

Appendix D: Detailed Comments on the Preliminary Environmental Information Report

This document provides comments from West Sussex County Council (hereafter referred to as 'WSCC') on the Rampion 2 Offshore Wind Farm Preliminary Environmental Information Report (PEIR), published by RED on 14 July 2021.

The remit of WSCC extends to the Mean High Water Mark (MHWM) and comments are limited to those elements that have onshore-related impacts (including those from the construction and operation of the offshore wind turbines and associated infrastructure).

The following table provides comment for each PEIR chapter relevant to WSCC, with specific paragraph/table/figure references where applicable.

NB: It does not include comments on behalf of the District or Borough Councils in West Sussex.

It also does not include comments in relation to the South Downs National Park (other than in relation to Highways or Public Rights of Way), which will be provided by the South Downs National Park Authority (SDNPA).

Ref.	WSCC Comment
Chapter 1 Introduction	
Figure 1.1	It would be useful if this figure also included the Rampion 1 project substation and the existing National Grid substation at Bolney, to set the PEIR boundary in context with the existing electrical infrastructure.
1.5.3	The inclusion of a draft Consultation Report would have been welcomed as part of the PEIR. Whilst it is noted that the PEIR directly responds to those comments made by the Planning Inspectorate (PINS) as part of the Scoping Opinion, it would have been useful if the PEIR also made direct response to those comments made by individual organisations during Scoping and during the informal phase of the consultation, to give stakeholders confidence views have been taken on board (or note reasons for not influencing the design). Although it is noted an Informal Consultation Analysis Report (interim) has been provided, it only gives general consultation themes, rather than direct responses to technical queries.
1.5.9	It would be helpful to reference the Statement of Community Consultation (SoCC) in relation to the COVID-19 pandemic and how that has influenced the methods for formal consultation.
Appendix 1.1	WSCC welcomes, pursuant to Regulation 14 (4) of the 2017 Environmental Impact Assessment (EIA) Regulations, the Statement of Competence which has been presented as part of the PEIR. WSCC expects this to be updated for inclusion within the Environmental Statement (ES).
Chapter 2 Policy and Legislative context	
	No comments
Chapter 3 Alternatives	
General	See comments above from 1.5.3. It would have been helpful to see how technical comments from the informal stage of consultation have influenced the design evolution, leading to the presented PEIR boundary. WSCC expect to see these comments detailed in the Consultation Report and relevant technical chapters within the ES.
Commitment C-1	Can RED update the wording to remove ' <i>where practicable</i> ' from this. See further comments on the Commitments Register within this Appendix. Although the production of a Commitments Register is a useful tool to aid this, WSCC wishes to see each commitment text made more meaningful by removing ' <i>where practicable</i> ' etc, to allow for robust prediction of residual impacts. These commitments must also be followed by a clear indication of how this will be secured through the Development Consent Order (DCO).
3.4.5	It is understood that the existing onshore cable route for Rampion 1 was unable to be utilised for the purposes of Rampion 2. It would be useful if this chapter however outlined if the general alignment of the route was considered or if other sub options from the site selection studies for Rampion 1 was investigated before taking forward a route from a new landfall.
3.4.34	It would be useful for the alternatives chapter within the ES to show more visually and clearly the constraints along the West Sussex coastline which led to all other landfall options being ruled out and Climping being taken

	forward. It is considered the description of the landfall site selection process could be much more transparent.
3.4.55	It is not clear in the chapter if there were multiple cable route options assessed for the route between Climping and Bolney, before the PEIR route was chosen. It would be useful to understand the alternative cable route options between Climping and Bolney and those that were discounted and why. Again, it is considered the description of how this route was taken forward could be more transparent.
3.4.88	There are a number of environmental sensitivities within the landfall area which will require due consideration through the design of the landfall. The commitment to HDD under the beach at Climping is welcomed, although there could still be indirect effects to these sites that have not been assessed as part of the PEIR and should be assessed in more detail in the ES. Matters such as the location and timing of the works will require careful consideration. Given the ecological sensitivities, a site-specific Method Statement would be a good way of addressing mitigation, compensation and enhancement measures, which should be further discussed with relevant stakeholders.
3.4.114	WSCC has highlighted specific risks with regards the remaining two options at Warningcamp within individual assessment sections below. WSCC requests continued dialogue with RED on the investigations and assessments undertaken (such as built heritage, ecology and LVIA) to determine the cable route option taken forward in this location. Consideration must also be given to the cumulative impacts of construction works with other potential developments in this area, such as the A27 Arundel Bypass.
3.4.122	The trenchless crossing of the Washington Recreation Ground is welcomed and WSCC would expect to see a Method Statement outlining the construction methods and mitigation measures to ensure the public are kept safe and aware of the construction works. There are a number of sensitive receptors in this locality that need careful consideration, such as the Village Hall, Primary School and Church. With respects to the Washington construction compound (northern option), forward visibility for vehicles turning from the A283 onto The Hollow is poor. It is understood that vehicles associated with the quarry are prohibited to turn right onto The Hollow as a consequence. Consideration of the HGV movements in and out of Rock Common Quarry should be included, ensuring that the movements can continue, avoiding preventing or prejudicing site operations. WSCC would request the number of temporary accesses proposed be reduced, particularly along the A283 corridor as this is a very busy high speed rural road, which does not have a good accident record. There is currently an application for Rock Common (WSCC/028/21), which should be considered and assessed as part of the proposals. Concerns are therefore raised with regards the construction compound options presented in the Washington area and further discussions will be required to understand the potential impacts on highway capacity and road safety and the on a number of sensitive receptors within the locality, including the village, school and campsite.
3.4.150	Access to the site would be directly from the A272, which is subject to agreement by WSCC, not Highways England.
3.4.152	Wineham Lane North substation option is also in close proximity to the Rampion 1 project substation, as well as that owned by National Grid. This must be considered for any cumulative impact assessment, as well as consideration of the impact upon the mitigation measures put in place

	for Rampion 1. This is further discussed in relevant sections within this response.
3.4.157	WSCC understands further investigations listed here are not exhaustive but would also expect the inclusion of residential visual amenity surveys, assessment of potential impacts to Rampion 1 mitigation and to fully understand the impact to heritage assets in both locations, to feed into the decision-making process.
General	WSCC wants to ensure continued technical consultation is undertaken through the design evolution of the electrical infrastructure. This includes further assessment work undertaken to make a final selection on the cable route options, the micro-siting of the cable working width within the PEIR boundary and the project substation. Technical comments made throughout this PEIR response also provide feedback on any risks/issues these options hold.
Chapter 4 Proposed Development	
General	<p>Technical comments with regards the offshore elements, in particularly the WTGs, are presented in the responses to Chapter 16 SLVIA. In summary, WSCC raises concerns over the significant visual impacts of the proposed project as presented in the PEIR, and WSCC wishes RED to consider developing the SLVIA methodology to include more detailed assessment of effects upon the receptors of West Sussex to further understand potential impacts. Also, to work with stakeholders to further develop commitments to the overall turbine size and layout of turbines to reduce the significant visual impacts as presented in the assessment. Areas for consideration are given below:</p> <ul style="list-style-type: none"> • Agree and identify the remaining viewpoints not considered as part of the PEIR (acknowledgment is made to the Method Statement sent by RED on the 26th July); • Review the quality and number of photomontages, to provide clarity on potential views from identified viewpoints; • Greater consideration of night-time views from highly populated coastal areas, where sensitive visual receptors are located and many of which benefit from a dark horizon in seaward views (acknowledgment is made to the Method Statement sent by RED on 26th July); • Scope of the Built Heritage Assessment; • Commitment to a clear separation of Rampion 1 and Rampion 2, to minimise the horizontal extent of the offshore wind turbines east to west along the horizon/seascape to reduce the potential curtaining effect; • Consideration of using the full North - South extent of the search area to also reduce the lateral spread; and • Although not deemed an overall worst case for assessment purposes, the greater number of turbines positioned in the western extension area versus that of Zone 6, will clearly be more detrimental to receptors along the West Sussex coastline. Therefore, a more detailed understanding and discussion of the balance between the potential locations of turbines in the extension area and that of Zone 6 should be held.
4.2.4	A 50m working width corridor will have significantly greater impact on woodlands, trees, and hedgerows than that of a narrower corridor, as with Rampion 1. There is also a statement at 4.4.8 that the construction

	corridor ' <i>may require widening beyond the standard width in predetermined locations</i> ' which could further increase the adverse impact. The Rampion 1 corridor was typically 30m wide but narrowed further in specific locations to avoid unnecessary loss of features. WSCC wishes the worst-case footprint is reduced to avoid impacts. This is further discussed in the response.
4.3.71 and 4.3.76	WSCC have previously raised the concerns over the likely effects on the beach area at Climping. Based upon the experience of Rampion 1, cable works at the HDD exit offshore, required works with plant, on a number of occasions at low tide, which required access to and from the beach and installation of temporary associated compounds on the beach. This along with the environmental sensitivities of the area should be considered during detailed design. WSCC requests a detailed Method Statement for works in this area to ensure impacts are avoided or minimised.
4.3.77	This paragraph describes the placement of a temporary construction compound behind Climping Beach with a dimension of 100m by 75m. This isn't shown on Figure 4.7. Due to the sensitivities in this area, confirmation on the location of this HDD compound is required and the potential temporary impacts of this location in the relevant assessment undertaken.
Graphic 4-19	This visual aid is useful to help understand the required elements within the 50m working width for the cable route. It is expected that this cross section will give individual dimensions for haul road, trenches, stockpiled material for example, and marked on the area the requirement for permanent easement along the route to allow the robust justification for both the temporary and permanent footprints. PINS also make reference to this in para 5.1.11 in Table 4-26.
General	With regards the above comment, further clarification is required on the 50m working width during construction, compared to that with Rampion 1, which required 30m. WSCC wish to see a stronger commitment to the reduced working width, including at key sensitive areas (Commitment C-3).
4.4.27 Temporary Compound	It would have been helpful if further details on the construction compounds were included within the PEIR. A justification for the required 4 ha per site, including an indicative layout would have helped in the understanding of likely impacts. No narrative has been provided for how these locations have been chosen. As consultation has not been undertaken on these sites prior to PEIR, further comments on each location are given below.
West of River Arun Compound	This compound is close to the Arun Local Plan Strategic Sites and potential realignment of the A259 roundabout which is required for that development to come forward. It should be noted that the current Ford Energy from Waste application has all traffic routed this way and that the ES suggests the roundabout is close to capacity during construction (if approved). There are therefore cumulative impacts here that need to be fully addressed in the ES. This compound is adjacent to the playing field and cricket club to the west (public amenity space) and a caravan park to the east. There is also a camp site along the northern boundary, with St Marys Church further north, and Climping Primary School to the south, all potentially sensitive receptors. These receptors must also be assessed as part of the EIA. Areas to the north and east are also in Flood Risk Zone 3.

Crossbush Compound	The location here is understood, close to a major road and south of the Service Station, however there is a hotel located here also. There is also a PRoW along the northern boundary, and property/cafe to the south. Construction will need to make sure there is no conflict with A27 Arundel Bypass NSIP (PEIR currently being produced) and also a WSCC approved planning application not too far to the south on the A284 for the Lyminster Bypass.
Washington Compound locations	<ul style="list-style-type: none"> • Washington (west) – A PRoW (north-south) splits the compound site in two. Rock Common Quarry to the east, has a live application to fill with inert materials to restore the site, and access is likely to be this way (see comments later in response). Washington Camping and Caravan Park is in close proximity to the north. • Washington (north) – Would access be required through the Rock Business Park? A PRoW runs through the trees to the eastern and southern boundaries. See comments later in response regarding access concerns. • Washington (east) – In the SDNP and potential cumulative traffic issues with Rock Common Quarry. It could also be visible from the south on high points of the Downs, this should be considered.
Oakdene compound	<ul style="list-style-type: none"> • Oakdene (west) – this compound option is off the A272, where there might be issues in achieving adequate visibility in this location. There is a double white line system which implies an existing visibility issue. There is also a PRoW which cuts through the north east corner of site. • Oakdene (east) – it is assumed access would be required off the A27. This is on a straighter, but potentially faster length of road and needs due consideration. Some potential flood risk along the eastern boundary. Assessment of this location should also take into account the 'historic parkscape' further discussed in the response.
Compound General	Some of the compound sites will need further micro-siting and assessment work to understand potential impacts, of particular concern are the three options at Washington, including the cumulative impacts of construction traffic entering and exiting the area. Accesses and proximity to PRoW will need to be considered. Flood risk areas will need to be avoided for storage of machinery and fluids/oils etc. WSCC also require clarity on the compound location for the Wineham Lane North substation option, as this is not shown on the figures within the PEIR.
4.4.33	Will construction of the cable trenches be undertaken in a number of work fronts, to minimise impacts of cable trenches being left open for long periods of time? There doesn't seem to be any reference to this within this chapter. An indication of how long each section would take to construct would be useful to enable better understanding of the cable route impacts at specific locations.
4.4.42	Reference should also be made to the Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018): ' <i>Bats and artificial lighting in the UK</i> ' and impacts of any lighting assessed within the relevant chapters of the ES. WSCC wishes to see any security lighting angled downwards and shielded, with no direct lighting onto hedgerows, woods, ponds or watercourses.
4.4.45	WSCC have made comments with regards the issues/risks associated with the two substation options within the relevant technical topics below, and within Chapter 3 Alternatives.

4.4.46	Concerns centre around the potential size of the site required. As well as 5.9 ha for the operational footprint, a total area of 9.2 ha is being proposed (as detailed in Chapter 19 LVIA) to ensure there is space for access, compounds and for mitigation landscaping and planting. It is appreciated this is a worst case design scenario, but every effort should be made to reduce the overall footprint (including height) as much as possible.
4.4.55	This section details the required cabling from the substation to the National Grid substation at Bolney. The chapter does not outline any required enabling works at the National Grid substation, what form this would take and whether this has been included within the assessments undertaken. Further clarity is needed on this. This was also raised by PINS in para 2.3.13, as reference in Table 4-26.
General	There is no indicative drawing for the substation building, other than in Graphic 4.24. WSCC would find more detail here regarding a comparison with the dimensions and visual appearance of the Rampion 1 onshore substation a useful aid in trying to better understand the scale of the development.
Chapter 5 Approach to EIA	
5.6	WSCC welcomes the approach to delivering proportionate EIA, considering the Institute of Environmental Management and Assessment (IEMA)'s guidance document Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice (IEMA, 2017). The use of the Commitments Register is a useful tool to aid this, however WSCC wishes to see each commitment text made more robust and meaningful by removing ' <i>where practicable</i> ' etc, to allow for robust prediction of residual impacts. These commitments must also be followed by a clear indication of how this will be secured through the DCO process. WSCC also wants the existing evidence base from construction and operation of Rampion 1 to feature prominently within the assessment work for Rampion 2.
General	Has consideration been given to breaking up the impact assessment sections to detail the likely impacts for each section of the onshore works? There is a need to be clear what impacts are relevant to certain receptors with regards the landfall, cable route, compounds, and substation.
General	How/will the EIA take into account the operational lifespan of Rampion 1? Will the CEA include the potential decommissioning/repowering of Rampion 1 during the operational phase of Rampion 2?
Appendix 5.1, Table 1-1 Responses to the Scoping Opinion, and 3.3.22 Climate and Climate Change	<p>It is stated that "<i>The Scoping Opinion identified the requirement to consider climate and vulnerability to climate change in the ES.Consideration of vulnerability to climate change, for example where climate change may exacerbate any potential environmental effects, is incorporated into all relevant chapters within this PEIR and Appendix 5.5: Vulnerability to climate change – policy and baseline, Volume 4.</i>"</p> <p>Volume 4, Appendix 5.5 Vulnerability to climate change – policy and baseline appendix lists places where this was relevant, but on cross-checking, there is no evidence of this within each of the chapters referenced. In some cases, it was listed as too hard to predict, and in some just listed in the policy documents. It would be useful if the list in the Appendix was shortened to those where it has deemed to be</p>

	significant, as at the moment the list feels like a misrepresentation on the consideration of climate change to the aspects. Preference would have been to see it included more within the cumulative effects section of each chapter. There is a focus within the appendix on adaptation of the design to make it resilient, not considering the likely increased sensitivity of the aspect to the impact of the project, after you have considered the threat climate change poses.
Appendix 5.2	Due to the nature of the project, the life cycle of the project in regard to carbon is very positive. WSCC would like to see more assurance that efforts are being undertaken to mitigate all possible carbon from all phases and aspects of the project, but particularly the construction phase to maximise the positives that are delivered.
General	It is difficult to get a full representation of how the project has considered climate change and carbon across the aspects. There are opportunities to improve this and make it easier for the reader, therefore WSCC expects this to be presented in more detail in the ES.
Appendix 5.4	<p>WSCC requests this long list is updated, but also the status and detail be reviewed prior to production of the ES. Table 2-2 notes that the data sources were accessed back in January 2021, 5 months prior to submission of the PEIR. Please note:</p> <ul style="list-style-type: none"> • A27 Arundel Bypass – this has submitted a Scoping Request, and received a Scoping Opinion from PINS; • Ford Circular Technology Park (WSCC/011/21); and • Rock Common Quarry (WSCC/028/21).
Chapter 14 – Nature Conservation (offshore)	
General	The marine environment and seabed off the Sussex coast include some important habitats such as offshore chalk cliffs and reefs, sandstone reefs and clay cliffs. Some of these habitats are both fragile and small in extent. Designated sites, such as Kingmere Rocks Marine Conservation Zone and Shelley Rocks LWS, The Waldrons LWS and HMS Northcoates LWS, only protect some of these sites. Thus, the precise route of the marine cables, and the method of installation, and any seabed preparation, must be subject to a detailed survey of the seabed to minimise significant impacts. Consideration should be given to whether elements of the offshore infrastructure, notably the foundations of the wind turbines and offshore substations, can and should incorporate measures to enhance biodiversity, such as artificial reef structures.
Chapter 16 – Seascape, Landscape and Visual	
General	In general terms, the assessment is detailed and provides useful information to enable the consideration of impacts on SLVIA aspects. A worst-case scenario has rightly been presented (reflecting the current position of the design and understanding of baseline conditions) and the methodology is largely clear, considering the full range of key matters that would be expected. It is recognised that some elements are matters of professional judgement, however, in some cases it is considered that these may have been downplayed, specifically with regards to receptors along the West Sussex coastline. WSCC note and agree with the concluding findings of the assessment, that the proposed development will have significant seascape, landscape and visual effects, and therefore maintains strong concerns about the scale of likely impacts from Rampion 2 in addition to, and in combination with the currently operating Rampion 1 Offshore Wind Farm.

Table 16-11	<p>With regards identification of viewpoints, WSCC have engaged with RED over the series of ETGs. As stated in Table 16-11, further viewpoints were discussed with RED that haven't made it into the PEIR but will be assessed as part of the ES. WSCC wishes to reiterate the last set of comments made to RED in a memo dated 10 May 2021. This memo was focussed upon the viewpoints in the West Sussex coastal plain, and those along the coastal strip. We have reiterated these points again, as the table only notes the additional of VP A and VP B for the ES. It is noted that RED have consulted with WSCC on further viewpoints to be included, during the formal consultation period. WSCC have included those comments made to RED in a memo in May 2021 below for completeness however.</p>
Comments from WSCC memo dated 10 May 2021	<p>VPs A-D – WSCC welcomes the identification of these VPs based upon feedback given in the first SLVIA ETG. As stated in the follow up ETG, WSCC would like to see VP A included, potentially microsituated to the car park (there are car parks at West Wittering and Bracklesham Bay) where there are likely to be a concentration of visitors. The inclusion of VP B would allow the views experienced from the eastern side of Chichester Harbour AONB to be presented, at a point where the maximum number of turbines would be visible. WSCC understands REDL will be further consulting with Chichester Harbour AONB on any additional VPs required. The microsituated location should be representative of views from Dell Quay and Chichester Harbour to the west and Chichester Golf club etc to the east where more visitors/tourists might be expected. VP C - WSCC suggests removal of the currently proposed VP C, which being directly between VP 13 and VP B probably wouldn't add much to the assessment and propose a new location to the south of Eastergate (where there is a large area of turbine visibility, the presence of Arun's Strategic housing allocation and the new alignment of the A29 - A29 realignment scheme - West Sussex County Council). It would also better cover off the apparent remaining large areas of maximum turbine visibility inland to the east of VPs A-D). VP D – the location of this VP seems sensible, located on the A259 between Chichester and Bognor, which would represent views experienced by receptors travelling along the coastal plain here.</p> <p>Elsewhere along the West Sussex Coast – Having reviewed the updated ZTV, WSCC wishes to highlight both the Ferring Gap/Goring and Lancing Beach areas. The ZTV shows in both locations, the maximum visibility of turbines in very well used coastal areas. This is highlighted by the presence of cafés, beach huts, promenade and green space with no possibility of intervening screening and mitigation.</p>
Table 16-22	<p>WSCC agrees with the presentation of the WTG maximum assessment assumptions, but maintains strong concerns over the likely significant environment effects associated with the size and layout of these WTGs</p>
Offshore substations	<p>It is noted that three offshore substations are likely to be required. Given their scale and significantly different silhouette on the horizon, it is important that due regard be given to their impacts upon receptors, particularly if they would require closer grouping (worst case currently shows these evenly spread across a wide area).</p>
Figure 3.2	<p>It is noted that the offshore PEIR boundary has been refined through project design evolution, reducing the eastern extent, and a very small corner of the north western extent (nearest Selsey Bill). Presumably beneficial for those receptors to the west, albeit of marginal significance.</p>

16.3.4	Why are key items raised by WSCC not included here? Comments were made ahead of a more detailed response at the Scoping Stage. WSCC expects all comments made during consultation to be included in the ES.
Table 16-5 Landscape receptors - Settlement	Only main towns have been identified here. Other settlements, such as Pagham, Climping/Atherington, Rustington, and Ferring, should be included.
16.4.13	List of receptors kept under review – that is welcomed. It will be important that the list is comprehensive, as it seems very high level in Table 16-5.
16.6.23	Is the ' <i>limited visibility in the low-lying landform of the West Sussex Coastal Plain</i> ' (i.e., more inland areas between Selsey and Littlehampton) backed up by the ZTV? Photomontages should be provided to demonstrate this.
16.6.29	Beach huts, cafes, and other open green spaces on the coast host recreational activities also.
16.6.30	Noted this section is intended to be an overview but WSCC raises the following: <ul style="list-style-type: none"> • Principal coastal settlements - what defines this? • Main road route - also A29 quite possibly a Main Road route (Principal Highway route – both terms are used). In future the proposed re-alignment of the A29 here (through a strategic housing site) will have bridge potentially providing elevated southward views; • Tourist and Visitor Locations – missing some key other beaches (Wittering's for which some (albeit limited) views are confirmed likely), and other coastal recreation areas as referred to above.
16.6.44	' <i>Agreement on VPs has been reached</i> ' - this is not entirely accurate. WSCC still wanted to see some issues resolved (see comments below), but notes additional consultation held with RED during formal consultation which is further discussing key VPs to be included.
Table 16-11 and 16.16.3	This table seems to include two additional VPs as discussed which are welcomed, however, not the corresponding plan to see the micro-sited locations and is missing VP C (recommend near Eastergate) and D (A259 which is highlighted as a Main Road Route) which were requested by WSCC in the ETG correspondence. What consideration has been given to additional beach and recreational areas as previously highlighted? Why no VP for Climping Beach which also has many of the characteristics, recreational, public access etc?
Table 16-14	Rampion 2 will likely be highly visible from the keep of Arundel Castle and should be appropriately considered, including cumulative impacts from other proposed developments.
16.7.9	Why can't there be perceptible separation distances between Rampion 1 and the proposed project? Further clarity is required on this.
16.7.25	Night-time photomontages need to take account of impacts at night for other key visual receptors.

16.7.26	Is any lighting for Offshore Substations proposed and has this been considered? Further detail is expected in the ES.
16.7.33	Suggests ETG discussions are set out in full in Appendix 16.1, but this only includes comments made by WSCC at the Scoping stage and no later. WSCC expects this to be included within the ES.
Table 16-30 and Table 16-31	Magnitude of change identified for areas to west of Selsey Bill will need to be verified by proposed additional VP in this location. Generally, given the strong coastal association of these character areas, it could be argued that sensitivity and magnitude of change is somewhat downplayed. Table 16-3 - clarity is required why only seemingly selected LCAs in the West Sussex Coastal Plain are described here?
Table 16-32	Useful summary but requires detailed cross referencing with Appendix 16.4. Again, sensitivity and magnitude of change are arguable, open to interpretation and may be underplayed in some circumstances.
16.10.38 – 16.10.51	Visual receptors presented in a different format (not tabulated). Consistency of approach across receptors would be easier to follow. Again, impacts potentially downplayed particularly given the recreational use of beachfront areas and associated visitor attractions along the coast.
16.12.4	WSCC/011/21 (live application)- Consider the LVIA presented here and the potential for large building and twin 85m stacks to act cumulatively with visual impacts.
16.16.5	Night-time views should be provided for visual receptors, particularly residents facing seawards.
Table 16-44	WSCC should be mentioned here too.
Appendix 16.5	Document is heavily focused on the SDNP and dark skies. As stated above this assessment should also consider night-time views from highly populated coastal areas, where sensitive visual receptors are located and many of which benefit from a dark horizon in seaward views. Figure 16.25 lighting ZTV shows how evident lighting will be to a high volume of receptors on the coastline. See 2.5.3 guidance which give equal importance to settlements and Dark skies as receptors to be considered and illustrations to be provided. Table 3-1 makes no reference to WSCC comments made on this in ETGs.
Dark skies	WSCC did comment in the follow up ETG that there should be representative VPs outside of the designation. It is understood the night-time assessment will focus particularly on this area, which is less influenced by night-time lighting and where the appreciation of dark skies could be most affected by additional WTG lighting. There is however the potential for receptors outside of the designation to experience night-time effects, especially those where light pollution is lower, and this should be covered off in the assessment. WSCC suggests there should be representative VPs for outside of the designation, as it is recognised there are many beachfront/coastal properties, and ecologically important sites that currently look out to a dark horizon, which will be affected by the presence of the operational turbines. WSCC requests a VP at Pagham Harbour and another at a more populated coastal settlement, such as Bognor or Worthing. WSCC also suggests consulting Chichester Harbour AONB on this matter also. WSCC notes that subsequent consultation during formal consultation has been undertaken to provide further clarity on these night-time VPs.

Photo-montages	<p>The provided photomontages are useful tools that aid in the assessment of visual effects. These clearly show the significance of impacts likely to be experienced by receptors in West Sussex, particularly in terms of impacts that will result from the lengthy westerly extension that will significantly extend the field of view over which impacts on seascape will be experienced. WSCC again raises strong concerns over the potential impacts here. Comments on specific photomontages are given below.</p>
Specific VPs	<ul style="list-style-type: none"> • 16.21b (ZTVs with visual receptors) Westergate, Slindon etc. all in blue (even with 10m screening) and no representative VPs. • 16.21 would have been useful to use 10m as a base, so more representative of receptors. • 16.34a – VP 9 Shoreham – This is set back and doesn't represent Shoreham Fort and Shoreham beachfront. • 16.35a – VP10 Worthing – offshore substation locations will need thought and careful consideration, very prominent from this viewpoint. • 16.36a – VP 11 Littlehampton, this shows a very large change from the current seascape views. • 16.43a -VP18 Cissbury Ring – Very prominent across a wide angle. Colouring (very white) seems to downplay impacts of westerly extent of turbines. • 16.45a – VP20 Springhead Hill – No photomontage included which makes it harder to assess potential impact. • 16.46e- VP21 Bignor Hill - Westerly turbines seem hazy in this photomontage. • 16.49 – VP26 Low Weald A29 near Ashington – No photomontage included, which makes assessment of impact difficult. • 16.52 – VP29 Kingly Vale – No photomontage which makes assessment of impact difficult. • 16.54 -VP33 Arundel –Unlike other photomontages turbines not made hazy in the view. LVIA from Ford Energy from Waste and A27 Arundel Bypass (when available) should be taken into account here. • 16.59 – VP50 The Trundle – Slightly hazy to the west, to be considered for new photography. • 16.61 – VP52 Chanctonbury Ring – WSCC would request new photography, as this was taken at dusk. • 16.62 – VP55 Beeding Hill – No photomontage undertaken, which would help assess impacts. • 16.64 – VP61 Nr Lancing College – No photomontage undertaken here; it is considered the baseline photography is unhelpful as large earthworks (temporary construction works) dominates the view.
Mitigation	<p>WSCC expects RED to work with stakeholders to further develop commitments to the scale and layout of turbines to reduce the significant visual impacts as presented in the assessment. Some areas for consideration are given below:</p> <ul style="list-style-type: none"> • Commitment to a clear separation of Rampion 1 and Rampion 2, to minimise the horizontal extent of the offshore wind turbines east to west along the horizon/seascape to reduce the potential curtaining effect; • Consideration of using the full North- South extent of the search area to also reduce the lateral spread; and

	<ul style="list-style-type: none"> Although not deemed an overall worst case for assessment purposes, the greater number of turbines positioned in the western extension area versus that of Zone 6, will clearly be more detrimental to receptors along the West Sussex coastline. Therefore, a more detailed understanding and discussion of the balance between the potential locations of turbines in the extension area and that of Zone 6 should be held.
Built Heritage Aspects	
Table 16-11	Heritage interest column identifies heritage assets. These should be picked up and assessed in the Historic Environment Chapter.
Figures 16.14 – 16.15	WSCC requests a separate ZTV to be produced with heritage assets and viewpoints overlaid.
Chapter 18 Socio-economics	
General-PRoW	WSCC welcomes the PEIR recognising the aims and aspirations of WSCC through maintaining multi use routes to a good standard and developing opportunities to improve access to rural areas and the SDNP.
Table 18.2	WSCC requests the Tourism Sector Deal needs updating to include the recently published Tourism Recovery Plan. Commentary should acknowledge importance of sector across Sussex and not focus on Brighton & Hove, this requires further discussion.
18.3	The economy plans referenced are not part of any formal planning policy (as the title suggests), they are strategic economic plans. The C2C plan is in abeyance in light of the national pause on the National Industrial Strategy. The two West Sussex Plans need updating to the Council Plan and the WSCC Economy Reset Plan 2020-2024. Reference should be made to the West Sussex Local Transport Plan – this is currently under review/consultation until 8 October 2021 West Sussex Transport Plan Review - West Sussex County Council .
18.5.4	2019 GVA figures are now released down to local authority level and there are some updates to the data sources since release of this document e.g., Annual population Survey, MYEs. This latest position should be reflected going forward.
18.5.12	There is some data available for other parts of Sussex, and it is not clear why this hasn't been referenced and used. WSCC requests this is included going forward.
18.6.21	SDNPA has also done visitor surveys and could be additionally referenced and provide further insight in addition to Brighton & Hove's survey.
18.6.29	The onshore works will potentially impact up to 136 PRoWs, as identified on the WSCC interactive maps (see clarification required below however). Those (up to 8) identified are heavily used. As presented in Chapter 18, other key routes such as ECP, Monarchs Way, the Downs Link and SDNT will also be affected during construction activities of onshore works. Along with cycles routes (NCN 2 and regional route 223) running along the Downs Link and the Rivers Arun and Adur, access land and Washington Recreation Ground and Allotments. WSCC wishes to see these impacts as minimised as much as possible with sensitive micro-siting of the cable route with the PEIR boundary and placement of the onshore substation. WSCC wishes management or diversion to be as limited as possible. The OPRoWS appears much the same as the Rampion 1 document and appears, as a high level document, to cover all mitigations

	in relation to proposed works on or affecting PROW and OAL. There are clearly some decisions to make on a number of issues before specifics can be finalised, particularly the sub-station option but in principle WSCC is satisfied with the contents of this document.
18.6.29	Reference to 136 PROW being affected by proposal but only 77 referenced in OPRoWS. Clarity is required on this.
General	The Downs Link is a shared-used path accessible to pedestrians, horse-riders and cyclists and uses a Public Bridleway. It is not a cycle route, and reference to this should be corrected.
Washington Recreation Ground	The trenchless method of crossing the Washington Recreation Ground is welcomed and WSCC would expect to see a Method Statement outlining the construction methods and mitigation measures to ensure the public are kept safe and aware of the construction works. Concern is however raised over the potential locations for the construction compounds in the Washington area; see further comments in this response.
Impact upon Climping Beach	A key commitment to construction of the landfall will be to HDD from the HDD construction compound behind Climping Beach to approximately 1km below the LWM. WSCC still raises concerns that although it is assumed therefore that access to Climping Beach would remain unaffected throughout construction, as will access to the inshore zone, the presence of the construction compound directly behind Climping Beach in addition to the presence of construction vessels offshore may temporarily reduce the appeal of the area with local bathers, walkers and users of this area of the coastline. Every effort must be made to keep the construction footprint and timescales for disruption as smaller as possible.
General	WSCC will expect consultation through the project development stages on ways to maximise the community benefits to West Sussex, in light of experience from Rampion 1 and the Community Benefit Fund. WSCC would want to see Areas of Benefit being targeted to the areas of the final project boundary, which experience a greater degree/duration of impacts (e.g., permanent electrical infrastructure, at the substation area, key tourist/recreational locations with affected views).
General	WSCC expects RED to take account of the Economy Reset Plan 2020-2024. WSCC would expect further consideration of visitor economy data that is available, beyond that for Brighton & Hove. A new report on the Sussex wide tourism data will be published soon. Elements of the data picture are out of date and don't reflect the significant impact the pandemic has had on jobs and employment. WSCC would like to see further acknowledgement of this. Similarly, there are currently labour supply pressures in construction, which may or may not settle by the proposed construction dates. Reference to a plan to help overcome this should be discussed further with WSCC. A key issue is the low economic impact for the County through the construction phase. Further assurance work is being progressed to seek to have some impact on this is needed, as per the commitment at the scoping stage. Again, further meetings with WSCC will be required to develop these commitments.
18.9.2 and 18.9.4	<i>"It is estimated that around 40% of the Proposed Development's £2.87 billion (in 2019-pricing) construction cost, or the equivalent of £1.14 billion (in 2019-pricing) will be retained by businesses in the Proposed Development's supply chain nationally. At the Sussex-level, the overall level of supply chain expenditure retained by local businesses is anticipated to be minimal (around 1.0% of total construction costs), adding up to £30.1 million (in 2019-pricing)." Whilst supply chain issues</i>

	are recognised, during the scoping stage it was stated scenarios considering the use of local ports and project expenditure captured by local businesses would be developed. Information on this work and what it intends to achieve will be expected, with a view towards the percentage figure for Sussex increasing from the current low base. WSCC would expect further discussions on this post formal consultation.
18.9.6	It is disappointing that <i>'despite the efforts on the existing Rampion 1 project there is not yet an established supply chain cluster in Sussex'</i> . Is there a plan to seek to address this further through the proposed project?
18.9.34	Sussex wide data will be available through a new report to be published in the next 2 months, which WSCC will expect to be included within the ES.
General	As this is a substantially bigger development than Rampion 1, and the projected direct jobs number is smaller, WSCC would like to understand why this is the conclusion. We have not seen reference to skills and career development opportunities, for example through apprenticeships. WSCC wishes further commitments to this and discussions through the next stages of the project.
Table 18-33	Only around a fifth of all FTEs will be located in Sussex, presumably the indirect effects of the supply chain elsewhere? This links back to comments made for 18.9.2 as above.
18.10	Economic Impact of tourism should also include data already available from across Sussex (not just Brighton & Hove), a new report on Sussex wide data is being published within 2 months and should be reflected in the ES.
18.10.26	On the value of tourism economy in Sussex being assessed as <i>negligible</i> , WSCC wishes to discuss measures and commitments that would support a boost to the tourism sector as it is a priority in economy plans across Sussex.
Appendix 18.2 Socioeconomic Baseline	
Employment forecasts	Clarity is required on what employment forecasts are used, if any?
1.2.30	See 18.3 above
1.2.37	See 18.3 above
Chapter 19 Landscape and Visual Amenity	
General	WSCC is disappointed no arboricultural survey had been undertaken in time for feeding into the PEIR. This will be very much needed for steering the design evolution. WSCC would wish to see this report once available to allow further discussions on this matter.
Table 19-5 and 19.4.9	<i>'The list of receptors will be kept under review during the EIA as more detailed information is obtained during baseline surveys and other forms of data collection by other aspects and will be reflected in the final ES'</i> . This is welcomed, with regards visual receptors, could settlements be broadened to be clear this means individual properties, community facilities, schools etc?
19.4.30	<i>'Each of the viewpoint locations have been agreed with a number of stakeholders...including WSCC'</i> . Consultation on viewpoints were based upon the location of infrastructure during the informal round of consultation in late 2020, and therefore doesn't reflect the latest route

	alignment or positioning of construction compounds which were not available at that time. WSCC has concerns over residential visual amenity and how this would be factored into assessments going forward. Also, on the selection of viewpoints in relation to the construction compounds and HDD crossings. This is further discussed in this section.
Table 19-9	WSCC wishes to see specific mention of the presence of construction compounds in the activity or impact section, rather than just construction activity along the route. These areas will be in place for a long time (3 years and 6 months) and will be the focus of lots of visual intrusion to receptors in the proximity of these works. Has the LVIA viewpoint identification work taken account of these proposed locations?
Table 19-6 and Figure 19.3a	<p>Substation Option A – Bolney Road/Kent Street:</p> <ul style="list-style-type: none"> • What about potential views to the large construction compound to the west of the substation site? This location was not available when we were consulted on the Method Statement. • Further VPs should be considered where there will be potential visual impacts from the construction compound, onshore cable and substation works. See comment above regarding concerns over not identifying residential properties in close proximity to the development, referencing that 'settlements' is a key visual receptor group in Table 19-5. • Is one VP from the High Weald AONB enough to assess potential impacts?
Table 19-7 and Figure 19.3b	<p>Substation Option B – Wineham Lane North:</p> <ul style="list-style-type: none"> • WSCC have raised concerns over the potential for removal of screening/landscaping put in place for Rampion 1 substation to construct Rampion 2 substation, if in this location. How has this been accounted for in the ZTV? • SB5 (Hickstead Lane) seems to be missing from Figure 19.3b. • How is the High Weald AONB being assessed, if there is currently no VP proposed for it, but visibility is suggested? • Further VPs should be considered where there will be potential visual impacts from the construction compound, onshore cable and substation works. • Are VPs going to be added on the basis of potential cumulative impacts with 'other developments'? This is raised because of the consented Coombe Solar Farm in close proximity.
Table 19-8 and Figure 19.4b	<p>Onshore Cable Route:</p> <ul style="list-style-type: none"> • WSCC requests the assessment includes cumulative impacts upon viewpoints near the coast (predominantly Climping - A) to take account of on, near and offshore works which they may experience at the same time. This is based upon Graphic 4-25 in Chapter 4, the Proposed Development, which indicates works will overlap for all these elements. WSCC expects this to be clearly assessed within the ES. • How has B1 VP location been chosen? There are a number of receptors around this section of the cable route that may experience disruption by construction works for '<i>up to three years and six months</i>'. Justification for this location, and agreement for any others required here should be discussed. • WSCC requests consideration of a VP to assess views associated with the Crossbush temporary construction compound.

	<ul style="list-style-type: none"> Are VPs going to be added on the basis of potential cumulative impacts with 'other developments'? for example, A27 Arundel Bypass proposals.
General	Has the ZTV taken account of the likely removal of vegetation for the cable route entering and exiting the substation site and for visibility splays required for access? WSCC would expect this to be factored into any assessment work, as in reality some of the screening afforded by existing vegetation around the substation sites may have to be removed to facilitate construction/access.
General	Has the identification of viewpoints included the potential visual impacts of works needing to be undertaken to upgrade the National Grid substation?
19.6.11 and Table 19-16/17	Visual receptors within the study area should include all residents likely to experience effects, not just larger settlements.
Table 19-19	<ul style="list-style-type: none"> Onshore cable route - WSCC requests the width of the working cable corridor is reduced as far as possible. Is '<i>up to 10m wide haul route</i>' required? Full justification of what is required should be detailed in the ES. Onshore substation - WSCC wishes to understand the differing values given for the footprints described for the substation. This varies in each chapter, (which is potentially as they are discussing slightly different things), but clarity and consistency is required to aid the reader. Chapter 4 states up to 5.9 ha for the built footprint, and 2.5ha for temporary works area. Chapter 19 describes the overall footprint for each option – approximately 9.2 hectares (ha), then gives values of permanent area of site for all infrastructure – 4.25 ha and Temporary works area - 2.5ha. WSCC requests similar values and definitions are used throughout the ES.
19.7.8	WSCC was hoping to see an Onshore Substation Design Principles document produced for the PEIR stage, which will detail the principles underpinning the design of the operational onshore substation and builds upon the design and construction of the Rampion 1 substation. WSCC would expect to see this as part of the ES.
19.8.7	Will the assessment for Year 1 and Year 15 be undertaken for both winter and summer months?
19.9.46	States that ' <i>landscape elements (mature trees, hedgerows and woodland) are indicative of higher levels of sensitivity (to change) as they are not easily replaced</i> ' and that the magnitude of change will be high. Therefore, avoiding removal in the first place must be the highest priority; there is too much leeway with the language used, e.g., 'where possible', 'as far as practicable', 'where practicable' etc.
19.9.48	Option B – Wineham Lane North – substation ' <i>areas to the south include mitigation planting as part of the existing Rampion 1 onshore substation</i> ' – not only planting, but a substantial bund to provide additional screening. How can the impact of the Rampion 1 substation be effectively mitigated if all this planting and bund is effectively destroyed by a Rampion 2 substation? If the latter was to be sited to the north of the Rampion 1 substation, how could the impact of the new substation and Rampion 1 substation be mitigated <u>effectively</u> , given that Coombe solar farm directly to the north has been granted consent?

19.9.72 19.9.77	States that there will be a ' <i>significant residual effect on 19 landscape character areas</i> ' and ' <i>multiple field boundaries will be crossed</i> '. The nature of the residual effects will be both direct and indirect, adverse and in some cases cumulative, considering other major developments; 28 known of so far. Of particular concern are the ' <i>significant effects</i> ' relating to the ' <i>loss of trees and woodland at Steyning and Henfield Brooks LCA where a number of trees will be removed to allow access and at Hickstead Low Weald LCA where trees and screening planting will be removed along Bob Lane, exposing views of the existing National Grid Bolney substation and Rampion 1 substation</i> '. The existing boundary vegetation along Bob Lane is crucial for screening both substations.
19.10.16	<ul style="list-style-type: none"> • A272 - Does the 300m section of the A272 include the likely removal of vegetation for access works including visibility splays? • Kent Street - Does the section of Kent Street include the likely removal of vegetation for access works or cable routes entering or exiting the substation site?
19.10.25	Wineham Lane - Does the 300m section mentioned include the likely removal of vegetation for access works/cable route through this area?
19.15.2	As stated during ETGs, WSCC requests that further assessment into the impacts upon residential visual amenity should be undertaken considering the Landscape Institute's Technical Guidance Note 2/19. This should be undertaken to aid the decision-making process for choosing a final location for the substation.
19.15.5	WSCC would also like to see the use of photomontages to help steer any further consultation with stakeholders on the two remaining substation locations.
Built Heritage Aspects	
Table 19-6 Table 19-7 Table 19-8	Heritage interest should be included in line with the SLVIA. These should then be picked up and assessed in the Historic Environment Chapter.
19.10	No heritage receptors/sensitivities/effects have been identified. Considerable concern that viewpoints including heritage receptors have not been considered or assessed. This has not been included within the Historic Environment Chapter. Additional views are likely required to consider heritage impacts.
19.15.1	Collaborative work with Historic Environment team is noted. However due to lack of assessments, there are concerns that this has not happened to date. Further work required includes identifying views with heritage sensitivities, potential additional viewpoints and assessment. Request for separate ZTV to be produced with heritage assets and viewpoints overlaid.
Chapter 20 Air Quality	
General	WSCC refers RED to responses from the relevant District and Borough Councils and Environmental Health Officers regarding air quality matters.

Table 20-27	The ES will require an update to the CEA table, as the information regarding the A27 Arundel Bypass is out of date, with regards status (Scoping has been submitted) and how the PEIR boundary and preferred route interact.
20.12.9	There is a specific environmental measure stated for dust ' <i>to hold regular liaison meetings with other high risk construction sites within 500m of the temporary construction site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised</i> ' (Table 20-22, item 8); this is secured under Commitment C-24 (Table 20-16). WSCC welcomes this commitment and should be considered for other construction activities where risks are identified.
Chapter 21 Soils and Agriculture	
21.9	With the potential for 207 ha of land to be affected by the construction of the project, and this resulting in a potentially very large magnitude of change to the baseline environment, the relevant embedded mitigation measures need to be as specific as possible to reduce this impact. WSCC requests that the design footprint is minimised as much as possible through the next stages of the project. Of particular importance will be the construction methodology for the cable routing, which as stated ' <i>will be in discrete sections to minimise the effects of soil storage and allow the reinstated soil to return to as normal function as possible</i> '. WSCC raises the concerns over some of the issues with construction of Rampion 1 in terms of the timescales the working width was left open, especially in areas where the cable route was used as the haul route and providing access to other parts of the site.
21.4.5	As recognised, there is also the potential for adverse impacts to farming practices through the temporary loss of land availability, restricted access and disruption caused by temporary working areas and construction traffic, as well as to the soil resource itself. RED acknowledges the financial effects on productive farmland has not been assessed within the PEIR, but WSCC expects this to be fully assessed within the ES, and the methodology of which to be consulted upon with stakeholders.
General	Will RED be assessing the potential impact of soil heating during the operational phase also?
21.9.3	The PEIR states that at least three quarters of the onshore part of the PEIR Assessment Boundary is estimated to be within the best and most versatile category; grade 2 and grade 3, which for the purpose of this assessment is being considered subgrade 3a, and the agricultural land is a high sensitivity receptor. WSCC wishes to see the minimisation of impacts whether short, medium, or long term upon the agricultural resource within the County, as per National Policy Statement for Energy (EN-1), minimisation of impact to Best and Most Versatile agricultural land. WSCC wishes to see the permanent loss of agricultural land at the onshore substation site be minimised through the design phase. WSCC understands further soils surveys will be undertaken for the purposes of further defining likely impacts.
21.9.6	WSCC notes C11, the storage of top and sub soil in the working corridor of the cable route. WSCC welcomes the reference to Defra 2009 Code of Construction Practice (COCOP) for the Sustainable Use of Soils on Construction Sites PB13298. However, from experience of Rampion 1, storage times for some stockpiles of soil were lengthy, and therefore a contingency should be considered. WSCC would expect details to be included within the Soils Management Plan as part of the OCoCP.

Chapter 22 Noise and Vibration

Table 22-6	The approach to the identification of Noise Sensitive Receptors (beyond those listed in Table 22-6) and monitoring locations for baseline surveys should be agreed with all relevant stakeholders, including WSCC post formal consultation.
General	WSCC would wish to further understand the establishment of the baseline, as it is not clear how this would consider the creeping impact at the substation site. The experience from Rampion 1 onshore substation is that it has already increased noise levels from that assessed. Further discussion is needed on the methodology and scope for this, and reference to the operational noise reporting undertaken from Rampion 1.
General	RED previously undertook noise monitoring throughout the construction period at the substation for Rampion 1. WSCC wishes to ensure lessons are learn from the process and to ensure that modelling for construction noise was/will be accurate.
General	With regards the advance notification required for works undertaken outside of stated working hours, WSCC would wish to discuss the wording of this commitment to allow for a more flexible approach on the process for this notification once the project has been further developed and the receiving environment is better understood. WSCC would wish to see an outline presented in the ES of any likely 24 hour or continuous construction activities (e.g., SGT deliveries and oil filling, concrete pours etc), and notification should be given to an agreed list of stakeholders. The ES also need to take account of a proportion of continuous works.
General	Based on the experience of Rampion 1, where there were instances of overrun in the construction programme for certain activities and locations, WSCC would wish to see this captured in assessments undertaken for the Proposed Development, and durations for certain activities should be reflected to take account of this.
General	WSCC would also want to see as part of the site selection process, consideration of the orientation of the substation in relation to the nearby PRoWs and sensitive receptors, with the louder noise emitting plant sited away from these receptors.
Table 22-7	Could RED confirm how the construction/operation of the enabling works at the Bolney National Grid substation have been taken into account with the assessment and how that will be dealt with as part of the DCO? This isn't mentioned in the activity/impacts for further assessment.
General	Assessments undertaken as part of the EIA, need to reflect the construction locations where there will likely be a more prolonged impact (some less transitory than others) e.g., construction compounds, HDDs, landfall, substation, areas where access is only via haul route along the cable corridor.
22.5.15	WSCC would like to further discuss the locations for baseline monitoring in relation to the cable route, noting the PEIR states ' <i>It is not initially proposed to undertake a sound monitoring survey to inform the assessment of the construction of the onshore cable, or construction of the offshore WTGs, as the extents of the study area are such that the noise environment at receptors will vary widely</i> '. WSCC would want to understand if baseline monitoring will be undertaking in proximity to HDD crossing points, accesses and construction compounds, along with any other more sensitive locations required.

22.6.7	Reference should be made for the Oakendene Industrial Estate when referring to noise sources around the substation search areas.
Table 22-10	How has any onshore substation piling activities been considered here?
Table 22-28	As requested throughout the ETGs, WSCC would expect consultation over the detailed survey methods for all baseline monitoring locations along with other local authorities.
Table 22-29	Based upon the characterisation of the receiving environment and the outcomes of the noise and vibration assessment, there may be additional environmental measures required along the route at particularly noisy locations, as well as that required for the substation area.
Chapter 23 Terrestrial Ecology and Nature Conservation	
General	Given the environmental sensitivities in the area of the landfall, a site-specific method statement should be produced as a way of addressing mitigation, compensation and enhancement measures.
General	With regards reinstatement of the cable corridor, there are embedded environmental measures covering this, e.g., <i>'all areas of this habitat (hedgerows) will be reinstated, with an emphasis on reinstating with species rich mixes where agreeable to landowners.'</i> Depending on how this is interpreted, it could mean that hedgerows are not reinstated if the landowner does not agree, which is not acceptable, or that the landowner may not agree to species rich mixes, which isn't acceptable either, but the replacement species choice should reflect either what was removed or what is characteristic locally (right plant, right place, right reason). It is imperative that strict biosecurity policies are applied, and all plant/seed material is UK sourced and grown or locally harvested seed is used where appropriate.
General	The experience of Rampion 1 reinstatement has not been wholly successful, with numerous and repeated planting failures; partly due to weather conditions but crucially, the lack of timely interventions to suppress weeds and provide other routine maintenance requirements which are seasonally dependent. The planting of larger, more mature tree stock has, yet again, demonstrated that without high maintenance inputs, these trees routinely fail, either entirely or partly, which is wasteful and loses several seasons' worth of potential growth. Continual replacement year on year is wasteful and, at worst, could result in trees/hedgerows at year 9 (of a 10-year maintenance plan) being replaced yet again instead of being well established and showing up to 10 years' worth of growth – the target condition. A comprehensive, detailed, fully resourced and implemented maintenance plan is essential with regular, timely inspections (at an agreed frequency) to ensure planting succeeds at an early stage in the plan. Planting in advance of the proposed development, as part of habitat creation and enhancement, where possible, would help to secure early gains.
23.5.27	23.5.27 refers to 34 ponds within the PEIR Assessment Boundary, yet 23.10.82 refers to 25 ponds within the PEIR Assessment Boundary.
Table 23-11	This table omits some HPI habitats such as ponds and rivers.
Table 23-13	Broadleaved semi-natural woodland has been scoped out in terms of fragmentation; <i>'the extensive linkages in the landscape will avoid meaningful fragmentation for woodland'</i> . How is <i>'meaningful</i>

	<p><i>fragmentation</i> defined? West Sussex is a well-wooded county, but local and multiple breaches of connectivity or loss of small woods or parts of woods have wider implications at a landscape scale. The preliminary assessment of the residual effect of the development on both semi-natural broadleaved woodland and native hedgerows is significant. Impacts on ancient semi-natural woodland have been scoped out since the cable route avoids direct loss of this habitat. However, the route lies very close to some ancient woodlands (e.g., Within 20m of Poling Copse LWS). Edge habitats can be very important ecologically. Thus, concern is raised. The ES needs to assess potential impacts on ancient semi-natural woodland and broad-leaved semi-natural woodland in close proximity to the onshore route.</p>
23.10.57	WSCC wish all veteran trees (once identified) to be avoided by careful placement of the cable route.
23.10.61	The installation of the onshore cable, the construction of the onshore substation and the temporary works required to deliver temporary construction compounds and access routes during the construction phase will result in the loss or change of semi-natural broadleaved woodland over an area of 5.53 ha. WSCC raises the concerns over this significant impact and expects this to be reduced as far as possible through the next stages of the project.
23.10.64	This section of the PEIR states that compensation for the loss of semi-natural broadleaved woodland will be provided through tree planting along the onshore cable corridor. The extent and location of this tree planting has not been determined at this point, this and other compensatory habitat as well as net gain for biodiversity will need to be further discussed with WSCC and stakeholders through development of the project.
23.10.64	Compensatory tree and woodland planting need not be restricted to the cable corridor but should also include the wider landscape.
23.10.78	It is suggested that the working width is reduced to 30m where it crosses all hedgerows (not just 'important' hedgerows) streams and ditches. These linear habitats often act as important wildlife corridors so it is important to minimise any severance. WSCC expects a reduction of the working width at all hedgerow crossings, not just those that are important.
23.10.79	Compensatory hedgerow planting need not be restricted to the cable corridor but should also include the wider landscape.
23.10.85 & 23.10.91	It is suggested that the working width is reduced where it crosses all streams and ditches. These linear habitats often act as important wildlife corridors so it is important to minimise any severance.
23.10.85	It is appreciated that micro-siting of the cable route will likely ensure that the majority of ponds are retained in-situ. However, habitats adjacent to ponds can be important for amphibians, grass snakes and other wildlife. Thus, consideration should be given to reducing the working width in the vicinity of all ponds to reduce adverse impacts.
23.10.86	Compensation could also include the creation of new ponds.
23.10.98	WSCC would have preferred further information on those mitigation measures that will be proposed, rather than just stating ' <i>tried and tested measures will be used</i> '.

Onshore Works Plan 1 - landfall	The landfall site is extremely sensitive ecologically. Thus, the proposal to HDD under Climping Beach Site of Special Scientific Interest (SSSI)/Local Nature Reserve (LNR) and Littlehampton Golf Course and Atherington Beach Local Wildlife Site (LWS) is welcomed. It is, however, difficult to understand the additional footprint needed at the landfall for construction compounds, access requirements, HDD pits, etc. Further clarity is needed on this.
Cable route	<p>With regards the cable route optionality at Warningcamp/A27 crossing, an initial ecological comment would be to reduce potential proximity to ancient woodland and Poling Copse LWS as much as possible. However, until the necessary supporting ecological surveys are presented, further comment on this cannot be made.</p> <p>With regards Warningcamp Hill and New Down LWS, this could be a significant impact as the crossing of the chalk grassland via open trench method is proposed. WSCC would like to see the results of the ecological surveys in order to discuss the development of robust mitigation measures.</p>
Substation sites	Wineham Lane North would impact on the landscape mitigation for Rampion 1 which is subject to a 10 year monitoring programme. This requires detailed assessment and avoidance where possible.
23.11 and Table 23-18	It is considered that R1 substation should be considered as part of the Cumulative Effects Assessment (CEA).
General	There are a lot of impacts being assessed within this chapter as significant. Therefore, WSCC expects that through the next stages of the project and through the collection of further survey data, this evidence base will allow impacts to be avoided in the first instance, followed by the development of robust mitigation measures for those impacts which cannot be avoided.
Appendix 23.3.	The survey identified important numbers of teal, wigeon and brent geese utilising discrete sites within the PEIR Assessment Boundary. This should inform the project design and mitigation measures.
Draft Report to Inform AA	Clarity is required on whether in-combination (cumulative) effects resulting from the operation of Rampion 1 offshore wind turbines (WTGs) been fully assessed in terms of potential impacts on foraging and migrating seabirds, and marine mammals?
Chapter 24 Transport	
General	There are certain roads referenced that are outside of West Sussex (those in and around Newhaven for example) and/or not maintained by WSCC (namely the A27). Unless specified below, WSCC Highways are not commenting on any aspects relating to these roads.
24.4.3	Incorrect road number, presume A289 should be A259.
24.4.4	Incorrect road number, as above.
24.4.16	The inclusion of Saturday working is noted for the purpose of traffic generation but given Saturday working is proposed there may need to be consideration given to potential traffic impacts at certain locations where there is the possibility of conflict with other developments/uses that have weekend traffic peaks.
24.6.19, 24.6.22	There are a number of typos relating to the spelling of Albourne.

24.4.20	Pierpoint village is referred to. It should be Hurstpierpoint.
24.6.25	There are a number of typos relating to the spelling of Wiston.
24.6.51	For the purposes of the PEIR, given the difficulties in surveying traffic, old data has been accepted where there is no recent data available (i.e., less than 5 years old). In light of traffic conditions returning to what may be considered to be more representative, further traffic data should be recorded. The exact scope should be agreed with WSCC. It is suggested however that data should be collected where surveys greater than 5 years have been used or in the locations where no data is available.
24.6.52	As per the comment above. Data should be collected for Ferry Road
24.6.61	Historical survey information has been accepted for the purposes of the PEIR. Further surveys should be undertaken to update this information.
24.6.63	The range of data is noted (01/01/15 to 31/12/19). More recent data (which will be available from Sussex Safer Roads) should be used. A commitment should be made to use the most recent accident data that is available.
24.8.83	It is appreciated that the HGV movements are based on peak weeks. However, there is no context to this. For example, whether it is a peak week or weeks, what the average number of HGV movements is over the time period the access/compound is in use. Whilst this may not be strictly necessary for the environmental assessment, it would at least put some meaning to the HGV numbers being quoted.
Table 24-28	Ferry Road does have a footway on one side; the entry in the table suggests otherwise.
Table 24-42	It is expected that a Transport Assessment is provided within the ES. A Stage 1 Road Safety Audit will be necessary for some of the more substantial accesses and those onto high-speed A roads. The exact scope of both of these should be agreed with WSCC.
Figure 24.19	There appears to be no peak week movements associated against compound 2 (Washington). This is the one compound where there are significant issues with vehicles routing west (as the proposal would increase slow moving HGVs onto the A24 at a junction where there is no merge) and where there is poor forward visibility for vehicles making the turn from the A283 onto The Hollow). WSCC require further discussions on potential locations and the associated impacts of a compound sited here.
General	Clarity is required on the operational access points presented in Chapter 4, which are not further discussed within the chapter here.
Appendix 24.1 – Outline Construction Traffic Management Plan	
Table 3.1	There are significant number of temporary accesses proposed. If possible, the number should be reduced, especially where multiple accesses are proposed onto the same A road. WSCC wishes to discuss this further with RED.
7.4.19	On some routes, the highway inspection area should be increased so as to include that length of access road from the nearest classified A or B road to the proposed site access. This is recommended as some of the access roads indicated will not typically be designed to accommodate HGV traffic. Damage may therefore ensue.

Annex A – Proforma	<ul style="list-style-type: none"> It is recognised that the exact details of visibility splays will be agreed based on speed surveys. However, there are a few locations, where adequate visibility may not be achievable (e.g., Access 13, 20a). Have any checks been undertaken to ensure the access locations are feasible? What is the fallback if some of the accesses do not meet the necessary guidance in terms of visibility? 90 metres visibility splays are indicated for all 40mph speed limits. 120 metres would typically be expected. With Access 6, it is unclear why a new access is needed given there is an existing access to the immediate south. The existing access already serves the land the proposed access is intended for. With Access 2 (Church Lane, Climping), the applicant should note the highway works associated with planning application CM/1/15 (Arun District Council reference).
Figure 24.1.9b	Vehicles cannot make the suggested right turn onto The Hollow from the A24 as indicated.
General	<p>Although not a new access, no consideration is being given to the increase in HGV traffic at the A24/The Hollow junction. The junction lacks any form of merge lane, as such traffic has to join at the priority junction. There is a strong concern that this proposal will significantly increase slow moving HGV movements onto a high speed road at this junction. This will need to be suitably assessed. Again, with respects to the Washington compound, forward visibility for vehicles turning from the A283 onto The Hollow is poor. It is understood that vehicles associated with the sand quarry operating on The Hollow are prohibited to turn right onto The Hollow as a consequence. Similar restrictions will be expected as part of the current proposals.</p> <p>It is suggested that the construction of the substation is dealt with separately to the cable route and associated works. The substation would potentially present a more intensive construction operation for the highway in the immediate vicinity.</p> <p>No consideration appears to be given to other temporary works necessary to enable the use of certain roads, for example, Kent Street, as this is extremely narrow. Additional works will be required on those roads where the road width is insufficient to enable a car and an HGV to pass.</p>
Chapter 25 Ground Conditions	
25.9.34 – 37 (Building Stone)	<p>The Strategic Stone Study and relevant mapping data (referenced at para 6.6.5, West Sussex Joint Minerals Local Plan (JMLP)), is available online via the BGS website- https://www2.bgs.ac.uk/mineralsUK/buildingStones/StrategicStoneStudy/EH_project.html</p> <p>As set out in paragraph 6.9.11 of the Joint Minerals Local Plan, the particular stone formations safeguarded are the Hythe Formation, Horsham Stone, Ardingly Sandstone and Cuckfield Stone.</p>
29.9.40 – 45. (Soft Sand)	The cable route south of the A283/Rock Common, through Lower Chancton Farm are within the Soft Sand Resource. Consideration should be given to the units of land and potential for severance of the resource and thus its workability, which may result in permanent mineral sterilisation.
29.9.50 (Rock Common)	There is currently an application being considered for Rock Common (WSCC/028/21). At present the site is accessed from the North (via the A24, south along The Hollow). The HGV movements in/out of Rock

	Common need to be considered, ensuring that there are no reasons that those movements cannot continue, preventing or prejudicing the sites operation. This is a possible issue around the Works Plan (10), that shows temporary areas for works to the north of the processing area of Rock Common Quarry. The continued winning, working and processing of sand from the existing Rock Common Quarry, the importation of inert classified engineering and restoration material, the stockpiling and treating of the imported material, the placement of the imported material within the quarry void and the restoration and landscaping of the quarry.
Chapter 26 Historic Environment	
General	<p>The potential archaeological impact on land will result from the excavation of a corridor of 36km by 50m in width for the cable trench, the substation and associated compounds. The proposal for Rampion 2 has the potential to have a significant impact on archaeological assets across West Sussex which will need to be appropriately assessed within the ES for the DCO submission.</p> <p>The burying of the onshore cable route will result in a significant impact on below ground archaeological deposits. Effects on below ground archaeological deposits will be permanent with archaeological deposits within the cable corridor requiring preservation by record (open area excavation). There needs to be early assessment of these deposits.</p>
26.3	Recommendations made at the early stages of consultation have been taken on board with the route with least known impact now being the preferred option.
Table 26-19 C- 1	Embedded environmental measures C – 1 will help preserve the setting of heritage however, it will have a significant impact on below ground deposits.
C-4	The presence of important archaeological deposits needs to be established at the design stage so that their preservation by directional drilling can be included. This is likely to require considerable trenched evaluation to understand the extent and importance of the below ground deposits present.
C- 9	There needs to be an understanding of the below ground archaeological deposits so the impact is understood.
C 29	For the majority of the sub surface deposits apart from the buried beeches these excavations will still impact the archaeological deposits.
C-79	W SCC would recommend a programme of trial trenching in advance of DCO application to determine the level of mitigation required and define the heritage impact of the project on below ground deposits.
C-115	The reduction of the working width in woodlands could be used also to limit impact on archaeological sites.
Table 26-19	W SCC would recommend this table needs a further measure for the archaeological assessment of sites by trial trenching in advance of the DCO application.
26.9.7 and 26.9.12	The loss of historic hedgerows could potentially be avoided by the use of drilling beneath these important landscape features. Although replanting can eventually restore these historic hedgerows this takes many years whereas drilling preserves the features in situ thus reducing the impact on the historic landscape.

26.9.16	The direct impact of both the underground cabling and the substation will result in the destruction of archaeological deposits within the 36 kilometres by 50m corridor as well as the substation area and is identified as being an impact of high magnitude and cannot be mitigated. It is therefore important that RED undertake appropriate assessment of the whole route to inform the ES.
26.9.17	The use of HDD installation beneath Climping Beach is supported as this will minimise the impact on the archaeological deposits in this area.
26.9.21	The completion of an appropriate evaluation would provide the detailed information to allow a full assessment of the impact of the development corridor for the ES.
26.16.2	It is recommended that once this baseline assessment has been produced, further meetings for heritage considerations are conducted to ensure that the scoping of heritage assets and evaluation techniques are agreed prior to further drafting of the ES.
Table 26-24	It is unclear why a scheduled barrow cemetery is regarded as high significance whilst a non-designated barrow cemetery is regarded as medium. This should be assessed in advance of the ES to see if the barrow cemeteries should be considered to be of similar importance. Similarly, within KP13-15 the presence of material associated with a scheduled monument may potentially be of a similar significance to the Scheduled Area following assessment, so this should be regarded as low to high within this assessment.
26.9.24	C-79 only reduces the environmental impacts if there is a detailed understanding of the impact in the first instance. More needs to be undertaken to assess the corridor for definition of known deposits and the identification of new sites.
26.9.35	The proposed substation site close to Oakendene Manor would have a significant impact on the surviving historic parkland. However, more detailed assessment needs to be undertaken to understand both site options.
26.16.2	Trial trenching is identified within the additional work proposed. However, there is little clarity on how this will be achieved or its extent. This should be undertaken to clarify the impact on the known buried heritage assets along the route and assess the blank areas for previously unrecorded archaeological deposits and assess their extent and significance.
26.16.2	There should be a programme of evaluation based on the results of the geo—archaeological desk-based work to ground truth the assessment and define the level of work that will be needed in advance of the onshore cable route being constructed. This would include elements such as dry valleys being test pitted or trenched to assess their importance. It is welcomed to see that the desk-based work will be integrated into the offshore work.
Outreach	The PEIR contains no information on any proposal for outreach or long-term opportunities for the promotion and management of the heritage resource which will be impacted by this scheme. The undergrounding of the cable will result in significant archaeological archive and finds assemblage. The local plan policies include recommendations that <i>whenever practicable, opportunities should be taken for the enhancement and interpretation of archaeological remains</i> . This project along with Rampion 1 will provide a major resource of information on the geo-

	archaeological and Palaeo-environmental data for West Sussex and it would be beneficial to discuss the potential of this material with the WSCC HER to maximise its potential.
<i>Built Heritage Aspects</i>	
Table 26-4	Conservation Principles should not be used, as these are not compliant with NPPF. WSCC requests the use of HEAN 12 and British Standards (if needed).
26.3.8 – 9 and Table 26-5	PINS scoping opinion – many comments by the Inspectorate have not been fully addressed. Most particularly – ID 5.8.3, 5.8.4, 5.8.6, 5.8.7. WSCC requires further clarity on these points, which should be responded to in the ES.
Table 26-5	5.8.1 – ‘How this is addresses in this PEIR’ – there is no methodology provided for the 2km buffer for the onshore substation. PINS had stated (ID 5.8.3, 5.8.4 The Planning Inspectorate, (2020). Scoping Opinion: Proposed Rampion 2 Offshore Wind Farm) that it should not be an arbitrary figure. WSCC raises concerns that the search buffer has not been fully considered.
Table 26-5	5.8.7 – ‘How this is addresses in this PEIR’ – no methodology has been provided for the how these assets will be scoped.
26.4.7	The Landscape and Visual Impact Assessment (LVIA) Zone of Theoretical Visibility (ZTV) and viewpoints (Chapter 19; Figure 19.3, Volume 3) does not clearly show that a 2km buffer for each substation option is appropriate. The ZTV should be overlaid with the designations map (SMs, LBs, CAs, NDHAs), this should then be used for targeted scoping rather than the arbitrary 2km.
26.4.14	Considerable concerns that the assessment of effects is based on the baseline desktop study (Appendix 26.2, Volume 4) – the study does not provide a sufficient baseline, including an understanding of historical developments relevant to heritage assets or any assessments of significance and contributions made by setting. This is fundamental to understanding the potential impacts/effects.
26.4.17	WSCC wishes for confirmation that this work has been complete? Concerns that this methodology will miss out sensitive heritage assets. Methodology for scoping should include heritage assets identified and assessed as part of Rampion 1. Particularly as harm identified to those may be increased.
26.4.18	Understanding any historical associations/historical development of sites should also be included within the principles and selection. This is particularly important for Oakendene Manor.
Table 26-8	‘Effects arising from changes to setting of the settings of heritage assets out with 2km of the onshore substation search areas (all phases)’ – Scoping out assets beyond 2km at this stage is not agreed, note above regarding ZTV and scoping process.
Table 26-8	‘Effects arising from changes to setting of heritage assets out with the seascape study area, as a result of the offshore substation and WTGs (all phases)’ – ZTV and views are required to demonstrate that there will be no effect. Assets have been missed from the assessment – most notably Arundel Castle, however ZTV may reveal others.

Table 26-8	<i>'Effects arising from changes to setting of heritage assets, not included within Table 26-26 to Table 26-31 (all phases). These tables list heritage assets to be taken forward for further assessment based on selection criteria described in Section 26.4.'</i> WSCC raises considerable concerns that assets have already been scoped out and have been included -
Table 26-10	Concern regarding the limited number of surveys. WSCC requests confirmation is given that further walkovers will take place, including reviewing the offshore impacts to heritage assets onshore.
Table 26-11	Clarification is needed on which study area.
26.6.12	It would be expected that these Conservation Areas would be assessed. No assessment provided to date.
Table 26-12	Considerable concern is raised here, the scoping of these assets has not been agreed. Scoped assets are not reflective of the SLVIA ZTV (Chapter 16; Figures 16.14 – 16.15, Volume 3) or the assets noted in the heritage interest column of Table 16-11 Viewpoints included in Volume 2, Chapter 16 Seascape, landscape and visual. Baseline assessment or reference to these assets listed are not provided in the Historic environment desk study – Chapter 26: Appendix 26.2.
26.6.3	ZTV map with locally listed buildings overlaid should be provided to demonstrate that these assets can be scoped out.
Table 26-19	C-61 – set out what these were. Including the mitigation methods for the substation. Ensure that the option analysis takes into account the embedded mitigation provided for Rampion 1. For instance, for any screening provided previously to limit impacts to HAs in the Bolney Road / Kent Street area may be affected.
Table 26-19	C-82 – methodology for how 'usually' is determined.
26.8.14	Assessments are insufficient. Baseline assessment in the appendix should be informing the assessment of significance. Outlining the contribution made by the setting to the significance of the heritage asset to understand the magnitude of change.
Table 26-26 to Table 26-31	Noted above, assessments are insufficient. WSCC cannot determine the magnitude of change and significance of effect without a sufficient and proportionate baseline. As such, these assessments have only been briefly reviewed for this comment as the methodology/assessment is not agreed. WSCC requests further discussion on these matters.
Table 26-26	Magnitude of change – methodology for determining this as it changes between very low and low and the significance of effect - Not Significant (NS), Potentially Significant (PS), Significant (S). Confirmation that these are temporary changes.
Table 26-26	Washington Conservation Area and listed buildings within – <i>Major adverse</i> – confirmation is required that this will not be a permanent change.
Table 26-32	WSCC/011/21, WSCC notes the application for Ford Circular Technology Park, the potential for cumulative views from Arundel Castle and potentially others to be further discussed.
26.16.2	WSCC raises the concern that outlined of further works to be undertaken has limited built heritage referenced. From a built heritage perspective, the principal considerations are the offshore wind turbines and the onshore substation. There are concerns that the potential impacts arising

for the offshore elements and onshore substation is not being appreciated and represented as it has not been presented or included within the PEIR assessment. Whilst it is appreciated that there are further works to be carried out, there are concerns that the list provided (Volume 2, Chapter 26: Historic environment, 26.16.2) comprises few built heritage elements and no further baseline assessments involving offshore elements.

Due to the different considerations and impacts caused by the proposed development, it is requested that built heritage matters, and setting issues, are separated out of the document (Appendix 26.2 Historic environment desk study) to form a standalone Heritage Impact Assessment. This should then inform the ES Chapter. It would be expected that this would form part of the appendix within the ES submission. It is recommended that once this baseline assessment has been produced, further meetings for heritage considerations are conducted to ensure that the scoping of heritage assets and viewpoints are agreed prior to the submission of the ES Chapter.

In addition to this, once it is understood which heritage assets have the potential to be affected by the proposals due to the visual impact to their setting, there may be design amendments that could mitigate some of the harm and should be considered. The potential for any successful design mitigation can also only be achieved after the baseline assessment has been completed. It would be recommended that further consultation is sought, once this is completed to identify and discuss the potential for design mitigations that could the potential to lessen the impact on surrounding heritage assets.

Offshore Aspects

There is considerable concern the offshore element will result in harm to a high number of heritage assets. It is considered that this has not been reflected in the built heritage assessment to date and the main study document (Volume 4, Appendix 26.2: Historic environment desk study) provided does not deliver a robust baseline to fully understand the existing historic environment. Only when a robust baseline is provided can the full potential for impact to surrounding heritage assets be appreciated.

Further information required/work to be completed:

- Built Heritage Assessment (to be used as an appendix to the main ES Chapter. The heritage assessment should use the stepped approach to assessing the setting of heritage assets contained within Historic England's Good Practice in Planning Advice Note 3: The Setting of Heritage Assets.) this should provide –
 - o Identification of surrounding heritage assets, cross referenced with heritage assets identified in Volume 2, Chapter 16 Seascape, landscape and visual.
 - o Scoping, informed by site walkover and the ZTV.
 - o Assessment of significance for heritage assets effected, including contributions made by setting.
 - o Full impact assessment, including assessing views.
 - o Assessment of cumulative impacts, particularly relevant for such sites as Arundel Castle with the proposed A27 bypass and Ford Circular Technology Park.
- Review of views within the Landscape and Visual Impact Chapter to understand if further views from a heritage perspective will be required

	<p>Landfall</p> <p>There should be consideration of the visual impact that this may have for heritage assets on the coast, and the potential for visual impact, and any cumulative impacts with the turbines. This should be included within the assessment.</p> <p>Onshore cable route</p> <p>Whilst the tunnelling has the potential of having a negative impact resulting in a level of harm to a number of heritage assets, this will be a temporary impact. It will be an important consideration to ensure that once complete, the areas are returned to their previous state to ensure that there will not be any permanent impact to the heritage assets affected by the construction stage. On the basis that this will be secured through the DCO process, this is of lesser concern from a built heritage consideration, particularly as there will be no direct fabric intervention with any built heritage assets.</p> <p>Substation sites</p> <p>The two substation location options, both have the potential to impact heritage assets. It is considered likely that the Oakendene site will have a greater impact, however the work carried out to date is insufficient and so is not known at this stage. It should be noted that the selection of the substation site cannot take place until this baseline assessment is completed.</p> <p>Further information required/work to be completed:</p> <ul style="list-style-type: none"> - Built Heritage Assessment (to be used as an appendix to the main ES Chapter). The heritage assessment should use the stepped approach to assessing the setting of heritage assets contained within Historic England's <i>Good Practice in Planning Advice Note 3: The Setting of Heritage Assets</i>. This should provide – <ul style="list-style-type: none"> o Historic development for both sites (to understand any land associations, particularly important for Oakendene as it is likely to be the former grounds – archival research is likely to be required) o Site assessment for both sites o Identification of surrounding heritage assets for both sites o Scoping, informed by site walkover, understanding how the site contributes to any of the heritage assets, and the ZTV o Assessment of significance for heritage assets effected, including contributions made by setting. o Full impact assessment, including assessing views, to inform the substation site selection with an understanding of the mitigation imposed for Rampion 1 and the potential impact of this. o Assessment of cumulative impacts - Review of views within the Landscape and Visual Impact Chapter to understand if further views from a heritage perspective will be required.
Appendix 26.2 Historic environment desk study	
Table 2-3	Conservation Principles should not be used. Not compliant with NPPF. Use HEAN 12 and British Standards (if needed).
3.1.2	As noted above regarding insufficient study areas – more refined selection needed using ZTVs.

Section 4	Baseline is mainly focused to archaeology, WSCC would expect more baseline particularly for areas/assets more likely to be affected.
4.4.2	As noted previously, methodology for study area not agreed and was noted by inspectorate.
6.1.3	No assessment been provided of assets in the study area. No methodology of study area. No methodology of scoping. As noted, considerable concerns that the baseline and assessment work has not been undertaken sufficiently.
Chapter 27 Water Environment	
Crossing Schedule	Based on the current mapping provided several water crossings have been missed i.e., Figure 4.2.1g ' <i>Main Crossing on onshore cable corridor</i> ', between TRX-19 and TRX-20. Also Figure 4.2.1h, to the east of RDX-13. Clearly not all water crossings will be picked up from the OS mapping, but it would be expected that all will be picked up during subsequent site walk overs. WSCC expects this to be fully detailed in the ES.
27.9.7	This section suggests ' <i>two parallel separate trenches</i> ' will be excavated and backfilled to install the cable circuit, yet the worst case scenario is ' <i>up to four</i> '. Clarification is needed on what assumptions have been used in the assessment.
27.9.11	WSCC understands the magnitude, and hence the significance of potential effects, have been assessed on the assumption that the embedded environmental measures are successful implemented as part of the Proposed Development and the assessment is of residual post embedded mitigation effects. For this to be a robust assessment, there needs to be stronger wording with regards the commitments made, and clarity on how these are to be secured through the DCO process.
27.9.12	Has piling been considered and assessed as a worst case?
Chapter 28 Major Accidents and Disasters	
General	It is noted fire risk is included within the assessment for Major Accidents and Disasters. With regards to the placement of electrical infrastructure at the substation site, this should include the risks to not only those constructing and operating the equipment, but to the surrounding area, including residents in the locality. Consideration should also be given to cumulative fire risk, with the potential for a cluster of electrical infrastructure (both the Rampion 1 and 2 substations, National Grid substation and the consented Coombe Solar Farm) in the vicinity.
General comments	
Commitments Register	
	<ul style="list-style-type: none"> C1- Can '<i>where practicable</i>' be removed from this sentence? In other areas the PEIR states this will be buried for its entire length. This should be a robust commitment which is the basis for the EIA. C3 – this states '<i>at sensitive crossing locations the working width will be reduced as far as practicable</i>'. A '<i>sensitive crossing location</i>' requires definition, but it should include hedgerows, particularly those assessed as important according to the Hedgerows Regulations 1997, all woodlands (which are habitats of primary importance), hedgerow / field / individual trees, and groups of trees, regardless of whether they are classed as veteran or ancient. Further discussion is required on which crossings are defined as sensitive and will be committed to in terms of reduced working width.

	<ul style="list-style-type: none"> • C-8 - WSCC would wish to see this updated to remove '<i>where feasible</i>' and include '<i>Oils and fuel are stored within designated areas at least 10m from any watercourse in impervious storage bunds with a minimum of 110% capacity to contain any leakages of spillages</i>'. • C-10 – Can '<i>is anticipated to be required</i>' be removed? If not, should this be assessed as a worst-case scenario in the EIA? • C-12 - WSCC requires clarification on the maximum length of time the top and sub soil will be stockpiled within the working corridor, sentence only states '<i>practicable minimum</i>'. • C-13 – has the importation of aggregates for suitable surfaces (for construction traffic) been included in the assessments for PEIR? • C-18 – Will the crossing schedule be updated for the ES to include all crossings, including hedgerows? • C20 – as per other comments in the response, the '<i>typical</i>' working width of 50m should be reviewed and reduced. The justification of the 50m should be made fully within the ES. • C28 – will land drainage pre-construction surveys be undertaken? • C61 – Due regard should also be given in the Design Principles document for Rampion 2 for a reduction in visual impact to coastal communities. • C68 – WSCC would request a specific onshore substation design principles document which would underpin the design of the operational onshore substation and could be submitted at the DCO application stage and could be read in conjunction with the OLEMS. • C-103 – this commitment needs to be much more robust to remove doubt that habitats will at the very least be returned to original state, if not enhancements made. • C106 – can '<i>appropriate</i>' speed limits be defined here? • C113 – WSCC would wish to see this 30m maximum width reduced even further. • C-115 - States that <i>the construction corridor will be 30m through woodland, tree lines and across important hedgerows</i> but even this has the potential for significant, lasting, adverse impact. It is appreciated that much of the detail is unknown, but the imprecise language used in the PEIR gives considerable leeway for loss and damage of habitat, e.g., '<i>where possible</i>' and '<i>where practicable</i>' and '<i>as far as is practicable</i>'. • C-165 – Please see comments within Chapter 24 with regards visibility splays; • C-193 - Can the wording be updated to include the following: <i>Replacement planting and seeding will be characteristic of the area, resilient to climate change and comply with all current biosecurity requirements. Plant and seed species will be selected carefully at detailed design stage with appropriate management and maintenance techniques established to support the development of these species to achieve independence in the landscape in line with the environmental requirements.</i> • There is no commitment to Biodiversity Net Gain in the list of commitments here which WSCC would expect to see, this will be a point of discussion through the development of the project.
Onshore Draft Development Consent Order Requirements (Please note this is the only section reviewed within the Draft DCO submitted as part of formal consultation;	

further discussion will be required on the wording of Requirements as further detail and assessment is undertaken).

General	<p>In general terms, this is very much an early draft and will require considerable input and review through the process. Nonetheless, in terms of the requirements, it seems that lessons learnt from Rampion 1 regarding 'stages' has been reflected in the new requirements which is welcomed. This should help enable individual 'stages' of the works to be managed in a logical way and allow works to proceed in a timely manner. There will remain a need for a clear structured approach as to how 'stages' and their boundaries are identified and split.</p> <p>Consideration should be given to how the substation works can be isolated in a similar manner. With Rampion 1, in reality the substation was dealt with in a single entity, much in the same way as a major planning application, for which LPAs are more familiar in dealing with. The extent to which requirements for the substation can reflect more traditional planning conditions would be welcomed, and for the DCO requirements to be suitably grouped for ease of reference. It will be important for the 'relevant authority' to be determined as early as possible in the process. At present the Draft DCO references WSCC, which has yet to be considered/determined.</p> <p>The 'procedure for discharge of requirements' appears to be set out in Schedule 14. This will need to be a very clear section and make clear if requirement schemes will be expected to be in accordance with any 'measures for success' or 'objective standards' and whether this will form part of the ES/DCO application. Given the likely scope and size of submitted schemes (and need for consultation with other parties – generally 21 days) 42 days is very tight. The relevant authority must be given sufficient time to consider and determine such schemes (noting that consultee comments are often delayed) without a threat of deemed approval.</p> <p>Perhaps most crucially, RED should set out what has changed in the requirements that were used for Rampion 1, and why. Understanding the rationale and clarification as to where previous matters (now omitted) are being picked up.</p>
Specific comments	<ul style="list-style-type: none"> • Requirement 7 (Onshore design parameters) - Further detail required here, which parameters will this cover? • Requirement 8 (Detailed design approval onshore – substation) – There is a need to set more detailed parameters here, e.g., maximum height, footprints etc. Consideration could be given to splitting out other specific substation matters such as planting, fencing, accesses, drainage etc and including here or in a number of grouped requirements. In reality, Rampion 1 substation was dealt with very much as a stand-alone development and it may be easier to split in this way. • Requirement 9 (Programme of works) – May need to work on the wording to make it clearer, but if this is trying to capture 'stages' and allow an ability to start one stage before another, that is sensible. • Requirement 10 (Provision of landscaping) – it is good that this is by 'stage', which should allow flexibility. Any implementation timetable for planting will need to be sufficiently flexible (or allow some scope for further amendments with relevant authority approval in writing) to avoid requirement amendments being needed. This seems to be about retention and protection of existing trees and

	<p>proposed planting. They are quite distinct matters, so consideration will need to be given as to how to best manage this.</p> <ul style="list-style-type: none"> • Requirement 12 (Implementation and maintenance of landscaping) - Five years will not be sufficient for a project of this magnitude, 10 years, as a minimum (as per Rampion 1) will be required. Further discussion will be required on this. • Requirement 13 (Ecological management plan) – Is this intended to be specific to ecology (which may be difficult as will always include an element of landscape). Clarity is required in how Requirements 10, 12 and 13 will interact, previously this was all under the banner of a single requirement – the ELMP? • Requirement 15 (Highway accesses) – There needs to be some thought to this and whether this may be better by 'stage' or area. There needs to be provision for reinstatement of temporary accesses, and this should also be within Part (3). • Requirement 16 (Operational highway accesses in the South Downs National Park) – Why is there a separate requirement in the SDNP referring to 'operational' accesses? • Requirement 17 (Fencing and other means of enclosure) – (5 & 6) Consider putting this into Requirement 8? • Requirement 19 (Surface and foul water drainage) – To be approved by the LLFA? Surely the LLFA will be a consultee and the 'relevant authority' to sign off/enforce etc? • Requirement 20 (Contaminated land and groundwater scheme) - Starts with 'no part' rather than 'no stage' which would be expected. The term 'cause significant harm' is not specific enough. • Requirement 21 (Surface water) – Specifies WSCC, should be relevant authority until that has been decided. Not clear it this is construction stage drainage, or the final built form, or both? Should require as built plans and a verification report (with remediation if not working as expected). • Requirement 22 (Onshore Archaeology) - Specifies WSCC, should be 'relevant authority' until that has been decided? Historic England a key consultee? (4) wording needs to make sure analysis and publication a requirement, as the wording is not specific enough currently. • Requirement 23 (Public Rights of Way) – This may need to include some more specific criteria to be provided, e.g., temporary diversions, durations etc. • Requirement 25 (Construction Traffic Management Plan) – Not clear what visibility splays is doing here, seems to be more relevant to Requirement 15 (or is it routes and ensuring points of access which are feasible)? Clarity is required. • Requirement 26 (European protected species onshore) - This seems to be worded to allow EPS licences to deal with matters (which is useful and avoids double handling), but there is also a need to make sure any corresponding requirement for an EMP, LMP can be sufficiently flexible to adapt to things approved under this condition. Is there any way of combining? • Requirement 27 (Restoration of land used temporarily for construction) – (1) it may be worth noting that approval may in some cases be under the terms of the relevant requirements? (2) Specifies WSCC, should be 'relevant authority' until that has been
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	<p>decided (3) the term 'wherever practicable' a little too weak, it must be guaranteed.</p> <ul style="list-style-type: none"> • Requirement 28 (Effect on Local Wildlife Sites (LWS) and sites of ecological importance) - Specifies WSCC, should be 'relevant authority' until that has been decided (2) This needs to be clear it is referring to the maximum working width allowed within the relevant site. This detail would likely also likely be expected in any tree protection or EMP requirements. • Requirement 29 (Control of noise during operational phase) – (iv) needs to build in something that triggers further mitigation where noise limits are not achieved and a timetable for doing so. • Requirement 32 (Amendments to approved details) – It will be important that 'immaterial changes' are fully understood. It needs to be clear that the materiality of the change is more in relation to the overall approved development (and ES) rather than the materiality of the change to the approved requirement scheme.
General – data sets	<p>WSCC understands that measures required in response to COVID-19 have had consequences for the proposed approach by RED to obtain relevant environmental information. WSCC has raised further comments below:</p> <ul style="list-style-type: none"> • Transport - WSCC Highways have been engaged through the preparation of the PEIR. As such, the majority of Chapter 24 has been previously reviewed and accepted in principle by WSCC. It is recognised that there have been on-going difficulties in collecting traffic data. As a result of this, some of the traffic data used is older than normally would be accepted and in one instance there is no base data available. The use of older data has been accepted in this instance to enable this and related sections of the PEIR to progress. RED should look to collect further data where possible and where this can be demonstrated as being representative of typical conditions (i.e., before any of the Covid 19 lockdowns). A number of comments have also been made in regards of the Outline Construction Traffic Management Plan. Further discussion will be required to agree the content of this document. • Ecology - The key limitation with regards to the baseline data presented in the PEIR is the extent of land that had been subject to field surveys. It is noted that the PEIR is based on a Phase 1 habitat survey which covered only approximately 27% of the onshore part of the PEIR Assessment Boundary. Until the Phase 1 habitat survey is complete and supported by National Vegetation Classification (NVC) and species surveys, many of the ecological impacts cannot be assessed. WSCC expects to see survey reports as they become available.
Lessons Learnt	<p>WSCC supports using any lessons learnt from the construction and operational phases of Rampion 1. WSCC refers to the comments on this raised during the Joint Consenting Workshop held with South Downs National Park Authority on 17 September 2019 (documented in RAM-ERA-ECO-REP_0034) and those comments raised by WSCC during the ETG meetings held to date.</p>
Health	<p>It is appreciated that studies show the risk of exposure to electromagnetic field from offshore wind farms as being negligible with not much evidence to suggest the contrary. However, to serve as reassurance to the public and all other stakeholders who may have concerns around this, we recommend that RED demonstrates that the risks, however little- have been assessed.</p>

Section 106 Agreement	WSCC wish to work with RED to seek to mitigate the significant impacts predicted, where possible, and where residual impacts remain, seek compensation through a Section 106 agreement. This should be discussed through the subsequent stages of project development.
Technical ETGs	WSCC welcomes the ETGs held to date as part of the Evidence Plan Process (EPP), however, to discuss some of the details within this technical response, further topic specific meetings with WSCC should be held, outside of these ETG meetings.