



Richard Kent
Senior EIA Advisor
On behalf of the Secretary of State

Our ref: EIA/20/0003
Your ref: EN010117-000006
Please ask for: Matthew Porter
Email: Matthew.porter@horsham.gov.uk
Contact Tel: 01403 215561
Date: 29th July 2020

Dear Mr Kent,

Scoping consultation

Application by Rampion Extension Development Limited (the Applicant) for an Order granting Development Consent for the Rampion 2 Offshore Wind Farm (the Proposed Development)

Thank you for your request of 6 July 2020 for Horsham District Council (HDC) to inform the Planning Inspectorate of the information considered should be provided in the Environmental Statement (ES) relating to the Proposed Development.

The Rampion 2 Scoping Report Doc Ref. 42285 dated July 2020 has been reviewed.

The HDC response focuses on high level, strategic topic areas at this stage. The topic areas covered do not reflect the full remit of those addressed in the Environmental Impact Assessment (EIA) but highlight what are considered by the Council to be the key issues within its remit.

Because the Council's remit ends at low water mark, impacts beyond that point have not been addressed, other than where they have onshore impacts. Each of the topics has been considered in relation to the four elements of the development (offshore, landing, onshore, and substation).

Description

Introduction

The onshore elements of Rampion 2 relate to the onshore electricity grid connection from the point of MHWS to connection with the National Grid transmission system. This will comprise the following key components:

- transmission cables defined in a cable corridor of approximately 36km in length; and
- a new substation that will connect to National Grid's substation at Bolney, for which there are currently a number of options under consideration.

Recognising existing constraints and sensitivities around the existing Bolney Substation, a number of candidate 'satellite' sites (within a radius of 5km and lying within the boundary set out in this Scoping Report) are being considered for where the new wind farm substation would be located. Regardless of final site selection, the electricity ultimately needs to be fed into the existing National Grid Bolney substation, which would require underground cables and minor upgrades at Bolney Substation.

Onshore Cable Corridor

The onshore grid connection for Rampion 2 will be made via a buried cable along the entire length of the route wherever possible. The cable corridor will be refined during the detailed design and the EIA process in order to identify a cable route corridor which is optimal from an environmental, economic and engineering perspective.

The onshore cable system will be installed in up to four trenches, with cables drawn through installed ducts. Other methods for cable installation such as HDD will be used as required to avoid or minimise potential effects where constraints are identified, including to cross environmentally sensitive water courses, major roadways and railways. Fibre optic cables will be installed alongside the transmission cables for communication and monitoring purposes. The onshore cable will not be oil-filled and there are no fluids required to be introduced into the cable trenches. The trenches will then be backfilled, with approximately 1m of soil covering the cables and ducts.

The onshore cable route will be constructed in stages or sections along the route. The trenches will be excavated, the cable ducts will be laid, the trenches backfilled and the reinstatement process commenced. At regular intervals along the route joint bays will be installed to enable the cable installation and connection process. The joint bays are subsurface structures with an associated link box located at or above ground level. These link boxes enable electrical checks and testing to be carried out on the cable system during operation.

During construction, a temporary construction corridor will be defined which will incorporate temporary working areas to provide access and allow for safe construction. In particular, the temporary construction corridor will provide access to construction traffic, and space for cable assembly, cable trench excavation, and storage space for excavated topsoil and subsoil in separate stockpiles. It is expected that the width of the cable construction corridor for surface trenching will be approximately 50m. At any sensitive points identified along the route, the working width of the temporary construction corridor will be reduced as far as practicable to avoid or minimise potential effects.

The temporary construction corridor may also require widening beyond the standard width in predetermined locations to allow sufficient space for access at crossings, avoidance of obstacles, directional drilling, and the application of trenchless techniques.

A number of temporary construction laydown areas will be required along the temporary construction corridor to accommodate construction equipment, materials, and site offices.

On completion of construction the cable construction corridor land will be reinstated to its former condition with the haul road, any soil storage and stock fences removed. Where underground cables are installed, a permanent easement will be agreed with landowners, or failing agreement acquired using compulsory acquisition powers, to enable access for inspections and maintenance during operation of Rampion 2.

Should construction of the offshore wind farm be undertaken in phases, it may not be possible to install all onshore cables in a single operation. For any remaining cables, ducts will be installed in the trenches in the initial phase to allow the cables to be drawn through the ducts as later phases of the Proposed Development are brought forward. This approach will remove the need to undertake repeat excavations along the route. The only exception to this are potential areas along the route that are identified for HDD to enable crossing sensitive locations. On completion of cable installation, the haul road, and any construction compounds will be removed, and the cable corridor will be fully reinstated.

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Onshore substation

Rampion 2 will connect to the National Grid's Bolney substation in West Sussex and in order to connect the transmission cable to the electricity network, a new substation will be required. The onshore substation will be located on land in proximity (up to circa 5km) to the existing National Grid 400kV substation at Bolney. The overall site footprint for the proposed onshore substation is anticipated to be up to 4.5 hectares (ha), and the exact location of the substation will be confirmed as the detailed design, the EIA process and landowner discussions progress.

Construction works for the onshore substation will include creation of site access, site preparation works, installation of underground services and foundations, construction of the building, installation of electrical equipment, installation of perimeter fencing, and landscaping.

The onshore substation will contain necessary transmission equipment including transformers, reactors, capacitor banks, and open busbars. The substation will also house switchgear and controls, and welfare facilities.

Environmental Aspects

In summary, HDC is in broad agreement with the methodologies outlined in the scoping report to be broadly appropriate for our areas of interest.

It should however be highlighted that the Council's formal EIA scope can change at any time during the EIA should additional receptors and potential impacts be identified as further project details emerge. This letter should also not be taken to imply any acceptance of the planning merits of the scheme and simply sets out the Council's Scoping Opinion as it currently exists.

Indeed, given the scale of the necessary new substation and its potentially significant visual impact on the immediate surroundings of where it is sited, careful consideration should be given to its location. It is HDC's strong view that the existing sub-station site should be utilised and expanded for Rampion 2 to limit its visual impact.

The Council wishes to highlight the following key comments:-

Socio-Economics

In terms of establishing the baseline conditions, HDC has an adopted Infrastructure Delivery Plan (IDP) that should be referred to in terms of assessing existing facilities/capacity and likely requirements: <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>

This section should acknowledge the various settlements and employment sites within the Study Area; in particular the communities of Henfield, Partridge Green, and Cowfold, and the Key Employment Area at Star Road/Huffwood Trading Estate, Partridge Green, and the various Parish Councils along the cable route and near the substation.

The cable construction has the potential to result in socio-economic impacts, as has the new substation. To offset the socio-economic impacts, and to ensure that the benefits of the project are

focused on the local area which will be subject to the greatest adverse impacts, consideration should be given to employees being sourced within an appropriate distance of the site.

Linked to the above two points is the matter of continued access to and maintained or enhanced Green and Social Infrastructure. The proposals represent an opportunity to implement improvements to the Green Infrastructure network; within the Study Area are numerous Public Rights of Way and 11 local green spaces allocated within Neighbourhood Plans.

The Downs Link, for example, is routed through the study area. Established in 1984 as a link between the North and South Downs, is a scenic, flat bridleway between Guildford in the North and Shoreham-by-Sea in the South. It is a key recreational asset in the district and its most popular cycle route and offers beginner, intermediate and experienced options.

The Wiston Whole Estate plan also takes quite a large area of the Study Area. Any conflicts with the estate plan objectives and other potential mitigation measures should be considered: <https://www.southdowns.gov.uk/planning-policy/whole-estate-plans/endorsed-whole-estate-plans/>

Development Plan

Our current Local Plan is called the Horsham District Planning Framework 2015 – 2031 (HDPF). The HDPF is the overarching planning document for Horsham District excluding the South Downs National Park. The HDPF sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs of the whole district, as well as looking beyond the district's boundaries. It identifies six priority themes for the Council: https://www.horsham.gov.uk/data/assets/pdf_file/0016/60190/Horsham-District-Planning-Framework-2015.pdf

The following plan policies from the HDPF are relevant to the Proposed Development:

- Policy 1 Sustainable Development
- Policy 24 Strategic Policy: Environmental Protection
- Policy 25 Strategic Policy: District Character and the Natural Environment
- Policy 26 Strategic Policy: Countryside Protection
- Policy 30 Protected Landscapes
- Policy 31 Green Infrastructure and Biodiversity
- Policy 32 Strategic Policy: The Quality of New Development
- Policy 33 Development Principles
- Policy 34 Cultural and Heritage Assets
- Policy 35 Strategic Policy: Climate Change
- Policy 36 Appropriate Energy Use
- Policy 37 Sustainable Construction
- Policy 38 Strategic Policy: Flooding
- Policy 39 Strategic Policy: Infrastructure Provision
- Policy 40 Sustainable Transport

Storrington Sullington and Washington Neighbourhood Plan 2018- 2031 coverage is partly within the Study Area. This includes policy allocations Policy 3: A24 Corridor and Policy 4: North Farm, Wiston Estate, Washington: <https://www.horsham.gov.uk/planning/neighbourhood-planning/storrington-sullington-and-washington-neighbourhood-planning>

The HDC Site Specific Allocations of Land (SSAL) DDP details a development proposal for new homes at the north end of Henfield, which falls within the Study Area. <https://www.horsham.gov.uk/planning/planning-policy/site-specific-allocations-of-land>

HDC is undertaking a Local Plan review. We consulted on the Regulation 18 Draft Local Plan between 17 February and 30 March 2020.

<https://strategicplanning.horsham.gov.uk/consult.ti/LocalPlanReview/consultationHome>

It has set a minimum target for our District of at least 965 new houses each year to 2036. We are also obliged to see if we can meet the housing needs from surrounding areas such as Crawley. This could mean our housing number will rise to over 1200 per year. The aim of the Local Plan is to allocate specific sites where it believes the new homes can be built over a long period. One such site falls directly within the Study Area:

Land North East of Henfield (Mayfield). The land promoter for this 310 hectare site has suggested that the site could bring forward around 7,000 homes, with supporting community and employment allocations, and a new link to A23, although not all of this would be completed before 2036:

https://www.horsham.gov.uk/data/assets/pdf_file/0010/80947/Land-North-East-of-Henfield-Mayfield.pdf

This is largest proposed Local Plan Review site within the search area but there are other smaller but still significant sites, such as around Partridge Green.

The timetable for our Local Plan review is set out in the link below, so you know the key dates and consultation periods. Please note that the above site is being assessed as a potential site under the Local Plan Review. Whether this site is taken forward under the Local Plan Review will be decided at the end of this year under Regulation 19. Our current estimated timescale is set out in the link below.

<https://www.horsham.gov.uk/planning/local-plan/local-plan-review-timetable>

Seascape, Landscape and Visual Amenity

SLVIA and LVIA

The 50km study area for the SLVIA offshore assessment and 2km study area for the LVIA onshore assessment is considered appropriate and agreed with.

HDC has taken note of and is satisfied with the initial embedded environmental measures proposed to reduce the potential impacts. It is confirmed the approach and methodology (appendix C and D) proposed to assess both the SLVIA and LVIA follows the current guidance and is considered comprehensive and proportionate.

A considerable extent of the Study Area falls within the landscape designations of the South Downs National Park and High Weald Area of Outstanding Natural Beauty. Key viewpoints have been identified and additional ones, to cover the assessment of views for the new onshore substation, will be agreed in due course and therefore HDC has no further requirements or comments to add at this stage.

The Council would welcome the opportunity to further refine the scope of the visual impact assessment as pre-application discussions progress.

Site-specific Visual Impact

Given the scale of the necessary substation and its potentially significant visual impact on the immediate surroundings of where it is sited, careful consideration should be given to its location. It is HDC's strong view that the existing sub-station site should be utilised and expanded for Rampion 2 to limit its visual impact.

Air Quality and Noise and Vibration

The main impacts from the proposed development on air quality will be from laying the underground electric cables from the offshore windfarm to the substation in Bolney. The applicant will use IAQM guidance on the Assessment of Dust from Demolition and Construction (2014) to assess and mitigate the impacts, which is the methodology that HDC recommends.

Regarding the assessment proposed in the Scoping Report, the focus of the assessment should be on mitigating the impacts. In accordance with the Air Quality And Emissions Mitigation Guidance for Sussex (2019), HDC endorses a low emission strategies approach to preventing and/or reducing air quality impacts, which entails encouraging mitigation from all 'major' development. To follow the message of low emission strategies, the Council would recommend that the mitigation plan for the construction/decommissioning phases of the project should include measures such as the compliance of construction traffic with the requirements of the London Ultra-Low Emission Zone.

Both Storrington and Cowfold Air Quality Management Areas (AQMA) are referenced in the Scoping Report. While the cable route does not pass through these areas directly, the Council's expectation is for a 'preferred route' to be used by all construction vehicles. The existing substation at Bolney is within 5km of the AQMA, therefore if traffic is to go via this route, the impact of traffic on this junction during the construction phase should be considered.

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

Terrestrial Ecology and Nature Conservation

The potential impact of the proposals upon features of nature conservation interest and opportunities for habitat creation should be included within the ES in accordance with appropriate guidance on such matters.

Both The Mens SAC and Ebernoe Common SAC (Sussex bat SACs) lie within West Sussex and the Impact Risk Zone identified by Natural England includes Horsham District. The Mens SAC is located west of the Study Area and lists barbastelle bats as a qualifying feature. Ebernoe Common SAC is also to the west, and lists barbastelle and Bechstein's bats as qualifying features. Arun Valley SAC, SPA and Ramsar is to the south west and lists rare and diverse plant, invertebrate and bird assemblages as qualifying features. The Ashdown Forest SAC is to the east of the Study Area and lists heathland plants and habitat as qualifying features.

The Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol provides advice for developers and local Councils when assessing applications which fall within an identified 12 km Impact Zone for The Men's SAC, Ebernoe Common SAC and Singleton and Cocking tunnels SAC. In line with this Protocol, this application is located within the Wider Conservation Area and significant impacts or severance to flight lines need to be considered.

Habitat connectivity and availability for foraging and commuting Barbastelle bats (functionally linked land) should be considered. Barbastelle bats are qualifying features for both SACs, and threats and issues relating to this species in the wider area have been identified in the relevant SIPs as: off-site habitat availability/management; habitat fragmentation/Habitat connectivity for barbastelle bats; and changes in land management, with reference to foraging and commuting routes.

The proposed cable route crosses hedgerows and the River Adur. If there are opportunities for additional hedge planting, such as gapping up breaks in hedgerows and re-connecting hedges, and river restoration this would reduce the negative impact upon the qualifying features of The Mens SAC (the Barbastelle bat). This should be enhanced provision rather than only replacing the same length of hedgerow or area of other habitat as would be affected.

SSSIs of nationally designated nature conservation also fall within or adjacent to the Study Area, and within the Study Area here are some 50 parcels of Ancient Woodland and a significant number of Ancient Orchards and numerous Tree Preservation Orders.

Therefore there is potential to result in significant impacts on habits and species, particularly if the construction-period impacts are not appropriately managed, or mitigated. There should be early

provision of an Ecological and Landscape Management Plan to ensure that measures within it are appraised as early in the process as possible. The aftercare period is particularly important.

Attention should be given to seeking opportunities for biodiversity enhancement, rather than just mitigation.

Wilder Horsham District is a five-year partnership between Sussex Wildlife Trust and Horsham District Council that aims to take a wider landscape approach to enhance wildlife and not restricting actions to specific sites. However, there are certain landscapes and areas of the Horsham District that will be the focus of the work of the partnership. At present these are:

- Hedgerows in the Low Weald (providing important connectivity between fragmented habitats)
- Woodland - New planting and allowing natural regeneration are important tools in capturing more carbon and helping wildlife
- The Adur catchment; improve freshwater and floodplain habitats, water quality and flood resilience through working with natural processes
- Join up key sites, such as the Knepp Estate with the woodland to the north-east of Horsham town and The Mens in the west of the District, creating the core of a District-wide ecological network
- Take action to support pollinating insects throughout the District, in both towns and rural areas

<https://www.horsham.gov.uk/climate-and-environment/wilder-horsham-district>

It will also link to the work of the Sussex Local Nature Partnership which has recently adopted the Sussex Natural Capital Investment Strategy. This document, the result of cross sector collaboration (Local Authorities are currently represented at a county and unitary level) provides guidance and a shared framework for nature's recovery in Sussex. This seeks to ensure that biodiversity is enhanced within new development sites, where this is not possible. <http://sussexlnp.org.uk/>

It is also noted Sussex Wildlife Trust has a current offshore sea kelp restoration initiative along the coastline between Littlehampton and Brighton: <https://sussexwildlifetrust.org.uk/helpourkelp>

Transport

The detailed scope of the assessment of highway and transport implications will be advised by the Local Highway Authority, WSCC. Within its remit HDC is in broad agreement with the assessment methodology detailed in the Scoping Report.

Ground Conditions

HDC is satisfied with the assessment methodology detailed in the Scoping Report.

Historic Environment

Within the Study Area are located a significant number of heritage assets (designated and non-designated) including two Conservation Areas (Washington and Henfield) and some 180 Listed Buildings and numerous Scheduled Ancient Monuments. The locality is known to contain extensive archaeological remains.

HDC is broadly content the description of the approach to the study and assessment of the proposal and its impact to the historic environment is detailed and robust.

Water Environment

HDC is in broad agreement with the assessment methodology detailed in the Scoping Report with the inclusion of Hydrogeology, Hydrology and Flood Risk.

The Scoping Report has identified the current areas of flood risk and potential pathways. It should be noted however that there are a number of smaller ordinary watercourses, such as ditches, within the Study Area that may not have been mapped for flood risk due to their catchment size.

Based on the flood map, parts of the Study Area are shown to be located with Flood Zone 2 and 3. However the majority of the cable corridor is within Flood Zone 1. As the site contains Flood Zones 2 and 3, the Sequential test applies to this development.

The Study Area includes a stretch of the River Adur, its tributaries and impoundments. HDC would encourage the opening up of culverts and other appropriate river restoration or land management techniques to be incorporated with existing flow routes to deliver flood risk and water quality improvements along the cable route, particularly where known upstream flood risk to adjacent areas can be reduced by improving conveyance and storage areas.

Conclusion

I confirm that this letter forms Horsham District Council's consultation response before adoption of the Scoping Opinion. This is to inform the Planning Inspectorate of the information that Horsham District Council considers should be provided in the ES.

Yours sincerely,

Matthew Porter
Senior Planning Officer