

Rampion 2 – Statutory Consultation: Potential Onshore Cable Route Changes: Response from West Sussex County Council, November 2022

Introduction

1. West Sussex County Council (WSSCC) welcomes the opportunity to comment on the further round of targeted onshore cable route consultation Rampion Extension Development Limited (RED) is undertaking. This is understood to be in response to further design evolution, informed by the previous round of statutory consultation held in summer 2021.
2. This response is not on behalf of other Districts and Boroughs within the County, and only addresses the element of project which is subject to the statutory consultation i.e., the targeted onshore cable route proposals. Technical feedback on the other elements of the project i.e., the onshore substation and offshore Wind Turbine Generators (WTGs), will continue to be raised through the Evidence Plan Process (EPP) and the relevant Expert Topic Groups (ETGs).
3. Details on the approach to this statutory consultation was discussed with RED (see community engagement section). Technical consultation materials published have included an addendum to Preliminary Environmental Information Report (PEIR) published in summer 2021, termed a PEIR Supplementary Information Report (SIR).
4. WSSCC officers have reviewed the PEIR SIR and a summary is given below, along with a table of more detailed comments in **Appendix A**. The key areas raised in this response relate to the following topics:
 - Technical and Community Engagement
 - Overview of Key Concerns
 - PEIR SIR Review:
 - Arboriculture
 - Biodiversity
 - Cultural Heritage
 - Landscape and Visual Impact (LVIA)
 - Public Rights of Way (PRoW)
 - Traffic and Transport
 - Project-Wide Issues:
 - Reinstatement
 - Biodiversity Net Gain (BNG)

Technical and Community Engagement

Technical Engagement

5. WSSCC notes that MHCLG guidance on the pre-application stage of the Development Consent Order (DCO) process emphasises the benefits that the

early involvement of local authorities (and communities and statutory consultees) can bring. WSCC welcomes the engagement with RED through the EPP and the range of ETGs held to date regarding the suitability of the evidence base gathered. WSCC acknowledges the fourth round of ETGs are being held throughout November 2022, prior to the close of the consultation, which will outline the key areas of the consultation and allow officers to raise questions during this forum.

6. Based upon the likely date for DCO submission stated in this consultation ('early 2023'), WSCC would wish to understand how the process for technical engagement will work between closure of the consultation (29 November 2022) and submission of the DCO in early 2023, which is a relatively short period of time. WSCC would expect engagement on the refined cable route proposals (after RED have given full regard to all consultation responses), scope of any further surveys/investigations, presentation of impacts, required mitigation packages and potential section 106 negotiations. WSCC would question if enough time was allowed for this meaningful engagement to take place with stakeholders ahead of the DCO submission date.

Community Engagement

7. Details on the approach to this consultation was discussed in May/June 2022 with RED via both formal and informal consultation on the draft Statement of Community Consultation (SoCC), which was updated from the previous version published in Summer 2021.
8. Due to the detailed nature and complexity of the proposals and the level of information to interpret, WSCC welcomes a longer than minimum 28-day period for consultation, and for this not to have been held over the summer period. Holding both face-to-face and on-line elements to the consultation will allow greater flexibility in accessing consultation materials by the local community. Although the range of methods and materials presented is welcomed, the documents, particularly the proposals on the maps, were not easily digestible, with a significant amount of information to interpret.
9. Local concerns raised to WSCC during the consultation period with regards methods for engaging (as documented in the published SoCC), will be considered as evidence for inclusion in the Adequacy of Consultation response, to be submitted by WSCC during the acceptance phase of the DCO.

Overview of Key Concerns

10. This consultation introduces a number of additional onshore cable routes and modifications to the existing routes presented in summer 2021: two new longer alternative cable routes (LACR); seven alternative cable routes (ACR); 14 modified routes (MR); 33 revised and/or additional trenchless crossings; and 32 alternative temporary construction and/or permanent accesses (AA).
11. Based upon these proposals, the PEIR SIR now presents an increased onshore Maximum Design Scenario (worst case footprint) for the cable route length from 36km, as presented in summer 2021, to 40.25km. This worst-case footprint for the onshore elements of the project has increased from 206.95ha to 227.45ha, which is an increase of 9.9%.

12. WSCC welcomes analysis of the feedback from previous rounds of consultation to drive the development of the design; however, it is concerned that the worst-case footprint (even with proposed mitigation) has increased as a result.
13. Although in some instances commitments have been made to reduce the working width along the route, the consultation is still presenting a worst-case construction working width of 50m. WSCC raised during the previous round of consultation that further justification was needed for the requirement of a 50m working width. A cross section of this 50m is given within the original PEIR, but a clear indication of dimensions for each element within the construction corridor was not.
14. One of the key concerns held was the location of the large construction compounds associated with the cable route proposals, which would be in place for the duration of the construction works (up to three years and six months). No detail has been given for the location of any new large compounds required to support the construction of the additionally proposed alternative routes, or any detail on the optionality of compounds along the original PEIR route, which was raised as a concern (e.g. the three proposed at Washington).
15. A high-level summary of the relevant issues from these proposals are discussed throughout each topic specific section, with Appendix A outlining more detailed queries. The key matters are detailed below.

Long Alternative Cable Routes (LACR)

16. LACR-01 and LACR-02 deviate geographically from the original PEIR Assessment Boundary. As stated by RED, LACR-01 and LACR-02 have arisen as a result of a combination of statutory consultation feedback received from local community members, statutory bodies and others:
 - LACR-01a (runs north of Littlehampton to the south of Lyminster, east of the original PEIR boundary. The route continues east, heading north of Poling where it crosses the A27 to the west of Hammerpot. The route then continues north to Michelgrove Park):
 - Potential interactions via a trenchless crossing of the Lyminster Bypass.
 - Temporary and permanent access routes in close proximity to sensitive receptors, including Lyminster Conservation Area and Grade 1 listed St Mary Magdalenes Church (AA-02/3) and in close proximity to residential dwellings (AA-16/17).
 - Close proximity to the Black Ditch (which is known to support water voles).
 - High archaeological potential along the route including the Late Bronze Age settlement activity at The Vinery, Angmering; the line of a Roman road and potential for roadside activity, multi-period activity identified during ongoing Lyminster Bypass field investigations and the potential for deeply buried palaeoenvironment deposits within the Arun floodplain. The projected line of the Brighton-Norton raised beach crosses LACR-01a in the vicinity of Poling Corner, south of the A27.
 - Potential interactions via a new crossing location on the A27 and access onto the A27 (egress in particular is of concern).

- Concern regarding cable trenching activities in the area and impacts to surface and groundwater flows during both construction and operational phases of the project, and the potential implications on increased flood risk.
- Wide boundary at the northern section surrounding Michelgrove Park and potential impacts upon Beech Copse and green corridor between multiple sites of ancient woodland (currently proposed to be open cut trenching).
- LACR-01b (continues from LACR-01a north-west and then northeast through agricultural fields for approx. 3km around the west side of Harrow Hill. It re-joins the original PEIR boundary 1.2km south-west of the summit of Sullington Hill):
 - Interactions with the Peppering Project – a higher tier Countryside Stewardship Scheme (which is being managed sensitively for farmland birds and other wildlife). Specific embedded environmental measures, such as those proposed, would be essential to mitigate the impacts here.
 - An Archaeological Notification Area (ANA) intersects with the route, relating to multi-period archaeological activity on Harrow Hill. This indicates a potential for archaeological features of potentially high heritage significance to be present within LACR-01b.
 - Temporary and permanent access running north along Michelgrove Lane (which is narrow with limited passing places). Access AA-22/23 is cause for concern as it crosses a Scheduled Monument (List Entry 1017446: Itford Hill style settlement and an Anglo-Saxon barrow field at New Barn Down). As above, the proposed creation of laybys/passing places is cause for concern; these would inevitably be within the Scheduled Monument and therefore there is the potential for significant effects to the historic environment.
- LACR-01c (continues from LACR-01a 750m north and then east through agricultural fields and crosses Michelgrove Lane. Continues 1km north-east to the shoulder and east side of Blackpatch Hill via trenchless crossings. Heads north to Sullington Hill parallel to wooded areas):
 - Significant number and complexity of temporary and permanent access routes (off Long Furlong Lane and from the A24 (Horsham Road) which will utilise approximately 2km of existing tracks running west, there will also be a section running for approximately 1.8km north to Sullington Hill/Barnsfarm Hill for this permanent access.
 - The route passes in close proximity to a number of other designated assets, including three scheduled monuments and three grade II listed buildings.
 - The intersection with five ANAs and the high archaeological potential evidenced by the concentration of activity in the vicinity of Blackpatch Hill including a large number of barrows and a concentration of flint mines, as well as multi-period field systems and other features.

- LACR-02 (commences north of the A27 and south of Crossbush Lane. Continues east for 650m towards Blakehurst, turns north for 1km then follows an existing estate road through ancient woodland, crosses Angmering Park Road and to the top of the slope down to Michelgrove):
 - Direct loss of approximately one hectare of ancient woodland.
 - Impacts to PRowS (including Bridleway 2189_1 and Bridleway 2211, which will need temporary diversion of 3km, part of which forms the promoted Monarch's Way).
 - Close proximity to several other designated assets, including two scheduled monuments and at least three grade II listed buildings.
 - This route runs south of Warningcamp Hill, and as a result would avoid the cable route intersecting with the complex of geophysical anomalies which lie within the PEIR assessment boundary on Warningcamp Hill. These have been identified as probable archaeological features likely relating to the two ANAs that cover this area identified, of potentially medium to high significance. This change is welcomed, as this would avoid harm to archaeological heritage assets of potentially high significance. However, LACR-02 runs through another of which may contain features of equal or higher significance to the PEIR boundary.

Alternative Cable Routes (ACR)

17. Seven Alternative Cable Routes (ACRs) (ACR-01 – ACR-07) to the original PEIR Assessment Boundary have been included within the proposals. Points of concern for some of the ACR proposals are given below:
- ACR-01 (located approximately 270m to the north-west of Littlehampton, starting adjacent to the original PEIR Assessment Boundary south of the railway) - This alternative route is suggested in order to avoid anomalies identified on the geophysical survey as being of potentially high significance. The consideration of alternative route options in order to minimise harm to these heritage assets is welcomed. However, it must be highlighted that the route should not be altered/fixed on the basis of avoiding heritage assets, until the new proposed area has been subject to, at a bare minimum, geophysical survey, in order to avoid a repeat of the same issue down the line.
 - ACR-06 (commences approximately 180m south of Ashurst running west of Horsham Road for approximately 750m and alongside Spithandle Road for approximately 700m) – this route moves closer to isolated residential properties east of B2135 (but also further from others northwest e.g. school/recreation ground). This route is also closer to Lower Barn Wood (ancient woodland), which is a concern. There is 'common land' either side of the B2135 close to the proposed route and therefore confirmation that this would not be affected is required. A trenchless crossing seems suitable mitigation, however, clarity is needed on associated compounds and timings of works to keep impacts to local receptors to a minimum.
 - ACR07 (located approximately 220m east of Bines Green at its closest point) – WSCC notes the high-pressure gas pipeline crossing here, and therefore a need to consult with SGN/HSE. In general terms, this alternative route brings the project closer to residential properties lining the B2135 and much closer

to Bines Green Site of Nature Conservation Importance (SNCI). It is also noted that the route passes close to Withyfield Cottage and Shepard's huts which are bookable accommodation/glamping and thus sensitive type uses (TC15 is very close to these, so impacts need to be fully understood). Associated TC-16 is in the floodplain so any compound will need careful consideration for storage of soils/plant/chemicals (this is also a more general issue for compounds along the entire route if in flood areas).

Temporary and Permanent Accesses

18. A number of alternative temporary construction and permanent accesses (AAs) (AA-01 to AA-32) have been included as a result of the ongoing design evolution activities since publication of the PEIR. Temporary construction accesses are required along the onshore cable route to allow for the transportation of materials, plant, equipment and personnel to and from the construction sites. Permanent operational accesses are required for future periodic inspection, test and fault investigation (if required) of the onshore cable system, likely to be required every two to five years, and maintenance and repair work.
19. There are a significant number proposed from those presented at PEIR, which have not been discussed in any detail with WSCC Highways. Specific concerns are highlighted throughout this response and in Appendix A.

Modified Routes (MR)

20. A number of Modified Routes (MR) (MR-01 to MR-14) to the cable route within the original PEIR Assessment Boundary have been included within the proposals, as a result of the ongoing design evolution process. Points of concern for some of the MR proposals are given below:
 - MR-01 (landfall at Climping, area added, moving the boundary approximately 350m to the east):
 - Detail is lacking on where HDD launch/reception bays will be located. Confirmation is needed if access would be required through the tree belt in this location. WSCC wish to note that for Rampion 1, a large area was needed for the Joint Bays from offshore cables (and pulling). Also, the landfall area was a construction site and compound throughout the entire construction programme, and therefore proximity to receptors is important.
 - Sheet 1 of the Works Plans has not been updated to reflect this change.
 - Concern is also raised with regards the requirement for beach access. 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. No allowance has been made for this within the proposals.
 - It is believed that these arable fields at the landfall may support wintering brent geese, therefore requiring appropriate mitigation and compensation.

- MR-07/MR-08 (Washington) - The launch/reception area for the HDD (north of the A283) is adjacent to Rock Common Quarry. There is a current application to fill the quarry with inert waste, which may need consideration of cumulative impacts (in particular HGV movements/routing). Also, there is a need to ensure any works would not have any effect on the integrity/stability or drainage of the quarry. MR08 moves the route closer to Green Farm House (adjacent to the Quarry) which is a listed building.
- MR-09 (150m east of Ashurst) – concern that this route is in closer proximity to Ashurst village, a listed building, and the village hall.

Trenchless Crossings

21. A number of revised and/or additional trenchless crossings (TCs) (TC-01 to TC-33) have been included as a result of the ongoing design evolution process since publication of the PEIR. These are associated with all cable route proposals, covering the entire route. WSCC welcomes the design evolution and understanding that embedding trenchless crossings into the design can reduce effects to sensitive receptors, especially for some sensitive features WSCC specifically raised as a concern during the previous round of consultation.
22. There is however, a lack of detail regarding the methodology, timings and locations of launch/receptor pits for each of these additional trenchless crossings, especially those that introduce additional noise sensitive receptors (for instance TC-12 (All Saints Church on Water Lane), TC-19 (Taintfield Farm and Westridge Farm) and TC-20 (Southlands Farm). Crossing methodologies and timescales can vary, and therefore detailed assessments of these activities must be undertaken to ensure effects are correctly mitigated.
23. WSCC would like to highlight TC-21, which is welcomed, as there was concern amongst the local community with temporary (approx.3 years) traffic lights here during construction of Rampion 1 OWF. This trenchless crossing would also avoid a second incursion into the treeline along the road, potentially affecting reinstatement works in this location. It should also be noted however for TC-21, the proposals seem to indicate an access from the east via Bob Lane. WSCC again raise concern over the use of Bob Lane as a means of access.

PEIR SIR Review

Arboriculture

24. The combined alternatives and modifications proposed to the onshore cable route have not reduced the worst-case scenario effects identified within the PEIR from significant. Embedded environmental measures has the potential to reduce this assessment of effect; however, there are some uncertainties with the working measures proposed and their practicality and/or suitability across all the areas proposed.
25. WSCC is disappointed that arboricultural surveys have not yet been provided from the entire PEIR boundary, it is therefore not clear what the potential impact to such individual trees will be, this could include veteran, ancient or high-quality trees. Whilst commitment C-174 aids the protection of veteran

trees which may be identified, this should be further enhanced to provide better protection measures for individual ancient trees and high-quality trees.

26. The use of trenchless crossings where this has been identified is welcomed, which aids to reduced impact to multiple woodlands and hedgerows. Concern is raised where this has not been identified as an option through LACR-02, instead using a reduced width open trench, resulting in permanent loss of ancient woodland (approximately 0.99ha). This approach has not been justified in full and a reduced impact approach could be undertaken along the same route. Whilst the corridor has a reduced width, it is expected that the canopy gap between the track will be far greater once trees have been removed to facilitate this working width impacting upon the visual landscape.
27. The PEIR boundary is notably wide around the northern section of LACR-01 surrounding Michelgrove Park. WSCC would prefer complete avoidance of Beech Copse, a site of ancient semi-natural woodland as opposed to surrounding plantation on ancient woodland, by removing this copse from the PEIR boundary and providing an adequate buffer.
28. The cable route LACR-01a intrudes a group of trees providing a continual green corridor between multiple sites of ancient woodland, WSCC is disappointed that this is not proposed to be carried out by a trenchless crossing technique to significantly reduce the impacts at this location.
29. The total number of hedgerows to be crossed by the cable corridor is not yet clear, some of which will be avoided by trenchless crossings which is welcomed, though the remainder are to be impacted to some degree. Commitment C-115, provides working methodology which includes 'notching' of hedges to temporarily transplant and replace sections of hedging, as well as tunnelling under certain hedgerow types carried out by hand and with mechanical aid. Whilst this approach to further reduce impact to hedgerows and speed their replacement is commended, this technique is considered to be specific to the hedgerow condition, structure, specie, maturity, soil structure below ground, and the option applied, of which none have yet been identified. WSCC is not convinced this technique will be as applicable, nor as successful, as it is suggested within the PEIR SIR. Further engagement and detailed methodology/examples of its use on similar hedgerow types would be welcomed to establish its suitability as an option.
30. As detailed arboricultural impact assessments have not yet been provided stating the loss of individual trees and hedgerows, it is difficult to determine at this stage which of the LACR options presented have the least complete impact to arboricultural receptors. The uncertainty of the suitability of commitment C-115 ('notching') as a general working approach is a concern and will require further consultation with stakeholders. However, from the information provided regarding the wider landscape of trees formed by woodland (including ancient woodland of varied sorts), it is clear that LACR-02 is of major concern due to the current proposed permanent loss of ancient woodland.

Biodiversity

31. It is of concern that the proposed alternative and modified routes and access points now being considered in the PEIR SIR are not based on the same level of

ecological survey information as those presented in the original PEIR (although some of the surveys were still ongoing when the PEIR was published). The PEIR SIR (section 1.4.1.4) refers to additional ongoing environmental surveys. The final detailed route design must be informed by the results of these surveys.

32. Commitment C-115 in the original PEIR states that 'The construction corridor through woodland, tree lines and across important hedgerows (in terms of the Hedgerows Regulations 1997) will be narrowed to no more than 30m for its entire length to minimise habitat losses'. The updated version of C-115 makes no reference to reducing the working width to 30m. Clarification is needed by RED on this matter.
33. Commitment C-3 states 'at sensitive crossing locations the working width will be reduced as far as practicable'. A 'sensitive crossing location' requires definition, but it should include all Habitats of Principal Importance (HPI), including all hedgerows, rivers and streams, ponds, floodplain grazing marsh, lowland meadows, chalk grassland and deciduous woodland.
34. PEIR SIR Appendix I states that, based on previous experience, success rates of hedgerow notching, outlined in Commitment C-115, are expected to be high and in excess of 80%. This is reassuring but it would be most helpful to have examples of where the hedgerow notching technique has been used successfully. It would also be helpful to have more detailed information on this technique, such as the size of the tree spade, depth of the notches, maximum time that each excavated section of hedge will be kept in the temporary receptor trench and aftercare plans, such as watering.
35. A new commitment (C-205) is proposed regarding compensation for the loss of ancient woodland. However, the lack of measures to compensate for loss of other habitats, including Habitats of Principal Importance (HPI), is disappointing. The PEIR states: 'Compensation for hedgerows has not been established but could involve the enhancement of other areas of hedgerow along the onshore temporary construction corridor (e.g. filling hedgerow gaps) or via the planting of new species-rich hedgerows.' Further detail, commitment and engagement on this subject would have been welcomed.

Cultural Heritage

36. WSCC has concerns over the PEIR SIR methodology for assessing significance of effect on receptors for the new proposals, and over the conclusion of 'no change' from the overall assessment outcomes presented in the PEIR. There are also concerns over the inclusion of embedded mitigation in calculations of magnitude of effect on receptors in the absence of further surveys/assessment to confirm suitability of the proposed measures and to inform assessments.
37. The Appendix K targeted assessment for LACR-01 and LACR-02 is welcomed and the LACRs are identified as most likely to result in a greater cumulative magnitude of effect on the historic environment due to their length. Overall, this document constitutes a proportionate, robust and well-structured assessment of the additional historic environment effects which may arise from the two LACRs.

38. The modified and alternative cable routes in many cases, entail significant new land take and the potential for adverse effects to the historic environment is therefore high. It is the view of WSCC that additional targeted assessments for the LACRs is required for all areas where significant new land take is proposed.
39. WSCC would like to see a preliminary targeted baseline settings assessment of those designated heritage assets scoped in for further assessment as the potential for substantial harm to the significance of some of these assets cannot currently be ruled out.
40. There have been no additional field surveys undertaken for the current route proposals, which raises cause for considerable concern. In the absence of geophysical survey results at a minimum, it is not possible to exclude the presence of archaeological features of high significance within the LACRs with any degree of confidence. The need for additional survey work does not just apply to the two LACRS; given the scale of many of the ACRs and MCRs, there is also the need for additional survey work for these route options.
41. To reiterate comments made at PEIR, trenched evaluation is required to understand the extent and significance of below ground archaeological features present. The lack of intrusive investigations to date within the PEIR boundary is highly concerning, and the same comment is applicable to the current route options. Archaeological potential and significance must be assessed through trial trench evaluation prior to fixing any proposed route changes.
42. The lack of additional detailed geoarchaeological assessment work for the PEIR SIR is also cause for concern, given the potential for significant geoarchaeological and palaeoenvironmental deposits, especially on the coastal plain/Zone 1.
43. The lack of dedicated additional surveys set out above, means that despite the robust desk-based assessment, the conclusions in the PEIR SIR regarding likely changes to significant effects since PEIR stage cannot be relied upon with confidence.
44. To repeat the response to the original PEIR, the sheer scale of the proposals, and the two LACRs, in particular, will certainly result in significant effects upon the historic environment. This means that the route changes are all likely to intersect with a substantial number of archaeological features and sites. The PEIR SIR identifies additional historic environment sensitive receptors, plus changes to the magnitude of impact assessed at PEIR, for all LACRs and three ACRs.
45. The majority of the routes will pass through open, undeveloped agricultural land and it should be assumed that survival of archaeological features will be good, for the most part. The PEIR SIR assessment states that for the two LACRs, there is archaeological potential for all periods, and confirms the conclusion by WSCC that there is a reasonable possibility of the proposed changes intersecting with archaeological heritage assets of high significance. The removal/loss of any such high significance features, as well as the cumulative effect of other archaeological features of lesser (low to medium significance), is likely to result in a significant adverse effect on the historic environment.

46. Concern is raised over the potential for significant effects to designated heritage assets and associated belowground archaeology arising from a number of the new proposed accesses. Whilst in many cases these proposed accesses will be along an existing farm or estate track, the proposed creation of laybys/passing places may result in harm to scheduled monuments and/or associated heritage assets.
47. In more general terms, the impacts of construction traffic upon nearby designated assets, both physical and arising from change within settings, will need to be robustly assessed.

Landscape and Visual Impact Assessment

48. The proposals will introduce a number of additional sensitive receptors who may experience significant adverse visual effects during the construction phase. For example, LACR-01 will affect some individual residential properties on the southern edge of Lyminster, as well as views from transport routes (A284 Lyminster Road, the new Lyminster Bypass and Poling Street) and users of PRow in the vicinity.
49. WSCC welcomed engagement with RED on some technical elements of LVIA viewpoint identification in September 2022, although this was based upon more limited cable route proposals. It is understood from RED during the LVIA ETG, that these comments have not been taken into account during the production of the PEIR SIR, and so have been reiterated within the comments on LVIA viewpoints within Appendix A.

Public Rights of Way (PRow)

50. A significant number of PRowS will be impacted along the onshore cable route, whichever route is taken forward from those proposed through this consultation. WSCC request this is kept to a minimum through the design evolution process when refining to a single cable route option. Reference is made in the consultation materials to a Public Rights of Way Management Plan (PRowMP) but no detail on which meaningful commentary can be made at this stage.
51. Various references are made throughout the PEIR SIR of interruption to users as a consequence of construction traffic management, including temporary and permanent access to the cable route. In some instances, alternative routes put users on roads. This may be acceptable in the short term but for those longer-term closures/diversions, it is expected that more user-friendly options are provided, where possible. It is understood this will not always be possible, but this needs to be seriously considered particularly in cases of roadway diversions with no footway. Alternative diversions should be considered, even if requiring the creation of new temporary routes. Concern is also raised that a number of accesses seemingly propose a shared use with PRow users.
52. Consideration of the phasing of these closures also needs to be undertaken in consultation with WSCC, for example, Bridleways 2208 and 2174/1. It seems that these offer an alternative to one another if closed, so consideration of the timing of these works is needed to not close both routes at same time, and therefore minimising negative impact on users.

53. The principles of how these routes will be managed and the required mitigation to interrupt public access as little as possible will require detailed engagement with WSCC ahead of the DCO submission.

Traffic and Transport

54. The LACR-01 cable route proposes a crossing with the Lyminster Bypass, construction on which has recently commenced. It is noted that the alignment of the bypass is not shown on any drawings submitted or therefore considered against the related new access points. Whilst the PEIR SIR acknowledges the likelihood of the bypass being complete and operational ahead of Rampion 2 commencing construction, none of the assessments appears to factor in the new road or the associated traffic redistribution. Further detailed discussions will be required with WSCC Highways in respects of the Lyminster Bypass if this route is taken forward, including crossing locations, methods and timings of the construction works.
55. The proposals introduce a number of additional permanent and temporary access points, some of these relate to the LACR, but most relate to a modified cable route as included in the initial PEIR assessment. It should be noted there has been no initial engagement with WSCC Highways on the substantial number of new accesses proposed.
56. An update Outline Construction Management Plan (OCMP) has been submitted. This covers the arrangements relating to the LACR only. Given there are additional accesses relating to the original cable route, the OCMP should be updated to account for these too. Given the constraints associated with some of these new accesses, there are concerns with the potential increased use of these, particularly by HGVs and equipment required for trenchless crossings. This includes AA-24 on Long Furlong Lane (via a single track), AA-21, 22, 23 and 32 using Michelgrove Lane, which is also narrow with limited passing places. Further details on specific accesses are given in Appendix A.

Project Wide Issues

Reinstatement of the Onshore Cable Route

57. WSCC welcomes the acknowledgement by RED of the importance of learning lessons from the construction of Rampion 1 OWF, and notes Fact Sheet 6 'Onshore Construction Methodologies and Managing Impacts', and the videos on the consultation website 'Restoring land after construction'. These documents refer to 'successful reinstatement of the onshore cable route'.
58. The experience of Rampion 1 OWF reinstatement has, however, not been wholly successful, with numerous planting failures; this was 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). Year-on-year replacement of failed stock may result in vegetation at year nine (of a 10-year maintenance plan) being replaced (instead of it being well-established and showing up to 10 years' worth of growth, which is the target condition).

59. Therefore, a comprehensive, 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 project, as part of habitat creation and enhancement (both in and outside of the PEIR boundary), would help to secure early gains and should be actively explored.

Biodiversity Net Gain

60. The commitment to include a Biodiversity Net Gain (BNG) assessment in the ES is welcomed. Section 6.9 of First Round of Statutory Consultation 2021-2022 Feedback (October 2022) states that 'the project has made a commitment to delivering a Biodiversity Net Gain (BNG) as part of the project ...' The omission of a suitable commitment within the register for addressing the delivery of BNG for the project is disappointing and should be included by RED.

Conclusion

61. Although the Rampion 2 Offshore Wind Farm continues to be supported in principle by WSCC, a clear demonstration of the least impactful onshore cable route needs to be made through the design evolution leading to a design fix for DCO. WSCC would like to see the refinement of the Maximum Design Scenario to reduce the potential impacts currently presented within the PEIR and the PEIR SIR.
62. The refinement process must be informed by the evidence base, which for some proposed new routes, is currently missing. RED must also outline to stakeholders and the local community, how the design development undertaken going forward will mitigate adverse impacts and provide benefits through wide ranging enhancement measures which go above and beyond those required to mitigate the project.
63. WSCC will continue to engage with RED through the development of the project, to enable the best possible outcomes for local communities and other sensitive receptors in West Sussex.

Appendix A: Detailed Comments on the Preliminary Environmental Information Report Supplementary Information Report (PEIR SIR)

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 Supplementary Information Report (PEIR SIR), published by RED on 18 October 2022.

This response is not on behalf of other Districts and Boroughs within the County, and only addresses the element of project that is subject to the statutory consultation i.e., the targeted onshore cable route proposals. Technical feedback on the other elements of the project i.e., the onshore substation and offshore Wind Turbine Generators (WTG), will continue to be raised through the Evidence Plan Process (EPP) and the relevant Expert Topic Groups (ETG).

The following table provides comment for each PEIR SIR chapter (and associated appendices) relevant to WSCC, with specific paragraph/table/figure references where applicable.

Preliminary Environmental Information Report Supplementary Information Report (PEIR SIR)

Reference	WSCC Comment
General	Some of these cable route proposals are outside of the Scoping Boundary. Clarification that discussions have been held with PINs is needed and they are content no further Scoping is required.
1.1.1.3	No further justification of the 50m working width has been given in these proposals. This was raised during the previous round of consultation, where no dimensions for the cross section was stated.
General	No detailed arboricultural or hedgerow surveys have been provided within the PEIR SIR, this was expected to establish the maximum extent of impact to receptors. This will be expected to steer the engagement prior to DCO submission.
Graphic 1-1	Clarification over timescales for engagement with stakeholders pre-DCO submission is needed, based upon the presented graphic. WSCC questions the tight timescales for detailed engagement on a chosen route post consultation, and before a stated DCO submission of 'early 2023'.
1.3.1.2	Reference is made to there being 32 additional and/or permanent accesses. A number of these accesses are proposed in relation to the Longer Alternative Cable Route. There are some though proposed in association with the original cable route. No changes are understood to be proposed to those accesses already assessed as part of the initial PEIR. This should be confirmed.
1.4.1.4	It would be helpful to know what the additional ongoing environmental surveys are that are mentioned here and when further baseline ecology reports might be made available. RED have committed to providing these in due course.

Reference	WSCC Comment
2.3.2	LACR-01a - WSCC notes close proximity to Decoy Ponds which is an outdoor venue for weddings and glamping. RED therefore need to consider impacts upon those receptors, especially if there is HDD crossing proposed. What about compounds/exit/entry pits in this location?
2.3.7.2	The cable installation works area for the northern most section of LACR-01a (surrounding Michelgrove Park) is very large and must be narrowed. The boundary includes Beech Copse of Semi-Natural Ancient Woodland status (not PAWS as suggested) which must be avoided and ideally removed from PEIR boundary.
2.3.7.4	Regarding the removal of a group of trees, it is not understood why this loss 'may' happen, no TC methods are stated or other working method to minimise impact, the trees create a barrier for open trenching techniques. Whilst the tree line to the east is well spaced toward ground level, it provides continuous canopy connectivity of the wider surrounding ancient, replanted woodland. Further mitigation via avoidance by TC or at least reduce the corridor by re-strengthening C-115 as suggested.
General	It must be highlighted that the route changes, and the two LACRs in particular, have the potential to result in additional or magnified significant impacts on heritage assets by virtue of their scale. The LACRs in particular, but also the ACRs and many elements of the MCRs, are all likely to intersect with a substantial number of archaeological features and sites. The PEIR SIR identifies additional historic environment sensitive receptors introduced as a result of the proposals for; LACR-01a, LACR-01b, LACR-01c, LACR-02, ACR-01, ACR-03, ACR-04 and ACR-05.
General	The majority of the routes for the LACRs, ACRs and many elements of the MCRs will pass through undeveloped agricultural land and therefore it should be assumed that survival of archaeological features will be good, in general. The PEIR SIR states that for the two LACRs there is archaeological potential for all periods. WSCC concurs that there is a reasonable possibility of the LACRs intersecting with archaeological heritage assets of high significance. Their removal/loss of significance, as well as the cumulative effect on other archaeological features of lesser value, is likely to result in a significant adverse effect on the historic environment.
2.3.10	LACR-01a and associated accesses passes in close proximity to a number of designated assets (including GII* listed Newplace Farmhouse (1232882) and several GII listed buildings). AA-21 for this LACR passes in close proximity to two GII listed buildings at Michaelgrove (1353888 and 1217075). The impacts of cable route trenching and construction traffic (as applicable) upon designated assets, including physical effects (vibration; accidental damage/collision) and those arising from change within settings (noise and visual changes) need to be

Reference	WSCC Comment
	robustly assessed.
2.3.10	The high archaeological potential of LACR-01a is evidenced in Appendix K, including the Late Bronze Age settlement activity at The Vinery, Angmering; the line of a Roman road and potential for associated roadside activity, multi-period activity identified during ongoing Lyminster Bypass field investigations and the potential for deeply buried palaeoenvironment deposits within the Arun floodplain. The route does not intersect with any ANAs but passes in close proximity to two (Multi-Period Archaeological Features on Harrow Hill, Angmering (SDNPA 030/DWS8153) and Multi-Period Archaeological Features on Wepham Down, Barpham Hill and Perry Hill, Burpham (SDNPA 028/DWS8151). The projected line of the Brighton-Norton raised beach crosses LACR-01a in the vicinity of Poling Corner, south of the A27.
2.3.10	LACR-01a has the potential to intersect with heritage assets of national significance, and to result in significant adverse effects to the historic environment. This includes a potential Major Adverse effect (Significant in EIA terms) identified for GII listed The Old Cottage 1027714) during construction phase.
2.3.10	LACR-01b and associated accesses passes in close proximity to a number of designated assets. Access AA-22/23 is cause for concern as it crosses a scheduled monument (Itford Hill style settlement and an Anglo-Saxon barrow field at New Barn Down (1017446)). Whilst the access will be along the existing estate track, the proposed creation of laybys/passing places is concerning, despite proposed embedded mitigation measures C-13.
2.3.10	The high archaeological potential of LACR-01b is evidenced in Appendix K. An ANA intersects with this route (SDNPA 030/DWS8153). It also passes in close proximity to two additional ANAs (SDNPA 028/DWS8151 and Multi-Period Features on Chantry Bottom, Sullington Hill and Kithurst Hill, Storrington and Sullington (SDNPA 078/DWS8203)). Appendix K identifies numerous undated linear banks identified on the LiDAR data on the northwest slopes of Harrow Hill, some of which extend into the boundary of LACR-01b.
2.3.10	LACR-01b has the potential to intersect with heritage assets of national significance, and to result in significant adverse effects to the historic environment.
General	LACR-01a and associated accesses passes in close proximity to a number of designated assets. The cable route is directly adjacent to a scheduled monument (Itford Hill style settlement and an Anglo-Saxon barrow field at New Barn Down (1017446)). AA-24 for LACR-01c is directly adjacent to a scheduled monument (1015880; Prehistoric flint mine and part of a round barrow cemetery at Blackpatch). AA-26 for LACR-01c is directly adjacent to two scheduled monuments (Flint mine and part of a cross dyke

Reference	WSCC Comment
	300m south-east of Tolmare Farm (1015237) and Muntham Court Romano British site (1005850)). AA-26 for LACR-01c passes in close proximity to three grade II listed buildings at North End (1353871, 1027627 and 1233900).
2.3.10	LACR-01c intersects with five ANAs (SDNPA 030/DWS8153; SDNPA 078/DWS8203; Multi-Period Archaeological features on Blackpatch Hill and Cock Hill, Patching (SDNPA 031/DWS8154); Multi-period features on Church Hill, Muntham Court, Findon (SDNPA 041/ DWS8164); Prehistoric Features on Barnsfarm Hill and Highden Hill, Storrington and Sullington and Washington (SDNPA 076/DWS8201)). The high archaeological potential of LACR-01b is evidenced by the concentration of activity in the vicinity of Blackpatch Hill including a large number of barrows and a concentration of Neolithic/prehistoric flint mines, as well as multi-period field systems and other features. The assessment identifies LiDAR features relating to a relic field system within LACR-01c, potentially a continuation of the scheduled archaeology at New Barn Down (1017446). Remains of an Iron Age or Roman field system near Muntham Court narrowly extend into LACR-01c.
2.3.10	LACR-01c has the potential to intersect with heritage assets of national significance, and to result in significant adverse effects to the historic environment.
2.4.5.4	The soil type/profile has not been described here. If the ground has been used for agricultural use and is of a clay soil (unlikely but possible), then decompaction measures may be required to break any clay pans within the soils.
2.4.7.2	It has not been fully justified as to why trenchless crossing (with HDD) is not possible here, if the length is too long could it be broken into shorter sections creating less of a loss to woodland? If not possible, impact to woodland could be reduced by staying on one side of the track only; a 20m corridor with the 4m track in the centre will impact existing wind firm trees on both sides as opposed to one side only. It is expected that the overall tree loss, plus a buffer zone to protect retained tree roots, will be much wider than 20m. If the intention is to create a woodland ride, this will need to be approached within the LEMP to enable its full establishment to seek the longer-term benefits in replacement for ancient woodland loss.
2.4.7.4	Of particular concern with route LACR-02 is the direct loss of approximately one hectare of ancient woodland.
2.4.7.6	Regarding Beech Copse, see comments under 2.3.7.2; ensure the TC is outside of this copse and that an adequate buffer zone is established (is 15m enough?). Further engagement is needed with stakeholders on these potential routes to reduce the maximum design scenario.
General	There is a lack of transparency or obvious correlation in assessment methodologies between the original PEIR and PEIR

Reference	WSCC Comment
	SIR. Within the PEIR SIR, residual effects for the new route options are repeatedly compared to those assessed at PEIR stage, but the original assessment is not quoted or repeated. It is not transparent or user friendly to have to refer to the original PEIR to make this comparison. If there is confidence in the 'no change' overall assessment for the LACRs and the alternative and modified routes, these should be set out clearly within the PEIR SIR.
General	The PEIR SIR factors in embedded mitigation measures when assessing magnitude of effect on receptors, compared to PEIR stage. WSCC considers that this approach is not appropriate in many cases. Further baseline survey work is needed so that the suitability of the proposed embedded mitigation measures and details of how these might be achieved can be understood (for example the appropriateness of embedded measure c-13 for creating passing places within a scheduled monument which might include traces of earthworks relating to a Late Bronze Age settlement enclosure and Anglo-Saxon barrows).
General; also 2.3.10.21, 2.4.10.13, 3.7.10.2, etc	The degree to which the proposed embedded measures might mitigate the scale of adverse effects on heritage assets, cannot be accurately calculated at this stage, and statements made to this effect within the PEIR SIR are challenged. For example, the assertion that C-79 measures (implementation of an approved programme of archaeological mitigation) will be sufficient to limit the magnitude and overall effect on archaeological assets to low to medium adverse, i.e. Not Significant in EIA terms, is not evidenced. Especially as the significance of any such features present within the various route options is not yet known.
2.4.10	It is concerning that AA-32 for LACR-02 crosses a scheduled monument (Itford Hill style settlement and an Anglo-Saxon barrow field at New Barn Down (1017446)); see above for concerns raised. The LACR and associated assesses also pass in very close proximity to several other designated assets. AA-31 passes directly adjacent to two scheduled monuments (, Deserted medieval settlement at Upper Barpham Farm (1015882) and Cross dyke on Barpham Hill (1015715)) and two grade II listed buildings at Upper Barpham Farm (1353838 and 1232897). LACR-02 is located in close proximity to GII listed 1222537.
2.4.10	LACR-02 intersects with areas of woodland characterised in the HLC as Ancient Semi-natural and Replanted Ancient Semi-Natural and also includes three areas identified for compensation woodland planting areas. There is potential for adverse effects arising through change to historic landscape character. The effects of these proposals on the historic landscape character will need to be robustly assessed, particularly in relations to areas of historic landscape character sensitivity, for example former historic parkland at Angmering.

Reference	WSCC Comment
2.4.10	The high archaeological potential of LACR-01b is evidenced in Appendix K. The route intersects with four ANAs (SDNPA 028/DWS8151; SDNPA 030/DWS8153; A Prehistoric Occupation Site, Bronze Age Barrows, and Roman Occupation Debris, Poling (SDNPA 027/DWS8149); Roman Occupation Site, Angmering (SDNPA 032/DWS8155). Palaeolithic potential is identified (Prehistoric Lithic Working Site, Green Lodge MWS1045).
3.3.10	ACR-01 has been proposed in part to avoid a complex of geophysical anomalies identified as being of potentially high significance. The consideration of alternative route options in order to minimise harm to these heritage assets is welcomed. However, it must be highlighted that the route should not be altered/fixed on the basis of avoiding heritage assets (which have not yet been confirmed, characterised or their significance assessed), until the new proposed route ACR-01 has been subject to geophysical survey and trial trench evaluation, in order to avoid a repeat of the same issue down the line.
3.4 and 3.6	For ACR-04, ACR-02 and AA-04, archaeology is cited as being part of the reason for the route changes. As above, no route alterations should be fixed on the basis of avoiding heritage assets until intrusive field investigations have been conducted for both original and alternative route options.
3.9.2	ACR07/TC-15/TC-16: There is a high-pressure gas pipeline crossing here, therefore consultation is needed with SGN/HSE. This proposal brings the cable route closer to residential properties lining the B2135, and much closer to Bines Green SNCI (and common land). WSCC also raises this new cable route passes close to Withyfield Cottage and Shepard's huts which are bookable accommodation/glamping and thus sensitive type uses, TC15 is very close to these so impacts need to be fully understood. TC15 seemingly would drill under public footpath, albeit the footpath also looks to form part of the proposed access. TC-16 in floodplain so any compound will need careful consideration for storage of soils/plant/chemicals etc (this is also a more general issue for compounds along the entire route if in flood areas).
4.2.2	The modified and alternative routes in many cases entail significant new land take within areas of open agricultural fields. There is the potential for additional significant adverse effects to the historic environment for the ACRs and parts of the MCRs.
4.2.2	<ul style="list-style-type: none"> MR-01 - Clarity is needed where HDD entry/exit pits will be located. Will access be needed through the tree belt? WSCC would also note that last time a large area was needed for the Joint Bays from offshore cables (and pulling). Also, that area (Brooklands) was a construction site and compound throughout the entire construction programme (proximity to receptors therefore important). Further details are therefore required. Sheet 1 of the works plan has not been updated

Reference	WSCC Comment
	<p>either on this change.</p> <ul style="list-style-type: none"> • MR-07/MR-08: The entry/exit pit (north of the A283) is adjacent to Rock Common Quarry. There is a current application to fill the quarry with inert waste, which may need consideration of cumulative impacts (in particular HGV movements/routing). Also, there is a need to ensure any works would not have any effect on the integrity/stability/drainage of the quarry. PRow crosses this field also starting at the current field access. • AA-14 seemingly would use a public bridleway, which needs clarification and engagement with WSCC. There is also a High-Pressure Gas Pipeline here, and the eastern arm of AA-14 would go right alongside it. This needs consideration, and consultation with SGN/HSE. • MR/09: This proposal is much closer to Ashurst village and the Listed Pub and Village Hall.
4.2.2.12	MR-01 which lies outside the PEIR Assessment Boundary and comprises arable fields which are thought to support feeding brent geese in winter. Appropriate mitigation may be required.
4.2.2.12	The boundary of Littlehampton Golf Course and Atherington Beach Local Wildlife Site (LWS) has been subject to some minor revisions (which can be obtained from The Sussex Biodiversity Record Centre).
6.2.2	<ul style="list-style-type: none"> • AA-16 and AA17 - AA17 is proposed to use a PRow, right through residential dwellings, which is of concern to WSCC. Also access (egress in particular) onto A27 is not ideal, although consultation would be undertaken with National Highways on suitability. • Where a road/sensitive feature crossing is to be replaced by HDD, there is no indication as to how this might affect access to the relevant areas (presumably via much longer routes from either side?). Further clarification is needed on this. Using TC-21 as an example, the red line includes an access from the east via Bob Lane. RED must be aware of the local concern of using this access for Rampion 1 OWF.
Section 6.2.2	<ul style="list-style-type: none"> • Concern is raised about the potential for significant effects to designated heritage assets and associated belowground archaeology. A number of the proposed accesses are a particular concern as the creation of laybys/passing places along existing tracks is a potential pathway for harm to scheduled monuments and/or associated archaeological features. • The PEIR SIR states that impacts will be reduced via embedded environmental measure C-13 (use of imported aggregates and non-intrusive construction methods). However, until a detailed assessment of significance has been undertaken for the designated assets in question, including a

Reference	WSCC Comment
	<p>site visit to confirm presence of upstanding earthworks, these proposals remain cause for considerable concern. Even with the use of geotextile and make-up, the potential for physical damage to scheduled archaeological remains through compaction and vibration from construction traffic in these passing places remains.</p> <ul style="list-style-type: none"> The creation of new passing places or other changes to the existing road/track surface should be avoided within or immediately adjacent to scheduled monuments. In the event this is not possible, the advice of Historic England must be sought on the viability of the passing places. At a minimum, additional survey work is likely to be required to demonstrate that these works will not result in harm to designed assets, and to inform the micro-siting of any widening works.
7.2.10.1 7.3.10.1	The conclusions for LACR-01 and LACR-02 and for the modified and alternative routes are considered premature in the absence of sufficient and additional baseline assessment work for the proposed alternatives and modifications.
8.1.1.13	AA-09; the stated impact on designated and high significance heritage assets is low to medium. The evidence to confirm this magnitude of impact is not there; especially in regard to concerns over impacts from passing places and road widening.

PEIR SIR Appendix C: Review Summary for LACRs and ACRs

Reference	WSCC Comment
Appendix C: Review summary for Longer Alternative Cable Routes (LACRs) and Alternative Cable Routes (ACRs)	The table identifies all key receptors (some of which are/may be of high value, and/or be subject to a high magnitude of change) as green, i.e., no change to overall assessment outcomes and/or conclusions presented in the PEIR. The original assessment of residual Significance of Effect made at PEIR is not included in Appendix C; this should be included for clarity and transparency.
Appendix C: Review summary for Longer Alternative Cable Routes (LACRs) and Alternative Cable Routes (ACRs)	<p>The preliminary assessment of residual effects made at PEIR (Table 26-36) covered a wide range of effects (for example <i>Negligible (Not Significant) to Moderate adverse (Potentially Significant)</i> for effects arising through changes to setting of heritage assets, for Zones 1 and 2). The 'no change' conclusion in the PEIR SIR for all aspects of the historic environment may therefore be technically correct but is too generic to be meaningful. The potential for Major Adverse Significance of Effect (via previously unidentified high significance archaeological features) has not yet been ruled out.</p> <p>On this basis, it is the view of WSCC that -</p> <ul style="list-style-type: none"> an assessment of no change cannot be supported on the basis

Reference	WSCC Comment
	<p>of the evidence;</p> <ul style="list-style-type: none"> • due to the generic conclusions in the original PEIR, the 'no change' conclusion in the PEIR SIR is not helpful for identifying the likelihood of Significant (in EIA terms) effects to the historic environment from the current proposals; and • The methodology for assessing change from PEIR does not allow meaningful differentiation in Significance of Effect between the various route options.

PEIR SIR Appendix F: Commitments Register

Reference	WSCC Comment
C-3	C-3 states 'at sensitive crossing locations the working width will be reduced as far as practicable'. A 'sensitive crossing location' requires definition, but it should include all Habitats of Principal Importance (HPI), including all hedgerows, rivers and streams, ponds, floodplain grazing marsh, lowland meadows, chalk grassland and deciduous woodland.
C-13	A similar approach must be taken should Root Protection Areas (RPA) of trees, hedges, or woodlands be present under the temporary cable corridor (other than where trenching is to take place which cannot avoid root disturbance). This must only apply where root/soil disturbance within RPA's is unavoidable by setting back/micro-siting the cable corridor away from such roots. New temporary ground protection must be capable of supporting any traffic entering or using the site without being distorted or causing compaction of underlying soil (as per BS 5837:2012, section 6.2.3).
C-115	<ul style="list-style-type: none"> • Please retain some aspects of the original commitment to reduce the corridor width where TC methods are not used to cross tree groups such as that identified within LACR-01a (para. 2.3.7.4 within the PEIR SIR, found on Append. A, fig: 36). A working width of <30m should be targeted (as applied elsewhere). • The wording of 'natural material' within the second to last statement should be amended to ensure the indication is that the hedgerow will be reinstated to an established living hedge following any unsuccessful notch translocations. • 'The construction corridor through woodland, tree lines and across important hedgerows (in terms of the Hedgerows Regulations 1997) will be narrowed to no more than 30m for its entire length to minimise habitat losses'. The updated version of C-115 makes no reference to reducing the working width to 30m. Has this been dropped with the introduction of the notching technique? If so, concern is raised.
C- 204	This is a welcomed approach. Please include that the stand-off must be protected by physical barriers (usually fencing) in line

Reference	WSCC Comment
	with BS 5837:2012, section 6.2.2.
C-205	Has the loss of ancient woodland been justified? What about HDD through the LACR-02 route in reduced lengths (if required)?
C-205	A new commitment (C-205) is proposed for the Commitments Register regarding compensation for the loss of ancient woodland. However, the lack of measures to compensate for loss of other habitats, including Habitats of Principal Importance (HPI), is of concern.
General	Sec 6.9 of the 'First Round of Statutory Consultation 2021-2022 Feedback' mentions "The project has made a commitment to delivering a Biodiversity Net Gain (BNG) as part of the project, measured using Natural England's Biodiversity Metric.". This has not been found on the commitments register.
General	Section 6.9 of the 'First Round of Statutory Consultation 2021-2022 Feedback' (October 2022) mentions "The project has made a commitment to delivering a Biodiversity Net Gain (BNG) as part of the project, measured using Natural England's Biodiversity Metric.". This is welcome. This commitment should be included in the Commitments Register.
General	Grouping by topic would make these commitments easier to navigate.
General	It is suggested that there should be a commitment to undertake habitat restoration as soon as practically possible, and within defined timescales according to a restoration plan.

PEIR SIR Appendix H – Landscape and Visual Impact

Reference	WSCC Comment
Viewpoints	<p>It is understood comments sent to RED on 5th September 2022 regarding LACR options to the south of the A27 were not considered within the development of the PEIR SIR. It is requested these are further considered:</p> <ul style="list-style-type: none"> Establishing the exact route at the map scale provided is difficult, particularly at Lyminster village, which could affect the VP selection. It is suggested H1c is north of the caravan site (which is south of the Church) but H1 a/b are north of the church, which does not make sense – this needs clarifying. Assuming alignment is south of Lyminster, then a VP on footpath FP2165 between the village and caravan park is key. Any viewpoints at Lyminster should take into account views out of the Conservation Area and setting of Listed Buildings (especially if LVIA will be used to inform Heritage assessments). Has the locations of the VPs considered the approved Lyminster Bypass which crosses here? It will depend on timing, but if that comes first, then you may need to

Reference	WSCC Comment
	<p>reconsider VPs (a viaduct and crossings proposed as part of this).</p> <ul style="list-style-type: none"> • It is assumed that H1d is footpath 2163_1 which is a sensible location. Given the gap between this and H2b, it may be worth considering something on the east-west bridleway 2163 further to the east. • Would H1e have any views of the alternative route proposed? We suggest considering something further east (on FP 2202_1 south of A27) where open views south are possible. • H2b seems suitable (and hopefully will be representative of Poling Conservation Area too). • H2a (consider being on road at point where intersected by FP 2200?) • H2c (east of Poling, not west as noted in table). Further north on the path nearer the route may make more sense here. • WSCC would suggest something on FP 2199 just east of the Vinery Industrial estate, and rear of residential properties (as also representative of another receptor). • H3a – seems suitable. WSCC would note that there are also a few footpaths crossed just to the west also. • General point – it is not clear whether any compounds etc will be included on this part of the route (which will have a greater impact over a longer period), can this be confirmed please? This may affect the requirement for further VPs.

PEIR SIR Appendix I – Ecology and Nature Conservation

Reference	WSCC Comment
2.2.1.3	<p>There are also areas of semi-improved grassland adjacent to Black Ditch, some supporting reptiles (Ecological surveys undertaken for WSCC's Lyminster Bypass scheme).</p>
3.2.1.2	<p>It is suggested that the Vegetation Retention Plan (VRP) will show hedgerows that are to be retained but also those that will be permanently lost, retained, notched, etc. This is to be welcomed but will require very clear keys to avoid confusion. It is recommended that separate categories are required to distinguish different types of 'retained' hedgerow:</p> <ul style="list-style-type: none"> (i) Retained hedgerows, not impacted (ii) Retained hedgerows where the cable has been laid by trenchless HDD; and (iii) Retained hedgerows where the cable has been laid by trenchless tunnelling by hand. <p>The latter, in particular, may suffer considerable root damage and thus should be clearly identified.</p>

Reference	WSCC Comment
3.2.4	<ul style="list-style-type: none"> • Reduced working widths are welcomed for hedgerow crossings, particularly with the addition of sections of trenchless crossing for 'important' hedgerows (with a 6m loss for the haulage road). However, as the hedgerows have not yet been surveyed, it is unclear how many would be suitable for the notching technique (considering species, age and structure, and underlying soils). • Regarding option A, are the gaps retained between notches to set scale (i.e. 2m width like the notches)? If 2m set sections are to be retained between notches, these are considered liable to failure due to significant root disturbance. An Arboricultural watching brief must be present during translocation to ensure retained hedgerow sections between the notches are not damaged through construction activity and stored suitably (this should be specified in the LEMP). • Full method statements and maintenance programmes shall need to be evidenced within the LEMP and referred to in the CoCP. • In considering the merits of hedgerow notching, it would be helpful to have an indication of the number of hedgerows involved, and in particular the number of 'important' hedgerows. Would it be possible to see the Hedgerow Regulations Assessment survey (undertaken April-September 2021)? • Examples of other successful hedgerow notching/translocation projects (including where the 80% success rate has been established) need to be demonstrated to understand this high figure. Was this technique for established hedgerows, particularly those >30 years old? • Option B includes hand dug tunnels beneath retained hedgerows/trees to a depth of 1.2m. It is not clear how far from the hedgerow the hand dug sections would be (Outside of their RPA? Within their RPA under Arboricultural supervision and retaining important roots?). Have soil types been considered here? Whilst at a depth of 1.2m may avoid roots of a significant size, would a duct be able to push through chalk which is present throughout a majority of the cable route? Is hand digging through chalk to this depth practicable/possible? If not, trial pits or boreholes will need testing throughout the cable route to check where this method is viable. • All hedgerows must be surveyed for their 'importance' and suitability of option A or B (or temporarily lost where neither option is deemed suitable) before the creation of the Vegetation Retention Plan (VPR) stated in para. 3.2.1.2 of Appendix I.
3.2.4.1	This appears to suggest that ALL hedgerows along the cable route and temporary construction haul road will be notched. This is

Reference	WSCC Comment
	misleading.
3.2.4.3	How long is it envisaged that the notched sections of hedge will be held in the temporary receptor locations? Might it sometimes be a matter of days? With regard to the 6m wide notched hedgerows on the haul road, might they be held in the temporary receptor locations beyond a single winter period? It would be helpful to know the worst-case scenarios.
3.2.4.3	It would be helpful to have more detailed information on this technique, such as the size of the tree spade, depth of the notches, maximum time that each excavated section of hedge will be kept in the temporary receptor trench and aftercare plans, such as watering.
Graphic 3-1	For clarity, it is suggested that the drawing for Option B depicts the trenchless tunnelling by hand, possibly as dotted lines across the hedgerow.
3.2.4.6	It is requested that a Monitoring Report is produced and sent to interested parties, including WSCC.
3.2.4.7	Is there confidence that it will be possible to tunnel beneath 'important' hedgerows and hedgerows with mature standard trees by means of hand digging? As these hedgerows may be wide and comprise large, old trees and shrubs, surely it will be very difficult to dig through, or under, the roots by hand. More information would be helpful. It is recommended that hand tunnelling may also be an appropriate method in regard to hedgerows which provide important wildlife corridors, such as for bats.
3.3.1.2	Access to woodland would be best undertaken at a time of year to avoid potential impacts on nesting birds and ground flora. Where strimming is required to monitor the drill from the surface, it is recommended that all strimming is at a minimum height of 300mm above ground level so as to reduce damage to the ground flora.

Appendix J Transport

Reference	WSCC Comment
7.2.1.2	It is noted that additional traffic data has now been collected at those locations agreed with WSCC. Further engagement on this data with WSCC will be required going forward. It should be noted that comments are not made against those accesses onto roads not maintained by WSCC (namely the A27).
7.3.1.3	It would have been helpful if reference could have been made to a named link within Table J-8 (similar to the approach applied in Table J-4). There is otherwise no direction to where a definitive list of the numbered links can be found.

7.3.3	It is unclear if this assessment accounts for the potential redistribution of traffic associated with the Lyminster Bypass.
Table J-10	There is a typo within the first line in the section covering 'Pedestrian amenity, pedestrian delay'.
10.1.2	Given the timescales associated with the construction of the Lyminster Bypass (identified in 10.4.1.3), the assessment should factor this in rather than provide an assessment of the existing route, which is unlikely to be used.
Table J-15	The updated outline CTMP is acknowledged as accounting for the Longer Alternative Cable Route. There are, however, quite a number of additional accesses proposed in association with the modified original cable route. These additional accesses do not appear to be covered within the updated outline CTMP. This includes AA-07, 08, 09 amongst others. These accesses are shown on the various figures included in appendix A of the PEIR SIR. Where is it intended for these accesses to be reviewed?
Table J-15	AA-05 (A284 Lyminster) shows the access for the current road layout. There is however a committed improvement (Lyminster Bypass) that is presently under construction. The alignment should be shown along with the proposed location AA-05.
Table J-15	AA-06 (A284 Calceto Lane) is missing from the table. This is an existing access with restricted visibility to the south. It is unlikely that adequate visibility would be achieved.
Table J-15	Access via AA-21, 22, 23, 31 all use Michelgrove Lane, which is narrow with limited passing places. Consideration will be required in terms of the additional mitigation needed. No reference is made to the existing A280/Michelgrove Lane junction, which has a notable approach gradient and restricted visibility. The increased use of this by HGVs without mitigation is not advisable.
Table J-15	Similar to the above, access on Longfurlong Lane (AA-24) is via a narrow single-track lane. It is unclear how this is to be managed and mitigated; a clear scheme of mitigation should be included within the DCO application.
Table J-15	There are a number of accesses indicated in the table where a visibility splay is not required (e.g. AA-22, 23, 24, 26). Whilst these accesses may be existing, the proposals will intensify the use. Some of these accesses are also onto high-speed roads and have potentially substandard visibility for emerging vehicles at present. An appropriate review of the appropriateness of these accesses to accommodate the intended use should be undertaken.
Table J-16	Reference is made elsewhere to the cable route passing under the Lyminster Bypass via a trenchless crossing (e.g. Figure 8 within Appendix A of the PEIR SIR). It is unclear why this table does not therefore commit to and be consistent with the information included elsewhere.

Figure 13	It is noted that the revised HGV strategy includes access AA-21 (along with others on Michelgrove Lane), AA-24, AA-25 and AA-26. Potential concerns have been raised in the above points about the adequacies of these existing accesses to accommodate a more intensive use.
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PEIR SIR Appendix K – Historic Environment

Reference	WSCC Comment
General	Appendix K comprises a stand-alone historic environment baseline study for the two LACRs, designed to supplement the wider baseline assessment submitted at PEIR stage. The targeted assessment for LACR-01 and LACR-02 is welcomed and the LACRs are identified as most likely to result in a greater cumulative magnitude of effect on the historic environment due to their length.
General	Overall, this document constitutes a proportionate and robust assessment of the additional historic environment effects which may arise as a result of the two LACRs. The report is well structured and comprehensive. It sets out the pathways by which likely additional effects to the Historic environment might occur for LACR-01a, LACR-01b, LACR-01c and LACR-02.
General	The geoarchaeological potential of the LACRs is not adequately assessed in Appendix K (although touched upon in Table K1-6), given the known potential for significant paleoenvironmental and geoarchaeological deposits within the coastal plain/Zone 1. For example, the projected line of the Brighton/Norton raise beach crosses LACR-01a.
General	The proposed changes relate to buried cable routes only, which will constitute a medium-duration, non-permanent/reversible change within the settings of affected heritage assets. There are no anticipated changes from PEIR stage to the effects to onshore heritage assets from the offshore arrays and the substation location excluded from the current consultation. The 1km study area for scoping in heritage assets is therefore considered sufficient for the purposes of the PEIR SIR.
Viewpoints - general	Historic environment receptors should be actively incorporated from the start when selecting additional viewpoints for the LACRs and route options. WSCC should be consulted on viewpoint locations to ensure heritage assets likely to be sensitive receptors for the new routes are adequately represented within viewpoints.
Table K3-1 Scoping and assessment of effects on designated heritage assets within 1km of	The scoping table included within Appendix K ensures that the shortlist of heritage assets scoped in for further assessment is clear and consistent, and the change from PEIR stage is clear. The comment on likely magnitude of change and significance of effect is useful. However, the opportunity has been missed to make the scoping process fully transparent, as initial stages are missing. The process by which Stage 1 of the <i>GPA3</i> methodology

Reference	WSCC Comment
LACR-01 and LACR-02	has been carried out is currently unclear. Was this scoping exercise carried out purely on the basis of the LVIA ZTV, or were results of walkover surveys incorporated into the process?
Table K3-1	Appendix K does not include baseline assessment of designated heritage assets scoped in for further assessment in Table K3-1. It is appreciated that due to the number of alternative routes under consideration a full baseline settings assessment may not be feasible at this stage. However, WSCC requests a preliminary baseline settings assessment, to cover, at a minimum, a subset of high sensitivity receptors with potential for higher magnitudes of effect. This should include an initial assessment of significance including contribution made by setting, sensitivity to change and likely changes to significance which might arise from the proposals. Only then can the preliminary assessment of magnitude of change and significance of effect in Table K3-1 be made with confidence.
8.1.1.13	Baseline assessment of significance for heritage assets is needed to understand impacts/magnitude of change and therefore likely significance of effect.
General	It should be noted that WSCC technical response comments to PEIR Chapter 26 – Historic Environment still stand, where relevant to the current consultation.
General	Other than the desk-based assessment work for the two LACRs (Appendix K), there have been no additional surveys undertaken since PEIR for the current proposals. This lack of additional targeted surveys is cause for considerable concern. Further baseline survey work is needed for designated heritage assets and archaeological remains (e.g., field investigations, site visits/walkover surveys, settings assessment baseline) to refine understanding of significance for the affected assets and (where applicable) contribution made by setting.
General	Geophysical survey is required for the LACRs at a minimum in order to advance route selection. In its absence it is not possible to rule out the presence of archaeological features of high significance within the LACRs (or the proposed modified and alternative routes) with any degree of confidence.
General	To reiterate comments made by WSCC at PEIR, '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'. To date the lack of intrusive investigations within the PEIR boundary is concerning, and the same comment is applicable to the current proposals.
General	Archaeological potential must be assessed through trial trench evaluation, and any archaeological features and their significance assessed, prior to fixing any proposed route changes.

Reference	WSCC Comment
General	There is a need for additional targeted geoarchaeological work in relation to consulted route options, given the potential for significant geoarchaeological and palaeoenvironmental deposits along the routes, especially on the coastal plain/Zone 1. In particular, the potential for raised beach/marine deposits (and the associated potential for Palaeolithic artefact assemblages, preserved Pleistocene land-surfaces and the possibility of <i>in situ</i> archaeological sites) to intersect with the LACRS and all route options needs to be assessed. For example, the projected line of the Brighton/Norton raise beach crosses LACR-01a.
General	The lack of additional surveys means that despite the robust desk-based assessment for the LACRs, the conclusions of the PEIR SIR regarding likely changes to significant effects since PEIR stage cannot be relied upon with confidence.
General	The modified and alternative routes in many cases entail significant new land take within areas of open agricultural fields. It is the view of WSCC that similar targeted additional assessment to Appendix K for the LACRs is required for all areas of proposed substantial new land take.

PEIR SIR Appendix M – Socio-economics

Reference	WSCC Comment
General	Bridleway 2208 and 2174/1 – it seems that these offer an alternative to one another if closed so it would be good to make sure planning of works do not close both routes at same time to minimise negative impact on users.
General	So far, the detail is light on the impacts to PRowS and some alternative routes put users on roads. This may be acceptable in the short term but for those longer-term closures/diversions, WSCC would expect to see more user-friendly options provided, where possible. This will not always be possible, but this needs to be seriously considered particularly in cases of roadway diversions with no footway. Alternative diversions should be considered, even if requiring the creation of new temporary routes.
General	Various references to interruption to users due to construction traffic management. Public rights of access take precedent over private rights of vehicular access therefore it will be those exercising a private right of vehicular access that will need to give way to lawful path users and this should be reinforced with signs on site.
General	WSCC will require detailed consultation on the draft PRow Strategy prior to submission of the DCO to understand and make comment on the proposals to impact PRow, once a refined cable route has been chosen.

PEIR (original) Volume 4, Appendix 4.1

Reference	WSCC Comment
C-21	Refer to BS3998: 2010 which relates tree works rather than BS5837: 2012 which is not relevant to this commitment.
C-174	Please amend wording similar to: "Where veteran or ancient trees or woodlands are identified within or adjacent the cable route corridor, a buffer zone shall be used forming a root protection area (RPA) in line with guidance "Ancient woodland, ancient trees and veteran trees: advice for making planning decisions" (Natural England and Forestry Commission, 2022). Such trees will be protected by micro-siting and providing a physical barrier at or outside of the RPA (with reference to BS 5837:2012). Where loss or avoidance is not possible, mitigation followed by compensation measures will be used as a last resort and the reasoning fully justified. A similar approach will be taken towards trees identified of high quality (i.e. A category trees as recommended within BS 5837:2012)."