the impact that the Rampion 2 Design Principles have on the special qualities of the CHAONB and loWAONB.</p>	<p>The Rampion 2 Design Principles appear to act mainly in the SHC area within the SDNP; a very small geographic area of the SDNP with the potential to be impacted by Rampion 2.</p> <p>Therefore, Natural England considers that the Design Principles for Rampion 2 have not been met with regard to effects on CHAONB and IOWAONB. For example, in views from Bembridge Fort (SLVIA Viewpoint 34) and St Boniface Down above Ventnor (SLVIA Viewpoint 35) the scheme will introduce turbines into portions of the seascape setting of 2 other designated landscapes (CHAONB and loWAONB) which are currently free of such visual intrusion.</p>	<p>The Examining Authority does not have information on whether the Applicant's Design Principles have been applied to the consideration of effects on the CHAONB and loWAONB, and if so how effective this has been in reducing impacts on those designated landscapes to acceptable levels. This information is not currently available in the Environmental Statement.</p>
<p>m. A technical assessment, inclusive of modelling work, on potential visual effects from both navigation and aviation lighting to loWAONB Special Quality 5</p>	<p>The aviation lighting ZTV in SLVIA Figure 15.25 indicates that parts of the loWAONB will experience theoretical visibility of up to 42 lit turbines, particularly from the east-facing coastline. However, no assessment of effects on aviation lighting on the loWAONB has been undertaken in the ES. Furthermore, there are no night-time photomontages from the loWAONB to evidence the conclusions of the assessment.</p>	<p>The Examining Authority does not have information on whether navigation and aviation lighting will result in significant effects on the loWAONB, specifically Special Quality 5 which includes 'dark starlit skies'. This information is not currently available in the Environmental Statement.</p>