MID SUSSEX DISTRICT COUNCIL

Rampion 2 Offshore Wind Farm
Nationally Significant Infrastructure Project
EN010117

Relevant Representation Submission

1 November 2023

Mid Sussex District Council's Relevant Representations on Rampion 2 Development Consent Order

1.0 Summary

1.1 In summary the key issues for Mid Sussex are as follows:

a) This Council is supportive of the principle of Low Carbon Energy Schemes provided that any adverse local impacts, including cumulative impacts, can be made acceptable;

b) Mitigation of landscape impacts is necessary, particularly from PROW 1T. Loss of vegetation should be minimised;

c) The proposed extension to the existing substation will have a degree of less than substantial harm in respect of the special interest of identified heritage assets. Consideration should be given to further planting around the site to mitigate any negative impact on views from the PROW to the east, and Bob Lane to the south;

d) Any above ground structures that create an impermeable area will require some drainage so as not to create or exacerbate flood risk.

e) To mitigate the impact on residents from construction noise, it is recommended that the applicant amends their proposed core construction hours to:

"*08:00 to 19:00 hours Monday to Friday; and 09:00 to 13:00 hours on Saturday*."

f) The applicant's commitment to deliver a Biodiversity Net Gain (BNG) of at least 10% for all onshore habitats is welcomed. The habitats to be created at the existing National Grid Bolney substation extension should be subject to agreement/consultation with the District Council at the appropriate time.

g) Appropriate mitigation through a detailed Construction Traffic Management Plan, will be essential.

h) MSDC supports the key design principle that the substation extension will be screened by existing vegetation and proposed landscape planting. It is important that these aims are appropriately secured. Recognition should be made of the contribution the site makes to the setting of Coombe House, Cowfold Road and not just Twineham Court Farmhouse, Bob Lane. Consideration should be given to the inclusion of ecological enhancements (such as the new bat boxes at Oakendene substation) within the Terrestrial Ecology Design Principles or the substation extension. MSDC supports the use of the existing access onto Wineham Lane for the construction and operational phases of the substation extension.

2.0 Introduction

2.1 This correspondence forms Mid Sussex District Council's response to the request for Relevant Representations in respect of the Rampion 2 DCO.

2.2 The Rampion 2 DCO application was accepted for examination by the Secretary of State on the 7th September. Mid Sussex District Council is a host authority, with proposed works taking place within its boundary that include an extension to the existing National Grid substation at Bolney and onshore cable installation.

2.3 The objective of the Rampion 2 project is to make a significant contribution towards the generation of clean sustainable energy supplies. This Council is supportive of the principle of Low Carbon Energy Schemes provided that any adverse local impacts, including cumulative impacts, can be made acceptable.

2.4 The Council is keen to ensure that all appropriate mitigations are implemented to manage any impacts on residents and the local environment.

2.5 The Council's Relevant Representations, which are those matters considered to be the key issues to be assessed in the planning balance as far as they affect Mid Sussex, are set out below.

3.0 Landscape

3.1 The summary of visual effects of the extension to the existing National Grid Bolney substation at Table 18-43 of Chapter 18: Landscape and visual impact assessment, Volume 2, are noted. Given these findings show a 'major' level of effect from Public Right of Way 1T(PROW), it is important that adequate mitigation is secured here.

3.2 When considering the visual impact in respect of long-distance views from within the National Park to the south, the comments of the South Downs National Park Authority should be given appropriate weight.

3.3 A comprehensive Arboricultural Impact Assessment and Landscape and Ecological Management Plan (LEMP) will be expected to be submitted to MSDC for consideration once the final designs are known.

3.4 The final designs should demonstrate a commitment to minimising existing vegetation loss to that which is necessary to facilitate the development, with careful justification expected on any removal of designated 'important hedgerows'.

4.0 Historic Environment

4.1 There are a number of heritage assets within the vicinity of the National Grid substation at Bolney which include the Grade II listed Twineham Court Farmhouse, Bob Lane and the Grade II listed Coombe House, Cowfold Road. The setting of the grade II Royal Oak Public House, which lies on the western side of Wineham Lane within Horsham District, is not considered to be materially affected by the proposals.

4.2 It is considered that the site of the proposed substation extension has some limited positive contribution to the setting of each of these heritage assets. As such it is considered that the height of the Bolney substation extension will have an impact on the currently positive contribution this part of the site makes to the setting of these heritage assets.

4.3 The proposed development will therefore result in a degree of less than substantial harm in respect of the special interest of these heritage assets. This must be given considerable importance and weight in the planning balance.

4.4 In terms of mitigation, consideration should be given to the potential for further planting around the site, to mitigate any negative impact on views from the PROW to the east, and Bob Lane to the south.

5.0 Water Environment

5.1 The site where it is located within Mid Sussex is in flood zone 1 and is at low fluvial flood risk (risk of flooding from Main Rivers). The site is shown to be at very low, low, medium and high surface water flood risk (comparable to flood zones 1, 2, 3a, and 3b).

5.2 This flooding appears to be linked to existing field boundary ditches/watercourses associated with agricultural land use. Though some areas within the Bolney substation site may be at an elevated risk of surface water flooding.

5.3 Mid Sussex District Council's records do not contain records of the site flooding. Our records also contain no records of flooding within the area immediately surrounding the site. However, Mid Sussex District Council's records are not complete, and flooding may have occurred which is not recorded. A site having never flooded in the past does not mean it won't flood in the future.

5.4 Any above ground structures that create an impermeable area will require some drainage so as not to create or exacerbate flood risk. Any surface water drainage will need to be designed to meet the latest national and local drainage policies. The drainage system will need to consider climate change, the allowances for which should be based on the latest climate change guidance from the Environment Agency.

5.5 The BGS infiltration potential map shows the site to be in an area with low infiltration potential. Therefore, the use of infiltration drainage such as permeable paving or soakaways is unlikely to be possible on site. To ensure the drainage hierarchy is followed this will need to be confirmed through infiltration testing on site as part of detailed drainage design.

5.6 To ensure the final surface water drainage design meets with the latest design requirements the applicant is advised to confirm the design parameters required in relation to climate change etc prior to undertaking detailed design.

6.0 Air Quality and Noise

6.1 The issues are construction noise & dust and, in respect of the substation extension at Bolney, operational noise. Regarding the latter, it is noted that the applicant's submissions state that "the operational plant of the existing National Grid Bolney substation extension (GIS or AIS) will not be audible outside of the extension site boundary."

6.2 The GIS infrastructure is expected to be minimal as the equipment will be housed within a building. Although not enclosed within a building, the proposed AIS infrastructure does not include the larger noise generating equipment (transformers, shunt reactors or condenser) associated with onshore substation infrastructure and therefore would not be expected to increase noise from Bolney substation at receptor locations.

6.3 Any changes to either of these proposals will require further consideration.

6.4 Measures should be put in place to ensure that noise from the substation extension is not increased at the nearest receptors. Mitigation measures should also include comprehensive management plans to minimise the impacts of construction dust and noise.

6.5 Regarding construction noise, the applicant has set out in their submissions (Outline Code of Construction Practice for example) that they intend to operate within the following core working hours:

"*07:00 to 19:00 hours Monday to Friday; and*
08:00 to 13:00 hours on Saturday."

6.6 There is no concern raised around the specific activities or circumstances highlighted by the applicant that may occur outside of these hours. There is, however, concern around the impact that these working hours, will have on the residential amenity of neighbouring residents who live in close proximity to the construction areas, and specifically, a 07:00 start time on weekdays and 08:00 on Saturdays.

6.7 The strong preference for MSDC would be for the applicant to amend their proposed core construction hours to more closely reflect those that are applied to other development within the district by the Council. Consideration should therefore be given to following proposed core construction hours being applied to the development to mitigate the impact of construction noise on residents:

"*08:00 to 19:00 hours Monday to Friday; and*
09:00 to 13:00 hours on Saturday."

7.0 Biodiversity

7.1 The mitigation for individual ecological features/impacts must be adequately secured.

7.2 The applicant's commitment to deliver a Biodiversity Net Gain (BNG) of at least 10% for all onshore habitats subject to permanent or temporary losses as a result of the construction and operation of the development is welcomed.

7.3 The habitats to be created at the existing National Grid Bolney substation extension include the planting of additional trees and this element of the proposals should be subject to agreement/consultation with the District Council at the appropriate time.

8.0 Traffic and Transport

8.1 The environmental effects of the construction traffic impact are a key consideration and the views of West Sussex County Council, as the local highways authority, and National Highways should be carefully considered.

8.2 Appropriate mitigation through a detailed Construction Traffic Management Plan, will be essential.

8.3 Effective mitigation is needed for the impacts on recreational users of the PROW network, especially during the construction period.

9.0 Design Principles – Existing National Grid Bolney Substation extension

9.1 The applicant states that one of the key design principles is the intention that the substation extension will be screened by existing vegetation and proposed landscape planting. MSDC supports this key design principle, and it is important that the aims of it are appropriately secured.

9.2 Under the Historic Environment Design Principles, a recognition should be made of the contribution the site makes to the setting of Coombe House, Cowfold Road and not just Twineham Court Farmhouse, Bob Lane.

9.3 Consideration should be given to the inclusion of ecological enhancements (such as the new bat boxes at Oakendene substation) within the Terrestrial Ecology Design Principles for the substation extension.

9.4 MSDC supports the use of the existing access onto Wineham Lane for the construction and operational phases of the substation extension rather than have a new access directly onto Bob Lane.

10.0 Draft Development Consent Order

10.1 There are some aspects of the draft development consent order that may need refinement. The following comments are not therefore exhaustive although any additional comments will be shared with the applicant and set out in the Local Impact Report.

10.2 Part 3, Requirements, 9 (Detailed design approval – extension to National Grid substation): Cross reference is made with the ground level definitions from the DAS but confirmation of the need to provide the existing ground levels should made explicit here or within the DAS.

10.3 Part 3, Requirements,12 (Provision of Landscaping): Reference should be made to the need to submit a comprehensive Arboricultural Impact Assessment as part of the landscaping.

10.4 Part 3, Requirements, 22 (5) (Code of Construction Practice): Should reference be made here to the ‘temporary construction compounds’ and ‘temporary soil storage areas’ identified as Works No 10 and 11 respectively?

10.5 Part 3, Requirements, 32 (Travel Plan): The wording appears to suggest that the OTP could be implemented at any time during the lifetime of the development. It is considered the timescale for implementation should be made more explicit. For example “*to be implemented at the time the project becomes operational and retained for the operational lifetime of the project*.”

11.0 Closing Comments

11.1 Without prejudice to the above representations Mid Sussex District Council will, at the required time, produce a Local Impact Report (LiR) which will set out its position in full on the above and any other relevant matters.

11.2 In the meantime, Mid Sussex District Council will continue to engage with the applicant regarding the DCO.