

Submission ID: 25469

We are very concerned about the flooding issues at the proposed substation site at Oakendene and do not feel that these issues have been adequately investigated or consequences assessed. Nor has the alternative site at Wineham Lane North has been adequately evaluated.

Submission ID: 25482

We are very concerned about the lack of due diligence when reviewing the alternative substation sites at Oakendene/Kent St. There appears to be no traffic modelling surveys, no details of the proposed "temporary traffic control measures" and no traffic impact assessment for the two alternative sites.

Water and Flooding at the proposed substation site at Oakendene.

Summary

This document is addressed to WSCC as Local Lead Flood authority. Please note that HDC was only invited to meetings regarding the proposed substation at Oakendene in June 2022, a month before the public announcement, and five months before the consultation closed. There appears to be limited research, based on desk top studies and an inaccurate interpretation of the Environmental Agency flood maps. Moreover, the research relies on inaccurate historical information regarding flooding at Oakendene from surface water, ground water and ordinary watercourses. There seems to be no flood risk assessments or modelling to account for the proposed piling or construction or an evaluation of their consequences for the local residents or communities downstream. Each item will be discussed in detail within this document.

The following documents have been assessed: 6.2.26, 6.4.26.4, 6.4.26.2, 6.3.26(1), 6.2.26(2), 6.4.26.1, 6.4.26.3. Oakendene was not included in the hydrogeological risk assessment or the floodrisk assessment for pluvial or fluvial floodplains, and there appears to have been no soil samples or geology tests conducted on the Oakendene site. The application frequently refers to EN-1 and relevant local authority plans and policies, but has largely ignored these guidelines and principals in its application. The Environmental Agency flood maps relating to the two sites appear to have been misinterpreted by Rampion and flooding risks downplayed at Oakendene.

Inadequate investigation of Oakendene site, prior to decision being announced.

There is no evidence to suggest that there was a thorough investigation of the two alternative sites, in terms of traffic impact, flooding/geology or environmental/ecology. Looking at the minutes of meetings, HDC only became aware that Oakendene had been proposed in June 2022, and Rampion announced their decision in July 2022. However, there was no environmental/ecological studies, geological or traffic surveys/modelling for this site. It was clear from a public meeting held with Rampion in Cowfold, one month before the end of the consultation process in November 2022, that Rampion were not aware that Oakendene had suffered from surface water flooding, nor that Kent St was a single-track lane, assessed as "inappropriate" in their Woods report, nor that a High voltage cable lay under the proposed site.

Fundamental Flaws to assumption being made:

Reading through the minutes of the meetings of 1.4.22 found in document 6.4.26.2, on p174, it's clear that there was an underlying assumption that Rampion 2 would be located on Wineham Lane, because participants were "trying to learn lessons from Rampion 1" and Oakendene had not been included in assessments. However, this assumption is not appropriate for Oakendene as there are significant differences between the two proposed substation sites. Rampion 2 is 30% bigger, with the entrance to the site directly off the fast moving, busy A272, which caters for over 18000 vehicles daily. Whereas Rampion 1 was located off the relatively quiet Wineham Lane, which is often used by HGV's because it is wider and has two lanes. Oakendene is also on a floodplain which has been designated as an area of "high flood risk" according to the Environmental Agency maps. Properties nearby have flooded badly and residents regularly ask the council to clear ditches and pipes in order to reduce their risk of flooding.

Why did Rampion choose a floodplain when a perfectly good alternative site, at Wineham Lane, was available?

- 1 The EN-1 planning guidelines encourage developers to avoid essential infrastructure from being built on vulnerable land, such as floodplains, just in case they suffer outages or loss of power due to frequent flooding. Such outages would affect wide areas of the South East, during the worst weather conditions.

Why has Rampion chosen such a vulnerable site, when a perfectly good alternative site is available at Wineham Lane North?

During the meeting on 9.11.2020 in 6.4.26.2 page 159, point 15- Oakendene was not even discussed as a substation site, therefore it was not included in the "Flood risk assessment in the fluvial or pluvial floodplains". Neither was it included in terms of floodplain storage loss and the impact of increased flooding for the neighbours and those living downstream was not assessed.

The meeting on 22.3.22 demonstrates that the underlying assumption was that the substation would be built at Wineham Lane, since there were no discussions about Oakenene and there was no representation from HDC, which would cover that area. During this meeting, RC (from Woods Gp) stated in points 4 & 5, that "the loss of fluvial floodplain storage... would increase the water levels elsewhere". There was also a discussion (in point 7) about the problems of Natural England objecting to moving floodplain soil away from site. TL from the EA made some excellent points regarding the need for additional information, when considering floodplains, however the discussion did not extend to, or cover Oakendene, or whether a receptor should be located nearby. The point about soil removal, it is highly likely to be necessary at Oakendene as new hardstanding and tracks will need to be installed, but this item does not appear to have been examined.

During the meeting on 22.6.22 between WSCC, HDC, MSCC and Woods Gp, the following statement was made by MB (from HDC)

"MB advised that as long as the substation was positioned outside the 0.1% AEP surface water flood extent, he would not be concerned. MB advised that HDC records of historical flooding indicated that no flood incidents at Bolney Rd or Kent St had been recorded." (According to neighbours, there have been a number of flood incidents for local residents and HDC is called out on a regular basis to deal with flooding issues).

According to the Environmental Agency flood maps, it would appear that Oakendene suffers from both 0.1% and above 3.3% AEP, thus classifying it as "at high risk of surface flooding". Having walked across these fields in November and May, these maps are possibly out of date because the flooding is far more extensive and widespread, with many areas being permanently submerged during the winter months, due to the impermeable wealden clay. Please let us know if you would like photos showing 4-6" of water flooding these meadows. Please refer to the maps on p199 (6.4.26.2) showing the extensive flooding at Oakendene, and p198 comparing Oakendene with Wineham Lane, which has no such flooding issues. The Oakendene meadows have a number of watercourses running through the land, as well as the 7km Cowfold Stream, and several lakes.

These maps obviously take no account of the pilings, or the displacement of water as a result of the concrete base/foundations. The displacement of water is expected to be significant and will thus increase the risk of flooding of neighbouring properties and also affect those communities downstream. No analysis or modelling has been completed for the consequences of construction on the alternative proposed sites.

Surface water flooding is a real concern for several local residents at neighbouring properties close to Oakendene. One household had to move out for an entire year, due to the extensive flood damage. A number of residents frequently contact HDC to clear the ditches, re bore holes and clear pipes that run under A272, in order to avoid more flooding. This is a very real concern to a number of residents in the vicinity of Oakendene. The

situation is only likely to get considerably worse if hardstanding and piling is installed at the site.

According to the Environmental Agency, the properties within the same Oakendene post code, which are currently at “high risk” of surface water flooding according to Gov analysis, are: Coopers Cottage, Cass Joinery at unit C11, Oakendene Estates office, South Lodge on Bolney Rd and the Coach House. Properties that are currently at “medium risk” are: Ashurst Cottage, and the following businesses Ultimate Autos at C7, Holders Tree Services and the Two units at C1-C2. There may be more properties at risk, however this was the only postcode that was checked.

Legislation and good practice

NPS EN=1 paragraph 5.7.5 identifies a variety of minimum requirements for Flood Risk Assessments (FRA's). These do not appear to have been completed for both sites. Paragraph 5.7.7 states that “Applicants for projects which may be affected by, or may add to, flood risk should arrange preapplication discussions with the EA, and, where relevant, other bodies such as Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRAs, and identify the information that will be required by the IPC (I [now the Planning Inspectorate] to reach a decision on the application when it is submitted.”

According to 6.2.26 Table 2-1 on p26

Legislation Relevance to protection of groundwater Overarching National Policy Statement (NPS) for Energy EN-1 Department of Energy and Climate Change (DECC) (2011) EN-1 states that “Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES or equivalent”.

No such studies appear to have been completed for the Oakendene or Wineham Lane sites. If they have been completed and comparisons made, please may we see copies of the results.

Questions:

- 1 What type of screening/analysis has been completed for the two proposed substation sites? Have they included soil analysis, flowpath screening/analysis, contour polygon screening, assessment of pluvial threats, fluvial and pluvial flood hazard assessments, EA flood maps updated, potential depth of inundation, site characteristics, such as existing drainage and topographic data? Accurate analysis of local historical flooding at the proposed sites?. Comparison of the Flood study modelling for the two sites?
- 2 How deep are the pilings expected to be for the Oakendene sub station? What are the impacts /consequences of dewatering and drilling activities on ground water levels for deeper excavations? (1.2.10 p9, 6.4.26.4)

- 3 6.4.26.1- p62 the Cowfold stream has been “screened out”. Should this be screened in? and included in the analysis since it is located on the proposed substation site at Oakendene.
- i) If pilings and concrete are poured as the foundation for the sub station, what consequential affects will it have on the surface water? and on the Properties that are currently categorised as at “high risk” of surface water flooding?
- ii) What will be the affect on properties downstream, along the River Adur?
- 4 According to 6.4.26.2 section 5.3.10 There is an area of isolated high risk 3.33%AEP. According to minutes on 22.6.2022, This area has only been assessed using historic aerial imagery and no soil analysis. Would it be possible to arrange a detailed site investigation during the winter months from November to April? Furthermore, Rampion state that “the underlying topography used within the RoFSW modelling pre-dates this development and does not provide an up to date overview of surface water flood risk at the site.” Therefore, an up to date survey is requested.
- 5 According to 5.3.15 “the development have the potential to increase the overall extend of lower permeability surfaces within the proposed DCO Order Limits. These are associated with the development of permanent hardstanding at the onshore substation at Oakendene. This could lead to an increase in peak runoff rates (and volumes) and a consequent increase in flood risk for downstream receptors.” Rampion were obviously aware of this increased flood risk. Please can this be investigated thoroughly using up to date information including modelling and soil samples. Rampion mention the need for suitable drainage strategies, for both surface run-off and surface run-on, but have not detailed them.
- 6 On p88, note 6.4.5 Loss of floodplain storage. Rampion state that “the creation of temporary raised structures in fluvial floodplain during construction works, such as raised stone haul roads and associated stockpiles of topsoil, could lead to a loss of floodplain storage and thus increase water levels elsewhere”. Would this lead to flooding downstream? There were meetings held on 9.11.2020 & 22.3.22 (see 6.4.26.2, minutes in Annex A, agenda item 15 & 7) where these items were mentioned, however Oakendene was not discussed or evaluated with regard to flooding at that time or since.
- 7 On p89 there is a note on “excess soil and floodplain volume”. The simple rule will be that for each tipper truck bringing material into the floodplain, to create the haul road, it should leave the floodplain with the equivalent load of soil, that no truck should leave empty.
- Where will this floodplain soil go? Will this increase the environmental damage and the carbon footprint? “Due to the potentially soft ground conditions in the floodplain, whilst the use of trackway would be preferred overall, it is possible that trackway would still require stone based footing”. How many additional HGV’s would this involve?
- 8 According to 6.4.20 as shown in figure 26.2.5a-e, Annex B, “the mapping indicates that the north eastern section of the proposed DCO Order limits is traversed by a number of surface runoff pathways and minor watercourse draining into the River Arun and Cowfold stream. Regions of high risk are also

mapped intersecting the construction compounds at Washington and the Oakendene substation”. Please refer to the EA flood maps showing the surface water flooding at Oakendene and compare it against the negligible risk at Wineham Lane (found in document 6.4.26.2 pages 198 & 199).

How could these two sites be considered comparable in terms of surface water flooding risk? On p198 & p199 Figure 26.2.5e clearly shows Oakendene has a high risk of surface water flooding, with areas over 3.33%AEP, whereas Wineham Lane has minimal risk.

- 9 In item 6.4.26, Oakendene has not been listed as a third party receptor- should the Oakendene site/Cowfold stream be listed as a receptor?
- 10 Questions to WSCC and HDC – have they completed a thorough investigation of the two alternative substation sites? In accordance with the guidelines provided in EN-1? Including soil analysis, extent of surface water flooding, flood maps. Have they completed a site inspection of Oakendene and Wineham Lane North after a period of sustained rainfall? The difference in drainage between the two sites is significant. Oakendene suffers from substantial surface water flooding, while the soil at Wineham Lane drains incredibly well, with no evidence of heavy rainfall. We have photos of both sites taken in November to show significant and obvious differences between the two sites. Please let us know if these would be helpful.
- 11 Will the substation be positioned outside the 0.1%AEP surface water flood zone? As directed by MB from HDC
- 12 Point 6.4.31 on p93, relating to dewatering of excavations. How is it possible to ensure that such excavation works and piling will not result in an increase in flood risk downstream?
- 13 On p131, item 9.1.36, the two potential onshore substation sites were compared. Apparently “the Wineham Lane North onshore substation search area was identified to be marginally preferable from a flood risk sequential approach perspective on the basis of approximately 97 percent of the onshore search area being at low or very low risk of surface water flooding”. Who carried out this analysis and formed these inaccurate conclusions? This statement appears to be incorrect given the EA flood maps and evident flooding of Oakendene, whilst Wineham Lane remained unaffected, during November, December and January. We have yet to assess February and March.
- 14 On p131, a reason for not choosing Wineham Lane North was that according to point 9.1.35 “ As a result of non-statutory consultation feedback and the proximity to sensitive receptors (ancient woodland and a listed building), Wineham Lane South onshore substation search area was removed from the PEIR Assessment Boundary.”. Oakendene, also has two listed buildings in close proximity and also Tainfield ancient woods, but was included in the PEIR Assessment Boundary..
- 15 On p132- What were the “other technical and engineering constraints” at Wineham Lane North? Were they impossible to overcome ? Given that the alternative was a floodplain at Oakendene.
- 16 The EN-1 planning guidelines encourage developers to avoid essential infrastructure from being built on vulnerable land, such as floodplains, just in case they suffer outages or loss of power due to frequent flooding. Why has

Rampion chosen such a vulnerable site, when a perfectly good alternative site is available at Wineham Lane North?

On p16 Policy W DM3 (ADC, 2018): SuDS sets out the requirement to identify opportunities in the early stage of the design process of a development to incorporate a range of SuDS to increase the levels of water capture and storage and improve water quality. The question is, why go to all this trouble and expose increased unnecessary risks, when an alternative site is available?

17 On p17 of 6.2.26, Rampion state that “In addition, floodplains (Flood Zone 3b) should be avoided and development is only acceptable in Flood Zones 2 and 3 following completion of tests, such as those within the recommendations set out in the Horsham District SFRA (HDC, 2010). The policy also states that proposals will require a site-specific FRA for all developments over 1 hectare in Flood Zone 1 and all proposals in Flood Zones 2 and 3.” My question is have WSCC & HDC seen the results of these extensive tests for the comparable sites?

18 P17-18. Mid Sussex District Plan (2014-2031) (Adopted March 2018) (MSDC, 2018) Policy DP41 (MSDC, 2018): Flood Risk and Drainage sets out how development proposals will be considered within areas at risk of flooding. The objective is to promote development that makes the best use of resources and increases the sustainability of communities and their ability to adapt to climate change.

Rampions response is “Development proposals in areas at risk of flooding should be supported by site-specific flood risk assessments.”

The Question is, has MSDC and HDC seen the site specific flood risk assessments? and if so, please may we have a copy.

19 on p18, Rampion state: Particular attention will be paid to those areas that have experienced flooding in the past and proposals for development should seek to reduce the risk of flooding by achieving a reduction from existing run-off rates. The policy also states that the preferred hierarchy of managing surface water drainage from any development is:

1. Infiltration measures;
2. Attenuation and discharge to watercourses; and, if these cannot be met; and
3. Discharge to surface water-only sewers.

Land that is considered to be required for current and future flood management will be safeguarded from development and proposals will have regard to relevant flood risk plans and strategies. The reader is then re directed to 6.4.26.2, which doesn't answer the question.

My question is, are WSCC and HDC satisfied with the assessments and the limited information provided by Rampion. Please may we have a copy of the soil surveys, geological surveys, incorporating the EA surface water flood maps and details of Rampion's proposals for mitigating these problems.

20 Are WSCC and HDC and MSC satisfied that sufficient analysis has been completed on the effects of pollution or risks to the water course through the construction activities? Rampion 1 suffered a diesel spillage, which they tried to ignore until local residents alerted the Environmental Agency. If such an event were to occur at Oakendene, the situation would be significantly worse given the extensive water courses and vicinity to the Cowfold Stream, which feeds the River Adur.

21 On p19 Policy SD50 (SDNPA, 2019): Sustainable Drainage Systems sets out how flood risk management opportunities should be sought to reduce the overall level of flood risk.

Rampions response:

This policy states “that development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change”.

The question is: Are WSCC, HDC and MSC satisfied that Rampion can achieve the above statement regarding Oakendene? If so, what evidence/modelling has been completed?

22 On p32 de watering consequences have been mentioned as a result of excavations. Is there any evidence to suggest that an assessment has been completed at Oakendene?

23 Has there been a site visit from the Environmental Agency during the winter months to examine Oakendene and the Cowfold Stream, as a tributary of the River Adur? When was the flood map last updated?

24 Asked about details of their proposals, Rampion state” Engagement will continue during the post-DCO consent, detailed design stage for the preparation of Environmental Permit and FRAP applications. RED will commence that process in advance of construction works”. Would it not be better to examine the proposals prior to granting permission?

25 P55 MSDC. “No significant effects have been identified in the PEIR but the Water Environment submissions and Flood Risk Assessment that will be compiled when the substation location is finalised to then form part of the DCO application will need to be fully assessed (by) Mid Sussex.”

Rampions response: Noted, no further action required. The onshore substation location is now outside of the jurisdiction of MSDC. Therefore, MSDC has deferred to HDC in relation to matters pertaining to onshore substation drainage, as noted in Section 26.3.

26 In section 2.44 WSCC listed a number of areas of concern and for different locations, but did not mention Oakendene. Has Oakendene been included in this analysis?

27 On p60 Polling Parish Council were given reassurances about no surface water flooding at Polling. No such reassurances were given to Cowfold parish council regarding the residents adjacent to Oakendene or to the surrounding businesses and homes that could be directly affected.

28 P106- Changes in Land use from agricultural land to industrial sites could cause changes in the hydrological, hydrogeological and geological conditions.

P108 regarding the onshore substation site up to 6 hectares (ha) onshore Oakendene substation with associated structures and infrastructure and up to 2.5ha additional temporary works area;

duration of construction: up to 3 years; and

the maximum potential for displacement of near-surface groundwater has been associated with piling construction techniques.

What are the consequences for local people and communities downstream, regarding “maximum potential for displacement of near-surface ground water”?

29 On p124, C-117 Rampion state “Works on areas identified as floodplain (Flood Zones 2 and 3) will be programmed to avoid the period between October and February inclusive to avoid disturbance of waterbirds, and where possible, will be programmed to occur in late summer/ early autumn, to avoid interaction with PEIR Outline CoCP”

How likely is it that Rampion will avoid the winter months when building the substation?

What effect will it have on the timing of the program?

- 30 P128. C-129 Temporary construction compounds will be surfaced with semi-permeable aggregate material (similar to access roads as per C-120) where practical, with the exception of fuel storage areas and similar where pollution containment in the event of a spillage is the priority. Areas of temporary construction compounds that are used for fuel storage, plant maintenance and refuelling will be surfaced with fully impermeable materials to prevent any infiltration of contaminated runoff and contain bunding in line with C-8 and C167. PEIR Outline CoCP (Document Reference: 7.2) and DCO requirement. This measure will help minimise changes to flow rates / pathways, and the potential for accidental contamination entering watercourses or groundwater. How will this be managed on the Oakendene floodplain?
- 31 P130. C-134 During construction, dewatering activities (of excavations) will be halted if a flood alert or flood warning is in place downstream, in order to minimise any impacts on flood flow conveyance and to maintain access for watercourse maintenance. PEIR Outline CoCP (Document Reference: 7.2) and DCO requirement. This measure will help minimise any impacts on watercourse conveyance. What safety measures have been put in place?
- 32 On p183, there appears to be no mention of Oakendene as a receptor, why is that?
- 33 Decommissioning. This phase is expected to take four years. Who will be responsible for paying for it? Is there a sinking fund already set up by Rampion?

Inaccurate/Misleading statements:

- 1 Appendix 26.1. 6.4.25.1 on p22, there is reference to the Cowfold stream, "stream is intersected by the proposed DCO order limits within the north-eastern section of the onshore temporary construction corridor near Cowfold". This description is inaccurate, since it is the proposed substation site at Oakendene and so it is more relevant and significant needing more attention.
- 2 On p62 of 6.4.26.1- 10/41/323101 described as "tributary of Cowfold Stream". This has been screened "out" of the analysis. As it is in the proposed DCO order limits, should it be included and not screened out?
- 3 On p86, Rampion have stated that there is minimal risk of surface water flooding, however having visited the site and that of Wineham Lane, this statement appears to be inaccurate or out of date. Please see attached file of photographs. Also please refer to the EA flood map and also records of local residents suffering from surface water flooding.
- 4 In document 6.4.26.2 on A28 on p180, the minutes of meeting 22.6.22 WSCC drainage and flood team and HDC (MB) drainage engineer (first meeting for HDC about the substation at Oakendene).
- 5 " RC (wood Gp) advised that a decision on selection for the substation site from the 2 x option sites presented at PEIR was imminent". Therefore up until that June 2022, neither council had made enquiries or conducted any investigation relating to Oakendene. Mid Sussex CC had discussed Wineham Lane on previous occasions. There appears to have been an underlying assumption that the substation would be located at Wineham Lane.

6 It was also noted that there were no flooding issues at Rampion 1 and so this shouldn't be an issue with Rampion 2

"KM (from WSCC) noted that on Rampion 1 overall there were no flooding issues from a construction perspective that he was aware of, as temporary arrangements were dealt with by the contractor and that it didn't give West Sussex County Council major concerns."

The major problem with this statement and assumption, is that the soil composition, geology and drainage of the two sites are completely different and that different methods of drainage will need to be employed. On visiting the two site in November and May, Oakendene had standing water and was flooded, whilst Wineham Lane sites had drained very well, with no puddles, or standing water.

7 A great deal of control is handed to the contractor and considering they hadn't previously built a substation on a floodplain, this decision may be unwise. The minutes record

" KM noted that on Rampion 1 overall there were no flooding issues from a construction perspective that he was aware of, as temporary arrangements were dealt with by the contractor and that it didn't give West Sussex County Council major concerns."

There were no flooding issues with Rampion 1, because the land drains well and is not a flood plain.

8 "RC advised that the intent is to retain flexibility for the contractor to decide based on site-specific locations and requirements. RC also noted that land drainage requirements would be addressed postconstruction".

9 Surface water flooding- discussed at the meeting on 1.4.22 There was no one representative from HDC at this meeting, since Oakendene had not been identified as the potential substation site at that time.

There have been a number of recorded surface water flooding incidents from nearby properties. The statement by MB appears to be incorrect with this regard.

10 " RC (from Wood Gp) talked through the Risk of Flooding from Surface Water (RoSWF) maps to identify potential sources of flood risk. The flood risk from the southern watercourse which is a tributary of the Cowfold stream was discussed.

11 RC asked for feedback on this approach.

12 MB advised that as long as the substation was positioned outside the 0.1% AEP surface water flood extent, he would not be concerned. MB advised that HDC records of historical flooding indicated that no flood incidents at Bolney Rd or Kent St had been recorded." This final sentence is incorrect, since neighbouring properties have experienced surface water flooding and the council has been called out to clear the ditches and pipes. Please refer to maps on p199, these clearly show that there are extensive areas where water is well in excess of .01% AEP, infact it is over 3.33% and at high risk of surface water flooding.

It's interesting to note that the design will be submitted after permission is granted, which seems illogical. "The operational drainage strategy will talk about these types of things which the Contractor will decide where to put within the footprint. The design will come once the consent has been granted. MB agreed with this type of approach and advised that a 2 stage approach would be more than sufficient."

Please refer to maps on p198 & 199 showing the extensive surface water related to Oakendene and no such issues at Wineham Lane.

On p169 of 6.4.26.2 during a meeting on 22.3.22 TL (from the EA) made some very useful observations and recommendations:"

TL advised that evidence to prove that the approach proposed would not impact the existing flood storage situation would be required.

RC asked TL for further clarification on what this evidence might look like. Also highlighting that the approach proposed intends to demonstrate that, by design, no impacts would occur and thus no modelling or calculations would be required (as there would be no loss to calculate).

TL requested that information be compiled to provide a visual representation and that this should cover the following: • how the floodplain could be amended; • where the topsoil strip would happen; • where would the volume go; and • where would it be moved to would inform his advice/position. TL outlined that the amount of evidence required would likely be dependent on the floodplains in question and surrounding receptors, so this would need to be considered.

TL would consult colleagues to get further steer on any evidence requirements, and any shared experiences from the Rampion 1 project for instance."

- 13 during the construction of Rampion 1, there was apparently no flooding and these drainage decisions were left to the contractor. They gave the impression that as a consequence of no flooding problems with Rampion 1, that Rampion 2 should not flood either and that these decisions should be left with the contractor. However, these are two very different sites. Oakendene is a flood plain which suffers from regular surface water flooding, whilst Wineham Lane soil drains very well.
- 14 P132 section 9.1.38 This statement is incorrect, given the maps and evident flooding at Oakendene and none at Wineham Lane. "The final selection of the Oakendene onshore substation (*at marginally higher surface water flood risk than the Wineham Lane North substation search area option*) has therefore been driven by other technical and engineering constraints. However, the onshore substation site is situated in Flood Zone 1 and considered to be at a comparable level of surface water flood risk, with the incorporation of suitable flood risk management and drainage measures as outlined in Section 8, and is thus concluded to have been determined appropriately via a sequential approach." Assessing the surface water flood maps on p23 Figure 26.8, it is clear that the Oakendene site suffers from surface water flooding, whilst Wineham Lane does not.
- 15 On p17, Policy 38 HDC, 2015): Flooding Development sets out measures that proposals will follow with respect to flood risk management.

Rampion response:

The policy states that priority will be given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere.

The selection of Oakendene seems to contradict Rampion's response.

17 On p131, item 9.1.36, the two potential onshore substation sites were compared. Apparently “the Wineham Lane North onshore substation search area was identified to be marginally preferable from a flood risk sequential approach perspective on the basis of approximately 97 percent of the onshore search area being at low or very low risk of surface water flooding”. Who carried out this analysis? Since the statement appears incorrect when looking at the flood maps and when visiting the sites during the winter months.

Relevant Legislation and local policies:

1 According to 6.2.26 Table 2-1 on p26

Legislation Relevance to protection of groundwater Overarching National Policy Statement (NPS) for Energy EN-1 Department of Energy and Climate Change (DECC) (2011) EN-1 states that “Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES or equivalent”. No such studies appear to have been conducted for the Oakendene or Wineham Lane sites. When will these be completed?

2 On p38 WSCC have stated “WSCC welcomes the embedded environmental measure C-75, which states that construction and permanent development in identified floodplains within the Scoping Boundary will be avoided where possible. WSCC expects any work where this cannot be avoided to be robustly justified through the site selection process, and any mitigation proposed to be compliant with all relevant policies, including the NPPF.”

Rampion could avoid the flood plain, but using the Wineham Lane site. Has WSCC been given sufficient assurances and evidence from Rampion? If so, please may we see copies.

3 Drainage and SuDS: “Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding”. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS. The alternative site at Wineham Lane North doesn’t appear to have been thoroughly examined. Nor has Rampion confirmed where exactly they are proposing to place the substation.

4 The Exception Test, 2.2.14 NPS EN-1 (DESNZ 2023a). The test provides a method of allowing necessary developments to go ahead in situations where suitable sites at lower risk of flooding are not available”. However the alternative site at Wineham Lane North has no such flood risk and is available. Please refer to attached EA flood risk maps.

5 On p103, point 26.6.77 and 26.6.81 The Environmental Agencies RoFSW mapping indicates a “regions of high surface water flood risk are shown to intersect the onshore substation site, the temporary construction compounds and Oakendene (Cowfold stream tributary).” “The most significant areas of Flood Zones 2 and 3 are located in the lower tidal reaches of the River Arun at Littlehampton in the southern section of the onshore cable corridor, and on the River Adur and the Cowfold Stream in the north-eastern section of the onshore cable corridor. When was the site survey carried out at Oakendene? And at What time of year? Please may we have copies.

6 P20 Drainage and SuDS “To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property” (Paragraph 5.8.24). “The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change

throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect." (Paragraph 5.8.27)

- 7 According to 6.4.26.2 Chapter 26.7 Table 26-20 on p18 The NPS EN-1 have flood risk specific requirements. "Flood risk -the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere". Has this been determined?
"Functional floodplain. "Energy projects should not normally be consented within Flood Zone 3b, or Zone C2, on land expected to fall within these zones within its predictable lifetime (paragraph 5.58.41)
- 8 P13. NPS EN-5 restates the requirements of NPS EN-1 that due consideration and assessment is given to the effects of future climate change on flood risk to electricity transmission infrastructure (Section 2.4).
- 9 Paragraph 2.4.1 requires that "Applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it would be resilient to: flooding, particularly The FRA presented in Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2) has addressed the issue of climate change and flood vulnerability resilience.
- 10 Page 13 Policy description Relevance to assessment for substations that are vital for the electricity transmission and distribution network; effects of wind and storms on overhead lines; higher average temperatures leading to increased transmission losses; and earth movement or subsidence caused by flooding or drought (for underground cables)."
- 11 on p17, Policy 38 HDC, 2015): Flooding Development sets out measures that proposals will follow with respect to flood risk management.
Rampion response:
The policy states that priority will be given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. This Statement from Rampion seems to contradict the decision for choosing Oakenene.
- 12 P13. NPS EN-5 restates the requirements of NPS EN-1 that due consideration and assessment is given to the effects of future climate change on flood risk to electricity transmission infrastructure (Section 2.4).
- 13 on p17, Policy 38 HDC, 2015): Flooding Development sets out measures that proposals will follow with respect to flood risk management.
Rampion response:
The policy states that priority will be given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere.
The selection of Oakendene seems to contradict Rampion's response.
- 14 In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

**Rampion 2- Highways

Traffic and Highways- Impact on Cowfold

Rampion's lack of local consultation and knowledge

The vast majority of Cowfold village knew nothing about the Rampion's plans to build a substation and storage facility at Oakendene, Cowfold until the month before the consultation closed. A few weeks before the end of the consultation period, there was a meeting organised by a concerned local resident where we learnt more about the proposal. It was clearly evident at this meeting in October 2022 that Rampion were not aware of the existing local traffic problems related to the Oakendene section of the A272, one of the most hazardous sections of road with the highest number of RTA's in the region. They didn't know about the prolonged congestion that occurs on this stretch of road regularly and consistently, with over 18,000 vehicles approaching Cowfold on a daily basis. They were also unaware that Kent St and Dragons Lane were single track lanes, described as "unsuitable" for their proposal. They didn't know that during times of heavy congestion, vehicles use the side lanes of Picts Lane and Bulls Lane as a cut-through, causing chaos for both drivers and residents alike.

Rampion apparently announced their proposed decision to locate the substation at the Oakendene site in July 2022. Up until that point, looking at minutes of meetings, there was an underlying assumption that the substation would be located on Wineham Lane in the close vicinity of Rampion 1.

On numerous occasions we've asked Rampion to supply details of their "temporary traffic control measures" relating to Oakendene/Kent St. During a meeting at Bolney, on 15.5.23, they promised that this information would be disclosed at a meeting on 21.6.2023, but have failed to do so, instead saying that it was a "highways problem". We are concerned how they are going to safely manage the movement of thousands of HGV's across two lanes of fast-moving, busy A272 traffic. Some 18,000 vehicles use this hazardous stretch of the A272 on a daily basis. We've also asked them to clarify the confusing and contradictory data relating to the numbers of HGV's, LGF's and construction workers vehicles that will make the two-way journeys to/from Oakendene. Local residents are extremely concerned about the safety aspect of these proposals, and the sustained congestion that will result from temporary traffic lights. Furthermore, the chaos that will result as drivers divert across the narrow country lanes of Picts Lane and Bulls lane, which are accessed from both directions along the A272 and A281.

WSCC

We have raised these concerns and others relating to Rampion's poor due diligence, missing data and insufficient information about the proposed "temporary (4+yrs) traffic control measures" with WSCC. Unfortunately, they responded by explaining that, given pressure on staff resources and dealing with other applications such as Gatwick, they were unable to help with this matter. They suggested we raise our concerns directly with the Planning Inspectorate.

This response was not surprising, considering we had received similar replies from other organisations such as the RSPB and Wildlife Trust who had requested survey information last year, but have only recently received it and are now inundated with data. They are struggling to analyse within the strict deadlines and limited resources available.

On several occasions, when answering questions, Rampion directs the reader to a number of other chapters, appendices and documents in order to find the information. However, often these sources either do not exist or do not provide the information required. Examples of this are detailed below, but it is not an exhaustive list. Perhaps Rampion thought that these sources would not be checked.

The Alternative Sites: Oakendene/Kent Street or Wineham Lane North

The two locations are significantly different in terms geology and of traffic/access and have not been assessed in the reports:

1 Oakendene/Kent St.

The site is accessed directly off the busy, fast moving A272. The site is about 1-1.5 miles from Cowfold village, and traffic regularly and consistently extends past the site towards or past Kent St., during rush hours. This stretch of road bends and dips, thereby reducing visibility and has double the number of RTAs than the section of A272 accessing Wineham Lane. However the actual number of RTAs is greater than the official data, because police are not called to each incident. I would recommend driving along this stretch of road to see evidence of vehicles that have plowed into fences, and hedges along this stretch of road. Kent St is a single- track lane, 3m wide lane with width restrictors, a narrow bridge and not suitable for HGV's or heavy traffic, according to the Woods report.

One mile east from Kent Steet, along the A272, is Wineham Lane. The daily Cowfold traffic congestion does not extend to Wineham Lane.

2 Wineham Lane

The proposed site would be accessed from Wineham Lane, which is 5.5m wide and was built in the 1960's to accommodate the National Grid construction works. This is a lane with relatively low numbers of vehicles, though can easily accommodate HGV's for which it was originally built. Access to Wineham Lane would be from the existing wide visibility splay along the A272, the approach to which is along a fairly straight flat stretch of the A272 with relatively clear visibility. The number of RTAs along this stretch of road is half those of Oakendene. Traffic was not deemed to be an issue during the construction of Rampion 1, as the construction vehicles 2.5m away from Cowfold village, seldomly got caught in the Cowfold daily congestion.

Rampion's lack of research and failing to provide essential information.

Rampion's substation site selection was made prior to detailed research.

Upon reviewing the Traffic section of Rampion's application, we are deeply concerned that they have not conducted a thorough examination of the local road network, indicating insufficient due diligence. Consequently, they may not fully grasp the avoidable negative

consequences of their proposals. It is likely that Rampion/Highways will need to install some form of traffic management for HGV's and other construction vehicles to exit the site and leave Kent St. However, this could have enormous damaging effects on the 18,000 daily road users and the local community.

Whenever there is an accident or incident on the A272 approaching Cowfold, which occurs relatively regularly, the side lanes of Picts Lane and Bulls Lane are used as cut-throughs. This single-track lane, accessible from both the A281 and A272 has witnessed utter chaos as cars get stuck, causing further jams. Tractors often pull cars out of ditches where drivers, impatient, or forced onto the grass verges, find themselves stranded. During the winter months, this situation exacerbates due to excessive mud on the verges, making it challenging even for 4x4's to dislodge themselves.

Rampion are now aware of the AQMA issues in Cowfold and has once again changed their plans, proposing to use the narrow lanes of Kent St and Dragons Lane. All this unnecessary upheaval and disruption could easily be avoided if they were to re-evaluate the alternative site at Wineham Lane North.

We consulted an independent Traffic Consultant who reviewed some documents and advised us that we should be able to view the full traffic survey, traffic modelling (with assumptions made), and a traffic impact assessment for both alternative sites. Regrettably, we have seen none of the above data.

The Rampion Application failings- missing and contradictory information

Throughout the documentation (6.2.23, 6.4.19.1, 6.4.23.2, 6.4.23.3 and 7.5,7.6,7.47 & 7.8), Rampion have repeatedly quoted all the guidelines that need to be observed and have quoted the policies of the relevant councils. However, they have failed to adhere to several of these guidelines and have not addressed the concerns raised or answered numerous questions from NH, WSCC or HDC. Instead, on countless occasions, the reader is redirected to another chapter, or another appendix, but the answers are not disclosed. Please refer to the section below:

You will see from the information found in document 6.2.23 and 6.4.23.2 ES Chapter 23- Transport, that National Highways, WSCC and HDC, have asked some very astute questions, however the answers have not been provided.

Furthermore, contradictory and missing data have been disclosed in various documents regarding the number of HGV, LGV and workers cars that will be used at Oakendene. There has been no analysis or research completed on the impact on local residents, surrounding lanes or villages in the close vicinity. The road traffic data has not been closely analysed. It would reveal that there are twice as many RTAs around Oakendene/Kent St as there are at Wineham Lane. Nor has there been any mention of the negative economic impact on Cowfold, where over a hundred businesses could suffer as a result of the increased traffic congestion. There are also no proposals concerning how the congestion is going to be managed.

I draw your attention to the NPPF located in document 6.4.23.2 p11,

National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2021)

Paragraph 111 of the NPPF states that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

Insufficient and delayed information from Rampion:

Rampion promised to provide the “temporary traffic management” proposal in mid June 2023 so that local residents could assess its feasibility and practicality. However, this has not been provided.

We asked for the number of HGV’s, LGV’s and ancillary vehicles but this information has not been disclosed. According to the documentation, it appears that this initial figure of 8,050 HGV’s is significantly underestimated. Please refer to p59 of 6.4.23.2, which again fails to include the number of private cars that will be used by construction workers. Also, no allowance appears to have been made for the need to shore up the tracks with hard core because the site is on a floodplain.

In mid summer 2023, we were promised details of the environmental surveys covering the wildlife. These were not provided. The Wildlife Trust has since advised that they are overwhelmed with applications and data and have insufficient resources to examine all these issues.

We suspect that Rampion deliberately delayed providing relevant information so that when they did provide data, the recipients would be so overwhelmed that they had insufficient time or resources to analyse them properly. However, we have identified a number of areas where data and information has not been provided, thus skewing the results, which will lead to poor decisions being made.

The Rampion application has also failed to:

- 1 Examine the extensive and consistent traffic queuing outside of Cowfold village during the rush hours or 0700-0900 and 1630 to 1800. The village is at saturation point when it comes to traffic, during rush hours.
- 2 Whenever there are any road works or traffic incidents either within the village of Cowfold or the approach along the A272, then traffic immediately backs up for miles, regularly extending to Kent St. This is due to the single lanes and double white lines along large stretches of the road.
- 3 Any traffic incident/roadworks along the A272 East of the village, results in the surrounding single track lanes being used as cut throughs and causing absolute chaos for both for drivers and residents. These lanes include Picts Lane, Bulls Lane and Longhouse Lane. There are several incidents of cars ending up in ditches or traffic at a standstill because vehicles are coming from both directions from A281 and A272, as drivers try and avoid the congestion in Cowfold village.

- 4 No account has been taken of the residents who move their horses or livestock along these lanes, nor of the horse riders, cyclists or walkers who would normally use these lanes. People come from miles away to walk through this AONB.
- 5 The section of A272 alongside Oakendene has double the number of RTAs as those at Wineham Lane. The proposed substation will be located at one of the most hazardous stretches of the A272.
- 6 A significant number of RTAs go unreported, and so the numbers are hugely under stated and do not give an accurate picture. However, one just has to go along this stretch of the A272 and see all the damaged fences and hedges, on both sides, where cars have ploughed through and ended up in fields or gardens or grass verges.
- 7 The traffic analysis completely fails to take account of the alternative locations along Wineham Lane, in Bolney. The Oakendene site is about 1.5 miles from the centre of Cowfold, and traffic already builds up and extends past the Oakenene site to Kent St on a regular basis. However a mile further along the A272 East (2.5 miles from the centre of Cowfold), Wineham Lane does not suffer from standing traffic extending from the village of Cowfold. It was evident during the construction of Rampion 1, (which is located along Wineham Lane), that the traffic here was not a significant issue. Neither was it raised as an issue, during their consultation.
- 8 As a result of the traffic congestion, a number of drivers will take alternative routes, either being stuck in the lanes or through other villages. There has been no analysis of the impact on the surrounding villages.
- 9 There has been no analysis on the economic impact of sitting in traffic and the lost productivity.
- 10 Rampion have not provided details of their proposed traffic control measures, that will enable the thousands of HGV and LGV vehicles to exit Oakendene/Kent Street safely onto the busy A272. These proposals will then need to be carefully analysed via traffic modelling and the consequences examined in detail.
- 11 The proposal seems to necessitate two visibility splays within close proximity of each other (0.5m) on the A272 , one to access the Oakendene site and another to access Kent Steet. Will this necessitate two sets of temporary traffic lights? What are the consequences of these measures?
- 12 Cowfold has a doctors surgery, care homes and a large proportion of elderly residents. Emergency vehicles will struggle to get through the congested traffic to reach those in need.

Another very worrying aspect, is that the application has downplayed significant aspects or simply ignored relevant facts:

- 1 There is no traffic modelling, even though there is reference made to it, within several of Rampion's reports. An independent traffic consultant should be employed to complete a proper traffic analysis including up to date modelling which incorporates the temporary traffic lights and visibility splays.
- 2 Wineham Lane and Kent Street have been described in identical terms. However in actual fact, Wineham Lane is a two lane road which was built in the 1960's to accommodate building the National Grid substation and is far better equipped to deal with HGV's and large vehicles, as it is 5.5m wide. Whilst Kent St is a

- single-track lane, 3m wide, with narrow grass verges, a narrow bridge and two width restrictors on either end. In the Woods report, commissioned by Rampion, it was described as “unsuitable” for the proposal.
- 3 The RTA data has been applied to the entire section of A272 from A23 to the village. However on closer inspection of the data, it shows that the section alongside Oakendene is far more hazardous, with double the number of RTAs than at Wineham Lane.
 - 4 No account has been taken of the two mini roundabouts in Cowfold village and the fact that traffic has to slow completely at these sections, hence leading to traffic backlogs for about 1.5m during the rush hours.
 - 5 No account has been taken of the young families who walk their children to the local primary school along the narrow pavements, and will be at increased risk of harm as a result of increased traffic.
 - 6 There is absolutely no mention of the economic hardship that will affect over one hundred businesses in Cowfold as a result of the increased traffic congestion. By comparison, there are four businesses in Bolney that will be affected.
 - 7 There appears to be a proposal for two visibility splays each being 215m long, within half a mile of each other. National Highways has asked for more details. Although Rampion refers the reader to another chapter, this information has not been disclosed and the answer is not available.
 - 8 The implications and consequences of any proposed Road Traffic Measures, such as temporary traffic lights, has not been detailed and has consequently not been assessed and needs to be properly analysed.
 - 9 There is no analysis on the consequences of the road traffic measures at Oakendene, on other villages, as drivers try and find alternative routes.

National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2021). (Document 6.4.23.2 p11)

Paragraph 111 of the NPPF states that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

On p11, Rampion refer the reader back to 6.2.23, where there is insufficient information and the questions have not been answered.

Please note that there appears to have been no analysis completed on the cumulative impacts on the road network, with no clear data on how many HGV's and LGV and private cars will be accessing Oakendene. There is nothing on the implications/consequences of traffic control measures at Oakendene, on the wider community.

Paragraph 113 of the NPPF states that “all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application

should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

The document sets out that the Transport Statement (TS)/TA should take into account:

week, although Rampion state that they will work on Saturdays from 0800 to 1300. In Document 7.6 p60, Rampion have confirmed “that a booking system will be used so that construction deliveries to the construction sites will be spread across the working day”. They have not confirmed that they will avoid rush hours, which NH has requested.

P38- NH have stated “that updated baseline data from September 2021 needs to be used.” Rampion have said further engagement has taken place – and the need to undertake refreshed surveys, *but not that these have been completed.*
Doc 7.7 on p 24, refers to traffic modelling that was completed and asks the reader to refer to 6.4.23.2, where it doesn’t appear to exist.

NH state that “the PEIR does not provide evidence to determine peak weeks between 53-136. A request for further information to determine the peak weeks.” There is an information gap. Rampion refer to Appendix 23.2 Traffic Generation Technical note Volume 4. 6.4.23.2 apparently gives details of peak weeks and when it is likely to occur. *This information has not been found in 6.4.23.2. Further in Document 7.6 on p19, the reader is referred to document 6.2.23, which does not include the peak weeks data that has been requested.*

In doc 7.6, p48, for Compound Access A-62, The HGV movement per week are 1320 & 892 for Kent Street & 828 & 468 LGV’s per week (for four years?), which is significantly higher than what was indicated at the initial meeting with Rampion, which should have totalled 8040 HGV’s.

On page 50 this information appears to be repeated. However this table does not specify which are the peak weeks and whether these are peak figures, thereby rendering this information meaningless.

P39 HN- has asked “for final arrangements of the construction works, methods and the construction phases is determined, given the implications for vehicle movements and number of staff required.” Rampion state: Further engagement has taken place with a range of stakeholders. But have not given this information. *This information does not appear to be contained in document 6.4.23.2 and has not been found.*

P39 NH has asked “for overall trip generation, and more detail divided into hourly time periods, throughout the entire construction period, with specific focus on peak hours. The applicant must provide a clear explanation of how the presence of plant equipment and personnel translates into traffic generation figures. This clarification is necessary to accurately assess the impact of construction activities on the transport network.” Rampion state the info is in Appendix 23.2 Traffic Generation Technical note Vol 4 6.4.23.2. *This requested information from NH does not appear to be in this document.*

P39 – “Movements of personnel on internal trips”- Rampion say it’s in Appendix 23.2 and specifically 6.4.23.2. *Table on p55. The data does not reveal the numbers of workers arriving in their private cars. It only states peak week, but doesn’t disclose when those peak weeks will occur or how many peak weeks there will be. In each LGV it is assumed that 5 people will fill each of them on all occasions, which is highly unlikely*
In Doc 7.6, p45 Table 6-1 meaningless percentages are placed in a table, neither does this answer any of the questions.

P40 NH state that “the PEIR and Appendix 24.4 do not assess the expectation of 2000+ two way movements for crew support vessels. This omission is concerning as it indicates an underestimation of the number of additional trips on the strategic road network (SRN) resulting from this activity. The specific timeframe for these 2000+ movements is not clarified, whether it is per day, per week, per year or over the entire construction period”. Rampion state that “The 2000+ two way movements is spread over the period of construction

NH have requested this information, however in 6.4.23.2 on p39, Rampion state that this information is not available.

P40 NH state “ In Chapter 24, a daily vehicle figure is provided per ‘Highway link’. This daily figure does not provide information about the timing of these trips. NH raises concerns about the distribution of trips throughout the day. They seek clarity on whether the trips will be evenly spread out or if there will be specific peak hrs associated with Rampion 2. More details are required to understand the proposed timing of these trips. They express particular concern if a significant number of trips are planned during the morning and evening peak hours on the highway network”. Rampion refer to Docu Ref 7.6. and say that construction HGV traffic will be spread across the day (where feasible). *In document 6.5.23.2 no details of timing are disclosed and no such reassurances given to NH. Furthermore, in Document 7.6, it states that deliveries will be throughout the day.*

P40 NH- “Traffic flow diagrams are provided for the Wineham Lane substation, but they only cover the local highway network and display daily trips. Highway Links 26 & 27 have logical routes to the strategic road network SRN. Therefore the applicant should expand the traffic flow diagrams to include the SRN, along with the morning and evening network peaks, the identified construction traffic peaks for Rampion 2 and the average interpeak period”. Rampion say that this information can be found in Figure 23.19 Volume 3 of ES Document Ref 6.3.23. *This document to which Rampion refer (on p40) to 6.2.23, does not exist and cannot be found on the website.*

Document 7.6, p60, confirms that a booking system will be used to ensure deliveries throughout the day, thus not avoiding the rush hours, contrary to NH requirements.

P41 NH state “It is observed that the temporary construction compounds are not accessed directly from the SRN. However, it is anticipated that vehicles destined for the temporary construction compounds would utilise the SRN to reach their respective locations. The Oakendene site 3, would be accessed through the A23. The Construction Traffic Management Plan refers to seven different construction compounds. Therefore the application is requested to provide clarification regarding the exact number of temporary construction compounds”. *Rampion have not answered.*

In the next paragraph they refer “these are being submitted as appendices to the application (Outline CTMP Document reference 7.6). *The two compounds are within 0.5m mile of each other and will have visibility splays of 215m each, which doesn’t sound ideal on the section of road which suffers from the regions highest RTA’s. There has been no discussion as to whether these entrances/exists will require temporary traffic lights and if so, what are the implications on the road network and local community?*

P44 WSCC – “Clarity is required on the access points presented, if possible, the number should be reduced, especially where multiple accesses are proposed onto the same road”. Rampion’s answer: Accesses have been reduced at the ES stage and discussed along with visibility splays in Outline CTMP Document reference e7.6. *In Document 7.6 p33 (A62 & A63), Rampion have stated that there will be two visibility splays each with 215m within half a mile of each other along the A272, running parallel to the Oakendene site.*

P44 WSCC. “The visibility requirements for access locations will be determined based on speed surveys, although there are a few locations (such as access 13 and 20a) where achieving adequate visibility may be challenging. It is important to determine if feasibility checks have been conducted for the access locations and what alternatives are in place if some accesses do not meet the necessary visibility guidelines or have negative implications in both visual and ecological terms.” Rampion’s answer- Visibility splays have been reviewed for all accesses along the route. *Once again, their response does not answer the questions.*

P44. WSCC “ Consideration needs to be given to where the use of certain roads is required and aren’t suitable. Some roads lack any merge lane, will significantly increase slow moving HGV movements onto a high-speed road, will disrupt the only access to businesses for staff, deliveries and emergencies during adverse weather conditions”. Rampion’s answer. The Outline CTMP Document Ref 7.6 sets out the principals of which routes have been selected for use by HGV’s – *In Doc 7.6 p41 point 3, Rampion clearly state that they will be using Kent Street, which has been deemed “inappropriate” and also Dragons Lane. This is contrary to the original proposal and analysis completed by Woods Grp, who deemed it to be inappropriate. Nowhere in the documentation is there any mention of the holding facility for the lorries. Where are they going to wait? Or are they going to clog up the lanes?*

P45 Table 23-5 Second statutory consultation exercise

HDC- “Additional traffic using roads is a concern to local communities” Rampion’s answer. Local access routes have been developed based on considerations including areas prone to congestion and are available in the Outline CTMP Document Ref 7.6. *The information provided in Doc 7.6, does not allay these fears. It merely confirms them.*

P45 HDC.”The Visual impact of the proposed routes would be significant and out of context with the surrounding countryside. Open views are attractive and having a permanent access in this location is likely to have a negative effect on the special qualities of the SDNP” . Rampion’s answer = noted. No specific actions in the ES

P49- WSCC “regarding visibility splays”. Rampion’s answer. Refer to outline PRoWMP Document ref 7.8. *Document 7.8 refers to Public Rights of Way, so it is unclear why Rampion have referred to this regarding the visibility splays. However Rampion have confirmed on p 17 of Doc 7.8, point 4.2.8 & 4.2.9 that there will be a compound at Oakendene West compound, (accessed from the A272), also there are “also two additional construction compounds associated with the new onshore substation at Oakenene and the extension works at Bolney”. These have not been identified.*

P51 HDC- “No new transport receptors have been identified as a result of the Bolney substation extension works, however it will result in a change of construction traffic generation. Construction traffic trip generation data should be further updated in detail in the ES and associated traffic flows”. Rampion’s answer: Info on traffic has been provided in Appendix 23.2 Traffic Generation Technical Note 4, of the ES document 6.4.23.2. *This information has not been included in document 6.4.23.2, as suggested by Rampion. There is nothing to cover the proposed change of routes for Kent St, nor Dragons Lane. Furthermore, there is no impact analysis for traffic being diverted onto the surrounding single track lanes of Picts Lane, Bulls Lane or Longhouse lane.*

OTHER FACTORS TO CONSIDER:

There appears to be no analysis or traffic modelling for the impact of the increased congestion, on the surrounding lanes used as cut throughs. Highways England have stated “the over reliance on “A” roads in the regions means congestion is quick to develop, with no built in resilience, and in turn, pushing road users into single carriageways.” This is precisely what occurs in Cowfold, causing chaos and havoc to surrounding areas when there are roadworks or an accident.

- 2 Highways England** stated, "the over-reliance on“A” roads in the region means congestion is quick to develop, with no built-in resilience, and in turn, pushing road users into single carriageways" (p7 of 2016 CBI report “Unblocking Regional Growth: productivity in the UK’s transportation network, as noted in Appendix 2). This is exactly what we see happening in Cowfold when there are roadworks, an accident, or a broken-down vehicle within a 1.5 mile vicinity of Cowfold village. Congestion builds very quickly, and drivers try to find alternative routes, causing chaos and havoc for the surrounding lanes.
- 3 Traffic diversions onto unsuitable lanes:** According to a Parliamentary Publication, the Select Committee on Transport’s seventh report, stated that “traffic diversions could have a significant effect on road safety as traffic moves to less appropriate routes for high vehicle flows”, which can have a very significant negative effect on less suitable surrounding lanes. If the substation is located at Oakendene, and traffic backs up towards Kent Street, then drivers will find alternative routes such as the single track lanes of Picts Lane, Bulls Lane, and possibly Long House Lane. There are a number of residents who use these lanes on a regular basis to move their horses to fresh pasture and turn them out. Aglands farm is a prime example a farm being used for a variety of different purposes by a number of different people, including for the local shoots and ploughing competitions. These single track lanes are in areas of outstanding natural beauty, and have very few passing places and are not suited to heavy volumes of traffic. Picts Lane has two narrow bridges which effectively act as width restrictors. They experience grid lock if there are accidents or roadworks along the A272 towards the village of Cowfold, because drivers access the lane from both the A281 and A272.

- 4 Congestion and Driver Delay, is a widely recognised consequence of additional traffic generated by the development. The Environmental Assessment (IEA) guidelines note that these additional delays are only likely to be significant when the traffic on the network in the study area, is already at or close to capacity of the system. It is worth noting that traffic approaching Cowfold must be close to capacity, considering it consistently suffers from congestion some 1.5 miles outside of the village.

5 Horsham District Council Plan

If the substation is located at Oakendene, the HDC plan will not be fulfilled.

Horsham District Local (HDC) Plan recognizes that there is a strong rural economy across the district. "It is important that this strategy provides support to rural businesses, allowing them to grow and thrive while protecting and enhancing the district's essential character." "As part of promoting economic growth, there is a requirement to maintain or improve the reliability of journey times on key routes" Please refer to West Sussex Transport Plan 2011-2026. This would involve "ensuring that the new development has nil detriment on the level of service on the SRN (Strategic Road Network)".

Draft Horsham District Local Plan 2019-2036

Strategic policy 41 – Infrastructure Provision. *This policy states that development will only be supported if local infrastructure has adequate capacity to support the development. Suitable mitigation should be proposed where local infrastructure does not have the capacity to accommodate development.*

Rampion refers the reader back to 6.2.23, where the answer is not found.

Strategic policy 42 – Sustainable Transport. *This policy sets out the conditions in which development will be supported for sustainable transport. The policy states "development will be supported if it: Provides safe and suitable access for all vehicles, pedestrians, cyclists, horse riders, public transport and the delivery of goods. Minimises the distance people need to travel and minimises conflicts between traffic, cyclists and pedestrians*

6 The Strategic Road Network and the Delivery of Sustainable Development Guidance 2.3.1

The Department for Transport (DfT) (2022) Circular 02/2022 'The Strategic Road Network and the Delivery of Sustainable Development' outlines the methods in which the National Highways (NH) (formally National Highways) *will engage with developers and communities to deliver sustainable development and consequently economic growth, whilst safeguarding the primary function and purpose of the Strategic Road Network (SRN).* August 2023 Rampion 2 Environmental Statement. Volume 4, Appendix 23.2: Traffic Generation Technical Note Page 17 2.3.2

Paragraph 55 outlines under 'Environmental assessments': "The company will engage in the relevant screening or scoping process where a potential impact on the SRN is identified. *Environmental assessments must be comprehensive enough to establish the likely impacts on air quality, light pollution and noise arising from traffic generated by a development, along with the impacts from any proposed works to the SRN and identify measures to*

mitigate these impacts. Requirements and advice for undertaking environmental assessments in respect of transport impacts can be found in the DMRB.” 2.3.3

7 The increased risk of accidents when drivers become frustrated, as outlined in the RSK Environment Ltd report of 2012 (Chap 29-22), is likely to cause more accidents and additional congestion and backlogs.

8. In Document 7.5 (Outline operational travel plan- Aug 23) Has no relevant information or answers to questions asked by National Highways or WSCC. On p12 The Regional Policy Note 2.3.1 on p12 “Transport Strategy for the South Easts (2020). The key aim of Transport for the South East is to deliver a safe, sustainable and integrated transport system that makes the South East more productive, competitive, improving the quality of life for all residents”. *If the Oakendene proposals go ahead then there will be chaos along the A272, and misery for thousands of road users and local residents alike. There will be massive negative impact on the local economy.*

9. In Document 7.5 p15, Mid Sussex District Plan 20104-2031 point 2.4.14, Policy DP21 – Transport requires developments depending on their size or impact to prepare a Transport Statement or Transport Assessment to be submitted with a planning application. The policy also requires submission of a travel plan statement or full travel plan alongside the transport statement or transport assessment which will be submitted with a planning application. *Rampion have submitted certain documentation but they fail to assess the local impact of their proposals. Further Rampion have failed to include significant data on the impact on local lanes such as Kent St, Picts Lane, Bulls Lane, Sprokets, Long house lane. Significantly in document 6.4.23.2, Rampion have classified Kent St and Wineham Lane as identical, which quite clearly they are not. Wineham Lane is a two lane road with a wide visibility splay. Kent St is a single track lane with narrow bridges and has been assessed as “not suitable” in Rampion’s report conducted by Woods.*

10 According to Document 7.6 The Outline Construction Traffic Management Plan, (dated Aug 23) on p5- “ the Outline CTMP has developed following modelling and assessment carried out in Chapter 23 6.2.23”. *There has been no modelling carried out and is not found in 6.2.23. The assumption made are misleading and significant information has been omitted.*

On p9, this document refers to the need to provide detailed information on the HGV’s, and air quality at Cowfold. *However, the document doesn’t provide this vital information, but instead states that it will be provided once the application has been approved. 1.2.4 on p9 “the stage specific CTMP will be developed prior to commencement of the relevant stage of works”.*

In Document 7.6 p 24, point 5.4.2 refers to document 6.4.23.2 where they take a worse case scenario of one person per car ratio, however they have not included that data in their analysis at all. It is missing. They have assumed 5 people per LGV. In point 5.4.4, they refer to traffic modelling, which does not appear to have been completed.

11 Document 7.6 p16, point 2.4.4 states that “This CTMP shows that National Highways comments have been addressed”. This is a misleading statement and only refers to new accesses and not to the other points raised by NH.

12 Document 7.6 page 19, Ref 3.6.3 confirms “Minimum duration of approx. 3.5 yrs allocated for the onshore substation Although activities will be preceded by pre-construction activities”. Rampion do not specify this additional time period.

13 Document 7.6 p 33 appear to suggest a visibility splay at Access A62 & A63 of 215m each. The impact of these has not been discussed or assessed.

14 Document 7.6 p41 Point 3- Avoidance of narrow rural roads. *The HGV Access Strategy has avoided the use of small single-track roads as much as possible* In light of what is NOW planned for Kent Steet and Dragons Lane, this statement is incorrect and misleading.

15. *Doc 7.6 p44 states that detailed traffic calculations have been undertaken and presented in document 6.4.23.2.* This is not correct, since much significant data is missing and it fails to inform the reader of the problem areas along the A272 near Oakendene. The traffic problems along Kent St and surrounding lanes.

16. Water neutrality. In Doc 7.6 p 62 point 8.4.20 the cleaning of vehicles prior to going back onto the highway. Does this work comply with water neutrality? Where and how will the dirty water be disposed?

17. Document 7.7 (dated Aug 2023), p 17, point 3.4.15, Policy 24, Horsham District Council Planning Framework 2015 “The most common source of air pollution in Horsham District is from vehicle emissions. Due to the existing areas of poor air quality and the potential for traffic increases arising from new development the council has taken the decision to declare the whole District an “Emission Reduction Area”. This means all developments in Horsham district must make reasonable endeavours to minimise emissions”. Over 185,000 LGV and HGV’s will be needed, not to mention the thousands of private cars used by workers.

18 Document 7.8, p17, point 4.2.9. In addition to the Oakendene West Compound, there is also going to be two additional construction compounds associated with the new onshore substation and extension at Bolney. *Where are they?*

19 In document 6.2.23 p 38 NH has asked for confirmation of construction works timings to avoid rush hours. *Rampion state that this information is in document 7.6. That information does not appear to be in document 7.6. It states that the deliveries will be spread across the day.*

20 Document 6.2.23 p 38 NH asks for info about peak weeks. Rampion state that the information is within 6.4.23.2. *This information or answers do not appear to have been provided.*

21 Doc 6.2.23 p43, WSCC raised concerns about slow moving traffic and HGV’s regarding the compounds. The same issue arises with visibility splays on p44.

Rampion state that: "provided data for all the compounds" but has not given any further details or alleviated any fears.

22 There have also been some fundamental and inaccurate assessments, such as describing Kent Street and Wineham Lane as being broadly identical, which is not the case. *P23 Assessment of Kent St and Wineham Lane sound almost identical, which is incorrect. Kent St is a single track rural lane, spanning 3m wide, with grass verges and no pedestrian footways, a width restriction, and bridge. Whilst Wineham Lane is a two lane carriageway, which is 5.5m wide and facilitates lorries. This was built in the 1960's to aid the construction of the National Grid sub station.*

3.1.27 Kent Street is a single carriageway rural road which passes between the A272 and Wineham Lane is a two lane carriageway and is subject to the national speed limit.

3.1.28 Wineham Lane is a single carriageway rural road which connects the village of Wineham to the A272 to the north and the B2116 to the south. Wineham Lane is subject to the national speed limit for all sections outside Wineham. Throughout Wineham, it is subject to a 40mph speed limit and residential/rural properties and driveways front onto the road.

23. P39. 2000+ two way movements -This has been requested by highways, but has not been disclosed by Rampion.

Rampion state: During the construction phase, it is anticipated that 2,000+ two way movements for crew support vessels are required, however the arrangements for these movements have not yet been finalised. Offshore construction worker movements have been considered as part of the onshore assessment. 4.2.3 *This information has not been located and doesn't appear to be disclosed.*

24 P55-58 See table of movements for LGV's & HGV's This table provides the numbers for HGV /LGV's at peak weeks. *How many peak weeks will there be? and when will this occur? . What about workers cars? How many extra workers and cars are expected? These questions were asked by NH, but answers not given. Reference is made to Outline CWTP 7.7 & 7.5* However, the answers do not appear in these chapters.

25. *P59 has peak daily traffic movements and totals HGV's and LGV's of 185,412 But it doesn't include normal workers in their cars or specify the time period.*

Conclusion

Please note that the examples given above, is not an exhaustive list, but instead demonstrates a lack of rigorous due diligence and that the alternative sites at Wineham Lane have not been examined thoroughly. Some of the information provided within the Rampion application appears to be misleading and significant information/ data is missing. You have seen that a number of relevant questions from National Highways and the local authorities have simply not been answered. The result is an incomplete report with inaccurate conclusions which cannot be relied upon, and will lead to poor and damaging decisions.

Recommendation

As detailed above, Rampion have stated that they have provided the following data. This has not been found in the chapters or documents to which they refer the reader. We would like Rampion to provide the following information:

- 1 Revised and up to date traffic surveys (as requested by National Highways 'NH')
- 2 Baseline traffic modelling assessments (detailing assumptions) as requested by NH, covering both options at Oakendene and Wineham Lane
- 3 A detailed Construction Management Plan – providing details of how the thousands of HGV's will cut across two lanes of the busy fast- moving A272
- 4 The number of HGV's, LGV's and construction workers vehicles which will access and leave the Oakendene/Kent Steet sites and the storage compound. Does this incorporate the additional HGV's needed to bring in additional hardcore to sure up the floodplain tracks? The construction traffic trip generation data, should ideally be split between different construction phases, including the number of staff required at the sites during peak times.
- 5 How many 'peak weeks' will there be? And how many vehicles are expected during those peak weeks?
- 6 What will be the distribution of trips throughout the day? Confirmation as to whether the construction vehicles will be arriving throughout the day, including the rush hours? (as requested by NH).
- 7 The location of the HGV waiting areas
- 8 What are the exact traffic control measures that will be implemented and for how long? For both the Oakendene site and Wineham Lane?
- 9 A detailed Traffic Impact Assessment , detailing the consequences of these temporary (4+yrs) of traffic control measures? For both sites.
- 10 Where will the traffic be diverted? What measures will be implemented to enable the surrounding lanes and villages to cope with the diverted traffic?
- 11 Economic impact on businesses on the Oakendene site and also those businesses in Cowfold and the wider community of Sussex, who will be stuck in traffic jams for the best part of 4-6 years.
- 12 What is the justification for using Kent St and Dragons Lane? which have been described as "unsuitable", when a perfectly good alternative at Wineham Lane exists?
- 13 How many access points will there be at the Oakendene substation and storage compound? And what will be the distance between the visibility splays?

If Rampion do not provide this essential information, we would like to see an independent traffic expert commissioned to complete a full traffic survey, traffic modelling and a Traffic Impact assessment for both options, since this will help determine which site is more suitable.

Thank you.

