

Questions regarding Relevant Representations:

1. RR 032 Ardent, for National Grid:

National Grid raises several concerns and objections regarding the Rampion proposals. However, we cannot see any mention of the 132kV cable which passes under the land on which the new substation is proposed at Oakendene, and which was mentioned to Rampion by several residents in the 2022 consultation responses and at meetings after that.

This high voltage cable goes under the northern half of the site, from north west to south east, under the access road and construction compound and almost certainly under the proposed attenuation basin and swale and probably under the northern part of the permanent substation location. It is also crossed at least twice by the proposed cable route from Oakendene to Wineham.

Nowhere in the DCO documents is there a discussion about it, certainly not in the Design and Access Document, nor is it mentioned in the Relevant Representation from the National Grid. It supplies power to much of the Horsham District. Perhaps, as it is an export cable, it is the property of UKPN instead? In any case, there is no evidence that either National Grid or UKPN have been consulted on this.

The cable, like the Rampion cable from the coast to Oakendene, also the same voltage, cannot be built on or planted over. The implications of this not being under consideration during the examination are serious: once consent is granted, the 'discovered' cable would significantly affect the design, mitigations and screening capabilities at the site or the applicant would need to seek permission for the cable to be re-sited involving the highly disruptive digging up of the A272 and Kent Street. Furthermore, if it were to be hit during excavations, the consequences would be devastating both to the workman concerned and the power supply to a large area.

Anything can be worked around, but would be costly, disruptive and not in the consultation.

2. RR 407 UK Health Security Agency:

In the now archived DCO documents for Rampion 1, the UK Health Security Agency (or Public Health England as they were then known) Relevant Representation notes that when considering the assessment of the EMFs produced by the new onshore cables and substation, as described in Section 2b of the Environmental Statement – Onshore Project Description, *“Public Health England advises that comparison with local area substations is not strictly appropriate as these operate at lower voltages than the newly proposed substation for stepping up to the National Grid. Further consideration should also be given as to whether case by case compliance assessments are required for new cables operating at voltages above 132 kV i.e. 150 kV, 220 kV and up to 400 kV in the cables connecting the two substations, and for substations containing air-cored reactors.”*

We would like to ask whether the assessment criteria, as suggested by PHE have been applied in this case, specifically for the proposed new substation at Oakendene and the 400kV cable which will connect Oakendene to the main substation at Wineham, please. Both are much larger than the cable and substation under consideration for Rampion 1 at Wineham Lane.

3. RR 330 Royal Mail:

The Royal Mail raises concerns about the need to keep key routes flowing smoothly and that changes in road capacity can have a major effect on their ability to meet their Universal Service Obligations. The A27 and A23 are mentioned, but are they aware of the many concerns raised by residents and businesses about the impact on businesses and transport caused by the construction traffic on the A272 and surrounding lanes? The A272 is a major east west route through the northern part of the county and Rampion's traffic assessments of that route do not reflect the everyday experience of users, including our excellent post men and women.

Comments on Relevant Representations and Principal Areas of Disagreements (PADs):

1. WSCC RR 418 and PADs:

We welcome many of the comments made by WSCC in their RR and PADs statements, particularly the recognition of downplaying of impacts in respect of the visual, heritage and noise and vibration effects. Also the lack of detail mentioned in the description and construction section of the RR (section B)

3.4.ii we share their concerns about the commitment C-19 to construct the cable route in sections. Even if this were possible, the commitment to avoid the AQMA in Cowfold means that the haul road across from Kent Street to A281 will need to remain open for the whole construction period causing unacceptable disruption to residents, farmers, and other businesses along the route, regardless of whether or not the cable was laid in sections.

However, we are disappointed that there is a lack of recognition of the ecological sensitivity of the Oakdene site and northern cable route, even though it is undesignated. We will provide evidence during the examination in support of this claim. Similarly, they do not appear to recognise the economic impacts of the disruption on the A272 which is an inevitable result of the construction work at Oakdene and the proposed vehicle routes. Limited economic benefits across the county are raised as a concern, but there is no recognition of the *negative* effects. We disagree with their traffic impact assessments:

3.12.ii "WSCC is content with the base data used within the assessment. This data includes traffic surveys of all routes that will be used by construction traffic." No, it doesn't; there is no assessment of Kent Street, Moatfield or Dragons Lane. Also, the methodology is wholly inadequate for Cowfold end of the A272 (road 27). It is nonsense to treat the whole road from A23 to Cowfold as one

3.12.vii) Whilst we also welcome the intention to avoid the AQMA in Cowfold. However, there are too many 'where possibles' and conflicting statements in the DCO. In addition, a consequence of this is to make the burden on Kent Street, Dragons Lane and the haul road intolerable to residents and highly destructive to ecosystems and endangered species. The narrowness and unsuitability of Kent Street has not been featured in the WSCC response.

2. HDC RR 148 and PADs:

We welcome the many observations from Horsham about the magnitude of many of the impacts of this plan on the communities on the Horsham area, particularly the lack of clarity on the plans and mitigations in the OCTMP, flooding, visual impacts and hedgerow loss. However, we strongly disagree with the following statements in the Relevant Representation:

Ecology surveys and assessments

5.3 *“Sufficient information has been provided to assess the effects of development on biodiversity, along with necessary ecological surveys together with any proposed prevention, mitigation, or compensation measures. This does not appear to be based on a true assessment of the surveys and directly conflicts with the assessment made by ourselves and the SDNPA of the information provided.*

Irreplaceable and Priority Habitat

7 5.4 *It is the understanding of HDC that the Applicant will not be removing any irreplaceable habitat within the DCO Order Limits within the administrative area of Horsham District. For the pocket of ancient woodland south of the Oakendene Industrial Estate, HDD will occur, with the drill entry complying with Root Protection Area and at a 6 metres depth. This is the only irreplaceable habitat mapped within the Phase 1 report in this area. In fact, the plan will require the removal or disruption of scrub containing important nightingale breeding sites, disruption of an ancient green lane and the loss of hedgerow and tree habitats which will not recover in the lifetime of the substation.*

In addition, the commitment to avoid the AQMA is welcomed but see above regarding caveats. The response from HDC appears to date from the early stages of the consultation when they may have been under the misapprehension that the likely substation site was to be in Wineham, and therefore the AQMA would largely have been avoidable. However, the commitment now to avoid it has disastrous consequences for the surrounding small lanes and directly conflicts with the commitment to avoid the use of small single track side roads.

We are also disappointed that HDC do not mention the impacts on local businesses as small businesses are recognised as an important contributor to the economy of the Horsham area in the Horsham District Plan.

3. Natural England RR 265 and PADs:

It is noted that the Natural England Responses do not refer at all to the northern cable route and the Oakendene substation site, but appear to focus on the marine environment and specifically designated habitats only. The lack of any reference to these sites however, should not be taken to mean they are of no importance, in the same way that Natural England in their 2020 scoping report, warned Rampion that the lack of data in desk top surveys did not necessarily mean there was nothing of importance to be found. They emphasised the importance of local knowledge testimony in areas which had previously had no reason to be surveyed. We will be providing that evidence, including now verified evidence, during the examination to show that this is indeed a site of significant importance.

4. Cowfold Ecology

In addition, we wish to draw your attention to the many Representations providing specific evidence for the ecologically sensitive habitats and red list species in the northern cable route and Oakendene site, even though undesignated, including, but not limited to the following:

RR 066, RR 084, RR 085, RR 128, RR 138, RR 155, RR 161, RR 164, RR 236, RR 314, RR 398

5. Common themes from many Relevant Representations across the project over all include:
- Landowner issues such as failure to engage with landowners and a suspicion that the intention is to force CPOs
 - A view that Rampion are asking for more land than they actually need for the current proposals
 - Inadequate consultation
 - Inadequate assessment of alternatives
 - Consistent failure to provide adequate detail
 - Consistent failure to provide visual representations
 - High level of uncertainty in proposals making it impossible to accurately assess environmental and other impacts and adequacy of mitigations
 - Biodiversity net gain and mitigations not clearly distinguished.
 - Downplaying of impacts in all areas and when compared to assessments made for Rampion 1
 - There have been so many changes as to be considered very different from what was consulted on
 - Inadequate ecology studies e.g. RR 084, RR 358-SDNPA, RR 418-WSCC
 - Risks of gaining consent *before* detailed studies and full assessments are carried out
 - Lack of economic impact assessment
 - Anomalies and contradictions in traffic management and construction plans