



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Rampion Two Offshore Wind Farm

Appendix H6 to the Natural England Deadline 6 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

01 August 2024

Appendix H6 - Natural England's Advice on Landscape Visual Impact Assessment

1. Summary

Natural England has reviewed the relevant documents submitted by the Applicant at Deadline 4 and 5. Our advice is summarised below with detailed comments provided in Tables 1-6. It should be noted that these comments relate to landscape only and any comments pertaining to the terrestrial ecology aspects are provided in Appendix J6. Additionally Natural England are submitting our final Risk and Issues Log at this deadline.

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

- [REP5-003] - 2.6 Tree Preservation Order and Hedgerow Plan Rev D
- [REP5-035] - 6.2.18 ES Vol. 3 Chapter 18, Landscape and visual impact assessment Rev B (tracked)
- [REP5-040] - 6.3.18 ES Vol. 3 Chapter 18, Landscape and visual impact assessment – Figures Rev C (Part 1 of 6)
- [REP4-038] - ES Vol. 4, Appendix 22.16 Arboricultural Impact Assessment Rev B (tracked)
- [REP5-073] - 7.10 Outline Landscape and Ecology Management Plan Rev D (tracked)
- [REP4-044] - 7.2 Outline Code of Construction Practice Rev D (tracked)
- [REP5-065] - 7.2 Outline Code of Construction Practice Rev E (tracked)
- [REP5-087] - 7.22 Commitments Register (tracked changes version) Rev E (tracked)
- [REP4-063] - 8.25.5 Applicant's Post Hearing Submission – Further information on South Downs National Park Rev B
- [REP5-125] - 8.87 Outline Vegetation Retention and Removals Plan Rev A

2. Natural England's Position

Natural England's position remains unchanged at Deadline 6 regarding major concerns and risks identified with the feasibility of the proposed trenchless drilling technique (Horizontal Directional Drilling – [HDD]) through the chalk scarps of the South Downs National Park (SDNP) without detailed ground investigation.

Natural England notes that detailed ground investigation and feasibility assessments have not been provided by the Applicant into examination. Therefore, we advise that outstanding fundamental risks have not been addressed in relation to the feasibility of mitigation measures. Please see D5.5 response to the rule 17 letter on Landscape for a summary of our position on HDD.

Final advice on updated documents are provided below. Natural England advises that the 'commitments' are made conditions of the DCO and where appropriate further conditions are added to manage down environmental risks.

3. Detailed Comments

Table 1 Summary of Key Issues Document Reviewed - [REP5-035] 6.2.18 ES Vol. 3 Chapter 18, Landscape and visual impact assessment 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	18.7	129, bullet point 1	Table 18-24	Natural England notes that the maximum parameters and assessment assumptions table has been updated. The second part of this bullet point is unclear. It states: <i>'Burial depth minimum 1.2m standard cover to top of duct and maximum (for HDD) 25m (trees within the HDD corridor will be retained).'</i>	Unresolved: No clear design parameters for HDD.
2	18.7	129-130, last bullet point	Table 18-24	We note that despite the amendments made to the maximum parameters and assessment assumptions, there is no change to the lighting parameter, despite HDD compounds requiring 24/7 lighting. We continue to maintain that the effects on SDNP special quality 3 (<i>'tranquil and unspoilt places'</i>) have been underassessed.	Unresolved: Natural England advises adverse effects on SDNP special qualities.
3	General			Natural England's landscape Relevant Reps raised concerns about under assessment given that the LVIA does not consider sequential landscape effects as a result of field boundary severance and instead concentrates on numbers of individual field boundaries. We continue to maintain that effects on the landscape of the SDNP and its special qualities has been under assessed due to this approach.	Unresolved: Natural England advises adverse effects on SDNP special qualities due to under assessment of sequential effects of field boundary severance.

Table 2 Summary of Key Issues Document Reviewed - [REP5-040] 6.3.18 ES Vol. 3 Chapter 18, Landscape and visual impact assessment – Figures Rev C (Part 1 of 6); [REP4-038] ES Vol. 4, Appendix 22.16 Arboricultural Impact Assessment 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	LVIA AIA Annex 2		Figures 18.8g, 18.8l, 18.8m, 18.8n; Insets 14, 23, 25 and 28 of 47	Natural England notes that there are discrepancies between the LVIA Figures and the Arboricultural Impact Assessment (AIA) Plans in relation to field boundary crossing methods. The LVIA Figures (18.8g, 18.8l, 18.8m, 18.8n) show a number of field boundaries which will be crossed by the cable route, but for which there is no information on the proposed crossing method.	We advise that this is resolved if Requirement 40 of the DCO is strengthened to state that the Vegetation Retention and Removal Plan (VRRP) is the only plan to be used by the project team in relation to the retention and removal of vegetation due to the cable route to the exclusion of any other plans; and that methods of crossings are added to VRRPs for complete clarity.

Table 3 Summary of Key Issues Document Reviewed - [REP5-073] 7.10 Outline Landscape and Ecology Management Plan Rev D

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	General point; example at 5	40	5.1.4	<p>The document continues to separate habitats and landscape character, with a concentration on habitats. This undermines the effectiveness of the Outline Landscape and Ecology Management Plan (OLEMP) in dealing with the landscape character effects of the cable route through the SDNP. This is highlighted by the tracked changes at paragraph 5.1.4 which deal with each feature being monitored for a range of fauna, but with no reference to reinstatement and replanting in relation to landscape character or the SDNP.</p> <p>Natural England welcome the inclusion of recommendations made by the SDNPA in their Deadline 4 Submission [REP4-085], paragraph 6.2 in this regard.</p>	<p>We advise that this is resolved if post consent stage specific LEMPs are required to take an integrated approach to landscape and terrestrial ecology in decisions affecting the SDNP; and this is incorporated into the relevant DCO as a requirement.</p>

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	40 & 41	5.1.4, 5.1.5, 5.1.6	Natural England welcomes the requirement for a 'suitably qualified and experienced practitioner' as part of the adaptive management measures (paragraphs 5.1.4 and 5.1.6), and in relation to monitoring habitats (paragraph 5.1.5), 'ecologist' as been replaced with practitioner, which is understandable. Despite repeated references to an Ecological Clerk of Works (ECoW) in the Commitments Register, there is no reference to one in this document.	We advise that this is resolved if post consent stage specific LEMPs require the ECoW to obtain advice from a landscape practitioner (in consultation the SDNPA) in all decisions regarding crossings through the SDNP to ensure consideration of effects on landscape character and visual amenity; and this is incorporated into the commitments register and linked to an appropriate DCO requirement.
3	4	32	4.5.5	Natural England welcomes the additional information on the proposed translocation of hedgerows in paragraphs 4.5.4, 4.5.5 and 4.5.6. However, in paragraph 4.5.5 a clearer commitment to keeping translocated plants watered is needed.	We advise that this is resolved if the wording 'regularly watered' is replaced with 'translocated plants to be watered weekly at least, if not more regularly where weather conditions require it'; and this is incorporated into the commitments register and linked to an appropriate DCO requirement.

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
4	4	32	4.5.6	Following on from point 2, in paragraph 4.5.6, ' <i>a period of 10 weeks</i> ' watering for translocated sections is too arbitrary and needs to respond to the prevailing weather conditions.	We advise that this is resolved if the period is amended to '10 weeks or more as required, depending on time of year and prevailing weather conditions'; and the ECoW is required to oversee the watering schedule and resolve any identified issues in sufficient time to prevent plant losses; and these points are incorporated into the commitments register and linked to an appropriate DCO requirement.

Table 4 Summary of Key Issues Document Reviewed - [REP4-044] - 7.2 Outline Code of Construction Practice Rev D (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	2	15	2.2.5	Natural England notes that reference is made to 'embedded environmental measures' seeking to further the purposes of the SDNP.	Unresolved: Natural England advises that it is not clear how the original embedded mitigation which underpins the Applicants LVIA conclusions accounts for all impacts to the SDNP as well as seeks to further its purposes.
3	5.2	40-41		We note that trenchless crossings as an embedded mitigation measure for the terrain of Michelgrove Park and Sullington Hill are not included in section 5.2. C-5 does not appear in the list of further commitments relevant to landscape and visual (paragraph 5.2.3), nor is there mention of trenchless crossings within the management measures at paragraph 5.2.4.	We advise that this is resolved if it is made explicit in post consent stage specific Codes of Construction Practice that C-5 is relevant to landscape and visual embedded mitigation and is included in the commitments register and linked to an appropriate DCO requirement to ensure the mitigation is secured and enforceable.

Table 5 Summary of Key Issues Document Reviewed – [REP5-087] 7.22 Commitments Register (tracked changes version)
Revision E

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		5	C-5	The protection of the chalk scarps at Michelgrove Park and Sullington Hill, Ancient Woodland at Michelgrove Park, and the SDNP special qualities, 1 and 3 - <i>'diverse, inspirational landscapes and breath-taking views'</i> and <i>'tranquil and unspoilt places'</i> .	becomes a standalone document for further clarity and ease of access.
2		13	C-19	Natural England notes that C-19 has been altered, but it remains unclear as to whether sections of 600m to 1000m between joint bays will be backfilled to reduce open trench time (an embedded measure) as claimed in the LVIA (paragraph 18.7.9, bullet point 4, p. 138). C-19 refers to the length between 600m to 1000m in relation to cable route joint bays and other ancillary infrastructure, but not to backfilling.	To resolve this we advise that C-19 is amended to make explicit that trenches will be backfilled in 600m to 1000m lengths as an embedded mitigation measure through the SDNP to ensure progressive/early restoration and reinstatement.

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
3			C-103	C-103 continues to refer to the reinstatement of habitats within 2 years of the loss. As habitats are part of the landscape, there is a conflict between the commitment at C-103 and the altered wording of the LVIA (paragraph 18.7.9, bullet point 4, p. 138).	To resolve this we advise that commitment C-103 is amended to refer to a shorter timeframe (ideally 6 months or soonest appropriate season) to correspond with the clarification in the LVIA.
4		57	C-115	Despite the altered wording of commitment C-115, there is no change to the uncertain language, which undermines the commitment. Notching is committed to ' <i>wherever possible</i> ' and ' <i>where appropriate</i> '; and replacement planting will be used ' <i>where chances of success are questionable</i> '.	Unresolved: We continue to maintain that notching is unlikely to mitigate the landscape and visual effects of the cable route through the SDNP.
5		57	C-115	Commitment C-115 has been modified, but our advice about the ECoW has not been addressed. The commitment requires the ECoW to justify the approach taken to removal and reinstatement of planting. An ECoW is likely to be focused on ecology, and thus would not fully understand the landscape sensitivities of the SDNP.	Natural England advises this is resolved if commitment C-115 is amended to require the ECoW to obtain advice from a landscape practitioner (in consultation with the SDNPA) in all decisions regarding crossings through the SDNP to ensure consideration of effects on landscape character and visual amenity.

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
6		128	C-216; C-278	<p>Commitment C-216 commits to 6m depth for HDD below Ancient Woodland, however no commitment is given for the depth of HDD under the chalk scarp at Michelgrove Park.</p> <p>We note that C-278 commits to 5m depth for HDD at Sullington Hill LWS to reduce risk of drilling fluid damage. Fluid damage for any part of the chalk scarps has the potential to cause irreparable damage.</p>	<p>We advise that this is resolved if Michelgrove Park chalk scarp and reference to the chalk scarp at Sullington Hill are added into commitments C-216 and C278.</p>
7		130; 131	C-282; C-285	<p>Commitments C-282 and C-285 relate to the Arboricultural Method Statement and refer to the Arboricultural Impact Assessment. There are discrepancies between this document and the Outline Vegetation Retention and Removals Plan in relation to the treatment of vegetation at crossings through the SDNP. See Table 1 point 1.</p>	<p>We advise that this is resolved if reference to the Outline Vegetation Retention and Removals Plan (and stage specific Vegetation Retention and Removals Plans) as the definitive plans to protect vegetation within the SDNP are added to commitments C-282 and C-285.</p>

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
8		134	C-292	<p>Commitment C-292 supports C-66 which aims to minimise effects on the special qualities of the SDNP. C-292 refers to an ECoW providing advice at 'each crossing of sensitive habitats'. No reference is made to the SDNP (all of which is sensitive in relation to landscape character). An ECoW, who would necessarily be focused on ecology is unlikely to have the skill to understand the landscape sensitivities of the SDNP.</p> <p>Note the linked commitments below:</p> <ul style="list-style-type: none"> - C-196 which aims to reinstate lost vegetation and maintain the landscape character (p.88/89). - C-207 which refers to ECoW ensuring compliance with relevant wildlife legislation, agreed mitigation and best practice (p.93) 	<p>We advise this is resolved if commitment C-292 is modified to require the ECoW to obtain advice from a landscape practitioner (and consult the SDNPA) in all decisions regarding crossings through the SDNP to ensure consideration of effects on landscape character and visual amenity.</p> <p>Linked commitments C-196 and C-207 should be modified to include this requirement.</p>
9			C-301	<p>Natural England welcomes the addition of this commitment. However, the commitment lacks reference to the effects on landscape character through the SDNP.</p>	<p>We advise that this is resolved if commitment C-301 is amended to require evidence when submitting stage specific LEMPs that the landscape character of the specific location where the replacement vegetation and/or habitat is proposed is considered in the choice of species/habitats.</p>

Table 6 **Summary of Key Issues Document Reviewed – [REP5-125] 8.87 Outline Vegetation Retention and Removals Plan Rev A**

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	General			Natural England has noted discrepancies between the LVIA Figures and the Arboricultural Impact Assessment Plans in relation to the field boundary crossing method.	We advise that this is resolved if Requirement 40 of the DCO requires that methods of crossing each field boundary within the SDNP are referenced within stage specific Vegetation Retention and Removals Plans. See Table 2, point 1.