Horsham District Council

Eleri Wilce
Rampion 2 Project
Rampion Extension Development Ltd
C/0 RWE Renewables
Greenwood House
Westwood Way
Westwood Business Park
Coventry
CV4 8PB

Our ref: PE/20/0089
Your ref: RAM_173 Party ID: 479
Please ask for: Matthew Porter
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Date: 16 September 2021

Dear Eleri Wilce,

Proposals for an offshore wind farm off the coast of West Sussex (known as Rampion 2)

Notice pursuant to Section 42 of the Planning Act 2008 and Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Thank you for your invitation of 14 July 2021 to Horsham District Council (HDC) as a statutory consultee/Prescribed Party, to your statutory consultation and notification pursuant to Sections 42 and 48 of the Planning Act 2008.

Introduction

As set out in your notification, Rampion Extension Development Limited (the applicants) will submit to the Planning Inspectorate an application for a Development Consent Order (DCO) for the construction, operation and maintenance of an offshore windfarm. The development will comprise both onshore and offshore infrastructure and will be EIA Development pursuant to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The application, if accepted, will be Examined by the PINS and a recommendation will be made to the Secretary of State for Business, Energy and Industrial Strategy who will then decide whether or not to approve the DCO.

It is understood this consultation is being carried out to inform the design of the scheme, and that the Council's response to the consultation will be considered, and details of how the Council's response has influenced the final proposals will be explained in the Consultation Report to be submitted with the application.

The Council's Response

The Council's Consultation response has been informed by the materials viewed from the project website www.rampion2.com/consultation. This includes:

- Preliminary Environmental Information Report (PEIR), with particular regard to chapters 19 (Landscape and Visual (Onshore)), 20 (Air Quality), and 26 (Historic Environment), and the Non-Technical Summary (NTS) to the PEIR;
- Accompanying documents, plans and maps showing the nature and location of the proposals; and Consultation factsheets.

The Council's response focuses on topic areas within the PEIR that are considered by the Council to be the key issues within its remit. Because the Council's remit ends at low water mark, impacts

beyond that point have not been addressed, other than where they have onshore impacts of the Proposed Development. That is not that same as saying that such impacts are not of interest to Horsham District Council – the Sussex coastline is a treasured asset, being the closest seaside amenity to many of those who live, work and visit our district.

The Council's response has referred back to its Scoping stage reply given on 29 July 2020, to inform the Planning Inspectorate of the information considered should be provided in the Environmental Statement (ES) relating to the Proposed Development.

Policy and legislative context (Chapter 2, Volume 2 PEIR)

Consideration is given to our adopted Local Development Plan (the Horsham District Planning Framework 2015 – 2031 (HDPF)) and the emerging Development Plan Document (Draft Horsham District Local Plan 2019 -2036).

The Government announced changes to the National Planning Policy Framework (NPPF) on Tuesday 20 July. These changes have had implications on the emerging Horsham District Local Plan which is now required to detail a 30-year vision. As a result of these changes the meeting of full Council on 28 July to approve the Regulation 19, Pre-Submission Horsham District Local Plan document was postponed. The Council is now targeting the agreement of its Regulation 19 Draft Local Plan at a meeting of the full Council in late November 2021, with an extended period of public consultation to follow across the Christmas and New Year period ahead of formal submission.

A number of Neighbourhood Plans within the District relevant to the Proposed Development were made at Full Council on 23 June 2021. To view individual plans:-

https://www.horsham.gov.uk/planning/neighbourhood-planning

Alternatives (Chapter 3, Volume 2 PEIR)

Onshore cable corridor – refinement since the Scoping Stage

The Council notes following the Scoping stage, the onshore cable route has been further refined to reduce the number of options being considered and the size of the area included in the PEIR.

The Council notes identification of alternative route options in our district:-

Washington

Given the technical construction challenges presented by the steep slope and potential environmental impacts such as Chanctonbury Hill SSSI and Washington Chalk Quarry Local Wildlife Site (LWS), as well as ancient woodland, the original route (Washington A) has been discounted and an alternative route (Washington B) adopted. The PEIR assesses the Washington B route to be the only viable alternative.

Washington B crosses approximately 200 metres of Sullington Hill LWS. The route is located near to Rock Common Sand Quarry, a locally important geological site and crosses an Archaeological Notification Area; multi-period features on Chantry Bottom, Sullington Hill and Kithurst Hill, Storrington and Sullington. It is within 100m of Washington Conservation Area, which includes several Grade II listed buildings and within 100m of two Grade II listed buildings at Lower Chancton Farm. Views in this area will need to be considered from the South Downs National Park.

Windmill Quarry

At Washington, the original route (Windmill Quarry C) crosses through Windmill Quarry, an authorised and active landfill site. This discounted this cable route. An alternative route (Windmill Quarry B route option with extension) is proposed. Although in proximity to ancient woodland, Windmill Quarry B avoids more woodland and trees. Potential impacts from noise due to the proximity to residential properties in the area will need to be considered.

Henfield

The initial appraisal study route identified two options through the Henfield area. Both routes cross main watercourses and flood zones at numerous points. Henfield 1C route has been proposed as an alternative to route to reduce the number of watercourse crossings and area of flood zone crossed. Only two Horizontal Directional Drillings would be required.

Bolney Road/Kent Street

The original route crossed flood zones 2 and 3. An alternative route (Bolney Road 1C & 1D) has been proposed to avoid crossing the flood plain entirely and to provide a more direct cable route.

Onshore substation – refinement since the Scoping Stage

The Council notes since the Scoping stage, more detailed site selection work has been undertaken to apprise the substation search area options within the scoping boundary.

The two substation search area options retained within the PEIR Assessment Boundary are:-

- Option A: Bolney Road/Kent Street; and
- Option B: Wineham Lane North

Bolney Road/Kent Street

Bolney Road/Kent Street substation search area option is located to the east of Cowfold Village (Figure 3.6, Volume 3 and Graphic 3-19) on greenfield land adjacent to an industrial estate. Constraints associated with this search area option include its proximity to Oakendene Manor Grade II listed building, proximity to the High Weald Area of Outstanding Natural Beauty (AONB) and nearby residential properties. It is also the furthest substation option from the grid connection point at Bolney.

Wineham Lane North

Wineham Lane North substation search area is located immediately to the north of the existing Bolney substation (Figure 3.6, Volume 3 and Graphic 3-20) on greenfield land. Access would be from Wineham Lane. Constraints associated with this search area option include its close proximity to ancient woodland which borders the north of the area, and proximity to nearby properties.

Cable route options to Wineham Lane North and Bolney Road/Kent Street substation search areas

The Council notes all of the different cable route options identified to each of the remaining two substation search areas have been retained within the PEIR Assessment Boundary at this stage, as there is no overall preferred option or clear preference from an environmental or engineering perspective.

Should Wineham Lane North substation search area be discounted from the final design, at least one of these two corridors could be removed. If the Bolney Road/Kent Street substation location is discounted, the southern Bolney Road/Kent Street cable corridor option (Bolney Road/Kent Street Route 1A & 1C) is unlikely to be retained.

The Proposed Development (Chapter 4, Volume 2 PEIR)

Of the Proposed Development, the following elements that are of most importance to Horsham District Council are:-

- Onshore underground cables with jointing pits to transmit electricity to a new onshore substation. It is expected that the onshore cables will be laid within a corridor, the majority of which shall have a temporary working width of up to 50 metres;
- The construction and operation of an onshore substation on land in the vicinity of the existing National Grid Bolney Substation in Twineham, Mid-Sussex; and

- Underground cables between the new substation and the existing Bolney substation to connect the offshore wind farm to the National Grid.

Key Environmental Aspects

In summary, HDC is in broad agreement with the methodologies and assessments set out and detailed in the PEIR for our areas of interest. It should however be highlighted that the Council's opinion could change should additional receptors and potential impacts be identified as the project is further refined. The Council wishes to highlight the following key comments in detail below:-

Historic Environment (Chapter 26, Volume 2 PEIR)

Overall Methodology and Assessment

The Council notes a precautionary approach has been taken in the identification of potential effects. It is anticipated that as detail of the construction sequence is further refined, the potential effects arising through change to setting identified at PEIR will be reduced. Where indirect effects through changes to setting are identified during the construction phase, these are expected to be short-term temporary.

However, the Council notes that where potential significant effects may arise, those assets will be subject to a more detailed assessment will be undertaken to support the Development Consent Order application.

Onshore cable corridor

Construction activity will introduce new visual and audible elements into the historic landscape character of the South Downs and Low Weald which will be perceptible, within long views across the downland particularly. However the Council acknowledges these will be time-limited and on completion of construction, the land will be reinstated to its former condition (paras 26.9.8 and 26.9.9). The District Conservation Officer is satisfied in the long term, this will partially mitigate loss of aesthetic and historic interest, although loss of archaeological interest will persist.

Intrusive groundworks will take place during the construction phase onshore, including topsoil stripping and sub-soil disturbance, which will adversely affect any surviving sub-surface archaeological remains. There are known archaeological heritage assets, some of which are of medium or high heritage significance (sensitivity), particularly on the downlands within the vicinity of Sullington Hill where scheduled remains of prehistoric, Roman and Medieval activity are known, including the scheduled group of four Bronze Age bowl barrows at the Chantry Post (List entry no. 1015713).

The submitted archaeological impact assessment identifies field investigations and any subsequent environmental measures, together within the avoidance of areas of sensitivity (or heritage significance), will limit the magnitude and overall effect on archaeological receptors to an acceptable level being low to medium adverse, which will be Not Significant in EIA terms. Having consideration of embedded environmental measures within the PEIR, including to address archaeological impacts, the District Conservation Officer is satisfied with the PEIR assessment that effects are identified as **minor adverse**, which will be short-term temporary and will be **Not Significant** in EIA terms. The District Council's Conservation Officer has been in liaison with the WSCC archaeologist, and fully supports the submitted archaeological impact assessment

Construction activities associated within construction of the onshore cable corridor could potentially affect the settings of designated heritage assets. The PEIR identifies designated assets which have the potential to be affected (table 26-26) with indication of the range of magnitude of change and heritage significance (sensitivity). For instance, Listed Building Grade I 1354113 Buncton Chapel of All Saints, is identified as **major adverse**.

Substation

Bolney Road / Kent Street onshore substation search area largely comprises post medieval landscaped parkland of Oakendene Manor (Grade II listed, List entry no. 1027074), which provides an important visual setting for the surviving manor house. Other than the visual effect of the tall dense planting, the presence of the industrial estate itself does not dramatically alter what is a rural parkland landscape with open views to the south and west.

The PEIR assessment of effects arising through change during the operation and maintenance phase to the historic landscape character at the Bolney Road/Kent Street substation search area, will be **moderate adverse**, which will be potentially **significant**. The PIER assessment of effects arising through change to the setting of Grade II Listed Building Oakendene Manor will be **major adverse,** which will be **significant**. (paras 26.10.3 and 26.10.9 and Table 26-29Bolney Road / Kent Street – Potential effects arising through change to setting of heritage assets during the operation and maintenance phase).

The Council's Conservation Officer is satisfied with the PEIR assessment that the Bolney Road/Kent Street onshore substation search area will be highly constrained due to perceptibility of construction activity from Grade II Listed Building Oakendene Manor, and the PEIR assessment of effects to its historic landscape character and parkland setting, including during the operation and maintenance phase.

Landscape and Visual impact (Chapter 19, Volume 2 PEIR)

Overall Methodology and Assessment

The Council's Landscape Architect is satisfied the proposed methodology is in accordance with best practice and current guidance; that all the likely visual and character effects have been identified; and that reasonable landscape principles (embedded mitigation) and other mitigation measures are being considered/put forward on the forthcoming Landscape Design Plan at Environmental Statement (ES) stage.

Onshore cable corridor

It is positive that the cabling route will be left in situ at decommissioning stage to avoid further landscape harm. There is also commitment that most trees within the cabling route will be retained although this can only be checked once further details on the landscape strategy are received. There may be slight contradiction in this commitment, as in the non-technical assessment reference is made to landscape elements, such as trees, woodland and hedgerows removed during the construction process being reinstated as far as possible.

Substation

PRoW 1786 is routed between east of Taintfield Wood and the A272 via Oakendene Industrial Estate. It crosses the southwestern corner of onshore substation search area option A. The ZTV (Figure 19.7b, Volume 3) indicates theoretical visibility from much of this recreational route. Viewpoint SA3 (Figure 19.12, Volume 3) is located on this route at Taintfield Wood. As reported in the PRoW Management Plan in Appendix 24.2, Volume 4, the part of the recreational route through the onshore substation search area will be closed and permanently diverted.

In assessing the level of whole Proposed Development residual effects, the PIER identifies there will be localised **significant** residual effects on the views from a short section of this PRoW as a result of both the onshore substation and onshore cable corridor (Table 19-30 Onshore substation search area option A – visual effects on views from Recreational routes).

The Council is therefore disappointed that one of the likely effects to the recreational route (PRoW 1786 between east of Taintfield Wood and A272 viewpoint SA3) has not yet been fully assessed in the PIER as the path is to be diverted and the final route is not agreed yet.

As there is present uncertainty to the final route of PRoW diversion, only indirect effects have been assessed in the PEIR. Given the identification of significant residual effects, the Council would expect the Environmental Statement to be informed by a precise and agreed final route, as this is necessary to fully inform the most appropriate location for the on-shore substation.

Air Quality (Volume 2, Chapter 20)

Overall Methodology and Assessment

Regarding the produced results, the Council's Environmental Protection team note that for virtually all the modelled human receptors, the impacts due to construction traffic have been assessed as negligible.

The applicant will use IAQM guidance on the Assessment of Dust from Demolition and Construction (2014, updated 2016) to assess and mitigate the impacts, which is the methodology that HDC recommends. A key measure proposed that is supported by the Council is for heavy goods vehicle routing to avoid the Cowfold Area Quality Management Area (AQMA).

To be able to verify that the dispersion model includes worst-case receptors in the Cowfold AQMA, the Council's Air Quality Officer requests that receptor locations with results be available in an Excel-compatible format – to enable quick plotting in a mapping software. Currently the results are only available in a pdf format (in Appendix 20.1), which does not facilitate processing in GIS software.

Construction/ Operation Phases

Assuming that worst-case receptors in the Cowfold AQMA have been included and the results have all shown a negligible impact, the applicant is required to draw up an air quality mitigation plan, to be in compliance with the Air Quality and Emissions Mitigation Guidance for Sussex (2021), which encourages the use of low emission technologies for all Major projects.

Regarding the proposed mitigation for air quality impacts in the Cowfold AQMA, the Council's concern is the feasibility of enforcement for heavy goods vehicle routing to avoid the AQMA, which is the key measure proposed.

A major cause of air pollution in the Cowfold AQMA is the build-up of traffic leading into the double roundabout in the village centre. This problem is worsened due to the stop start nature of this traffic, which cause a build-up of pollutants. Because construction vehicles are often slow moving, if any construction vehicles are to pass through Cowfold, their movement should not restrict the constant flow of traffic through the village.

To follow the message of the Council's low emission strategies, and as Rampion 2 is a project of national importance, the Council expectation would be for the applicant to employ clean technology to deliver the project - including low emission construction traffic (in addition to a routing strategy) and low emission non road mobile machinery (NRMM). Therefore, the Council's Air Quality officer would like the applicant to confirm the emission standards of the construction traffic vehicles and NRMM used for cable installation along the A272.

Although Air Quality and Emissions Mitigation Guidance for Sussex (2021) guidance was written in the context of operational impacts it de facto applies to impacts lasting a number of years. As such it still applies to construction activities that take a number of years to complete. It is stated in the PEIR that the duration of the construction phase for cable installation may take up to three years, although – as confirmed by the consultants – construction activities at any given location will be of fairly short duration as the contractors work their way along the route. It would be helpful, if possible, at ES stage to clarify the duration of the installation activities taking place along the A272 between the A23 and A24.

<u>Other Environmental Aspects</u>

Socio-Economics (Chapter 18, Volume 2)

This section acknowledges employment and recreational sites within the district. Measures ensure the benefits of the project are focused on local people to access employment opportunities and continued access to Green and Social Infrastructure, with focus on Pubic Rights of Way. Reference is made to The Downs Link.

The Council notes the onshore cable corridor will have impacts on recreation assets, and Access Land users and Washington recreation ground and allotment users as sensitive receptors.

Several parcels of other Access Land are in the vicinity of the onshore cable corridor and two will be crossed, both are near the northern border of the South Downs National Park Authority, near Sullington Hill. There is a concentration of 'open country' access land along the northern border of the Downs, providing a large public access resource over approximately four miles of the National Park boundary. The potentially affected Access Land parcels include Sullington Hill, TQ096122.

While not a registered common and therefore not Access Land, there is one other block of public green space that falls within the onshore cable corridor. This is the Washington Recreation Ground and Allotments (TQ122132) which has one football pitch, one cricket pitch and parking for 12 vehicles. The land lies directly on the cable route and but will be crossed using HDD. Two abutting parcels of land are also recognised as public green space, these are Jockey's Meadow and The Triangle, shown in

The Council notes the sensitivity impacts to these receptors is noted as **Low** and Medium with **negligible** and **minor** significance. The Council further notes a number of embedded environmental measures have been identified and committed at reducing (and mitigating) the impact of constriction activity on these receptors. The Council would expect commitments at Environmental Statement stage to demonstrate the applicant has engaged with those communities affected on the effects to reduce disruption to these recreation assets.

Ground Conditions (Chapter 25) and *Water Environment* (Chapter 27, Volume 2)

HDC is in broad agreement with the ground conditions, hydrogeology, hydrology and flood risk assessments detailed in the PEIR.

Terrestrial Ecology and Nature Conservation (Chapter 23)

It has been agreed with WSCC that the detailed assessment of terrestrial ecology and nature conservation implications will be advised by that authority given their in-house expertise on this specialist environmental aspect.

The PEIR includes appropriate guidance on such matters upon features of terrestrial ecology and nature conservation interest and opportunities to improve biodiversity.

The PEIR identifies impacts on designated sites (international, national and local), protected species and Priority habitats and species in the district, as a result of the Proposed Development (via Zones of Influence). In particular identifying the Arun Valley SAC, SPA, and Ramsar; The Mens SAC; and Amberley Wild Brooks SSSI/Pulborough Brooks SSSI, setting out preliminary assessment outcomes and embedded environmental measures.

Also identified is Amberley Mount to Sullington Hill SSSI and Sullington Hill Local Wildlife Site, both stretches of the South Downs escarpment that support moderately species-rich chalk grassland (Calcareous semi-improved grassland) on north and east-facing slopes. The Council notes the effects of Sullington Hill Local Wilidlife Site has been subject to detailed discussions with West Sussex County Council (WSCC) and South Downs National Park Authority (SDNPA) and their respective in-house specialists. From these discussions it is proposed to adopt a trenchless technique, with the area of Sullington Hill crossed by the onshore cable corridor will be subject to a trenchless crossing (e.g. Horizontal Direction Drilling) and access needs will be met through the use of existing tracks outside of the SSSI boundary. As part of embedded environmental measures mitigation will be provided for calcareous semi-improved grassland through the narrowing of the construction working

width as the onshore cable corridor passes through this habitat type. This will shrink the onshore cable corridor from a 50m width to 30m thereby reducing the amount of habitat loss. Reinstatement will occur through the replacement of turves that were cut, labelled and maintained to allow replacement from the location that they were stripped from. Compensation for this habitat has not been established but could involve the enhancement of other areas of this habitat along the onshore cable corridor.

Given these embedded environmental measures are a result of WSCC and SDNPA advice to the applicant, the Council is satisfied that both public bodies continue to lead having the in-house specialist resources to best address these matters.

Embedded environmental measures include habitat connectivity and availability and land management, which are key components to the development of ecological networks which create wildlife corridors towards delivering the district's recently adopted Nature Recovery Network (NRN) Report:-

https://www.horsham.gov.uk/climate-and-environment/wilderhorshamdistrict/horsham-district-nature-recovery-networks

The district NRN report has been formed in partnership with the Sussex Wildlife Trust and the Council notes reference within the PEIR is made to discussions between the applicants and the Trust with regard to its conservation priorities for the area.

Reference is also made to discussions with WSCC on the draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol. The Council notes the effect of lighting of the operational onshore substation is assessed as **Significant** on an ecological feature of County important (Bats) (para 23.10.105) and that within the ES further survey information will be available on which to base a full assessment.

Nature Conservation (Offshore) (Chapter 14, Volume 2 PEIR)

The kelp restoration zone is within a 4km buffer off the Sussex coast. The offshore array area is not within the kelp forest restoration zone, however the export cable route will have a small overlap with the area in the area close to the landfall. Direct interaction with the Kingmere MCZ has been specifically avoided from the export cable and array. Potential impacts to the MCZ within the PEIR, including potential impacts to Black Bream from Piling noise and disturbance to the seabed resulting in increased sediment in the water column.

On both matters, the PEIR identifies the applicant is working with Statutory Nature Conservation Bodies, including Natural England to ensure that any impacts are minimised through design and construction techniques.

Seascape, Landscape and Visual Impact Assessment (Chapter 16, Volume 2 PEIR)

HDC has taken note of and is satisfied key viewpoints have been identified.

Transport (Chapter 24, Volume 2 PEIR)

The detailed scope of the assessment of highway and transport implications will be advised by the Local Highway Authority, WSCC. Within its remit HDC is in broad agreement with the assessment methodology detailed in PEIR. Horizontal Directional Drilling should be fully utilised to reduce highway disruption during the construction phase.

Major Accidents and Disaster (Chapter 28, Volume 2 PEIR)

The PEIR has identified that whilst a fire which could occur at one of the substations is a potential major accident during the operation phase, fires are primarily protected by good design of the electrical systems and fuel storage, which will be considered. The applicant has committed to

ensuring that design of the Proposed Development will not be objected to by the Health and Safety Executive.

Summary and Recommendations

I confirm that this letter forms Horsham District Council's consultation in response to your statutory consultation and notification pursuant to Sections 42 and 48 of the Planning Act 2008.

Taking into consideration the evidence of the PEIR, which has identified **significant** landscape and heritage effects of sub-station search area Option A (Bolney Road/Kent Street), it is HDC's strong recommendation that the sub-station search area Option B (Wineham Lane North) be utilised and expanded for Rampion 2 as opposed to Option A.

The Council expects before Environmental Statement stage submission that:-

- Assessment of the most appropriate substation location be informed by a precise and agreed final route of the diversion for PRoW 1786 routed between east of Taintfield Wood and A272 viewpoint SA3, and plans that show the precise trees/hedgerows to be removed when the final LVIA is provided.
- Where it is identified potential significant effects may arise to settings of heritage assets, those assets are subject to a more detailed assessment in the identification of potential effects, to include Listed Building Grade I Buncton Chapel of All Saints (List entry no. 1354113); archaeological heritage assets within the vicinity of Sullington Hill including the scheduled group of four Bronze Age bowl barrows at the Chantry Post (List entry no. 1015713); and Oakendene Manor and its landscaped parkland (Grade II listed, List entry no. 1027074)
- The applicant includes as an embedded environmental measure, an Air Quality Mitigation Plan, to be in compliance with the Air Quality and Emissions Mitigation Guidance for Sussex (2021), which encourages the use of low emission technologies for all Major projects, and requests the emission standards of the construction traffic vehicles and NRMM used for cable installation along the A272 to be confirmed at ES stage.
- Noise monitoring locations to sensitive receptors be identified and environmental measures embedded accordingly.
- Embedded environmental measures demonstrate the applicant has engaged with those communities affected on the effects to reduce disruption to communal recreation assets at Washington.
- In consideration of further refinement of the cable route options, the use of trenchless crossings (Horizontal Directional Drilling) is fully maximised as a means to reduce highway disruption during the construction phase; safeguard ecological interest in the area of Sullington Hill crossed by the onshore cable corridor; as well as avoiding impacts on the river environment.

The Council requests before Environment Statement stage submission that:-

- An additional area to be considered for a desk based and field walking assessment by the applicants is Shermanbury Grange. It is identified in the H.E.R. under ref: MWS3325. This appears to be a country house and parkland now split into several dwellings. Some of the designed landscape may still exist.
- The applicant present the air quality dispersal model receptor locations plotted on a map rather than a list of grid references, to enable ease of reference for specialist consultees and better understanding for the public.
- Consideration be given to the HDC Nature Recovery Network report to inform embedded environmental measures.

Yours sincerely,

Matthew Porter
Senior Planning Officer