



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Rampion Two Offshore Wind Farm

**Appendix I3 to the Natural England Deadline 3 Submission**

**Natural England's advice on the Applicants Deadline 1 Submission – 8.35  
SLVIA Maximum Design Scenario Principles and Visual Design Principles  
Clarification Note [REP1-037]**

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

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25 April 2024

## **Appendix I3 to the Deadline 3 submission. Natural England's advice on the Applicants Deadline 1 Submission – 8.35 SLVIA Maximum Design Scenario Principles and Visual Design Principles Clarification Note [REP1-037]**

In formulating these comments, the following document has been considered:

- [REP1-037] Deadline 1 Submission – 8.35 SLVIA Maximum Design Scenario Principles and Visual Design Principles Clarification Note, dated February 2024, Revision A.

### **1. Summary**

- Natural England welcomes REP1-037 in response to additional evidence requested within Natural England's relevant representation [RR-265]. Table 1 provides a review of REP1-037 in relation to Natural England evidence requests a, b, c, d, e, h and j (Appendix I, pages 3&4).
- Overall, Natural England does not accept that some Rampion 1 design principles are not appropriate for the Rampion 2 project. Natural England does not agree that the Rampion 2 principles have had a "similar regard and intent to minimise adverse effects" (REP1-037, paragraph 4.2.6) when compared to those of Rampion 1.
- Natural England are unclear if the maximum possible impacts from development in Zone 6 on the statutory purposes of the SHC and SDNP have been assessed. This is of considerable concern given the impacts on the statutory purposes of the South Downs National Park are already predicted to be of major significance.

## 2. Detailed Comments

Table 1 Summary of key issues based on a document review of REP1-037

Document Reviewed - REP1-037					
Point Ref	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
1	6	29	6.1.5	<p><b>NE requirement A:</b> Detail on how the Rampion 1 Design Principles have influenced the Rampion 2 maximum design scenario.</p> <p>AND</p> <p><b>NE requirement B:</b> The Applicant's justification for why the Rampion 1 mitigation measures do not directly apply to the Rampion 2 project.</p> <p>Natural England disagrees with the Applicant's view that Rampion 1 Design Principle 3 (to locate the largest turbines, in any <b>hybrid</b> scheme, to the southwestern portion of the Order) is not appropriate for Rampion 2. The Applicant's view is that Rampion 2 is not a hybrid scheme, because the draft DCO confirms that there would be no material difference in the size of the turbines installed across the Rampion 2 Order Limits. Natural England's view is that the Rampion 2 Project is a direct extension of the Rampion 1 array (as noted by NE in 3.5bii of RR-265). The Order Limits of both projects are contiguous, and critically Rampion 1 and 2 will be viewed and perceived together in the seascape as a hybrid array.</p>	<p>To satisfy proposed environmental measure C-61, the Rampion 2 project design must give due regard to Rampion 1 Design Principle 3. This is because the impacts of the perception of a hybrid array (Rampion 1 and Rampion 2 viewed together in the seascape) will result in greater 'major significant' effects on the Sussex Heritage Coast (SHC) part of the South Downs National Park (SDNP).</p>

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2	6	29 - 31	6.1.6 – 6.1.10	<p><b>NE requirement A:</b> Detail on how the Rampion 1 Design Principles have influenced the Rampion 2 maximum design scenario.</p> <p>AND</p> <p><b>NE requirement B:</b> The Applicant's justification for why the Rampion 1 mitigation measures do not directly apply to the Rampion 2 project.</p> <p>Natural England disagrees with the Applicant's justification that because Rampion 2 Order Limits are proposed at a greater distance from the SHC than those of Rampion 1, the Rampion 1 design principles are not appropriate for the Rampion 2 project. This is because the Rampion 2 WTGs will appear to be nearly twice the height of the Rampion 1 WTGs from the SHC. It is therefore essential that the embedded mitigation measures provided by the Rampion 1 Design Principles are utilised by the Rampion 2 project. This mitigation related <b>entirely</b> to upholding the statutory purposes of the coastal portion of the SDNP and SHC (as noted by NE in 3.5a of RR-265), these mitigation measures were effective, they remain relevant, and no suitable rationale has been presented to indicate why the Rampion 1 design principles are not appropriate for the Rampion 2 project. The design of the Rampion 2 project must fully align with, and not compromise, the principles agreed for</p>	<p>Natural England advise that every Rampion 1 design principle needs to be adopted by the Rampion 2 project, to ensure that the visual impacts of the two developments should be designed to uphold the statutory purposes of the coastal portion of the SDNP and SHC.</p>

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				the Rampion 1 project to protect the statutory purposes of the coastal portion of the SDNP and SHC.	
3	6	44 - 45	6.2.8 – 6.2.11	<p><b>NE requirement C:</b> Evidence to demonstrate why constructing more WTG in the Zone 6 (Eastern Array Area) than described within the indicative layout would not present a 'greater worse-case effect'.</p> <p>Natural England appreciates the additional information that:</p> <ul style="list-style-type: none"> <li>• It is only possible to accommodate a <b>further four</b> of the larger WTG type in areas to the far south-western edge of the Zone 6 array.</li> <li>• The potential for further densification within the DCO order limits of the Zone 6 area is <b>very limited</b>.</li> </ul> <p>It is Natural England's opinion that the presented MDS layout will result in significant effects on the SHC portion of the SDNP, and that further development of 4 turbines in Zone 6 will intensify these significant effects. We also note that the Applicant does not provide certainty that Zone 6 could not accommodate even more than four further larger-type WTGs.</p>	<ul style="list-style-type: none"> <li>• Evidence should be provided to confirm that the further four possible WTGs in Zone 6 will be subsumed behind closer WTGs when viewed from key sensitive viewpoints within the SHC such as at Beachy Head and Birling Gap.</li> <li>• Indicative locations of the four additional turbines in Zone 6 have not been provided.</li> <li>• Natural England's position is that any development within Zone 6 will harm the statutory purposes of the SHC and SDNP. Evidence has not been presented to demonstrate why constructing more WTGs in Zone 6 would not present a 'greater worse-case effect'. Natural England advises that a greater densification of Zone 6 will cause more harm to the statutory purposes of the SHC and SDNP.</li> </ul>

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				<p>Natural England's advice remains that no WTGs should be constructed in Zone 6. Natural England is concerned that the maximum possible impacts from development in Zone 6 on the statutory purposes of the SHC and SDNP have still not been assessed. This is because the current design parameters make it possible to further the density of turbines in Zone 6 to that assessed in the SLVIA, while also retaining the maximum lateral spread of turbines across the extension area.</p> <p>Natural England advise that the conclusion that "a greater worst-case effect from the Zone 6 (eastern extension area) would not occur" cannot be reached.</p>	<p>Natural England are therefore not satisfied that the maximum possible impacts from development in Zone 6 on the statutory purposes of the SHC and SDNP have been assessed.</p>
4	6	45 - 46	6.2.14	<p><b>NE requirement D:</b> 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>Natural England are concerned that a development scenario where Zone 6 is at maximum density has not been assessed in the SLVIA, so the assertion that this development scenario is not materially different to the version assessed is not evidenced.</p> <p>It is stated that "If a greater proportion of WTGs were to be installed in any area, including a bias towards either</p>	<p>Natural England have not seen 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>If the Applicant is proposing requirements on the design of the development as a mitigation measure, these should be formally captured in the DCO. Additionally, the Applicant should</p>

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				the eastern or western parts of the proposed Order limits, WTGs will <b>require</b> to be located 'behind' and further offshore than the other WTGs in the layout". This is not currently a requirement of the draft DCO (REP2-002), and if it was, as noted above Natural England would remain unclear as to whether these WTGs will be subsumed behind closer WTGs when viewed from key sensitive viewpoints.	demonstrate that the WTGs in question can be subsumed behind closer WTGs from sensitive viewpoints, to demonstrate this is a viable mitigation measure.
5	6	47 - 48	6.2.21 - 6.2.25	<p><b>NE requirement E:</b> 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>No further evidence in the text provided.</p>	NE advice unchanged.
6	6	31	6.1.12 – 6.1.24	<p><b>NE requirement H:</b> 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>No further evidence in the text provided.</p>	NE advice unchanged.
7	6	34 - 43	6.1.25 – 6.1.77	<p><b>NE requirement J:</b> 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 welcomes that this assessment has been made available to the examination. However, no new information has been presented.</p>	As stated above, we remain concerned that the worst-case scenario has not been presented and assessed.