

Rampion 2 Offshore Wind Farm

Request for an Accompanied Site Inspection submitted by Ancleggan Limited

1. *Location of proposed Accompanied Site Inspection:*

The location of the proposed Accompanied Site Inspection (“Location”) is on land situated to the north east of Coombe Farm, Bob Lane, Twineham, Haywards Heath RH17 5NH.

OS X (Eastings): 524362 OS Y (Northings): 121155

Nat Grid: TQ243211 / TQ2436221155

what3words: [talent.clotting.scrambles](https://www.what3words.com/#!/en/ta-ent-clotting-scrambles)



2. *Issues to be observed at the Location:*

2.1 Background

- 2.1.1 Ancleggan Limited (“**Ancleggan**”) is an Interested Party and submitted a relevant representation on 20 October 2023, annexed to this request.
- 2.1.2 Ancleggan commenced the promotion of a battery energy storage development (the “**Ancleggan Development**”) at the Location on 4 November 2020.
- 2.1.3 The Location forms part of the area designated for “Work No. 19 – Onshore Connection works” on Sheet 34 of the R2ED’s Onshore Works Plans dated 25 July 2023.
- 2.1.4 The Applicant has applied for a development consent order boundary for a corridor of between 100 and 125 meters at the Location affecting the Ancleggan Development.

- 2.1.5 In a letter dated 21 April 2023 from the Applicant to the planning officer considering the Ancleggan Project, the Applicant stated that it “requires a 30m construction corridor, becoming a 20m permanent easement”. Accordingly Ancleggan considers that the 100 to 125 meter corridor applied for by the Applicant is disproportionately large and, if granted, will make the Ancleggan Development economically unviable or significantly more expensive and complex to develop.
- 2.1.6 Further, Ancleggan believes that it is open to the Applicant and National Grid to agree a more direct cable route between Oakendene and Bolney substations which does not enter the Location at all. Accordingly, Ancleggan has requested that the development consent order application boundary granted by the ExA does not encroach on the Ancleggan land encompassing the Location.
- 2.1.7 If there is any possibility that the ExA is not minded to grant Ancleggan’s request that the development consent order application boundary does not encroach on the Ancleggan land encompassing the Location, Ancleggan believes that the ExA would benefit from an Accompanied Site Inspection in order properly to consider the issues described in paragraph 2.2 below.
- 2.2 Issues to be observed:
- 2.2.1 The Examining Authority’s note of Unaccompanied Site Inspection (USI) to which the Application or Specified Matters relates on 15 and 16 November 2023 states:
- “The ExA then travelled to the National Grid sub-station located on Wineham Lane and walked along its southern boundary on Bob Lane, noting the location of the proposed extension to the sub-station. Finally, the ExA drove north along Wineham Lane stopping at the location the proposed connection from the onshore sub-station crosses the lane and viewing the point it enters the National Grid sub-station.”*
- 2.2.2 Ancleggan submits that the ExA will not have been able properly to assess the Location from the southern boundary on Bob Lane or from Wineham Lane as the Location is not adequately visible from either of these places.
- 2.2.3 Ancleggan further submits that the ExA will be assisted by an inspection of the Location in order to be able to assess the matters raised in Ancleggan’s representation properly, and in particular the opportunity for the determination of the development consent order to provide for the mitigation of:
- 2.2.3.1 unnecessary adverse effects of a 100 to 125 meter corridor on the Ancleggan Development; and
- 2.2.3.2 adverse effects on the “High Quality Category A trees” identified in the Arboricultural Constraints Plan (Appendix B to *Rampion 2 Environmental Statement Volume 4, Appendix 22.16: Arboricultural Impact Assessment* (Document EN010117-000247-6.4.22.16));
- 2.2.3.3 adverse effects on the hedge on the western boundary of the Location in accordance with the “Principles to minimise harm” set out on page 57 of *Rampion 2 Environmental Statement Volume 4, Appendix 22.16: Arboricultural Impact Assessment* (Document EN010117-000247-6.4.22.16); and
- 2.2.3.4 adverse effects on the trees comprising group G248.

2.2.4 The ExA may also find the site visit helpful in order to view neighbouring land relevant to representations made by the following Interested Parties:

2.2.4.1 TC Rampion OFTO Ltd; and

2.2.4.2 John O'Rourke.

3. *Information on whether the site can be accessed via public land.*

The Location cannot be accessed via public land. Ancleggan would be happy to arrange accompanied access for the ExA at a time and date convenient to the ExA.

4. *The reason why the location has been suggested.*

The Location has been suggested because it allows the ExA to see and appreciate fully the boundary of the development consent order applied for by the Applicant and properly and fully to consider Ancleggan's relevant representation in relation thereto.

Annexe

Representation from Ancleggan Limited in response to a notice served on it pursuant to Section 56 of the Planning Act 2009 on behalf of Rampion 2 Offshore Windfarm (the “**Rampion Development**”).

1. Ancleggan Limited is a company registered in England with company number 12951231 whose registered office is at Biddlesgate Farm, Cranborne, Wimborne, Dorset BH21 5RS (“**Ancleggan**”).
2. Ancleggan commenced the promotion of a battery energy storage system (the “**Ancleggan Development**”) on land forming part of Charles Worsley’s land on the north side of Coombe Farm, Bob Lane, Twineham, Haywards Heath RH17 5NH (the “**Ancleggan Land**”) on 4 November 2020.
3. The purpose of the Ancleggan Development is to provide storage capacity for electricity generated by renewable energy projects so that it can be released when it is needed most. Battery storage technologies are essential to speeding up the replacement of fossil fuels with renewable energy. Battery storage systems will play an increasingly pivotal role between green energy supplies and responding to electricity demands. (Source: <https://www.nationalgrid.com/stories/energy-explained/what-is-battery-storage>)
4. Ancleggan has an interest in land by virtue of an option agreement entered into between (1) Charles Worsley and (2) Ancleggan on 17 December 2021 (the “**Option Agreement**”). The Option Agreement is recorded on the register of title for title number WSX22448 at HM Land Registry. The Option Agreement grants Ancleggan a right to call for a lease of the Ancleggan Land.
5. On 4 April 2022 Ancleggan wrote to Rampion 2 Extension Development Limited (“**R2ED**”) in response to R2ED’s public consultation notifying R2ED of the Ancleggan Development and objecting to the potential use of the Ancleggan Land as the site of the Rampion Development substation. R2ED subsequently chose to locate its substation at Oakenden and connect to the National Grid electricity substation at Bolney.
6. Since July 2022, Ancleggan has held regular online meetings with R2ED during which each party has kept the other party updated with the progress of its respective development.
7. Ancleggan’s agent, One Planet Developments Limited submitted a screening request to Mid Sussex District Council on 26 April 2021. It subsequently submitted a planning application in respect of the Ancleggan Development to Mid Sussex District Council on 20 March 2023, (reference DM/23/0769) (the “**Ancleggan Application**”) The Ancleggan Application was validated on 20 March 2023 and is expected to be determined shortly.
8. The Ancleggan Land forms part of the area designated for “Work No. 19 – Onshore Connection works” on Sheet 34 of the R2ED’s Onshore Works Plans dated 25 July 2023.
9. Ancleggan understands that R2ED intends to lay a pair of 400kV cables between R2ED’s substation at Oakendene and the National Grid substation at Bolney. In a letter to the planning officer considering the Ancleggan Application dated 21 April 2023, R2ED stated that it “*requires a 30m construction corridor, becoming a 20m permanent easement*” for the R2ED cables.

10. The relevant part of the development consent order boundary applied for which affects the Ancleggan Land provides for a boundary which runs between 100 and 125 meters inside the Ancleggan Land.
11. Ancleggan understands that the reason for this request is to allow R2ED flexibility in the eventual location of the 30-meter construction corridor and 20-meter permanent easement referred to in its letter of 21 April 2023 for the R2ED cables.
12. Ancleggan has shared its survey data over the Ancleggan Land with R2ED which indicate that there are a number of existing cables in the south-western corner of the Ancleggan Land. Ancleggan believes that there is room at this boundary to accommodate the R2ED cables if a collaborative approach to the cable route is taken by R2ED and National Grid with Ancleggan. We believe this could significantly mitigate the severely adverse impact of the proposed development consent boundary on the Ancleggan Project.
13. Ancleggan submits that it is unreasonable for R2ED to be granted a disproportionately large development consent order boundary within the Ancleggan Land. This is particularly the case given the Ancleggan Land is to the north-east of the National Grid Substation and to the east of R2ED's proposed substation at Oakendene, and therefore not enroute. The flexibility R2ED wishes to preserve suggests that R2ED has prematurely submitted its application for a development consent order because it has not yet determined with sufficient accuracy where the R2ED cables will be located.
14. The width of the development consent order boundary applied for has a disproportionately adverse effect on the Ancleggan Development. If granted as applied for, the boundary may make the Ancleggan Development economically unviable or significantly more expensive and technically complex to develop.
15. Ancleggan believes that it is open to R2ED and National Grid to agree a more direct cable route between the Oakendene and Bolney substations which does not enter the Ancleggan Land at all, and therefore avoids the technical complexities required in crossing the pre-existing cables in the south-western corner of the Ancleggan Land.
16. Accordingly, Ancleggan requests that the development consent order application boundary does not encroach on the Ancleggan Land.
17. If the Examiner is not minded to grant Ancleggan's request in paragraph 16, Ancleggan requests in the alternative that insofar as the development consent order application boundary affects the Ancleggan Land, it is reduced to no more than 40 meters in width at its widest point from the westernmost boundary of the Ancleggan Land.
18. In addition, Ancleggan supports Mr. Worsley's requests that:
 - a. the R2ED cable route should be defined at an early stage in the development consent order process so as to avoid the mature trees classified on the boundary of the Ancleggan Land which are identified in the Arboricultural Constraints Plan (Appendix B to *Rampion 2 Environmental Statement Volume 4, Appendix 22.16: Arboricultural Impact Assessment* (Document EN010117-000247-6.4.22.16)) as High Quality Category A trees;
 - b. that the cable construction corridor should be reduced to 14-meters if it crosses the hedge onto the western boundary of the Ancleggan Land in accordance with the "Principles to minimise harm" set out on page 57 of *Rampion 2 Environmental*

Statement Volume 4, Appendix 22.16: Arboricultural Impact Assessment (Document EN010117-000247-6.4.22.16); and

- c. under no circumstances should the trees comprising group G248 be removed. In support of this, we refer to a report prepared on behalf of Ancleggan by Ian Howell, Arboriculturist of the arboricultural consultants Barton Hyett Associates which states:

“These works would have the potential to result in harmful severing of anchoring roots and feeder roots of mature English oak and common ash trees that are part of an important landscape and habitat feature for the site. There is also the potential for tree removals to be required to facilitate the works or as the result of the works being carried out. This would equate to high arboricultural impacts for the sites arboricultural resource that could easily be avoided by utilising an alternative cable route.”

19. Further, Ancleggan supports Mr. Worsley’s suggestion that if the R2ED cables are to be located within the Ancleggan Land at all, the least environmentally damaging crossing point would be the existing hedge gap between two ash trees suffering from vascular wilt fungus (Ash Dieback). This is also supported by the Barton Hyett Associates arboricultural report which states, referring to this route:

“The alternative cable route... would utilise a historic breakthrough point that had previously been created for Rampion 1 construction works, where the sum of the tree losses would equate to a single Category U common ash tree that was in a state of acute decline during the August 2022 survey. The Rampion 1 construction access track can still be seen quite clearly within the aerial imagery as a lighter green corridor of grass running west to south-east across the neighbouring field. Where this reached the tree-line it broke through a natural, and then previously widened, gap in the tree-line. As mentioned above utilising the route of this previously established (and now restored) construction track would avoid the potential for significant negative impacts on the sites arboricultural resource all together, and is by far the preferred option from an arboricultural perspective. I would therefore strongly advise that [this] ... cable route ... be adopted into the proposals in order to avoid unnecessarily impacting on this prominent tree group (G4).”

20. For clarity, the points raised in this representation have all been raised with R2ED on numerous occasions before R2ED’s application for a development consent order was submitted.