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Rampion 2 Project  
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If Calling Please ask for: Matthew Porter  
Date: 24th March 2023

Dear Sir/Madam,

**Notice pursuant to Section 42 of the Planning Act 2008. The construction, operation and maintenance of up to 90 offshore wind turbines and associated foundations. Construction of up to three offshore substations.**

### **Rampion 2, Offshore Wind Farm Off The Coast of West Sussex**

#### **Notice pursuant to Section 42 of the Planning Act 2008.**

Thank you for your invitation of 22<sup>nd</sup> February to Horsham District Council (HDC) as a statutory consultee, to your statutory consultation and notification pursuant to Section 42 of the Planning Act 2008 on the potential amendments to the onshore cable corridor.

#### **Introduction**

As set out in your notification, in summer 2021 the Applicant carried out a statutory consultation pursuant in respect of its proposals for an offshore wind farm. This was then opened again for a period of time for a specific category of stakeholders in early 2022. A supplementary consultation on potential amendments to the onshore electricity cable corridor was then undertaken in Autumn of 2022. In considering the responses to those consultation exercises and having regard to stakeholder and landowner feedback, engineering considerations and further environmental assessment information, the Applicant has identified one further alternative cable route and additional access options which are located both beyond and within the previously identified onshore cable corridor.

The purpose of this letter is to consult HDC on this potential amendment to the onshore cable route. The modifications proposed comprise potential alternative cable routes, modifications to existing routes, additional accesses and new working methods along the onshore cable corridor.

#### *The Land Affected*

The land to which the changes in this current consultation relate is in the South Downs National Park, within the parishes of Patching, Clapham and Storrington & Sullington. An alternative cable route is proposed, 3km in length, from Myrtle Grove to Sullington Hill, north of Patching.

#### *The Land Affected within Horsham District*

LACR-01d (north)

From the northerly point of LACR-01d (west) and LACR-01d (east), LACR-01d (north) runs north for approximately 1.7km to Sullington Hill. This area is wider than the working width needed for the onshore cable construction corridor. Depending on the final onshore cable route configuration within the onshore cable corridor, LACR-01d (north) will cross up to six PRoWs (Bridleway 2173, Bridleway 2282\_1, Restricted Byway 2092, Restricted Byway 2693, Bridleway 2108\_1, Bridleway 2282). LACR01d (north) will then either re-join the original PEIR Assessment Boundary (southwest of Sullington Hill) or the northern section of LACR-01c southeast of Sullington Hill) depending on the final onshore cable corridor option selected through LACR-01d. At the northern extent of LACR-01d (north), there is an overlap with Sullington Hill Local Wildlife Site (LWS). This area of the LWS supports a mixture of scrub and calcareous grassland. Sullington Hill LWS will be crossed using trenchless crossing techniques, as previously described in the PEIR and PEIR SIR for all previous onshore cable route options in this area.

## **Summary and Recommendations**

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

The Council understands its Preliminary Environmental Information Report: Further Supplementary Information Report (PEIR FSIR) 2023 feedback will enable a finalised onshore design of the Proposed Development to achieve a single onshore cable route and associated infrastructure, and as such not all alternatives and modifications presented in this report will be adopted and then assessed in the forthcoming Environmental Statement (ES). Refined Development Consent Order Limits, including a final set of associated accesses and temporary construction compounds will be presented as the final plans in the application for development consent and accompanying ES.

Changes in the magnitude of impact as a result of Alternative Cable Route are noted to arise, even accounting for the implementation of embedded environmental measures, and the Council has raised concerns on some of these in its detailed response set out below.

Horsham District Council is in broad agreement with the methodologies and assessments set out and detailed in the PEIR FSIR for its areas of interest, subject to resolution on the response comments set out below. This includes using trenchless crossing techniques, as previously described in the PEIR (and PEIR SIR (2021/22)).

Horsham District Council comments would be that there are likely significant landscape and visual adverse effects identified for route LACR-01d. Given there are at least two other routes where the identified effects are slightly lower (LACR-01b and LACR-01c), those would be favoured by Horsham District Council.

## **The Council's Response**

The Council's Consultation response has been informed by the materials viewed from the project website <https://rampion2.com/consultation-2023>. This includes the Further Supplementary Information Report (FSIR) to the PEIR. To assist with understanding the FSIR, the Council has also read the Preliminary Environmental Information Report (PEIR).

The Council's response focuses on topic areas within the PEIR FSIR that are considered by the Council to be the key issues within its district authority remit within its local authority area. The Council's response has referred back to its responses to the 2022 Statutory onshore consultation (PEIR SIR Oct-Nov), and 2021/22 (PEIR) Statutory project wide consultations, and Scoping Report (2020).

The Council's response to this consultation (PEIR FSIR) 2023 is as follows.

## **Longer Alternative Cable Route 01d**

It is noted Route 01d passes through a number of public right of ways (including Bridleway 2209, 2173, PRoW 2262, a small section of footpath 2260). The construction of an operational access area includes a bridleway 2173 and some clumps of trees. However, this length is outside of Horsham District.

The section of the route within Horsham District and wholly within the South Downs National Park, is LACR-01d (north). However, it is noted that the conclusions of the PEIR FSIR Assessment are made considering the 01d route as either north-west or north-east.

Three additional temporary construction and/or permanent accesses are proposed associated with LACR-01d (AA-34 to AA-35). These three AAs (AA-33 to AA-35) are modifications and/or extensions to AAs considered in the PEIR SIR (2022) (AA-10, AA-24 and AA-26). Two of these AAs (**AA-34 and AA-35**) cross into Horsham District.

### **Socio-Economics**

LACR-01d and associated AAs introduce additional socio-economic receptors including users of public rights of way (PRoW). The top section of the cable route, which is within the South Downs National Park, is bounded by bridleway 2173 along the western boundary of the cable route. Bridleway 2282\_1 cuts through the area and also restricted byway 2092 near where it meets Local Wildlife Site Sullington Hill.

LACR-01d is also likely to have significant adverse effects on national trails including the South Downs Way and the Monarch's Way. Compared to the PEIR, LACR-01d (north) results in a Moderate/Major adverse effect (Significant) on users of Restricted Byway 2092, which is part of the South Downs Way National Trail (SDW), and Restricted Byway 2693; and a Minor/Moderate adverse effect (Significant) on users of Restricted Byway 2092 (south of Restricted Byway 2693) during the open trench crossing of these strategic PRoWs. It is noted the assessment of Restricted Byway 2693 has been based on the maximum design scenario of an open cut trench crossing however it is expected Restricted Byway 2693 will either be avoided or crossed via trenchless crossing technique depending on the final onshore cable corridor option selected.

AA-35 results in Moderate/Major adverse effects to users of Restricted Byway 2092, Bridleway 2107 and Bridleway 2109, which are Significant in EIA terms. The impact on these PRoWs will arise predominantly from the proposed use of AA-35. It is noted the use of the assessed AA-10 (as presented in PEIR SIR (2022)) would result in the same effects as AA-35.

### **Summary on Socio-Economics**

A key consideration is that for LACR-01b no significant effects are identified for national trails including the South Downs Way and the Monarch's Way but also the number of footpaths and bridleways (and therefore users) are less or equal than the alternative routes.

### **Terrestrial Ecology and nature conservation**

Phase 1 habitat survey data collection is noted. The updated PEIR FSIR Commitment C-115 (notching for reinstatement that gives structure earlier than standard planting regime) to hedgerows/tree lines crossed by the cable route is noted and supported.

According to PEIR FSIR, given the route of LACR-01d, it does not change the outcomes described at PEIR SIR (2022) as provided within the PEIR (2021).

As the design becomes finalised prior to the DCO Application, the opportunity to understand more fully the realistic worst-case scenario (including new and updated embedded environmental

measures) will likely enable some of the significant effects identified at PEIR (2021) to be revised to not significant. Additionally, the effects of fragmentation can be better understood and assessed.

### Landscape and Visual Impact

LACR-01d is a longer route that cuts through a higher number of field boundaries, and thus it is likely that significant adverse effects will be experienced on the landscape character areas and landscape features.

Looking at the Landscape and Visual Assessment and comparing the residual effects with the previous findings for LACR-01c and LACR-01b, it is the Council's opinion from the preliminary assessment presented in the PEIR FSIR, that LACR-01b is the preferred route over LACR-01c or LACR-01d (north east or north west), as significant effects have been identified for all routes.

With regards residual landscape character effects, it is the case for all routes that the proposals will have a significant adverse residual effect on part of the South Downs National Park (SDNP) and on two of the special qualities of the SDNP. The nature of these adverse residual effects will extend across part of the SDNP and its setting and expound from significant adverse effects on landscape character and visual receptors that will occur during the construction phase.

When it comes to Landscape character areas, it is still the case that all options will have significant residual adverse effects on the A3: Arun to Adur Open Downs character area.

In addition to Landscape Character Area A3, LACR-01d also results in significant adverse residual effects on another Landscape Character Area, I3: Arun to Adur Downs scarps. The nature of these residual effects will be both direct and indirect, adverse and in some cases cumulative with the offshore elements of the Proposed Development

Routes LACR-01b and LACR-01d both crosses five tree belts/hedgerows as opposed to 18 no. field boundaries identified for LACR-01c (the numbers referred to above are the overall field boundary crossings along the section of that route, not just what would be found within Horsham District).

Overall, the Council are of the opinion that the LACR-01b route so far is the least harmful, but this is only looking at the landscape and visual matters in isolation. From a landscape perspective LACR-01d is a route with a higher landscape and visual adverse impact and should not be pursued for this reason, unless there are other factors that would make this a more attractive option.

### Historic Environment

A Historic environment site walkover survey has been conducted.

The historic environment assessment within the PEIR and PEIR SIR (2021; 2022) considered potential effects on onshore historic environment receptors. The PEIR FSIR assessment where new receptors or changes to magnitude of effects on known receptors have been identified, the residual effects are comparable to those identified in the PEIR (2021). Therefore, according to the PEIR FSIR, LACR-01d and associated AAs, following the implementation of embedded environmental measures (2022), are expected to be comparable to the overall assessment outcomes and conclusions presented in the PEIR (2021).

It is noted further historic environment surveys and analysis will be required (for example surveys to understand the presence and significance of as yet unknown archaeological remains) in relation to LACR-01d.

### Other Matters under Horsham District Council remit (with the exclusion of Transport)

#### *Air Quality*

According to the PEIR FSIR, LACR-01d and associated AAs results in a change in construction traffic generation. However, the PEIR FSIR assesses no changes are anticipated to the overall assessment outcomes and conclusions (see Tables G-8 and G-10 in Appendix G of the PEIR SIR (2022)).

#### *Soils and agriculture*

LACR-01d, considering the implementation of embedded environmental measures (PEIR SIR 2022), does not change the overall assessment outcomes and conclusions of the PEIR SIR (2022) and of the PEIR (2021; 2022).

#### *Noise and vibration (onshore)*

LACR-01d and associated AAs result in a change in construction traffic generation. However, the PEIR FSIR assesses the predicted change in construction traffic flows are minimal and consequently, there is change to the overall conclusions of PEIR (2021).

#### Summary

LACR-01d and associated AAs will introduce additional sensitive receptors compared with those presented in in the PEIR (2021).

Considering the implementation of embedded environmental measures (PEIR SIR 2022), new significant residual effects have been identified which alter the assessment outcomes and conclusions presented in the PEIR (2021) for onshore recreation (socio-economics), landscape and visual impact, and historic environment.

Horsham District Council comments would be that there are likely significant landscape and visual impact adverse effects identified for route LACR-01d. Given there are least two other routes where the identified effects are slightly lower (LACR-01b and LACR-01c), those would be favoured by Horsham District Council.

Yours faithfully



Emma Parkes  
Head of Development and Building Control