



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Rampion Two Offshore Wind Farm

Appendix J4a to the Natural England Deadline 4 Submission
Natural England's advice on Terrestrial 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

3 June 2024

Natural England's advice on Terrestrial Ecology

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

- [APP-003] 5.8 Design and Access Statement Rev B (tracked)
- [APP-224] 7.2 Outline Code of Construction Practice Rev C (tracked)
- [APP-232] 7.10 Outline Landscape and Ecology Management Plan (Tracked) Rev B

Natural England do not have any further comments to make on the following documents at this time:

- [REP3-022] 6.4.23.2 ES Volume 4 Appendix 23.2 Traffic Generation Technical Note Rev C (Tracked)
- [REP3-024] 7.1 Outline Operational Drainage Plan Rev B (tracked changes)
- [REP3-030] 7.6 Outline Construction Traffic Management Plan Rev D (tracked)
- [REP3-032] 7.7 Outline Construction Workforce Travel Plan Rev B (tracked)
- [REP3-034] 7.8 Outline Public Rights of Way Management Plan Rev B (tracked)
- [REP3-036] 7.9 Outline Onshore Written Scheme of Investigation Rev B (tracked)
- [REP3-053] 8.59 Air Quality Mitigation Strategy Rev A
- [REP3-054] 8.60 Outline Noise and Vibration Management Plan Rev A
- [REP3-055] 8.61 Construction Access Update Assessment Summary Rev A
- [REP3-056] 8.62 Outline Air Quality Management Plan Rev A

1. Summary

Natural England has reviewed the relevant documents submitted by the Applicant at Deadline 3. Our main outstanding concerns are set out below with more detailed advice regarding these documents provided in Table 1. It should be noted that these comments only relate to terrestrial ecology aspects of these documents.

1.1 Horizontal Directional Drilling (HDD)

Natural England still maintains major concerns with regard to the feasibility of proposed trenchless drilling technique without detailed ground investigation at ecologically sensitive sites. Natural England has discussed this issue with the Applicant and will provide a further response once we have reviewed the Applicants written submission of their oral case from Issue Specific Hearing 2.

1.2 Licensable Protected Species

Protected species licences are required from Natural England for any development activities which carry the risk of impacts to the relevant protected species and/or their habitats, and which may be significantly impacted by the development proposals.

Natural England advises that the best course of action for the resolution of protected species matters would be to for the Applicant to submit draft protected species licence applications to Natural England for review via the Pre-Submission Screening Service (PSS). If Natural England agrees with the Applicant and proposed mitigation commitments, Natural England may provide Letters of No Impediments to the progression of the Application, to ensure the ExA has the necessary certainty in this regard. Further engagement on this issue will therefore only be undertaken as part of direct communication between the external NSIP project team

and Natural England's Wildlife Licensing Service (NEWLS). Natural England advises that all efforts should be made by the Applicant to obtain Letters of No Impediments from Natural England before the end of the Examination, and that these should be agreed before the Secretary of State makes the final consenting decision on the project.

Natural England will not be providing any further detailed advice within the Examination on licensable species unless they are a notified feature of protected site for which Natural England is the statutory consultee.

2. Detailed Comments

Table 1 Summary of Key Issues Document Reviewed - [APP-003] 5.8 Design and Access Statement Rev B (tracked)

Point number	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	3.5	37	4.1.5 and 4.1.6	<i>It is stated that 'TE2 Prior to commencement of the onshore substation site preparation works, advance planting will be provided along the western extent of the Oakendene onshore substation site to provide mitigation for the loss of dormouse habitat. This will include a 15m wide strip of woodland and scrub planting and plugging of hedgerow gaps as shown on the Appendix D Oakendene onshore substation - Indicative Landscape Plan. This advanced planting will also provide opportunities to a range of other species including foraging bats and reptiles.'</i>	We welcome clarification regarding the phasing of habitat reinstatement at Oakendene substation. To progress this issue please see response above relating to licensable protected species under section 1.2.

Table 2 Summary of Key Issues Document Reviewed - [APP-224] 7.2 Outline Code of Construction Practice Rev C (tracked)

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the Issue
2	5.6	57	Table 5-5	<i>Commitment C-135 states that 'A stand-off distance of at least 3m (with greater distances implemented based on local biodiversity and pollution control considerations) will be applied from watercourse bank tops (other than for watercourse crossings) to account for potential issues such as water vole burrows, otter holts and pollution control.'</i>	To progress this issue please see response above relating to licensable protected species under section 1.2.
3	5.6	59	Table 5-5	<i>Commitment C-216 states that 'All ancient woodland will be retained. A stand-off of a minimum of 25m from any surface construction works will be maintained in all locations from cable installation works. Construction traffic may operate within 25m of an ancient woodland on existing tracks, with any track maintenance works being restricted to the current width. Works to provide safe access from the highway are required in three locations within 25m of ancient woodland, being accesses A-42, A-56 and A-57. At these locations specific design measures detailed in the Outline Code of Construction Practice will manage any potential indirect effects on ancient woodland. Where ancient woodland is crossed via trenchless crossing a depth of at least 6m below ground will be maintained to avoid root damage and drill launch and retrieval pits will be at least 25m from the woodland edge.'</i>	Natural England advise that there is insufficient information provided by the Applicant to assess whether 6m is sufficient. We advise it is for the Applicant to clearly outline the evidence which underpins the proposed methodologies to avoid impacts to sensitive ecological features. Natural England has discussed this issue with the Applicant and will review further information provided to progress this issue.
4	5.6	61	Table 5-5	<i>Commitment C-278 states that 'Trenchless crossings of Climping Beach SSSI, Sullington Hill LWS, Atherington Beach and Littlehampton Golf Course LWS would be designed to ensure a minimum depth of 5m is maintained when passing beneath them to reduce the risk of drilling fluid breaking out to the surface and avoid archaeological remains of high heritage significance at Climping Beach (identified currently or during pre-commencement investigations).'</i>	As above Natural England reiterates our previous comments made at within our Appendix N3 [REP3-086] that there is insufficient information provided by the Applicant to assess whether 5m is sufficient. We advise it is for the Applicant to clearly outline the evidence which underpins the proposed methodologies to avoid impacts to sensitive ecological features. We advise that without geotechnical information it is not possible to ascertain whether the 5m proposed is feasible at this location. See Natural England's response in our Appendix N3 [REP3-086].
5	5.6	61	Table 5-5	<i>Commitment C-291 states that 'Where hedgerow, tree lines or belts of scrub are temporarily lost to facilitate the installation of cable ducts, suitable material (such as straw bales, dead hedging, willow hurdles etc.) will be placed in the gaps to facilitate bat movement along linear corridors following backfill of cable trenches and until such time as reinstatement begins. This also</i>	Natural England welcomes the commitment to further mitigation measures which ensure habitat functionality and connectivity.

				<i>applies to haul roads – in the time period after the removal of the haul road, prior to reinstatement of hedging.'</i>	
6	5.6	64	5.6.18	<p>It is stated that 'There are three accesses where construction works will take place within 25m of ancient woodland. At access A-42 a new access from The Pike is to be created adjacent to that used by an existing timber yard business. This access solution is to minimise the length of hedgerow loss and retain a category A ash tree. A bell mouth will be constructed and be just over 15m from the edge of ancient woodland. At access A-56 ancient woodland is present north of Greentree Lane. No works are required to gain access within the ancient woodland but widening of the existing bell mouth and track to its southern side will be necessary. At access A-57 bell mouth construction will take place within approximately 12m of some ancient woodland, although on the opposite side of the A281.'</p>	<p>Ancient Woodland guidance highlights that "where possible, a buffer zone should:</p> <ul style="list-style-type: none"> • contribute to wider ecological networks • be part of the green infrastructure of the area <p>A buffer zone should consist of semi-natural habitats such as:</p> <ul style="list-style-type: none"> • woodland • a mix of scrub, grassland, heathland and wetland <p>The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.</p> <p>You should consider if access is appropriate. You can allow access to buffer zones if the habitat is not harmed by trampling.'</p> <p>We advise such measures are given further consideration by the Applicant.</p>
7	5.6	71	5.6.58 & 5.6.59	<p>5.6.58 states that 'The EcoW will oversee a programme of water vole surveys in suitable habitat within 200m of any working area at least two months prior to expected activity in that area (C-210)'. 5.6.59 states that 'The ECoW will continue to carry out checks of suitable habitat within 200m of the working area for water vole in the days prior to construction occurring in each relevant area'.</p>	<p>Natural England welcomes the inclusion of "within 200m of any working area". To resolve this issue please see response above relating to licensable protected species under section 1.2.</p>