



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Rampion Two Offshore Wind Farm

Appendix H5.5 to the Natural England Deadline 5.5 Submission

Natural England's Advice on Landscape Visual Impact Assessment

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

18 July 2024

Appendix H5.5 - Natural England's Advice on Landscape Visual Impact Assessment (LVIA)

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

- [REP4-026] 6.3.18 ES Vol. 3 Chapter 18, Landscape and visual impact assessment – Figures Rev B (Part 1 of 6)
- [REP4-038] ES Vol. 4, Appendix 22.16 Arboricultural Impact Assessment Rev B (tracked)
- [REP4-048] 7.10 Outline Landscape and Ecology Management Plan Rev C
- [REP4-044] 7.2 Outline Code of Construction Practice Rev D
- [REP4-058] 7.22 Commitments Register Rev D
- [REP4-064] 8.25.5 Applicant's Post Hearing Submission – Further information on South Downs National Park Rev B

1. Summary

The age and profile of the chalk stratigraphy varies across the country. Our assessment is that until full and proper ground investigations have been undertaken to determine the suitability of Horizontal Directional Drilling (HDD) in both Michelgrove Park and Sullington Hill chalk scarps and to ensure that the exit pits can be appropriately located, it cannot be concluded that it is possible to avoid irreversible impacts. Without the ground investigations there remains no certainty in the maximum design parameters and worse-case scenario presented in relation to potential irreversible harm to the chalk scarp. In addition, Natural England highlights that alternative approaches to that of HDD i.e. open cut trenching, have not been assessed in the Landscape Visual Impact Assessment (LVIA). Therefore, we cannot advise that the landscape character and the statutory purpose manifest through the special qualities of the designated landscape will not be adversely impacted by the proposed development and/or that there are any suitable alternative installation techniques.

If the project receives a DCO, then we anticipate that should it be determined post consent that HDD cannot sufficiently mitigate the impacts, and there are resultant changes in design parameters including (but not exclusively) increases in scale and significance of the predicted impacts and/or installation techniques beyond those assessed and consented, there would be a requirement for further consultation with the regulators and potentially the Secretary of State.

2. Main Comments

Horizontal Directional Drilling (HDD)

The chalk geology/scarps of the SDNP, are one of the key reasons for its designation and they underpin its special qualities. The chalk scarps are therefore of the highest landscape and visual sensitivity. Any harm to them will result in permanent, irreversible harm to the natural beauty and landscape character, and the special qualities of this nationally designated landscape. HDD (alongside corridor reinstatement and the replanting of vegetation) is one of the key embedded mitigation measures which supports the LVIA's conclusion that there will be no residual effects on the SDNP and on its special qualities, setting or integrity.

Natural England continues to maintain that until full and detailed ground investigations/designs by qualified experts have been undertaken on the actual stratigraphy of each of the chalk scarps it is not possible to know whether or not HDD can take place through the South Downs National Park (SDNP) scarps. The Applicant provided an example of successful drilling at Dunstable Downs for the CEMEX Kensworth to Rugby Pipeline Project (2008) to demonstrate success of HDD. However, the age and properties of the zig-zag chalk at Dunstable Downs are significantly different to that in the SDNP. Therefore, we advise that this does not prove that HDD will be successful through the chalk scarps of the SDNP at Michelgrove Park and Sullington Hill. It remains that no relevant site-specific ground investigation information has been provided to support the 'no dig' specialist's claim that the proposed trenchless crossing locations are suitable for HDD.

In the absence of the ground investigation data, Natural England advises that as a minimum an HDD risk assessment and feasibility study should be completed and consulted upon with the Local Planning Authority and relevant interested parties prior to commencement of construction to ensure that irreversible impacts can be avoided. We advise that this requirement should be secured in the DCO. We will provide further advice on this aspect of the DCO at Deadline 6.

SDNP Special Qualities

We welcome the revision B additions in relation to furthering the purpose of the SDNP in [REP4-026]. Further Information on the South Downs National Park However, this does not alter our position that based on the uncertainty of HDD there is an under assessment of the harm the landscape and special qualities of the SDNP, specifically Special Quality 1, '*diverse, inspirational landscapes and breath-taking views*' and Special Quality 3, '*tranquil and unspoilt places*'.

Viewpoint Analysis and Viewpoint Directory

We have not reviewed the Viewpoint Analysis [REP4-034] or Viewpoint Directory [REP4-036] both Revision B as the SDNPA have provided detailed responses in relation to viewpoints, which NE supports.