

Jeremy Smethurst WR summary, deadline 1

Please see attached my written representation for the 28th February deadline (deadline 1).

In summary, it includes the following:

Traffic impacts on

- A272: Traffic flows and accident risks
- Kent Street: New traffic modelling evidence
- Dragons Lane
- Picts Lane

Flood Risk Assessment:

- Detailed analysis of Rampion's FRA
- Errors in the FRA document which affect adequacy of consultation and FRA assessment

Photographic evidence of

- Kent Street and Picts Lane in normal use
- Picts Lane when delays on A272 cause drivers to use Picts Lane as a cut through. Similar photos of Kent Street previously submitted as RR168

Video evidence of flooding at Oakendene: fields and tributary on southern boundary. See two attached videos

Traffic:

I do not feel that the traffic impacts have been understood by Rampion at all. If this proposal is allowed to happen, there will be years of chaos on the A272 and surrounding small lanes. This is all due to the lack of consultation with local residents, which led them to inadequately assess the impacts or the alternatives. When they have heard from residents, having already made the choice of substation site, they have not wanted to hear us.

Their traffic modelling does not seem to really take into account the 1000s of LGVs and other support vehicles and workers cars. It is impossible to work out from DCO documents the numbers of LVs or private cars accurately. But based on Rampion 1, and fact that this is bigger, we estimate roughly 350 cars alone will come to the Substation site daily, and probably more working out of the compounds. But we need absolute clarification on all of this

A272

The A272 behaves quite differently approaching Cowfold compared to the section going through Bolney further east. You can see that residents there are far less affected by the traffic at Bolney by the fact that there was no mention of the A272 in the Rampion 1 consultation, or in fact, the current submissions from residents of Twineham, Wineham or Bolney. Congestion backs up to Kent Street and beyond at peak times and whenever there is anything affecting the flow of traffic, even a delivery vehicle. Screenshots of the congestion on this stretch show some examples of what happens, see below.

Accidents:

The area of the A272 along the Oakendene manor and industrial estate stretch has a high incidence of accidents along it. A Freedom of Information request to the police showed that between 2021 and 2023 there were 8 accidents which came to the attention of the police between the A23 and Wineham Lane, compared to 30 from Wineham Lane to Cowfold over the same period.

The number of exits and entrances to the Rampion sites will make the danger worse. It is also quite worrying that at the hearings Rampion did not appear to think that traffic lights would be necessary. I feel this is because they have realised that people are worried about the congestion and delays which will be caused by traffic lights. However, they really do not understand how dangerous it already is to be turning in and out of side roads on this part of the A272 and how long it can take at times. I will not infrequently wait for 5-10 minutes to turn right, out of my driveway even now, and if traffic is queuing to get into the village they will not be able to see past it to turn right towards the A23 at the end of the day which means they will launch themselves blind into the oncoming traffic.

Mud from the many vehicles on the sites will increase the dangers. Wheel washing might occur at Oakendene, but it cannot prevent the mud coming out of Kent Street onto the A272, from the haul road. And what about the other compound? Mud on Wineham Lane might be a nuisance, but mud affecting 18000 vehicles at 60mph on the A272 is dangerous.

I take issue with Rampion's comments at the Hearings that the access to the Oakendene industrial estate will not be an issue because it is already used by HGVs. This shows a lack of understanding of the true picture: the industrial estate is for small scale businesses, hence the majority of vehicles using the entrance are ordinary cars belonging to the people who work there and customers, plus

the kind of small vans used by small independent tradesmen. Also a few LGVs. HGVs do visit, but this usage is currently small.

This will not only increase the accident risk on this part of the A272 but will severely affect the businesses on the Industrial Estate as customers will be reluctant to come and deliver drivers will not want to be stuck in the congestion on the A272. Most people in Cowfold believe there is a real risk that the Oakendene Industrial Estate will not be able to survive if the substation is built here. In the Draft Horsham Plan, Policy 30 Lists Oakendene as a Key Employment area where Local Employment is to be safeguarded. Its loss would be a catastrophe for the local economy.

Their proposed core working hours are far too long with too many exceptions for extending them. The idea that they can add an extra hour onto each end of the day because vehicles will be coming back from some distance is also unacceptable. They must be made to **have left** the compounds by the end of the core working hours.

Residents are also very worried by the polluting effects of the construction traffic both in the AQMA and along the A272, and the noise. On the A272, Kent Street and the haul road, even if the pollution levels do not exceed the national limits, (which they might on the A272 in fact) there will nevertheless be a large change from the baseline, which must be taken into account. EN-1 para 5.2.9 *“The IPC should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality limits.”*

Kent street

In the chapter on traffic, you can see they **had** done traffic monitoring for Wineham Lane: and quote the normal daily total as around 948 vehicles a day, of which around 17 are HGVs.

We have raised the issue that no traffic monitoring has been carried out by Rampion on Kent Street, a 3m wide lane which they propose to use to access the haul road. Having made a commitment not to use single track lanes ‘where possible’, they have instead increased the proposed use of this lane since the consultation began.

In October, residents became aware of a traffic monitor on the lane, and assumed it was Rampion. However, it now appears it was placed there by Enso Energy, who have submitted plans to HDC and Mid Sussex DC for a Battery Storage Farm on Kent Street (Application number DC/24/0054).

The graphs in Appendix B of the Construction Management Plan (Attached) show an average of 486 two-way movements a day during the week of Wed 18th October to Tuesday 24th. However, **the A272 was closed from 20-22nd** causing the mayhem experienced on Kent Street and Picts Lane during that time, when hundreds of vehicles went down Kent Street daily causing absolute chaos, traffic was jammed in the lane, vehicles were stuck or in ditches. And very few of these were HGVs. We have sent photographs of this previously.

There were 802 vehicles heading northbound alone on Kent Street on the 21st, 708 of them between 7am and 7pm. And high levels on the days either side. The road closure began on 20th around 1pm and continued until sometime in the afternoon on 22nd. This obviously radically increases the average

daily numbers. There were relatively few HGVs and most were going in the same direction as can be seen from the graphs.

Excluding the 3 days of A272 closure, you can see that the daily numbers are more like 75-90 and looking at the vehicle classification graphs in Annex 2, the great majority of vehicles which normally use the road are cars, and a small number of LGVs, probably mainly tractors and horse boxes, with the occasional light delivery vehicle. **Only 0-2 HGVs pass along the road on a normal day.**

The increased traffic from Rampion's proposal would therefore represent a huge increase in all vehicle types, except for cars, , causing unacceptable congestion and danger on this small road. The peak week estimates for Kent Street in Table 5-5 from Appendix 23.2 p55 are far worse than the Enso Energy figures and will be mainly LGVs and a vast increase in HGVs:

Section 3 – Oakendene Industrial Estate Compound (Access A-62) A272 (E) – Kent Street (S)
A-60 0 0 A-61 252 486 A-64 252 683

Section 3 – Bolney Road / Kent Street onshore substation compound (Access A-63) A272 (E) –
Kent Street (S) A-60 0 0 A-61 252 486 A-63 696 419 A-64 252 683

Based on 5.5 working days a week, this represents at least 300 goods vehicles a day, over 200 of which would be HGVs. This would therefore be even worse in reality than the road closure experience in October, due to the vehicle size and the two-way traffic.

There are no recorded accidents on this road, but farmers regularly pull vehicles out of ditches when they have tried to go round oncoming traffic, as was frequently the case on those road closure days.

Below you can see a photograph showing the usual 'traffic' on Kent Street- a couple of walkers leading a miniature pony. This is a reflection of the high amenity value of this quiet lane and surrounding PRoWs to the surrounding community. The loss due to the lane traffic and the closure of numerous, connected PRoWs over several years will have a major impact on wellbeing locally.

Dragons Lane

A map from [REDACTED] to another resident shows their intention to use the private road Dragons Lane to access the cable route, **despite promises to the residents in the early stages of the consultation that the lane would not be used.** This is extremely narrow, unmetalled and is the **only access to their homes** for the residents. The last half, to Cratemans, is extremely narrow indeed, with ponds and ditches either side. In recent responses they have said that Dragon's Lane is for operational use only. Is this just more conflicting information, or can we now rely on this as truth? How otherwise do they propose to access all the cable route and in particular the compound surrounding Cratemans? Have they actually thought about this; they are just flip-flopping as they realise they haven't thought this through properly. There are also major ecological and heritage concerns about the use of this road.

Picts Lane

Every time there is any congestion on the A272 Picts Lane, Bulls Lane and Longhouse Lane in the High Weald AONB are used as 'rat-runs' to try to avoid the traffic as indeed is Kent Street, which is something Rampion have not factored into their assessment of how they will use Kent Street.

Picts Lane is a very narrow lane with very poor visibility around sharp bends and twists. It is usually safe to use because of the very low numbers of vehicles using it on a normal day. Like Kent Street, it is mainly used for leisure activities such as walking, running and horse-riding. When the A272 was

closed, it was similarly dangerously overrun with farmers having to pull vehicles out of ditches and coaches wedged across the lane where they had tried to turn round. See photos below.

Flood Risk:

Rampion underestimate the flood risks on this site and overestimate the potential to drain water away into the saturated water courses. There are inevitable impacts on water neutrality and any attempt to drain the site into the stream to the south must fail when the stream is already overflowing and will have effects downstream on the Adur valley. There is also the risk of flooding vulnerable properties on the north side of the A272.

CowfoldvRampion are sending photographs in their LIR of repeated episodes of flooding throughout the winter months at the site and around the Cowfold Stream. **I attach videos to this WR** of the fast-flowing water in the tributary at the southern end of the substation site during one of these flooding episodes; it is clear there is nowhere for additional water from the construction site to go.

From the Oakendene Historic Parkscape assessment, **done in Oct 2021**, doc ref 25.5 3.3.4, during the historic environment site walkover (see **Section 1.3**) in October 2021, it was observed that drainage was fairly poor with the ground conditions being generally wet and particularly waterlogged near the southern boundary adjacent to the stream where ground levels are lower, and also along certain field boundaries where surface water was observed. Yet Rampion did not take this into account when assessing the site for suitability. Instead, they seem to have put the substation exactly where the Historic Parkscape assessors pointed out the wettest area was.

In the June 22 ETG, MB, the HDC drainage engineer, advised that as long as the substation was positioned outside the 0.1% AEP surface water flood extent, he would not be concerned. Yet this is exactly where they have put it, as they have realised it can't go on the doorstep of Oakendene manor, or right up against the A272, or over the high voltage cable, they have pushed it down into the bottom corner, where the flooding is worst!

There is an error in the information provided by the applicant in the Flood risk assessment (document 6.4.26.2), which prevents proper assessment of the evidence. Firstly, in the Sources of Information and Consultation section on Page 9, it is clear that HDC were not involved in the meetings about this topic until June 2022, when the substation site had virtually been chosen.-The action summary from the April 2022 meeting, which included Mid Sussex DC and WSCC, but not HDC, includes the following: "Wood agreed to check and communicate which districts the substation option sites are in (MSDC or Horsham Council)." GD actioned -"Bolney Rd/ Kent Street Substation Option lies within HDC and the Wineham Lane North Option lies within MSDC" In other words, up to that point they did not know that Oakendene was in Horsham district and had not been engaging with HDC about the site options, only Mid Sussex, skewing the decision-making process. Another problem is that, apart from the list of attendees and the Action Summaries, the minutes of the two meetings are identical. They appear to relate to the June meeting, as MB from Horsham, who appears in them, was not listed in the April meeting. Obviously, we have no indication of what was discussed in April, when it dawned on them they should have been including Horsham. This is another example of the poor attention to detail in the DCO submission.

This lack of realisation by Rampion that Oakendene fell within Horsham district may also explain why HDC do not appear to have been involved in *substation related discussions* about noise and vibration, or soils and agriculture, until 2022, whilst they may have been taking part in cable route

discussions before that. This may have helped sway Rampion 's 'marginal' decision to choose Oakendene.

Further analysis of Flood Risk Assessment (Doc Ref 6.4.26.2)

Some of the meetings of the FRA ETGs are minuted, other minutes are said to be in the consultation document, 5.1, but I am unable to find them anywhere.

Table 1-1: the links do not show exact information, just generic links to the website. It is very difficult/impossible to find the information claimed.

Table 1-2 looks at the definition of flood zone categories. It seems to me that, based on the photographic, video and local knowledge evidence, that the Oakendene site, particularly along the stream tributary area and lake, should be classified as not just at risk of surface water flooding, but as Flood Zone 3b, or at very least 3a. (in particular, see the movement in the flood video). The flooding at this site happens repeatedly, several times each year. The Cratemans area must be recognised as 3b.

NPS EN-1 regulations, table 2-2:

I believe the proposals at the substation site fail to meet most of the regulations in this table, especially those regarding climate resilience (4.9.11, 4.9.13).

Land drainage:

Rampion recognise that land drainage will be disrupted, but propose to say how they will deal with this only once consented. (para 4.4.26 and 7) This is not good enough given the true state of the fields and watercourses as has been demonstrated.

Sequential test:

The arguments given for why the substation site choice has passed the sequential test for assessment of flood risk (Paras 9.1.29-9.1.40, and see figure 26.2.5e) do not seem to be valid. The assessment was largely desk top. If they had truly engaged with the Cowfold residents early in the consultation, they would have heard how the reality is not as the gov.uk website suggests. Assessment of the maps they used and of the findings for Rampion 1 would have shown them that the water drains away from the Wineham substation area and towards Oakendene. Land surveys were not carried out before choice was made.

There was no reason for the government site to be updated as there are no dwellings there, so the flooding was unlikely to have been brought to anyone's attention; it is private land. The lack of updating for the smaller water courses such as this is recognised in the EA meeting minutes on page A3, item 24 *"AJ advised that there is less certainty for the smaller watercourses as these are visited less often."*

There ARE documented episodes of flooding of properties on North of A272 so Rampion were misinformed by WSCC; again, reasonable consultation with local people at an earlier stage would have brought this to their attention.

Indeed, their own map (Figure 26.2.6a) shows the risk of surface water flooding to be quite significant. Section 5.3, para 7-10 discusses the surface water flood risk on site. I dispute what is said in table 5-8; whilst this may be true for the whole Oakendene site, much of the highest risk areas ie 9,5% of the site, lies within the actual substation footprint (see map) There are too many 'it is thought that' statements-actual consultation would have cleared this up easily.

Yet even so, they admit in paragraph 6.5.3: *“Regions of high risk of surface water flooding are anticipated within the onshore substation footprint, coincident with several surface water flowpaths which drain from north to south across the site. In the absence of appropriate mitigation, aspects of the onshore substation and associated infrastructure may be at risk of flooding from both surface water run-on and run-off.”* However, their Outline Drainage Plan does not adequately address this.

Cowfold Stream:

In the minutes of the meeting between Rampion and the EA (page A3), item 24, the EA asks that cable works in flood zone 3 should be carried out between late summer and early Autumn. How will this also work with avoidance of the breeding birds and reptiles at Cratemans and yet allow the haul road to function? How will the haul roads be useable and how will the risk of contamination of the water from vehicles, the nearby storage compound and soil storage be addressed?

They also asked them to investigate the re-use of the Rampion1 cable route, **rather than go through the flood plain areas. There does not appear to be a follow up on that.**

From what is possibly the June 2022 meeting with WSCC, ADC and HDC: *“RC advised that the Oakendene sub-station would be covered in this meeting, being in the Horsham District;”* **the Wineham Lane North substation option site had been covered in an earlier meeting with Mid Sussex DC, but HDC were not there.**

“RC 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. RC noted that, to date, the Environment Agency’s 0.1% AEP surface water flood extent had been used as the area for the substation footprint to avoid. MB advised that as long as the substation was positioned outside the 0.1% AEP surface water flood extent, he would not be concerned.” Yet much of the substation appears to be in that zone.

Macquarie have had a majority stake in Southern Water since 2021. Macquarie Asset Management’s website tells us how Southern Water’s Clean Rivers and Seas Taskforce is working to reduce pollution, and address challenges posed by climate change. Yet, in particular by failing to take the true extent of flooding in the site into account, at Oakendene they risk contamination of waterways by oil spillages as at the Rampion 1 station, leaks from cables, herbicides and battery storage fires; waste water will be poured into the Adur tributaries and flooding downstream will be affected by this and the cutting of trenches around the Cowfold Stream.

Kent Street on a normal day



Picts Lane on a normal day



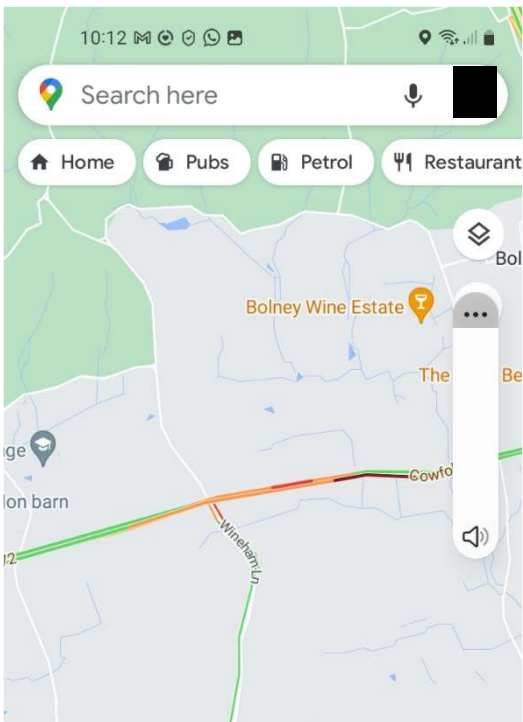
Rat run chaos – Picts Lane



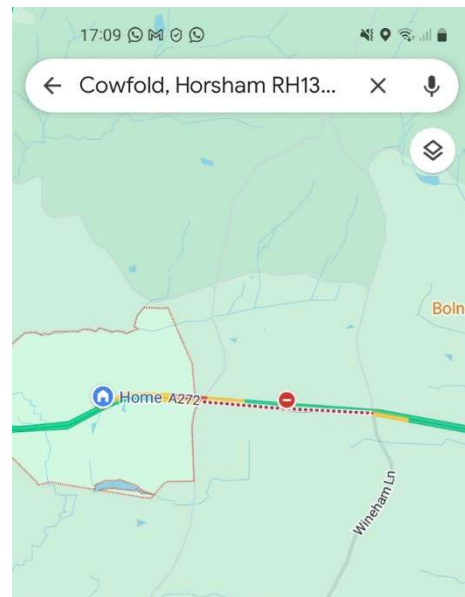
More Rat run chaos – Picts Lane



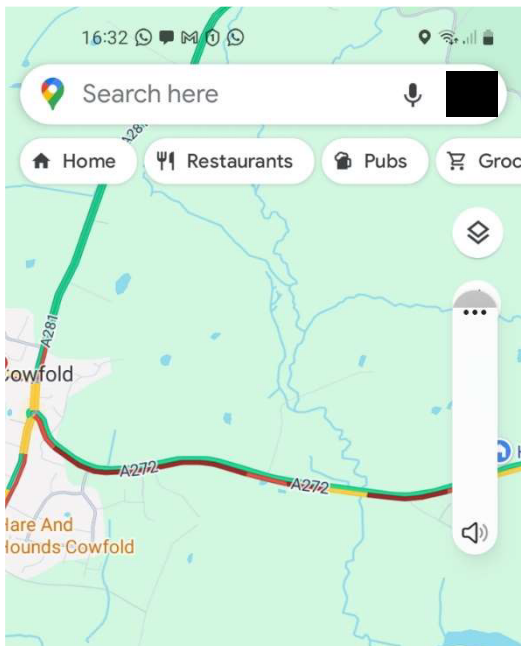
Screenshots of Google Maps showing A272 Traffic Problems



24 Jul 2023 – 10:12



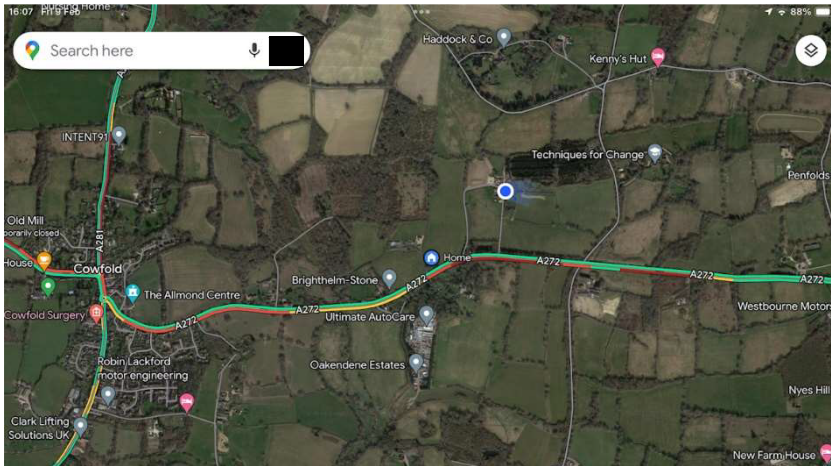
22 Oct 2023 – 17:09 (A272 closed)



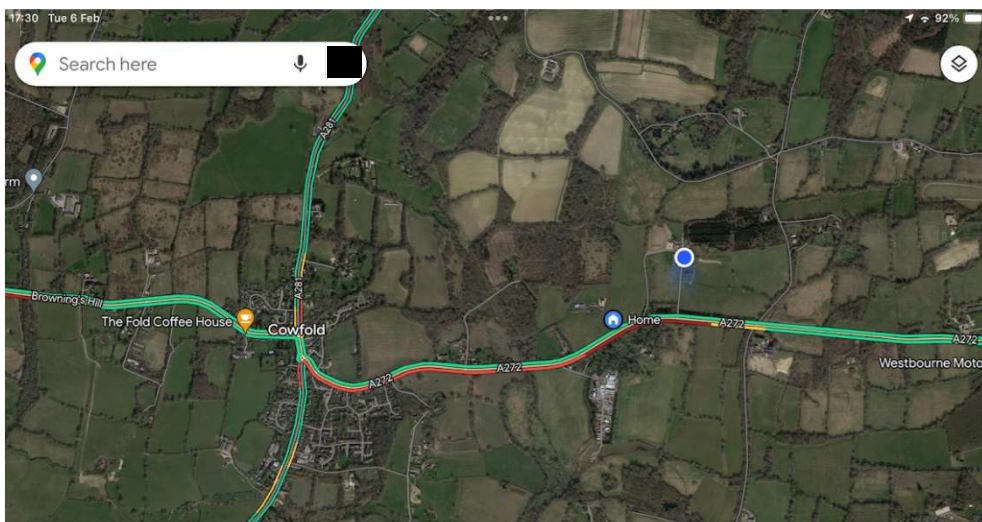
18 Jan 2024 – 16:32



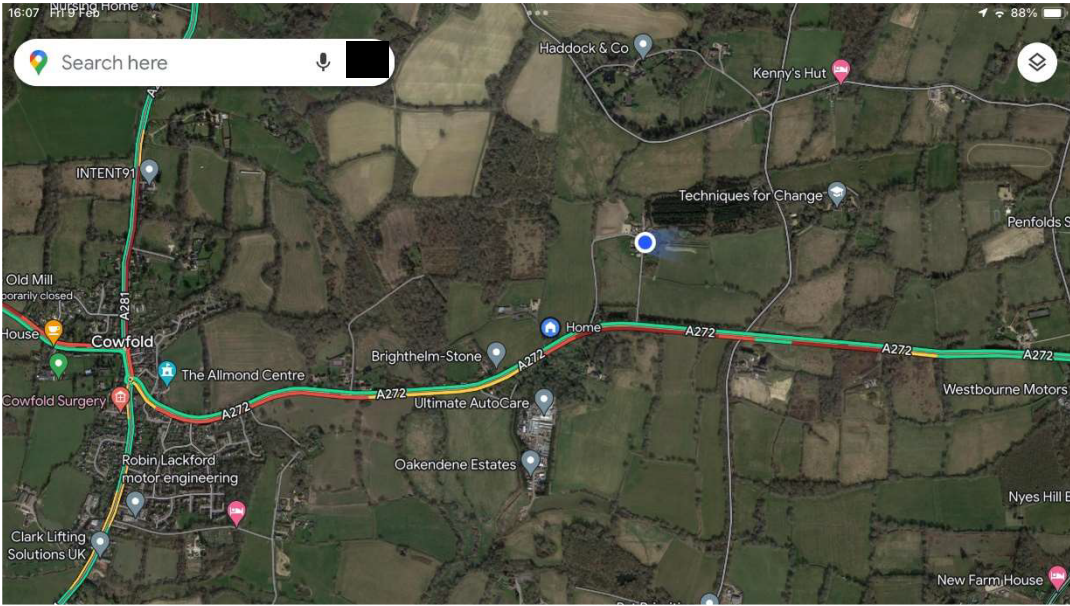
6 Feb 2024 – 08:05



6 Feb 2024 – 16:07



6 Feb 2024 – 17:30



9 Feb 2024 – 16:07



14 Feb 2024 – 16:27

USED FROM HERE:

There has been no traffic modelling for the impact on Kent Street. We now have some, done by Enso Energy, [whom Rampion will know all about]. It shows that: the daily numbers are around 75-90, less than a tenth of WL, and looking at the vehicle classification graphs they show, the great majority of vehicles which normally use the road are cars, and a small number of LGVs, mainly tractors and horse boxes, with the occasional light delivery vehicle. **Only 0-2 HGVs pass along the road on a normal day.**

The increased traffic from this proposal would therefore represent a huge increase in all vehicle types, causing unacceptable congestion and danger on this small road.

The monitoring happened to also cover 3 days when the A272 was closed and hundreds of vehicles went down Kent Street daily causing absolute chaos, traffic was jammed in the lane, vehicles stuck or in ditches. And very few of these were HGVs. **It should be noted that the peak week estimates for Kent Street in Table 5-5 from Appendix 23.2 are in the same sort of region ie several hundred a day of BOTH LGVs and HGVs! Absolute insanity.**

Well-being use of prows. Come from wide area. Cycling. Bridleway. All appreciate. All will be closed

Look at RRs (all) and expand eg kent st, consultation no longer same proposal etc

Traffic, kent st burden, picts lane. No traffic assessment for kent st

Traffic chaos on A272 and surrounding lanes, all due to inadequate consultation with local residents, led to failure to adequately assess impact or alternatives

No mention of A272 in R1, or current submissions from Twineham

IPC decision making

5.2.8 Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.10 on the interface between planning and pollution control therefore apply.

5.2.9

5.2.10 In all cases the IPC must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits the developers should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed. **In the event that a project will lead to non-compliance with a statutory limit the IPC should refuse consent.**

?MES to say:

Concern that R do not appear to think TLs necessary

From Sue:

- 2 The flood risk for the communities downstream due to building on a flood plain
- 3 The potential pollution of the River Adur through diesel spillages, as experienced during Rampion
- 1
- 4 The potential pollution of the surrounding watercourses, via the Cowfold stream which feeds the River Adur, due to all the weedkiller that will be frequently used on-site.

5 We understand that all underground cables have an oil sleeve to cool them, and that they leak not infrequently. We understand that a boom was needed in the past, in order to clear a leak from Oakendene lake. If permission is granted at Oakendene, there will be three underground cables, which could potentially leak into the surrounding water course and contaminate the River Adur.

And add pictures of Wineham and mention dry etc and why(if not in here, MUST go in CVR)-are in LIR

Add Janine latest photos and all 3 sets photos nov to Dec-are in

As well as improving operational performance to meet its existing regulatory obligations, Southern Water is also focused on additional actions to mitigate the causes of the 98 per cent of pollution incidents that are outside the direct control of the company, which result from rain-water run-off from highways and urban areas and groundwater entering the sewer network.

Southern Water's Clean Rivers and Seas Task Force is collaborating with community and industry stakeholders to pilot new partnership delivery approaches to address this problem and retain more water in what is a water-stressed region. If supported by these partners, the initiative could address the challenges posed by climate change, population growth and ageing infrastructure while establishing Southern Water as a leader in tackling key sectoral challenges.

Yet with their other hand, Macquarie are involved in Rampion 2 as co-owners, and will be putting water courses at risk, similarly also high risk of contamination from BSF proposal at Kent Street.

Add Macquarie ownership of southern water and irony of working to prevent contamination. See water doc ISHs

I refer you to the above Rampion DCO document. Firstly, in the Sources of Information and Consultation section on Page 9, it is clear that HDC were not involved in the meetings about this topic until June 2022, when the substation site had virtually been chosen, indeed, the June minutes say that the announcement about the substation is imminent. The action summary from the April 2022 meeting, which included Mid Sussex DC and WSCC, but not HDC, includes the following:

"Wood agreed to check and communicate which districts the substation option sites are in (MSDC or Horsham Council)."

GD actioned -"Bolney Rd/ Kent Street Substation Option lies within HDC and the Wineham Lane North Option lies within MSDC"

In other words, up to that point they did not know that Oakendene was in Horsham district and had not been engaging with HDC about the site options, only Mid Sussex, thus skewing the decision making process. They may have been engaging with Horsham about the cable route and flood risk assessment, however.

Also, apart from the list of attendees and the Action Summaries, **the minutes of the two meetings are identical**. I assume they relate to the June meeting, as MB from Horsham was not listed in the April meeting, but can't be certain. Obviously, we have no indication of what was discussed in April. This is another example of the poor attention to detail in the DCO submission.

This lack of realisation by Rampion that Oakendene fell within Horsham district may also explain why HDC do not appear to have been involved in *substation related discussions* about noise and vibration, or soils and agriculture, until 2022, whilst they may have been taking part in cable route discussions before that. This may have helped sway Rampion's 'marginal' decision to choose Oakendene.

Page 9, AnnexA : meeting held 22/3/22 with Environmental Agency.

WSSC and **Mid Sussex** 1/4/22 Minutes of this meeting (Annex A, page A21) confirm Woods to check whether Horsham should be involved in SS discussions, so clearly weren't. The minutes of this meeting are shown on page A21: However, apart from the list of attendees and actions summaries, **they are identical to the minutes for 22/6/22**

Wood agreed to check and communicate which districts the substation option sites are in (MSDC or Horsham Council).

**GD actioned -
Bolney Rd/ Kent
Street Substation
Option lies within
HDC and the
Wineham Lane
North Option lies
within MSDC.**

In other words, **They did not know at that point that HDC were responsible for the Oakendene area**, and HDC were not present

WSSC, HDC and ADC 22/6/22

**Flood Zone: 3a
High Probability**

Land having a 1 in 100 or greater annual probability of river flooding; or

Land having a 1 in 200 or greater annual probability of sea flooding.

1% (fluvial)

0.5% (tidal)

1 in 100

(fluvial)

1 in 200

(tidal)

Flood Zone: 3b

Functional

Floodplain

This zone comprises land where water has to flow or be stored in times of flood.

Local planning authorities should identify in their Strategic Flood Risk

Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the

Environment Agency. AEP 5%, Annual flood risk 1:20

Submission ID: 26377

I have both contributed to, and fully agree with, the content of the document submitted by CowfoldvRampion for deadline 1 on 28 February 2024. The title of the document is: 'Cowfold Residents' Impact Statement on Rampion2'.