

National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN  
BY EMAIL TO [Rampion2@planninginspectorate.gov.uk](mailto:Rampion2@planninginspectorate.gov.uk)

20<sup>th</sup> February, 2024.

Dear Sirs,

**WRITTEN REPRESENTATIONS ON BEHALF OF ALAN DAVID  
LEWHELLIN GRIFFITHS AND JANICE ELIZABETH GRIFFITHS OF  
MERRION FARM, BINES GREEN, PARTRIDGE GREEN, HORSHAM, RH13  
8EH**

We submitted representations to you on behalf of the above clients last October (RR-003) which set out in outline our clients' deep concerns with this scheme as submitted in the DCO application.

We now write with more detailed comments.

**1. General comments on the cable route**

In the Open Floor Hearing on 6<sup>th</sup> February, there was discussion over the route chosen for the onshore cables by RWE, including reference to the cable route used for the Rampion 1 scheme. Choice of route is dictated by choice of connection point into the National Grid, the 3 options mentioned being:-

- i) at Wineham (as for the Rampion 1 scheme and as for the DCO application as currently shown)
- ii) at Fawley on Southampton Water
- iii) on the coast at Dungeness

Given the substantial impacts of laying onshore cables over any significant distance on:-

- ecology and biodiversity
- the landscape
- rural businesses (particularly agricultural)
- disturbance to homes and privacy

the applicant must demonstrate that it has considered all other less impactful options and provide evidence that they are not viable. We submit that the applicant has failed to do this.

With regard to option i) above, the applicant has not provided a convincing explanation as to why it cannot lay the cables along or close to the Rampion 1 route. We are aware that the Rampion 1 cables themselves have been sold off to a third party provider, as required by the industry rules, but this does not preclude RWE from negotiating both with that provider and the landowners along that route (all of whom are known to RWE from Rampion 1) to obtain the necessary rights for the Rampion 2 cable route. The writer acted for several landowners on the cable route of Rampion 1 and is aware that the ecological and business impacts of that scheme were significantly less than they will be from Rampion 2.

With regard to option ii) above, at the hearing, RWE stated that they had calculated there would be an additional cost of approximately £200 million if an undersea cable route to Fawley was used, and, as raised by the chair of examiners, we question whether this is not a justifiable cost in the context of a £3 billion scheme so as to avoid all the impacts referred to above.

## **2. The Farm business and other enterprises**

Attached at appendix 1 is a copy of sheet 27 of the Onshore Works Plans (APP-009), showing the extent of our clients' property edged pink, and on which it is clear that the DCO route of the construction corridor passes right across the farm and will occupy a substantial portion of it.

Merrion Farm comprises 157 acres with the following enterprises:-

1. Milking herd of 130 cows, which is being increased by home rearing to 160 by September of this year.
2. Countryside stewardship scheme to increase farm biodiversity
3. Holiday lettings from a purpose built cottage (shown on plan)
4. Shepherd's hut for glamping (shown on plan)
5. Wild camping site (shown on plan)

It should be noted that, due to the limited size of the farm by modern standards, items 3, 4 and 5 provide essential diversified income without which the business could not continue.

## **3. Cable route through the farm**

Based on the writer's experience of the Rampion 1 scheme, the construction period, and the resultant temporary loss of use of the working strip to the Griffiths, is likely to be in excess of 3 years. The impact of construction from this route through the farm will be substantial, including:-

- Significant loss of agricultural land and thus forage production, requiring either purchase from elsewhere of substantial amounts of forage for the dairy herd, or, more likely given the difficulties in sourcing such forage, the reduction in size of the dairy herd.
- Unacceptable disturbance to amenity of users of Holiday let, shepherd's hut and wild camping, most likely resulting in temporary closure during construction, and given this may be for 3 or more years or more it may take years to rebuild to the current level of business once reopened due to the extent of competition from similar facilities in the area.

These concerns have been clearly stated to RWE throughout the consultation process.

Because of this, it is imperative that RWE takes reasonable steps to minimise these impacts, and we submit that they have not done this. The Secretary of State has to be satisfied that the DCO area is no more than is reasonably required. We have marked on the plan approximate widths of the DCO corridor in places (measured by scaling), and on these dimensions we make 2 points:-

- i) We understand that RWE will only require a 40 m wide strip for construction in most places, within which will be a 20 m wide permanent easement strip for the cables. Thus there is no justification for the DCO corridor being so wide, given the potential impacts thereof referred to above. A narrower corridor, particularly if routed more sensitively, could significantly reduce the disturbance on the 3 tourism enterprises referred to above..
- ii) RWE has advised that they will be making a trenchless crossing under the River Adur at the north end of the farm. However, they have given no justification for why this will require such a large corridor width in this area. Its impacts on our clients will be excessive at this width given the amount of land take.

#### **4. Construction access along farm drive and associated compound areas (marked blue on plan)**

It will be noted that this access passes close to the Griffiths' residence and the holiday let, whilst the 2 compound areas will take up significant space and render the parking for the Shepherd's hut unusable.

Attached at appendix 2 is a copy of RWE's landowner engagement form from a site meeting on 9<sup>th</sup> March, 2022. As the notes confirm in the section 'Alternative Construction Route Comments', this construction access was discussed and an

alternative option was proposed, namely a direct access off the public road avoiding the farm drive. The Griffiths have not received any explanation as to why this option, which would have caused far less disturbance to them, has not been included in the DCO application. We believe the option of using the farm drive for this access is unreasonable given:-

1. That other options are available
2. The level of disruption it will cause to:-
  - i) Their day to day living in the house
  - ii) Their farming operations, due to conflicts of use on the farm drive
  - iii) The loss of business from the holiday let, shepherd's hut and campsite. On this point, it is interesting to note the effect on these during recent construction of a slurry lagoon on the farm, which involved the importation of a lot of soil for which heavy lorries used the farm drive for a period of 13 months from February 2022 to March 2023, such use possibly being similar to the heavy traffic which construction for the Rampion project will involve, albeit that is likely to be over a period of 3 years or more. The following table, using the Griffiths' own figures from that experience, demonstrates the effect:-

	ANNUAL OCCUPANCY RATE PRIOR TO CONSTRUCTION OF SLURRY LAGOON	OCCUPANCY RATE FOR YEAR OF CONSTRUCTION OF SLURRY LAGOON
HOLIDAY COTTAGE	86%	55%
SHEPHERD'S HUT	84%	45%

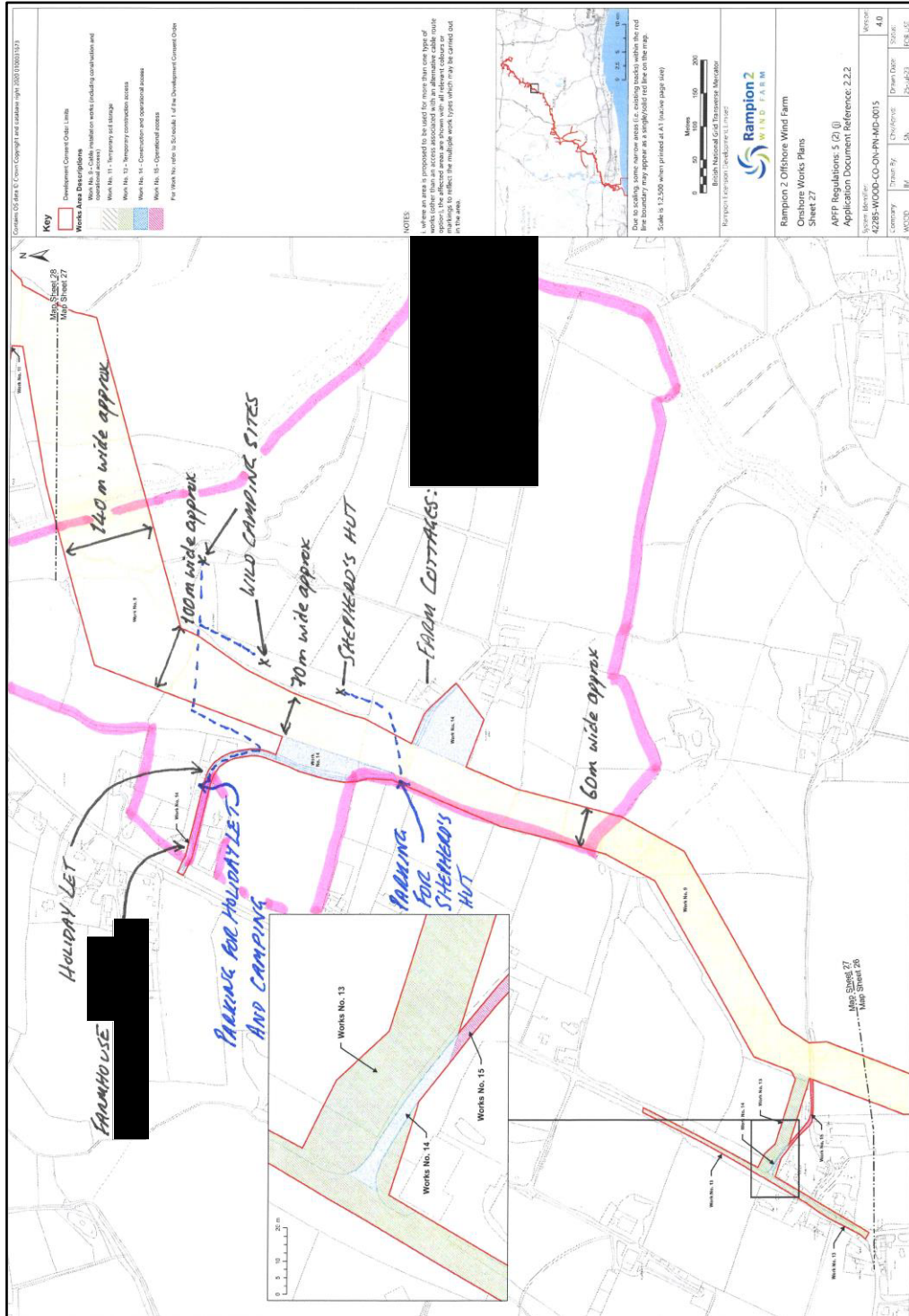
These figures are suggestive of the likely drop in bookings from these enterprises due to the use of the farm drive as a construction access alone. This is without factoring in the significant additional disturbance due to construction activity within the strip itself, given its close proximity to the various enterprises.

Yours faithfully,

**ROBERT CRAWFORD CLARKE, BSc, MRICS**

Director

**APPENDIX 1 – PLAN (NOT TO SCALE)**



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## APPENDIX 2



Carter Jonas

### Landowner Engagement Feedback Form: Rampion 2

Land Parcel Reference	
Name of Party / Grantor	Alan Griffiths Janice Griffiths
Type	Landowner
Property Address	Merrion Farm Bines Green Partridge Green Horsham West Sussex RH13 8EH
Title Reference	WSX288796
E-mail Address	Merrion Farm < <a href="mailto:merrionfarm@aol.com">merrionfarm@aol.com</a> >;
Contact Number: - Home - Mobile	

<b>Comments/ Issues discussed during Consultation:</b>	

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**Site Meeting – 9<sup>th</sup> March 2022**

LT met Mr & Mrs Griffiths and their son on site with the Wood Engineer (Nick Waple).  
RCC was in attendance.

The purpose of the meeting was to present and walk the alternative route proposals which had been created in order to alleviate the concerns of the original route – principally it was deemed not possible to construct the cables between the slurry pit and the gas main (see route above – yellow circle denotes construction of slurry pit). It was also to discuss two proposals for construction access and obtain the landowners feedback on these.

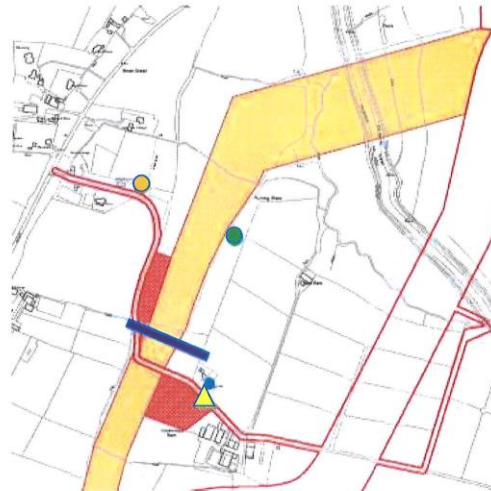
We inspected the slurry pit which was under construction (with the HGVs using the main driveway to access the site), walked the new cable route proposals, and considered a potential proposed construction access and its viable alternatives.

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The alternative route proposals are outlined by the map below:



**Alternative Cable Route comments:**

- Diagram above illustrates the proposals for an alternative cable route (orange).
- The original route remains on the plan (to the right edged in red lines), and will be included within the upcoming consultation as nothing will be removed until a later stage in the project design process.
- The landowner has concerns about the impact of the new proposed route on their holiday lets including the Cottage (orange circle) and Shepherds huts (green circle). LT advised that the project team had been made aware of these following the first site meeting.
- Occupants also noted to be living in the dwellings outlined by the blue circle.
- The landowner noted that the farm water main is running under the new area (which would require a trenchless crossing), please see markup of purple line above.
- Landowner noted that daily use of the track is needed.

**Alternative Construction Route comments:**

- As a trenchless crossing is being considered to the north of the site (in order to cross the waterway), there will be a requirement to use a drilling rig in this location.
- In order to facilitate this, the options were:
  1. Create a new construction access heading eastwards from Bines Green directly to the new proposed cable route.
  2. Use part of the existing road to Merrion Farm and areas either side of the cable route (outlined by the red shaded areas above). **This option will be taken to consultation following feedback from the owner, as well as engineering and ecological considerations.**
- Yellow triangle roughly indicates the current opening in the hedge to allow construction traffic for the slurry lagoon (see photo below).

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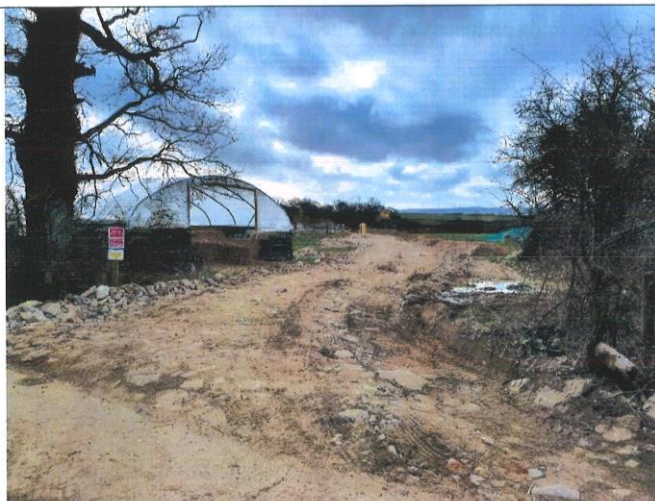
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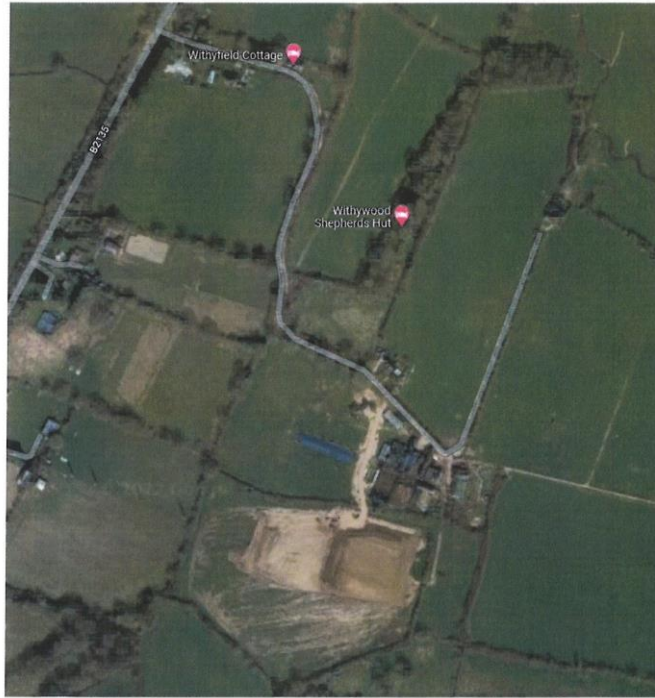
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**Construction of slurry pit underway as per google maps:**



Action Points	Follow-up required & by who?
Clarification required on when construction (trenching and laying of cables) will be undertaken so as to mitigate losses on holiday cottage / shepherd hut.	RED

**Engagement Information**

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Date:	9th March 2022
Time:	11:00 – 13:00
Contact Method:	Site Meeting at Merrion Farm
Consultation Team Members: (Present)	CJ – Lucy Tebbutt (LT) Wood – Nick Waples (NW)
Consultation Team Member (Print & Signature)	

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