

Horsham District Council Deadline 6 Submission

## **EN010117: Application by Rampion Extension Limited for the Rampion 2 Offshore Wind Farm**

HDC Response to the Applicant's additional information/submissions received Deadline 5.

Overview:

The Examining Authority invited commentary on the Applicant's additional information/submissions received at Deadline 5. Horsham District Council's response is set out below.

	<b>HDC Response</b>
<p><b>[REP5-006] Draft Development Consent Order (tracked)</b></p>	<p>New Requirement 41 is wholly unacceptable to HDC. The Requirement requires implementation of the tri-partite arrangement (affecting SDNPA and Horsham DC) put forward by the Applicant at Deadline 5 Submission - 8.94 Landscape Enhancement Scheme Principles (South Downs National Park Authority and Horsham District Council) [REP5-132]. The tri-party arrangement is wholly unacceptable to HDC.</p> <p>This is reasons set out in detail in HDC Closing Statement. Since a meeting between parties on 23<sup>rd</sup> July 2024 the Applicant is proposing a different approach, whereby two separate Requirements are created (one for Horsham and one for SDNPA – note there is already a separate requirement for WSCC). Proposed wording is suggested for the HDC Requirement as set out in a Joint Position Statement, and is set out below:</p> <p><b><i>Horsham District mitigation and landscape enhancement</i></b></p> <p><i>42—(1) The authorised project must not be commenced, save in respect of onshore site preparation works, until a Horsham District mitigation and enhancement scheme in accordance with the Horsham District mitigation and enhancement principles document has been submitted to and approved by Horsham District Council.</i></p> <p><i>(2) The Horsham District mitigation and enhancement scheme must set out appropriate measures to compensate for the impact of the authorised development on the landscape character areas in which the onshore substation is located.</i></p> <p><i>(3) The Horsham District mitigation and enhancement scheme must be implemented as approved.</i></p> <p><i>(4) In this requirement “Horsham District mitigation and enhancement scheme principles document” means the document certified as such by the Secretary of State under article 51.</i></p>

	<p>Schedule 13 Part 1 Noted following hedgerows have been added to the Removal of Hedgerows list: H520b (permanent, modified) and H610 (temporary)</p> <p>Requirement No. 8 – HDC endorses ExA’s recommendations dated 17 July. Additionally, HDC would prefer to have reference to SuDs and drainage within Requirement No. 8, but recognise the ExA considers this repetition as also covered by Work No. 16 e) <i>surface water and drainage management measures</i>.</p> <p>Requirement No. 22. – Clause (b) <i>vegetation removal plan</i> has been deleted from the requirement. HDC will agree to this change if the ExA’s 17<sup>th</sup> July recommendation to DCO Requirement No. 8 is progressed. Otherwise please reinstate.</p> <p>Requirement 23(2)(b) HDC notes and endorses ExA’s recommendations dated 17 July</p> <p>Requirement 24(2)(a) Storrington AQMA should also be included in this commitment, for reasons provided in the Council’s submissions including at Deadline 5 [REP5-148].</p> <p>Disappointment that ExA’s suggested new requirement [PD-013] related to site specific plans for the detailed design approval of construction compounds at Washington have not been accepted by the Applicant, and HDC urges the ExA to consider as if without, the DCO is sufficient tightened to secure and clearly deliver these details.</p>
<p><b>[REP5-087] Commitments Register (tracked) REV E</b></p>	<p>C-26. The thresholds of significance described BS5228 are not sufficiently protective for works in tranquil locations, vulnerable receptors (e.g. Washington camping and caravanning site) and for works at night. Lower thresholds should be applied in these locations.</p> <p>C-157 states that HGV routing during the construction period to individual accesses will be developed to avoid major settlements such as Storrington, Cowfold, Steyning, Wineham, Henfield, Woodmancote <i>where possible</i>. It is still not clear how such a</p>

	<p>routing decision will be made. Storrington is also an AQMA and should be treated like Cowfold. HGV traffic should not be routed through Storrington.</p> <p>C-158 should be altered to include Storrington and Cowfold and the OCTMP REV F [REP5-069] revised accordingly.</p> <p>C-201. Local Authorities as well as WSCC be included. Local Authorities have responsibility for air quality impacts not the highways authority.</p> <p>C-231. Low frequency noise not included.</p> <p>C-263 requires the Applicant to apply to the Local Authority for a s61 consent where BS5228 threshold will be exceeded. This has resource implications for the Local Authorities that has not been addressed within the DCO submission, including on the face of the DCO order.</p> <p>C-302 has no requirement for independent review. This will fall to the Local Planning Authorities and is another resource issue that has not been addressed within the DCO.</p>
<p><b>[REP5-124] Outline Construction Communications Plan REV A</b></p>	<p>The local community (in particular, at Washington and vicinity of Kent Street) seek reassurance and having a site-specific version would be the requested solution, especially due to proximity to school and recreation ground for Washington. There is local community interest in the impacts of the traffic and accountability of HGV routes at construction compound locations and the Oakendene substation.</p> <p>The OCCP Rev A at paragraph 9.1.3 includes a chapter on tailored communications, which is welcomed. However, it is more important still that there is a site-specific version of the Construction Communications Plan as the ExA's suggested new requirement 41 (deadline 5) related to site specific plans for the detailed design approval of construction compounds at Washington have not been accepted by the Applicant, and HDC urges the ExA to consider as if without, the DCO is sufficient tightened to secure and clearly deliver these details.</p>

<p><b>[REP5-125] Outline Vegetation Retention and Removal Plan REV A</b></p>	<p>H613 cannot be located within the plans of the revised Outline Vegetation Retention and Removal Plan [REP5-125]. HDC request this is added for consistency across documentation.</p> <p>HDC does not find the information submitted under [REP5-125] provides the level of details that is helpful to understand the extent of vegetation removal and reinstatement to be carried out, particularly at site scale in the vicinity of Kent Street and the Oakdene substation, and therefore welcome the ExA's 17<sup>th</sup> July recommended amendments under DCO Requirement No. 8 (c).</p>
<p><b>[REP5-024] Design and Access Statement (tracked) REV C</b></p>	<p>Please note HDC's submission at Deadline 5 [REP5-150] to amend wording to the Indicative planting phasing plan 42285-WSPE-EX-ON-FG-OL-3902 appended to this document, which has not been actioned. Recommended wording as follows:</p> <p>'First available planting season prior to the erection of perimeter fencing'. It is also recommended that the key includes the following wording: Temporary close board fence to have access points suitable for maintenance of the landscaped areas.</p>
<p><b>[REP5-065] Outline Code of Construction Practice (tracked) REV E</b></p>	<p>HDC would welcome additional NO2 monitoring to supplement our monitoring on construction traffic routes. This would help address concerns from residents regarding the additional construction traffic movements, and to provide community reassurance.</p> <p>The thresholds of significance described BS5228 are not sufficiently protective for works in tranquil locations, vulnerable receptors (e.g. Washington camping and caravanning site) and for works at night. Lower thresholds should be applied in these locations. No independent review. Burden will fall to local authority with consequent resource implications. It is unclear how matters of dispute between the Applicant and the local authority will be resolved. e.g. where justified complaints are made about construction noise which is below the thresholds of significance described BS5228.</p>

<p><b>[REP5-069] Outline Construction Traffic Management Plan (tracked) Rev F</b></p>	<p>As previously raised at Deadline 5 [REP5-150], there is no drawing 62280651-WSP-XX-XX-DR-TP0100-0139 as stated at para 3.4.4 (A272/Kent Street – Accesses A61 and A64)).</p> <p>This drawing is not included within the documentation despite it being stated the concept designs for Access A-61 and A-64 are a principle to the traffic management strategy for accesses A-61 and A-64 (Chapter 3 of Technical Note – Construction Accesses A-26, A-28, A-61 and A-64 Traffic Management Strategies Rev C July 2024 (Appendix D of REP5-069)).</p> <p>Therefore, HDC welcome the ExA’s 17<sup>th</sup> July recommended amendments under DCO Requirement No. 8 (c).</p> <p>The OCTMP REV F continues to set out only a limited set of measures for the management of the CTMP and enforcement. The majority of measures seek to address immediate site management rather than issues enroute, such routing to avoid certain settlements. There are no sanctions or penalties proposed in the OCTMP nor on the face of the DCO order to deal with non-compliance beyond internal disciplinary procedures.</p> <p>In its written submissions throughout the Examination, HDC has suggested proportionate and realistic measures it suggests are included, such all HGVs be tracked using GPS technology to monitor compliance with the proposed HGV routes and for a formal review mechanism at timely interventions to allow for refinement or additional control measures in the strategy to be added if necessary.</p> <p>The need for management on enroute is highlighted by the fact that C-157 states that HGV routing during the construction period to individual accesses will be developed to avoid major settlements such as Storrington, Cowfold, Steyning, Wineham, Henfield, Woodmancote <i>where possible</i>. It is not clear how such a routing decision will be made. Storrington is also an AQMA and should treated like Cowfold. HGV</p>
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	traffic should not be routed through Storrington. C-158 should be altered to include Storrington and Cowfold and the OCTMP revised accordingly.
<b>[REP5-073] Outline Landscape and Ecology Management Plan (tracked) REV D</b>	<p>It is advised against the inclusion of Box species within Mix E (as listed in Appendix 22.16 Arboricultural Impact Assessment, APP-194) for hedgerows, given the increasing prevalence of non-native Box Tree Moth and its decimation of box hedges in recent years. This degree of devastation could have impacts on landscape and ecology mitigation. It is also argued that when mitigating for habitat qualities, native species mixes should be prioritised. Therefore, species listed within Mix B will suffice for hedgerow planting. It is understood that species planting compositions will be addressed within stage specific plans.</p> <p>Please note HDC's requirement at Deadline 5 [REP5-150] to amend wording to the Indicative planting phasing plan 42285-WSPE-EX-ON-FG-OL-3902 appended to this document. Recommended wording as follows:  'First available planting season prior to the erection of perimeter fencing'. It is also recommended that the key includes the following wording: Temporary close board fence to have access points suitable for maintenance of the landscaped areas.</p> <p>Otherwise acknowledge changes and no further comments.</p>
<b>[REP5-112] Outline Noise and Vibration Management Plan (tracked) REV B</b>	This authority will require compliance monitoring be undertaken to verify the modelling of noise impacts. As above its unclear how matters of dispute between the Applicant and the local authority will be resolved. e.g. where justified complaints are made about construction noise which is below the thresholds of significance described BS5228.
<b>[REP5-114] Outline Air Quality Management Plan (tracked) REV B</b>	HDC has held meetings with the Applicant between Deadlines 5 and 6, the outcome of which has resolved the Council's outstanding air quality queries. An updated Air Quality Mitigation Strategy July 2024 REV B has been shared informally by the Applicant, to be submitted at Deadline 6. On this basis, HDC acknowledges changes in the OAQMP [REP5-114] and no further comments.

<p><b>[REP5-051] Environmental Statement – Volume 4 Appendix 18.3 Landscape Assessment (tracked) REV B</b></p>	<p>Whilst HDC remains in disagreement with some of the ranking of the effects shown on the tables supplied, the rankings are in the ‘Not Significant’ range and therefore would not change the overall conclusions of the assessment.</p>
<p><b>[REP5-035] Environmental Statement – Volume 2 Chapter 18 Landscape and visual impact (tracked) REV B</b></p>	<p>HDC acknowledge and welcomes the additional information and amendments to the assessment. Whilst some difference of judgements remains with the rankings and some of the conclusion, the discrepancies in judgement are not considered to raise the effects of the identified receptors to a Significant Landscape or Visual Effect.</p> <p>For example, HDC disagrees with the LVIA assessment of Minor/Negligible concerning the residual effects at Year 10 of Kent Street, where the substation is located. Although the mitigation measures will help integrate the substation, this remains an uncharacteristic feature within the character area and at most it will be a residual Minor Effect. Equally, HDC considers that the loss of the tree line and woods within the area are likely to remain a residual Moderate effect or that, as result of the temporary loss of vegetation during construction works, the wooded, rural character of Kent Street will be adversely impacted but in time the features will be reinstated.</p> <p>HDC is overall satisfied that the amendments to the assessment provided a clearer rational and overall provides a good understanding of the expected landscape and visual impacts.</p>
<p><b>[REP5-041] - 6.3.18 Environmental Statement Volume 3 Chapter 18 Landscape and visual impact assessment - Figures Rev C (Part 2 of 6)</b></p>	<p>HDC acknowledges and welcomes the amendments to viewpoint SA2 A272 indicating the widening of Kent Street during construction.</p> <p>As raised at deadline 4 [REP4-084], SA7a viewpoint PRow southwest of site, west of Taintfield Wood looking towards the temporary compound (construction phase) has been omitted from the document but it is thought this may be a typo as SA7 appears repeated in the document twice. Please reinstate.</p>
<p><b>[REP5-049] - 6.4.18.2 Environmental Statement Viewpoint analysis (tracked)</b></p>	<p>HDC welcomes the recognition that receptors along Kent Street and residual visual effects, are higher than originally anticipated and now moved to the Significant</p>



	ranking during construction, Year 1 and Year 5. Amongst others additions and clarifications, the separate assessment of Washington recreation ground is appreciated.
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**End**