



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Rampion Two Offshore Wind Farm

Appendix N3 to the Natural England Deadline 3 Submission

**Natural England's Response to The Examining Authority's Written Questions
relating to Seascape, Landscape and Visual**

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

25 April 2024

SLV 1.2 - The Applicant states at table 4.14 Applicants' response to Natural England – Appendix I (Seascape, Landscape and Visual Impact) in response to Ref I1 [REP1-017] that the Proposed Development will result in not significant effects on views or special qualities of the Isle of Wight Area of Outstanding Natural Beauty (IoWAONB) (paragraphs 15.15.50 to 15.15.53 ES Chapter 15) [APP-056] and that the IoWAONB agrees with these findings (table 15.7 ES Chapter 15) [APP-056] . Explain why NE holds a different view to the Applicant and the said parties.

1. Natural England's assessment on the special qualities of the IoWAONB indicates that that the westward expansion of WTGs will result in significant effects on the seascape setting of the eastern portions of the IoWAONB at Bembridge Down and St. Boniface Down, resulting in further loss of natural beauty.
2. The Applicants assessment (Tables 15.39, 15.40, 15.41, ES Chapter 15 [APP-056]) identifies a series of Moderate effects on landscape character, visual receptors (viewpoints), parts of the coastal path and special qualities of the IoWAONB. The ES states in the method (Table 15.28) that "*Moderate levels of effect may be significant or not significant subject to the assessor's professional opinion which shall be clearly explained.*"
3. There is a difference of professional opinion between Natural England and the Applicant one significance of the Moderate effects identified by the Applicant. In Natural England's opinion this collection of at least Moderate effects should be regarded as significant for the purposes of EIA. We consider that the Magnitude of Change is greater than that identified by the Applicant. We note that Paragraph 15.7.29 (ES SLVIA) states that '*the less HFoV that is affected, the lower the magnitude of change*'. The Applicant has not provided 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. Natural England reference this omission within section 2.1 of our Relevant Representation.
4. Natural England have within our Relevant Representations also identified further evidence required for a full assessment of impacts on the special qualities of IoWAONB. These assessments are outstanding.
 - a. **An assessment of the impact that the Rampion 2 Design Principles have on the special qualities of the IoWAONB.** The SLVIA includes no direct assessment of the impact that the Rampion 2 Design Principles have on the special qualities of the IoWAONB.
 - b. **A technical assessment, inclusive of modelling work, on potential visual effects from both navigation and aviation lighting to IoWAONB Special Quality 5.** We acknowledge the narrative provided in relation to night-time impacts to IoWAONB special quality 5. However, in the absence of a detailed assessment (inclusive of modelling work of potential lighting visual effects from both navigation and aviation lighting), we do not agree that effects from lighting can be discounted. Figure 15.25 (Zone of Theoretical Visibility for the aviation lighting of Rampion 2) indicates that all IoWAONB viewpoints, the maximum number of turbine aviation lights (34 – 42) are theoretically visible, and therefore this matter requires further assessment. For example, in relation to views from St Boniface Down. Here, the photomontages provided for Viewpoint 35 show that from this representative elevated location, turbine lighting will not be near the horizon or below the skyline, indicating the potential for visual effects on Special Quality 5 "dark starlit skies".

SLV1.3 - In the context of the Applicant's Seascape, Landscape and Visual Impact Assessment (SLVIA) Maximum Design Scenario and Visual Design Principles clarification note [REP1- 037], comment upon the Applicants assertions at table 4.14 Applicants response to Natural England – Appendix I (Seascape, Landscape and Visual Impact) in response to Ref I6 [REP1-017], that:

	Applicants' assertion.	NE response.
1	There is a distinct gap between R1 and the Proposed Development	Natural England disagrees with this assertion. In many views, Rampion 2 appears as two separate wind farms. The perceived visible separation 'between arrays' is actually the separation between the Zone 6 Area and the Extension Area of the Rampion 2 project, and not a separation between Rampion 2 and Rampion 1.
2	That the Proposed Development will form a clearly separate array grouping that has a narrower lateral spread in field of view than R1.	Natural England disagrees with this assertion. <ul style="list-style-type: none"> a. Rampion 2 cannot be considered in isolation from Rampion 1. The location and surroundings are effectively the same as Rampion 1. Rampion 2 is a direct extension of Rampion 1 and the two developments will be perceived together. b. The Proposed Development does not have a narrower lateral spread in field of view than Rampion 1. From viewpoints in the Sussex Heritage Coast (SHC) part of the South Downs National Park (SDNP) which look to the eastern end of the combined array the lateral spread it is approximately doubled. From other viewpoints within the SDNP the wide lateral spread is identified by the Applicant. For example, in the ES (15.15.25) the Applicant describes that "<i>...from the most elevated tops of the downs, the offshore elements of Rampion 2 will form an additional wind farm influence in the seascape, in part due to their larger vertical scale when compared to Rampion 1, but notably due to the wide lateral spread of the proposed WTG array when viewed from these inland areas of the SNP directly to north, in which the full western spread of the array can be appreciated within its seascape context</i>". (bold text highlighted by Natural England) c. Natural England notes that a suitable 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 has not been submitted into the Examination by the Applicant, despite this being requested in our Relevant Representations
3	The south of R1 is the optimal location within Zone 6.	a. Natural England fundamentally disagrees with this assertion. We advise that there is

	Applicants' assertion.	NE response.
		<p>no location in Zone 6 that is acceptable in landscape and visual terms in relation the SHC part of the SDNP.</p> <p>b. The Applicant indicates that by aligning the eastern edge of Rampion 2 with Rampion 1 (south of R1) the eastward lateral spread is limited and this is therefore an optimal location within Zone 6. Natural England do not agree that this is an optimal location, because from the most sensitive westward facing views from the SDNP the WTGs are not perceived as 'behind' the existing array but seen as a new lateral extension.</p> <p>c. The siting of WTGs in this location also directly contravenes Rampion 1 Design principle (iii) <i>to locate the largest turbines, in any hybrid scheme, to the southwestern portion of the Order</i>. The proposal effectively creates a hybrid scheme and does not avoid stark scale comparisons, as the Applicant asserts.</p> <p>d. Therefore, south of Rampion 1 is not an optimal location. It does not minimise impacts and harm to special qualities of the SDNP, and does not show regard to the statutory purpose of the SDNP.</p>
4	<p>The additional 7 degrees over and above R1 is a relatively small lateral spread.</p>	<p>Natural England advises that this metric is misleading.</p> <p>a. The Applicant states that in views from Beachy Head and Birling Gap, the additional lateral spread of the Proposed Development (beyond that occupied by Rampion 1) will only be around 7°, which is considered a relatively small spread.</p> <p>b. As Natural England has stated, Rampion 1 and Rampion 2 cannot be considered in isolation from these viewpoints. The Applicant's own definition of the 'Field of view' Design Principle agrees. The purpose of this Principle is described as <i>"reducing the field of view or 'horizontal extent/lateral spread' of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2."</i> (15.7.24 of ES) (bold text is Natural England emphasis).</p> <p>c. The combined lateral spread of Rampion 1 and Rampion 2 from these highly sensitive viewpoints is the most important statistic here, and this is not reported. Considering the additional lateral spread of Rampion 2 alone in comparison to Rampion 1 alone is misleading.</p>

	Applicants' assertion.	NE response.												
		<p>d. As described by the Applicant in their viewpoint assessment, extending the WTG developed skyline eastwards approximately doubles the extent of the WTG array. An 100% increase in the extent of WTG in the view cannot be described as a relatively small change.</p> <p>e. Furthermore, the lateral spread of the combined arrays (R1 and R2) cannot be considered in isolation to other factors such as the difference in scale and height of R1 in comparison to R2.</p> <p>To summarise, the table below provides the information used to calculate the additional lateral spread of Rampion 2 alone in comparison to Rampion 1 alone as described by the Applicant (Table 15-27 of ES). This figure is around 7 degrees. Natural England advise that information to understand the perceived combined lateral spread of WTGs at key viewpoints is not available. The Applicant's judgements of impacts to the SDNP and SHC have been informed by metrics describing the additional visible HFoV of Rampion 2, rather than the visible HFoV of Rampion 1 and Rampion 2 combined. This conflicts with the purpose of the Field of View Design Principle, which is to reduce the combined lateral spread of Rampion 1 and Rampion 2.</p> <table border="1" data-bbox="719 1238 1390 1675"> <thead> <tr> <th data-bbox="719 1238 879 1473">Viewpoint</th> <th data-bbox="879 1238 1038 1473">Visible HFoV of Rampion 1 (degrees)</th> <th data-bbox="1038 1238 1198 1473">ES MDS - Visible HFoV of Rampion 2 (degrees)</th> <th data-bbox="1198 1238 1390 1473">Visible HFoV of Rampion 1 and Rampion 2 combined (degrees)</th> </tr> </thead> <tbody> <tr> <td data-bbox="719 1473 879 1574">Beachy Head</td> <td data-bbox="879 1473 1038 1574">9.8°</td> <td data-bbox="1038 1473 1198 1574">17°</td> <td data-bbox="1198 1473 1390 1574">Information not available.</td> </tr> <tr> <td data-bbox="719 1574 879 1675">Birling Gap</td> <td data-bbox="879 1574 1038 1675">10.8°</td> <td data-bbox="1038 1574 1198 1675">19°</td> <td data-bbox="1198 1574 1390 1675">Information not available.</td> </tr> </tbody> </table>	Viewpoint	Visible HFoV of Rampion 1 (degrees)	ES MDS - Visible HFoV of Rampion 2 (degrees)	Visible HFoV of Rampion 1 and Rampion 2 combined (degrees)	Beachy Head	9.8°	17°	Information not available.	Birling Gap	10.8°	19°	Information not available.
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Beachy Head	9.8°	17°	Information not available.											
Birling Gap	10.8°	19°	Information not available.											
5	<p>The WTG's will be experienced within a remote context setting beyond intervening non designated and urbanised coastal strip between the open downs and the sea.</p>	<p>Natural England advises that although views may be experienced in the context of an urbanised coastal edge this does not change the significance of the effect.</p> <p>Further explanation:</p> <p>a. The Applicant states in the ES (15.15.25) that <i>"The proposed development will increase the WTG developed seascape element in panoramic views from the tops of</i></p>												

	Applicants' assertion.	NE response.
		<p><i>the downs however, it is at increased distance, typically experiencing the sea beyond the intervening, non-designated and urbanised coastal strip between these open down landscapes and the sea. Inland views from these areas of open downs typically experience the sea within a remote context setting beyond intervening landscape influences.</i>" However, this statement does not accord with the Applicant's own assessment which identifies numerous significant effects from these viewpoints within inland sections of the South Downs National Park.</p> <p>b. For the majority of these views, the photomontages reveal that the elevated location means that the urbanised coastal strip is not evident, and the views extend from the open downs directly out to the seascape context. The elevation further increases the perceived scale of the turbines compared to those views on the lower coastal edge. This is recognised in the ES by the identification of numerous significant effects on views experienced by people along the open tops of the downs, for example walking the South Downs Way. These locations are described by the Applicant as an '<i>auditorium for sea views</i>' (ES 15.15.27).</p> <p>c. The Applicant's own conclusion on the significance of effects indicates that the intervening developed coastal edge (whether visible or not) does not have a mitigating influence.</p> <p>d. In conclusion, despite the fact there is an intervening more urbanised coastal edge, the nature of the topography means that this edge is not generally experienced or does not influence the views from the tops of the downs which offer panoramic views out to sea. This is borne out by the extent of significant effects identified by the Applicant from these locations on the open downs.</p> <p>e. We would draw attention to a sample of viewpoints which do include the more developed coastal strip:</p> <ol style="list-style-type: none"> a. 4 Seaford Head b. 16 Firle Beacon c. 17 Devil's Dyke d. 18 Cissbury Ring e. 27 Hollingbury <p>For all of these viewpoints the Applicant finds that effect will be at least Major/moderate and</p>

	Applicants' assertion.	NE response.
		significant. So although views may be experienced in the context of an urbanised coastal edge, this does not change the significance of the effect.

SLV1.4 Justify the position on how Rampion One Offshore Wind Farm (R1) should not form part of the baseline assessment. The position is contrary to the Applicant's assessment in the ES [APP-056] in which R1 does form part of the baseline. The Applicant further cites accordance of its approach with paragraph 7.13 of the Guidance for Landscape and Visual Impact Assessments and the Planning Inspectorate's (PINS) Advice Note 17.

1. Natural England agreed with the Applicant and the Planning Inspectorate (ES 15.12.4) that the cumulative seascape, landscape and visual effect of Rampion 2 with other offshore windfarms, with the exception of Rampion 1, can be scoped out of the EIA. Natural England agrees that Rampion 1 should form part of the baseline assessment.
2. Natural England agrees that the approach taken by the Applicant is in accordance with GLVIA3 (in particular noting paragraph 7.13). Natural England are in agreement that it is necessary to consider Rampion One Offshore Wind Farm (R1) as part of the assessment of cumulative landscape and visual effects.
3. The Applicant identifies the potential for 'in combination' effects of Rampion 1 and Rampion 2 but does not provide a clear assessment of these. Natural England refer to our Relevant Representations where we advise that this assessment is required (Natural England evidence requirement f). We advise that this evidence is needed to ensure that the Applicant's approach is in accordance with PINS advice note 17. Paragraph 3.4.6 of PINS advice note 17 states "*Where significant cumulative effects between the proposed NSIP and 'other existing development and/ or approved development' are only likely to arise in relation to one environmental aspect area, the assessment should focus on that issue only.*". Accordingly, Natural England's advice remains that an assessment focussing on evidencing the additional harm on the SDNP and special character of the SHC from the addition of Rampion 2 into the seascape is required, and that this has not been provided by the Applicant.
 - a. The ES notes that Rampion 2 will often be viewed in combination with Rampion 1, and that cumulative effects between Rampion 1 and Rampion 2 may arise. For example,
 - i. ES paragraph 15.6.27 states that "*In views from these areas, Rampion 2 will result in visual effects arising from the appearance of Rampion 2 when viewed in-combination with Rampion 1. The apparent height of the larger Rampion 2 turbines (up to 325m) relative to the smaller operational turbines (140m) is likely to be central to the potential for cumulative visual effects arising from these areas.*"
 - ii. ES para 15.12.24 it states that "*It is considered that there is no potential for the offshore elements of Rampion 2 to have cumulative effects with other offshore wind farms or onshore projects, beyond those arising with the existing Rampion 1 project (which are considered in the main assessments in Sections 15.9, 15.10 and 15.11).*"

Overall, Natural England advice remains that it is necessary to consider Rampion One Offshore Wind Farm (R1) as part of the assessment of cumulative landscape and visual effects. Natural England's position is that the addition of Rampion 2 into the

seascape will cause further harm (than that caused by Rampion 1) to the statutory purposes of the SDNP and special character of the SHC. Natural England advise that this additional harm on the SDNP and special character of the SHC needs to be fully understood and evidenced. Natural England advised within our Relevant Representations that the outstanding question for the PINS to consider is the acceptability of further harm to the statutory purposes of the SDNP and special character of the SHC (and harm to the statutory purposes of the CHAONB and loWAONB).

SLV1.5 Given the Applicant's conclusions on harm to statutory purposes at table 4.14 Applicant's response to Natural England – Appendix I (Seascape, Landscape and Visual Impact) in response to Ref I1 [REP1-017]; to paragraph 3 of Natural England's response to ExA Questions Appendix N2-Annex 1 Deadline 2 Submission [REP-039], and to the SDNPA's LIR [REP1-049, explain what is the correct approach in concluding on the impact upon special qualities and whether the statutory purposes of the designation are compromised.

1. Where there is an assessment of significant harm to a special quality, this indicates likely harm to the designation's statutory purpose to conserve and enhance natural beauty. The natural beauty of the National Park and the opportunities afforded for open-air recreation are the reasons for which it was designated in statute. An impact that causes harm to the natural beauty harms the purpose of the designation, and this cannot be downplayed by assertions about the relative size or scale of the harm in relation to a particular part of the SDNP or to any of its special qualities. This includes downplaying the level of impact by comparing the number of affected special qualities to the number of unaffected ones.
2. The Applicant and decision maker for Rampion 2 must consider the new duty to seek to further the statutory purposes of the SDNP. Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty ("National Landscape") in England, **to seek to further the statutory purposes of the area**. The duty applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers.
3. LVIA/SLVIA are not intended to assess effects on the special qualities of protected landscapes. This is why NE requested that a separate clear assessment of special qualities should be supplied by the Applicant. This evidence remains outstanding to the examination.
 - a. Many special qualities will be features and characteristics which fall outside the scope of the GLVIA methodology, for example experiential considerations such as SDNP Special Quality 1 "diverse, inspirational landscapes and breath-taking views", and SDNP Special Quality 3 "tranquil and unspoilt places". Such impacts will need to be considered separately.
 - b. For the assessment of landscape effects, the GLVIA methodology sets out the need to consider geographical location as part of an assessment of magnitude of change. For the assessment of the special qualities and thus the assessment of effects on the statutory purpose of a designated landscape, the extent of geographical harm is irrelevant. The irrelevance of geographical effect was understood and set out by the Examining Authority in the Navitus Bay Wind Park case in June 2015.

4. Natural England advises that while the landscape and seascape evidence submitted should be used to inform the planning decision, other evidence and advice, which may include an independent assessment should also be used. In relation to the assessment of special qualities for Rampion 2 overall:

- a. The Applicant's assessment finds that the special qualities of the SDNP will be harmed.
- b. Natural England's assessment finds that the special qualities of the SDNP will be harmed.
- c. Natural England advise that the Examining Authority may wish to decide whether they want to seek an independent assessment.