

Ref	S51 Advice / S55 Checklist	Rampion 2 Response
General Scheme Outline Plans		
1	Applicant to submit Onshore General Scheme Outline Plans that clearly show arrangements of onshore cable routes.	A set of Onshore General Scheme Outline plans will be issued to PINS in advance of the relevant representation period.
Land Plans (Doc 2.1.2)		
2	<p>Applicant to review the Land Plans to ensure cut lines are clear and consistent. Ensure that plots which appear on multiple sheets are labelled consistently. Some cut lines labelling directions and insert directional lines often sit directly on red line boundaries, making it difficult to identify continuation of lines and division of plots (examples include sheet ½, 2/3, sheet 22).</p> <p>Clarity is required with regards to cut lines. It is not clear from the sheet where cut lines truly match or are completed. It is not clear on sheet 13/14 that those cut lines are consistent. The boundary between 13/7 and 14/5 is also unclear as both plots seemingly have different labels on different sheets.</p>	<p>The Applicant agrees that it will be beneficial to review the cut lines locations and formatting, but notes that the land plans are consistent with the works plans in this regard. Should it prove appropriate to amend the cut lines or labelling directions an updated set of land plans will be submitted at an appropriate time prior to the commencement of the examination. .</p> <p>For clarification at this stage, please note that there are no plots that are on multiple sheets and repeated. The plot number prefix relates to the different sheet numbers, and the suffix is the number.</p>
3	Applicant to review labelling use of insert lines within the plans. It is unclear whether there are two different plots of land labelled 3/25. The review of labelling should also include a consistency check over inserts as identification of duplication of insert 4/B has been noted on sheet 4 of the Land Plans. The Inspectorate also noted that inserts are not	As above the Applicant agrees that it will be beneficial to review the lands plans and any amendments necessary will be addressed in an updated set of plans submitted at an appropriate time before the commencement of the examination

	used for some smaller plots, examples being 1/20, 14/5, 17/4, 27/21. These should be included and labelled accordingly.	<p>For clarification now we confirm:</p> <ul style="list-style-type: none"> - There is only one plot 3/25, but two labels were added due to a narrowing of the plot, mirroring ownership boundaries. There was a plot leader line obstructing this, which will be moved. - The duplicate insert of 4/B will be amended to read 4/C. - Review of smaller plots are being undertaken and insets will be added where required.
4	All plots should be clearly labelled. For example, plot 7/6 should be labelled which is presently missing. It is also noted that the use of insert lines appears to create additional unlabelled plots of land. Additionally, inserts overlay some labelling, making it difficult to identify plots via their descriptions, an example being sheet 27 – Godsmark Farm description for 27/26, which is partially covered. The Applicant is advised to check for consistency between the offshore and onshore elements of the Proposed Development.	<ul style="list-style-type: none"> - Plot 7/6 is labelled on the plans, however the label on the inset is not clear; this will be moved to be visible. - There are no inset lines that have created new plots. The inset lines are coloured black, and the plot boundary lines are coloured red. Where insets overlay some labelling, a review is being done and these will be moved to a more appropriate location, within the space available on the sheet.
5	Full legends are used for every sheet, this is not always required.	The Applicant notes the comments, however for consistency a full legend will be kept on every sheet.
Book of Reference		
6	The Applicant is advised to conduct a cross reference between the BoR and Land Plans to ensure all plots are clearly identifiable and included in the plans. The Land Plans show a plot 9/015 and 9/010 which are not included within the BoR.	The inset on sheet 9 of the land plans will be updated to contain the final plot numbers (9/2 and 9/3) as seen on the plan page; these plots are also correctly contained in the BoR. The references to Plot 9/015 and 9/010 are erroneous as these plots do not exist.

	Some descriptions in the BoR are also not identifiable. For example, Atherington Cottages for plots 1/6 and 34/21 is described in BoR as "lying north east of Old Doctors and south of Eastridge Lodge" whereas on plan (sheet 34) it is described as "lying south east of Old Doctors and south east of Eastridge Lodge". Furthermore, plot 33/24 is described in BoR as "south of Cowfold Road" however Cowfold Road is not labelled on sheet 33. Such descriptions should be amended and made clear and identifiable.	The locators in the description will be reviewed and amended where required. The updated BoR will be provided at an appropriate time before examination starts.
7	The numbering of insert 9a is incorrect.	As noted above, the inset on sheet 9 of the land plans will be updated to contain the final plot numbers (9/2 and 9/3).
Works Plans (Doc 2.2.1 to 2.2.2)		
8	It is noted that the areas which include the Works seem to be excessively large and vague. Areas should be concise and only be of suitable sizing for the works taking place within them.	The Applicant notes the comments but notes that the area depicted comprises that considered necessary for implementation of the project. The areas depicted, and the works described to be carried out in those areas, are the subject of the assessment reported in the ES
9	The Applicant should ensure works comprising various elements should be correctly and precisely labelled. Although work numbers appear in the key, there are no work numbers on the plan. All work numbers should be included so they can be read and understood fully. The approach with labelling is not consistent with onshore work plans. Therefore, both onshore and offshore approaches should be consistent.	The Applicant acknowledges these comments, and will update the offshore works plan to include the work numbers on the plan as well as in the key as requested, as per the onshore works plan. These updated plans will be submitted at an appropriate time before the commencement of the examination.
10	Some areas do not have appropriate labelling. For example, Works 9 (a), 9 (b) are both labelled as Work No 9, these should be split and labelled accordingly.	The full extent of the cable route is identified as Work No.9, and the area identified for this work will include all elements (a) to (f) comprising this work description in the dDCO. It is not possible at this stage to distinguish exactly where each of these seven elements will

		<p>be located within the cable corridor, however the locations which have been identified for cable installation by horizontal directional drilling and specifically assessed as such are set out in the Crossings Schedule which comprises Appendix A of the Outline Code of Construction Practice (Document Reference 7.2)</p> <p>The approach of identifying a single work for cable installation within an onshore cable corridor has been adopted in a number of DCOs for offshore wind farms including Hornsea Four, Norfolk Boreas and Norfolk Vanguard.</p>
11	Work No 14 is missing from the plan and should be included.	While Work 14 is not present in the area covered by sheet one, it is shown in blue hatch on sheets 2-5, 7, 11-12, 15, 17-18, 21 and 23-33 and labelled as such.
12	There should be consistent labelling across the Works numbers and draft DCO. It is noted that the key states Work No.18 is "Permanent substation access" whereas schedule 1 states Work No 18 is "construction and operational access including drainage connecting Work No. 16 to the A272 including a new access junction". A cross check should be conducted to ensure labelling across the Works numbers and dDCO are consistent and accurate. There should also be consistency between the offshore and onshore elements of the proposed development.	The Works Plans key provides the Work Number and a short description of the function of the work, which is provided in full in the draft DCO. Work 18 is indeed intended to be a permanent access to the proposed substation, but this summary can be expanded in the next iteration of the Works Plans to be provided at an appropriate time before examination starts.
Draft Development Consent Order		
13	The Applicant is advised to ensure all references with other schedules and documents are accurate and consistent. For example, the 'Outline Operational Travel Plan' is referenced as 7.2 in the dDCO whereas the Index and document title is 7.5. No reference number is included in the dDCO for 'Outline	These typographical errors in the dDCO are acknowledged and will be corrected in the next iteration of the document.

	<p>Construction Method Statement’ whereas the index states the reference to be 7.23. Land Plan documents are referenced in the dDCO as 2.1.1, whereas the index and document title is 2.1.2. Finally, the Index states “Offshore in Principle Monitoring Plan” whereas the dDCO states “In Principle Monitoring Plan”.</p>	
14	<p>The Applicant is advised to conduct a cross reference between Volume 2 Chapter 4 of the Environmental Statement (ES) and the dDCO numbered works to ensure all references and wording are consistent and accurate. A comprehensive description of Rampion 2 (the ‘Proposed Development’) is provided in Chapter 4: The Proposed Development, Volume 2 of the ES (Doc 6.2.4). On page 15 of this document in section 4.2.1 it states that: The draft Development Consent Order (DCO) Limits (illustrated in Figure 1.1, Volume 3 (Doc 6.3.1) used to inform this ES combines the offshore and onshore elements of the Proposed Development. Figure 1.1. shows the red outline. The only reference to numbered works in the ES Vol 2 Chapter 4: The Proposed Development, is to works No. 8 and works No. 10, which makes it very difficult to compare the numbered works in the dDCO with exactly what is covered in the ES.</p>	<p>The works descriptions set out in the dDCO describe the various elements of the project, which have been assessed as part of the EIA and the effects reported in the ES.</p> <p>The general approach in the ES is not to include reference to the Work Nos as set out in the dDCO, as the latter may change, whereas this does not affect the assessment of whether the project, or any particular aspect of it, is likely to have significant effects on the environment</p>
15	<p>The Inspectorate notes it is reference in Schedule 1 Part 1 for Work No.1, and in Part 3 Requirement 2 that the authorised development must not exceed 90 wind turbine generators (WTGs) and in Requirement 2(a), that they must not exceed a height of 325m. The Inspectorate notes, however, that no assessment of the effect of 90 WTGs appears to have taken place and evidenced in Chapter 15 of the Environmental Statement (seascape, landscape and visual impact assessment), where it appears that only 65 WTGs have been</p>	<p>The dDCO establishes the parameters for the project overall, with the maximum possible number of turbines given as 95, and the maximum possible height as 325m. However, the dDCO also specifies that the total rotor swept area must not exceed 4.45 square kilometres (Schedule 1, part 3, requirement 2). This ensures that the project cannot exceed 65 of the ‘larger’ turbines, or 90 ‘smaller’ turbines, with these two scenarios having been assessed as maximum design scenarios and their effects reported in the ES.</p>

	assessed. The Inspectorate considers that the dDCO needs reviewing to ensure that the total quantum of turbines sought has been fully appraised and assessed in the ES taken as a whole.	
16	Furthermore, inconsistent language is used between Part 1 and Part 3. Part 1 refers to “no more than 90...” whereas Part 3 states “must not exceed 90...”. While the Inspectorate accepts there may be little difference in the interpretation of both, consistent language and terminology should be used throughout the dDCO.	This concern is noted and consistency in language used will be addressed in the next iteration of the dDCO.
17	A description cannot be found similar to that of Work No. 2b or 2c (cables and connections from the WTGs to the offshore substation) in the ES Volume 2 Chapter 4, The Proposed Development. Works Nos. 2a and 2b are spatially depicted on the Works Plans.	The subsea array cables comprising Work No. 2 are described in paragraph 4.3.38 of the ES, and the parameters are controlled by requirement 5 of Schedule 1, Part 3 of the dDCO, for the work as a whole. The distinction between the three elements of Work No. 2 on the Offshore Works Plans arises due to the restriction on the locations of the offshore substations comprising Work No. 3 (secured by paragraph 3 and Table 2 of Schedule 1, Part 1 of the dDCO) and hence the connection into the substation can only take place in these locations as shown in the Offshore Works Plans.
18	ES Volume 2, Chapter 4, section 4.4.6 again has minor inconsistencies as to whether the temporary construction compound is in works 8 or 9. It is referred to in works 9 in the draft DCO but the description in section 4.4.6 infers it is part of works 8.	Works No.8 includes the area specifically identified for the landfall temporary construction works including the Horizontal Directional Drilling (HDD) compound and the transition joint bays as described in paragraph 4.4.6 and 4.4.7 of the ES, connecting the onshore and offshore cables. Work No.9 also includes temporary construction compounds for the proposed trenchless crossings, but these are solely required in relation to the onshore cables, going under roads and rivers, for example. The indicative compound areas for these crossings are shown in the figure accompanying the Crossing Schedule (see Appendix 4.1: Crossing Schedule, Volume 4 of the ES

		(Document Reference: 6.4.4.1)). The compounds referred to in Work Nos 8 and 9 are distinct from the construction compounds that will service the wider project. These are described in Works No.10, which identifies the larger temporary main construction compounds along the onshore cable route which are detailed in Table 4-22 of the Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference 6.2.4).
19	The description of works 10 to 18 in the dDCO appear much less detailed than the description of other numbered works in the dDCO.	<p>The approach to describing Works 10 to 18 is not dissimilar to the approach adopted in recently approved DCOs, save that, in some instances, a number of temporary activities are contained within a single work; see for example Work No. 9 in the Hornsea Four DCO.</p> <p>There is nothing more that is appropriate to be added to the descriptions of the majority of these works, and the extent of the works that can be carried out will be delimited by the extent to which the works have been assessed in the ES, the controls in other documents accompanying the application and compliance with the requirements. Consideration will, however, be given to the extent to which it may be possible to provide a more detailed description of the onshore substation comprising Work No. 16</p>
20	Scour protection should be included in the dDCO works description.	Scour protection is included in the 'Further Works offshore' (see point (a)) rather than in Work No. 1 or 3. This approach is consistent with recently made DCOs including Hornsea Four, East Anglia One North, East Anglia Two, Norfolk Boreas and Norfolk Vanguard.
21	The description of the proposed development in ES Volume 2 Chapter 4 section 4.4.5 mentions a connection into the A259. This is not mentioned within Work No.9 in the dDCO but a similar connection to another A-road is described under Work No.19 in the dDCO.	Works No. 9 (d) includes "temporary construction consolidation sites, construction of a haul road and accesses" and (f) the provision of operational accesses for the onshore cable connection works. As per the description in paragraph 4.4.5, " <i>Main temporary construction access to the landfall will be from the north through an existing road (Ferry Road) connecting into the A259. An existing field access point</i>

		<p><i>will be upgraded.</i>" The location for the main access to landfall is therefore on Ferry Road and not the A259, although Ferry Road connects into the A259 to the west as described. This access is a construction and operational access shown as A-01 on the Access, Rights of Way and Streets Plan (Document Reference 2.5).</p> <p>Following construction, the access onto Ferry Road would be reinstated to its original condition and used for operational access by a 4x4 or similar. Works No. 19 contains the same provisions but for the connection between the Onshore Substation at Oakendene and the National Grid Bolney substation.</p> <p>Work No. 18 includes specific reference to the A272, as this is where a new access junction would be built and used to access the onshore substation site during both construction and operation of the Proposed Development.</p>
22	<p>There is limited mention to drainage works – they are only referenced once in the ES Volume 2 Chapter 4 in relation to the whole of the cable construction, however it is a component of many of the numbered works in the dDCO such as, Works no 9 (e), 16, 18 and 19 (3).</p>	<p>The drainage works during construction are included in Works No.9 (e) along with the wider onshore cable connection works. The areas shown in Works No.9 on the Onshore Works Plans (Document Reference 2.2.2) have been assessed in the ES for potential impacts e.g. the disturbance of soils (Chapter 20: Soils and Agriculture, Volume 2 of the ES (Document Reference 6.2.20)) or archaeology (Chapter 25: Historic Environment, Volume 2 of the ES (Document Reference 6.2.25) or land drainage effects in relation to water environment (Chapter 26: Water Environment, Volume 2 of the ES (Document Reference 6.2.26)). The design of construction phase drainage is not available at this stage, however the assessment has been carried out on the basis of the embedded environmental measures secured within the associated commitments as set out in . the Commitments Register (Document Reference 7.22) including C-28, C-73, C-140, C-143, C-181, C-252 and C-256.</p>

		<p>The design of the proposals for land drainage during the construction phase will be confirmed at detailed design through the Construction Phase Drainage Plan to be included as part of the stage specific Code of Construction Practice (see Requirement 22 (5) (c) in the dDCO) and in accordance with the commitments in the Outline Code of Construction Practice (Document Reference 7.2)</p> <p>This provision is also included in Work No.19 for the onshore cable connection works between the onshore substation and National Grid Bolney substation and has been assessed in the same way.</p> <p>With respect to Works No. 16 (Onshore substation), 18 (Onshore substation access) and 20 (National Grid Bolney substation extension) this temporary construction drainage is described in 4.5.56 and 4.6.11 of Chapter 4: The Proposed Development, Volume 2 of the ES (Document reference: 6.2.4). The indicative proposals for the permanent drainage at these sites is described in further detail the Outline Operational Drainage Plan (Document Reference 7.1) and secured under Requirement 17 and 18 in the dDCO.</p>
23	<p>There is limited consistency between landfall works description in Environmental statement Volume 2 Chapter 4 section 4.4.3 and Works numbers 6 and 9 when describing the intertidal works.</p>	<p>With respect to Works No.6 which covers the underground landfall connection under the intertidal area, this is covered by the description in paragraph 4.4.1 which notes the cables will be installed by HDD under Climping Beach, and includes the intertidal area. The text in paragraph 4.4.3 is describing the landfall works as defined in Works No.8. Work No.9 covers the onshore cable connection works and is not in the intertidal area.</p>
24	<p>The onshore grid connection at Bolney substation is described in Environmental Statement Volume 2 Chapter 4 section 4.6.1. However, circuit breakers, surge arrestors, relay marshalling rooms are not mentioned specifically in the</p>	<p>It is clarified here that the circuit breakers, surge arrestors and relay marshalling rooms (and other elements described in Work No. 20) are part of the equipment to be installed as part of the GIS or AIS options that are described for the National Grid Bolney substation extension</p>

	Environmental Statement Volume 2 Chapter 4 but they are mentioned specifically in the dDCO.	works in Section 4.6 of Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference 6.2.4). These are components of the equipment described in Section 4.6 and are covered by the parameters and assessed in the ES.
Statement of Reasons		
25	The Applicant is advised to conduct a cross reference check between the SoR and works numbers to ensure consistency. For example, plot 34/25 states in SoR, Appendix 1, that it will be used for Works Nos 10, 13 and 19, whereas the works plans suggests there is a small area of work No 15 (operational access) in 'pink stripes' as well which is not referenced in the SoR.	The Applicant has conducted a cross-referencing check between the SOR and Work Numbers as recommended by PINS. The Applicant agrees that Appendix 1 should be updated to refer to Work Number 15, in addition to Work Numbers 10, 13 and 19, in the row relating to Plot 34/25. No other discrepancies were identified by the Applicant. This error will be corrected as part of a submission at an appropriate time prior to the commencement of the examination.
26	Plot no 24/6 states in Appendix 1 it will be used for works no 14. An insert 24/A on the Land plans but no insert is provided on the Works Plans. The red outline is very thick, making plot 24/6 illegible.	The Land Plans and Onshore Works plans have been checked/compared electronically by the Applicant. Appendix 1 of the SOR correctly states that Plot 24/6 will be used for Works Number 14. The Applicant agrees that it would be beneficial to include an inset on the relevant Onshore Works Plan. This will be addressed in the updated Works Plan to be submitted at an appropriate time prior to the commencement of the examination.
Environmental Statement		
27	It is advised that the Applicant reviews the array areas which are inconsistent with the executive summary of the introductory Chapter of the ES and Explanatory Memorandum at paragraph 4.1.1, whereby they are quoted at 160 square km whereas the parameter at Table 4.1, paragraph 4.2.6, Volume 2, Chapter 4 of the ES is 196 square km.	The array areas have been reviewed and it is acknowledged that Table 4.1 of Chapter 4: The Proposed Development, Volume 2 (Document Reference: 6.2.4) should be amended to state that the wind farm array area for Rampion 2 is 160km ² , consistent with the remainder of the ES. The two areas where Wind Turbine Generators (WTGs) and the offshore substations (OSS) can be constructed (Works No. 1, 2c & 3a in the offshore works plan) have a combined area of approximately 160km ² . However, the areas where only transmission cables will be

		placed (where only Works No. 2a, 2b & 3b take place) total 196km ² which resulted in the discrepancy between these two calculations. The discrepancy will be clarified as part of a submission at an appropriate time prior to the commencement of the examination.
28-	The Inspectorate notes that there is inconsistency surrounding the distances mentioned between the site location and Rampion 1 Offshore Windfarm. ES Chapter 4 states that the site is located adjacent to the existing Rampion 1, approximately 13km and 26km from the Sussex Coast in the English Channel. It is not made clear in the main text of ES Chapter 4 why these two distances are provided. Paragraph 4.2.3 refers to the same distances of approximately 13km to 26km and ES Figure 4.1 (Doc 6.3.4) shows the red line boundary offshore. Table 4.1 however lists the Proposed DCO Order limits characteristics and states that 13km would be the closest distance to shore of wind farm array area, but the 26km distance is not explained. Additional explanation should be provided here.	The two distances indicate the distance of each of the closest and furthest part of the array area to the coast, with the closest point of the wind farm array area being located 13km from the coast and the furthest point being 26km from the coast. This will be clarified as part of a submission at an appropriate time prior to the commencement of the examination.
29	As referenced above, the Inspectorate considers there remains inconsistency with regards the quantum of WTGs sought by the Order. The dDCO states “no more than/must not exceed” 90 in total, yet no assessment of that number forms part of Chapter 15 of the Environmental Statement. Throughout ‘Chapter 15, there are discrepancies which should be checked and amended. For example, Table 15-25 refers to the maximum of 65 larger turbines only, rather than the 90 smaller turbines option listed in other aspects of the ES, and subsequently the minimum spacing of 1,130m rather than the smaller 830m. The chapter also refers to the total length of the offshore export corridor as 140km, whereas the majority of the ES states 170km. The Inspectorate further	As outlined in row 13 of this table, the dDCO specifies that the total rotor swept area must not exceed 4.45 square kilometres (Schedule 1, part 3, requirement 2). This ensures that the proposed development cannot exceed 65 of the ‘larger’ turbines, or 90 ‘smaller’ turbines. The larger 325m WTG layout scenario consists of 65 WTGs, has the highest WTG blade tip height (325m) and largest rotor diameter (295m). The realistic maximum design scenario layout considered as the basis for the SLVIA has WTGs located to the full eastern and southern extent of the array area south of Rampion 1, as well as the full western and northern extent of the array area to the west of Rampion 1, which results in WTGs being located in positions likely to result in the maximum adverse effect on the area of coastline within

	<p>notes that the ES Volume 3 Figures associated with Chapter 15 of the ES illustrates 65 WTGs only.</p>	<p>the Sussex Heritage Coast and South Downs National Park (SDNP) to the east, the coastlines of Sussex to the north, and the Isle of Wight (IoW) Area of Outstanding Natural Beauty (AONB) to the west, both in terms of proximity, scale and widest lateral spread in views from this coastline. The maximum design scenario was consulted on during the 2021 statutory consultation period and responses are recorded in Chapter 15: Seascape, landscape and visual impact, Volume 2 (Document Reference: 6.2.15) Table 15-7 including Natural England’s response (page 81) which agrees with the proposed maximum design scenario for the seascape, landscape and visual impact assessment. There was a clear preference to present one maximum design scenario for the SLVIA, which is the larger 325m WTG layout scenario, comprising 65 WTGs with highest WTG blade tip height (325m) and largest rotor diameter (295m).</p> <p>The total length of the offshore export cable is a typographical error and should be 170km, as referenced elsewhere in the ES. The offshore export cable assessed in the SLVIA is shown in the figures accompanying Chapter 15, for example, Figure 15.1 SLVIA Project Design Envelope. Effects arising from the operation of the offshore export cable are also scoped out of the SLVIA, with effects limited to temporary effects during the construction and decommissioning phase associated with vessels laying sub-sea offshore export cables.</p>
30	<p>There are continuous changes with reference to the worst-case scenario throughout ES chapters which should be addressed and amended to ensure consistency. ‘ES Chapter 9: Benthic Ecology’ states 90 wind turbine generators would be the worst case scenario. However, page 102 states “Piling fewer wind turbine generators (65) 13.5m monopiles represents a greater spatial impact than (90) 10m monopiles”. Again, ‘ES Chapter 9: Benthic Ecology’ appears to interchange between 90 and 65. It is therefore unclear what</p>	<p>The Maximum Design Scenario (MDS) varies for each assessment of the Environmental Statement, being based on the specific project parameter being considered and the aspect (and receptor) being assessed. The MDS has been determined by establishing the worst-case scenario for the receptors identified within each assessment, through a combination of data analysis, consultation with stakeholders, and professional judgement. Using a bespoke MDS for each assessment ensures that a precautionary, worst case has been</p>

	<p>is considered as the worst-case scenario. This is also repeated as an inconsistency in 'ES Chapter 8: Fish and Shellfish Ecology'. All discrepancies should be changed and present the same 'worst case scenario'.</p>	<p>assessed, to ensure that the predicted effects will not be exceeded, regardless of the type or layout of the WTGs ultimately chosen.</p> <p>The Applicant recognises there are some typographical errors within the MDS tables within Chapter 9: Benthic, Subtidal and Intertidal Ecology (Document Reference: 6.2.9) and Chapter 8: Fish and Shellfish Ecology Volume 2 (Document Reference: 6.2.8). These relate to the specified number and size of monopile foundations stated as representing worst-case, which has resulted in some discrepancies within both chapters. The statements of 90 wind turbine generators (WTGs) as a spatial worst-case for noise immissions are incorrect; the worst case should refer to the piling of 65 of the larger (13.5 m diameter) WTG monopile foundations. Additionally, the references to 90 WTGs using 13.5 m diameter monopiles is incorrect; where the higher number of WTGs are used, these will be smaller devices on smaller (10 m) diameter monopiles.</p> <p>The Applicant also recognises that additional clarity may be beneficial in setting out the worst-case scenarios that are relevant between a single piling event, sequential piling, and simultaneous piling at Rampion 2.</p> <p>The Applicant confirms that the changes to the MDS tables and associated text descriptions will not affect the assessment presented, as this has been correctly based on the noise modelling of the larger 13.5 m diameter monopiles.</p> <p>The corrections will be made as part of a submission at an appropriate time prior to the commencement of the examination.</p>
31	<p>The Applicant should review their approach with regards to the allocation of significance in the SLVIA, LVIA and onshore archaeology / cultural heritage chapters to ensure a</p>	<p>SLVIA: As set out in paragraph 1.8.3 of Appendix 15.2: Simple Seascape, Landscape and Visual Impact Assessment Methodology, Volume 4</p>

<p>consistent approach is taken in line with their methodology. There are areas where moderate is referred to as significant and other times not.</p>	<p>(Document reference: 6.4.15.2), significant seascape, landscape and visual effects are highlighted in bold and shaded dark grey in Table 1-6. They relate to all those effects that result in a ‘Major’ or a ‘Major/Moderate’ level of effect. Moderate levels of effect (shaded mid grey) <u>may be significant or not significant</u> subject to the assessor’s professional judgement, with assessments explained in full in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 (Document Reference: 6.2.15), Appendix 15.4: Viewpoint assessment, Volume 4 (Document Reference: 6.4.15.4) and Appendix 15.5: Assessment of aviation and navigation night-time lighting, Volume 4 of the ES (Document Reference: 6.4.15.5) where they occur.</p> <p>The assessments undertaken make clear whether moderate effects are significant, or are not significant, supported by reasoned professional judgement. The Guidelines for Landscape and Visual Impact Assessment (GLVIA3) (Landscape Institute, 2013) recognises that moderate effects are likely to fall around the ‘threshold’ of significance, and may or may not be significant, with further justification to be provided in making the judgement as to whether a moderate effect is significant or not. This approach to the assessment of moderate effects as being either significant or not significant, supported by reasoned professional assessment and justification, is typical and widely used in LVIA (which relies on professional judgement) and is supported by GLVIA3 and recent draft clarifications (Landscape Institute, Draft Technical Guidance Note 05/23)”. </p> <p>GLVIA3 notes (3.33) that <i>‘it is not essential to establish a series of thresholds for different levels of significance of landscape and visual effects, <u>provided that it is made clear whether or not they are considered significant</u>’</i> (emphasis added). Draft Technical Guidance Note 05/23 notes (3(5)) that <i>‘typically, effects falling below the</i></p>
---	---

middle of the range of overall effect are assessed as not significant. For example, if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects are likely to be on the borderline and may or may not be significant and justification would need to be provided in making the judgement as to whether a moderate effect is significant or not' (emphasis added).

The assessment methodology for seascape, landscape and visual for the ES is consistent with that provided in the Scoping Report (RED, 2020), however some slight changes have been made since the scoping phase and PEIR in order to address comments provided during Statutory Consultation (Table 15-7).

LVIA:

As set out in **paragraph 18.8.3 of Chapter 18: Landscape and visual impact, Volume 3** (Document reference: 6.2.18) the assessment has been undertaken in accordance with the Landscape Institute and IEMA (2013) *Guidelines for Landscape and Visual Impact Assessment*, 3rd Edition (GLVIA3). The assessment methodology for landscape and visual impact for the ES is consistent with that provided in the Scoping Report (RED, 2020) and no changes have been made since the scoping phase and PEIR (RED, 2021) provided alongside Statutory Consultation.

The assessment accords with the Methodology set out in **Appendix 18.1: Appendix 18.1 Landscape and visual impact assessment methodology, Volume 4, page 37, paragraph 1.8.3** (Document reference: 6.4.18.1): *"In some circumstances, **'Moderate'** levels of effect (shaded light purple) also have the potential, subject to the assessor's opinion, to be considered as significant and these exceptions are also highlighted in bold in the text and will be explained as part of the assessment, where they occur."*

		<p>An example is provided by the assessment of landscape character and elements along the onshore cable corridor, where in Appendix 18.3: Landscape Assessment, pages 25-29, Table 2-5 (Document reference: 6.4.18.3), the assessment of the landscape character “35. Lower Arun Valley Floor” is concluded to be ‘Moderate’ and Significant as a result of the onshore cable corridor construction works. Landscape elements (scrub and hedges) that would also be affected by the onshore cable corridor construction works are also assessed as ‘Moderate’ but concluded to be Not Significant. The explanation notes that the landscape elements are not key characteristics of this landscape and that the effects on these elements would not adversely affect the landscape character of the Lower Arun Valley Floor.</p> <p>Historic environment: The assessment of significance has been completed in accordance with the methodology described in paragraph 25.8.15, page 227, of Chapter 25: Historic environment, Volume 2 (Document reference: 6.2.25) which states for Moderate effects that: <i>“.. professional judgement is applied, where appropriate, to determine significance of effect. Where effects are assessed, according to the matrix in Table 25-26, to be Potentially Significant in EIA terms, professional judgement is applied to determine whether they are Significant or Not Significant.”</i> The assessment methodology for historic environment for the ES is consistent with that provided in the Scoping Report (RED, 2020) and no changes have been made since the scoping phase and original PEIR (RED, 2021) provided alongside the first statutory consultation exercise.</p> <p>Where professional judgement has been applied, the reasoning behind this is explained in the narrative for the assessment. An example of this is in the assessment of effects on Bines Farmhouse</p>
--	--	---

		<p>Grade II Listed Building, for which paragraph 25.9.250 of Chapter 25: Historic environment, Volume 2 (Document reference: 6.2.25) identifies a Moderate effect resulting from changes within its setting during the construction phase. As a result of the temporary nature of the works, it is judged that this would be Not Significant.</p> <p>Paragraph 25.9.153 of Chapter 25: Historic environment, Volume 2 (Document reference: 6.2.25) assesses the significance of effects on any previously unidentified archaeological remains of Bronze Age date within Zone 2 (South Downs), noting a potential residual Moderate effect. As this has the potential to involve a permanent effect on remains of up to national importance, this was adjudged to be Significant.</p>
32	<p>The Applicant is advised to conduct a check in relation to the figures as the ES does not always represent all the sensitive receptors referred to. Air Quality figure 19.1 shows 6 Air Quality Management Areas, with a detailed figure only provided for 2. There are some other minor labelling omissions such as Figure 26.1 representing Water Framework Directive waterbodies that are not labelled.</p>	<p>Figure 19.1</p> <p>The onshore part of the proposed DCO Order Limits lies within the administrative areas of three District Councils: Arun, Horsham and Mid Sussex. Each District Council produces an Annual Status Report which describes air quality in its administrative area, including any Air Quality Management Areas (AQMAs) that have been declared, and the results of air quality monitoring. Figure 19.1, Volume 3 (Document reference: 6.3.19.1) includes the 6 AQMAs within these administrative areas of Arun, Horsham and Mid Sussex. Section 19.8.5 of Chapter 19: Air quality, Volume 2 (Document reference: 6.2.19) explains that examination of the traffic data identified a number of highway links to be brought forward for detailed assessment and that there are no impacts on AQMAs within the Study Area with the exception of Worthing and Cowfold AQMAs. Figures 19.2a and 19.2b, Volume 3 (Document reference: 6.3.19.2) show the modelled road links, the modelled receptors and monitoring sites used to inform the road traffic modelling (Section 19.8.6 of Chapter 19: Air quality, Volume 2 (Document reference: 6.2.19)). Therefore, detailed figures of the other AQMAs as identified in Figure 19.1,</p>

		<p>Volume 3 (Document reference: 6.3.19.1) are not required and as such have not been provided.</p> <p>Figure 26.1 Figure 26.1, Volume 3 (Document reference: 6.3.26.1) shows the Water Environment Study Area and relevant features including the Surface Waterbodies which have been scoped in for assessment as part of Chapter 26: Water environment, Volume 2 (Document Reference: 6.2.26) in accordance with the methodology section. This includes the scoped in tributaries of the River Arun and River Adur which are either intersected by or downstream of the proposed DCO Order Limits. The River Storr is also marked as it is considered on the basis of it being downgradient and potentially hydrologically connected to the proposed DCO Order Limits by surface water pathways. The other tributaries which are situated outside of the Study Area are not labelled or symbolized as Water Framework Directive (WFD) water bodies on Figure 26.1, Volume 3 (Document reference: 6.3.26.1) in order to focus on key features of interest to the assessment. The only minor labelling omission on Figure 26.1, Volume 3 (Document reference: 6.3.26.1) is the transitional (TRaC) water body extent of the River Adur, however it is shown on the detailed WFD water body figure (Figure 26.2, Volume 3 (Document reference: 6.3.26.2)) instead.</p>
33	<p>Temporary construction compounds (associated with, for example joint bays and lasting 6-8 weeks as referenced in the LVIA chapter) should be added and represented on the ES figures, as these mostly appear to show the larger construction compounds shown on the works plans.</p>	<p>Chapter 4: The Proposed Development, Volume 2 (Document Reference: 6.2.4) of the ES describes the joint bay and cable joining works for the onshore elements of the Proposed Development in Sections 4.5.18 to 4.5.20 including the parameters and assumptions (Table 4-20). These sections outline that along the onshore cable route joint bays (subsurface structures with associated link box and fibre optic junction box) will be constructed to enable cable installation and cable jointing. Section 4.5.19 of Chapter 4: The Proposed Development, Volume 2 (Document Reference: 6.2.4) also states that the locations will be determined during the detailed</p>

		<p>design phase but will be typically located every 750-950m (location depending on factors such as needing to avoid surface features, crossings and bends). Furthermore, Table 4-28 of Chapter 4: The Proposed Development, Volume 2 (Document Reference: 6.2.4) outlines the Planning Inspectorate's Scoping Opinion responses relevant to the Proposed Development which includes a comment with respect to joint bays (Paragraph 2.3.12):</p> <p><i>'the Scoping Report identifies the need for joint bays and link boxes "at regular intervals along the route" to enable the cable installation and connection JBs, FOC JBs and LBs are required at regular intervals along the route to enable the cable installation and connection process. Regular intervals are defined as 600 – 1,000m in C19, Appendix A of the Scoping Report, although it does define whether their locations will be determined by the time the application is made. The Inspectorate anticipates this may not be the case. If uncertainty persists, the ES should identify a worst-case scenario for the number of jointing pits and link boxes that may be required, and their impact during both construction and operation'.</i> In response, it is acknowledged in Table 4-28 of Chapter 4: The Proposed Development, Volume 2 (Document Reference: 6.2.4) that joint bays are required at regular intervals along the route dependant on onshore substation, onshore cable route and length (also referring to Section 4.5.18).</p> <p>The specific locations of the joint bays are not included in the ES figures as these will not be determined until detailed design (as outlined in Section 4.5.18 of Chapter 4: The Proposed Development, Volume 2 (Document Reference: 6.2.4)).</p> <p>With respect to Chapter 18: Landscape and visual impact, Volume 2 (Document reference: 6.2.18), Table 18-24 includes the following maximum assessment assumption:</p>
--	--	---

		<p><i>'Up to 66 joint bays with temporary construction compounds 4m x 14m – construction duration 6-8 weeks'</i></p> <p>This assessment assumption is referring to the temporary construction works related to the construction of the joint bays (subsurface structures with an associated subsurface link box and Fibre Optic junction box as described in Section 4.5.18 of Chapter 4: The Proposed Development, Volume 2). Therefore, reference to temporary construction compounds should be read as the joint bay specific compound</p>
Design and Access Statement		
34	Plans at Appendix C & D are very poor quality – the keys are either missing or are on the first page so out of sequence and illegible.	These plans appear to have been corrupted following submission to the Planning Inspectorate. The Applicant has reissued the document to the Case Manager at the Planning Inspectorate by email with a request to ensure that this file is replaced on the Inspectorate's website.
Planning Statement		
335	PS references location as between 13km and 25km off the Sussex Coast whereas the Executive Summary of Volume 2 Chapter 4 of the ES and the introductory Chap of ES references 13km and 26km	This is a typographical error in the Planning Statement and of Chapter 4: The Proposed Development, Volume 2 (Document Reference: 6.2.4) of the ES is correct. This will be noted as an errata to the Planning Statement which will be submitted at the appropriate time prior to the commencement of the examination.