

Please see attached the CowfoldvRampion Residents' Action Group Impact Statement on Rampion 2 and associated Summary.

Attached also is Cowfold Residents' Impact Statement section 3 Alternatives Attachment 1 - Oakendene Enterprise Park.pdf which should be read as an appendix to the main Impact Statement.

Also attached is a WR on issues either raised at the Issue Specific Hearing 1, but not fully discussed, or where more information has been requested by the Panel, namely:

- The need for the DCO
- The failure of reinstatement following Rampion 1
- The feasibility of screening at Oakendene and the factors which affect it
- Photographs of some of the Rampion 1 reinstatement failures are included

Summary Of CowfoldvRampion Impact Statement on Rampion2.

Attached is the Impact Statement on Rampion 2 from the CowfoldvRampion community action group. It represents the views of, and contains evidence from, around 150 residents of Cowfold.

The main sections are based on the PEIR reports of the consultation, but addenda are added after each one containing evidence and comments informed by scrutiny of the additional information provided by Rampion on Acceptance.

We understand that the Rampion DCO will be examined under the existing Energy National policy statement July 2011 not the draft 2023 version, but under either policy, we provide evidence that Rampion did not adequately assess the alternatives, that there ARE alternatives which can deliver the same output in the same time frame, or less, and that they would be far less damaging to ecology and communities.

We support the view of Protect Coastal Sussex that this project is the wrong one in the wrong place, and believe that our evidence lends weight to that argument at a local level. However, even if the Examining Authority is minded to approve the application in principle, we believe that our evidence will show that there is at least a reasonable alternative to this substation site, if not to the whole project.

Rampion's assessment of the alternative substation site would in the end appear to be that there is a marginal difference between the two and that this difference is largely based on their own financial considerations. (see Alternatives Doc ref 6.2.3, para 3.6.25)

When weighed in the balance, we believe that the negative impacts on ecology, economy and the disruption caused by the impact on traffic at this site cannot justify the choice.

The huge range of biodiversity at Oakendene and the Cowfold stream area reflects how at home nature is in this site. An abundance of insects, red list species such as hazel dormice, nightingales, badgers, snakes and toads thrive in the meadowlands and ancient landscape, which contains 8 of the 14 Important Hedges Rampion recognise across the whole project area. In several instances, Oakendene is the **only** location where some endangered species are to be found. At a time when Britain's nature is under threat it cannot be sensible to destroy such a habitat when alternative, less damaging sites exist.

We show how Rampion have failed to understand the movement of traffic at this location, and why simple traffic flow models are too simplistic. As a result, they have not properly assessed the impacts on traffic flow, congestion, pollution and road safety. Nor have they taken in to account the number of businesses which will be adversely affected, including the Oakendene Industrial Estate, a key employment area in the Horsham Local Plan

Also, they have downplayed the evidence regarding visual impacts, heritage impacts communities and ecology.

Traffic and Pollution:

Traffic in Cowfold is a big concern for the whole village and the far wider community who use this road on a daily basis.

We do not agree with Rampion's methodology for assessing the impact, and believe they have significantly downplayed the impacts on congestion, pollution and accident rates. They have not

properly understood the way the mini roundabouts in Cowfold alter the flow of traffic, or why looking at only percentage increases in traffic numbers is too simplistic an approach. Cowfold will provide evidence, both based on local knowledge testimony, and scientific evidence, of the more likely true effect of the proposed vehicle movements.

The traffic movements will affect the AQMA in Cowfold to a far greater extent than they suggest. The impact on the tiny lanes of Kent Street and Moatfield lane will create an unacceptable level of misery for residents and for those on Picts Lane and Bulls Lane to the north.

No Traffic Impact Assessment has been carried out for Kent Street, despite the extent to which it will be used, and the fact that the impact assessment on Wineham Lane was used to exclude the Wineham Lane substation sites.

Wineham Lane was widened in the 1960s for the construction of the main substation site. No concerns were raised in the relevant representations for Rampion 1 regarding traffic on A272 at the Wineham Lane turning.

Rampion have failed to adequately consider the health and social impacts of the traffic, including noise, air pollution, quality of life and access to health care.

Economy:

Rampion have not considered the impact of the construction traffic on the economy of Cowfold and wider community. Neither have they weighed this in the balance when choosing the site. Rather, they have focussed on the largely tourist economy of the South Downs and Coastal areas.

There are 130 businesses in Cowfold which could be negatively affected by the additional congestion, loss of business, delayed deliveries, and diversions using adjacent lanes. From a wider perspective, over 18,500 road users would be severely inconvenienced by sitting in unnecessary queues as they approach the village of Cowfold every day. The loss of productivity, delays in receiving supplies and loss of business as people are put off from visiting as a result of the traffic congestion, could be catastrophic. The Oakendene industrial estate is a significant provider of rural employment in this area, yet it faces extinction as a result of the traffic delays and construction compounds required to be navigated in order to access it.

Ecology:

The ecological impacts of the proposals have been significantly underestimated or ignored by the Applicant. NPS EN-3 section 3.8.16: "where development affecting irreplaceable habitats requires the benefits (including need) to clearly outweigh the harm." The area of the northern end of the cable route approach and exit from Oakendene are just such irreplaceable habitats and the risks do not justify the benefits, as reasonable alternative locations exist.

EN-1 section 5.4.2 recognises the importance of the government's policy for biodiversity as set out in the Environmental Improvement Plan, Biodiversity 2020 and the National Pollinator strategy whose aim is to halt biodiversity loss, support healthy well-functioning ecosystems and to establish coherent ecological networks, more resilient and adaptable to climate change effects. The proposals are in direct conflict with these aims by the choice of substation location, and, in line with the mitigation hierarchy, (section 5.4.42), cannot be justified as less-damaging options exist. Instead of making the wildlife more adaptable to climate change, they in fact reduce their resilience to change by causing irreparable damage to species, habitats and connectivity.

We show that, although the area is undesignated, its habitats and species are of such significance, as we watch the biodiversity decline elsewhere across the nation, that they should be protected.

Landscape, visual and heritage:

Rampion underestimate the landscape and visual impacts of the substation and the damage to heritage sites including Grade 2 listed buildings, including the context in which they sit within the landscape. They have not paid proper attention to the heritage aspects of the landscape itself, nor of the part that plays in the ecological importance of the area.

They fail to include many of the nearest properties when assessing visual impacts, noise, lighting or any other impacts and therefore their claims give a misleading picture.

The Design and Access Statement (doc ref 5.8) now recognises the existence of a PRow (no 1786) directly through the site and admit a greater heritage impact on Oakendene Manor. They also now recognise the extent of the flooding on this site. None of this was taken into consideration when looking at the 'engineering constraints' which informed their choice of substation location.

Reasonable Alternatives:

As part of the development falls within the SDNP, Rampion must consider the alternatives (NPS EN-1, section 5.10.31). Further, the Secretary of State should be guided by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity, including energy security, climate change and other environmental benefits, in the same timescale (section 4.2.22).

We will demonstrate that there *are* suitable alternative substation sites which can be used in the same time frame or potentially less and which are far less damaging ecologically and to communities. There is also good evidence that they did not consider this before choosing the site. They admit that they have only a marginal preference for the Oakendene site. We believe that when the additional factors are weighed in the balance, the balance is not in favour of using Oakendene

Finally, there is widespread concern about the cumulative impacts of this, the Kent Street battery storage farm proposals (also under Macquarie's umbrella) and the Cobwood solar farm.

We feel the proposals have materially changed from those consulted on:

- The plans for Kent Street have gone from recognising that it is 'a single-track lane unsuitable for HGVs' during the informal consultation and the first-round consultation, to now expecting it to bear a significant burden of traffic for the haul roads
- Extended use of the western compound
- The complicated traffic movements now proposed
- The numbers of HGVs and LGVs has increased several-fold.
- AQMA - it is now apparent that there will be considerable construction traffic going through Cowfold, yet from FOI requests to the Parish Council it is clear that they believed they had been given assurances before the first consultation, that NO site traffic would pass through the village. This may explain their apparent decision not to oppose the proposals.

Written Representation by CowfoldvRampion for 28th February Deadline

We wish to make the following comments regarding questions raised at the Hearings in February:

The Need for the DCO:

There is a maxim in medicine; first do no harm. This is not always possible, but as a clinician you have to do your best ensure the right treatment with the least possible damage to the patient. The same applies here. In a project of this size, there will always be harm done to communities and the environment, but we have an absolute obligation to ensure the proposal is in the most efficient place production-wise, and doing the least damage by its location.

It must not be steam rolled in at any cost on the grounds that it is green therefore it must be good. What is the point of investing in green energy if we find in the process, we have destroyed the very species and habitats we were seeking to protect?

The need for the proposed development is closely linked to sustainability.

Unlike the 2011 NPS, which focusses exclusively on windfarms to meet our green energy needs, the 2023 policy allows for a wider range of technologies, recognising the rapid development of other means of achieving net zero, and perhaps suggesting that by the time this windfarm is built it will be superseded by more efficient methods of providing the energy we need, then all this destruction will have been needless.

Even if it is needed, we must ensure it is in the most efficient and least damaging place possible. Regarding efficiency, PCS will provide you with evidence which shows how far Rampion 1 has fallen short of its predicted output. On the day the consultation was announced, I am told, Rampion 1 put out just 2.5% of its predicted daily electricity. It isn't very windy here. Rampion were asked to provide evidence of the actual output from Rampion 1; we have yet to be convinced. And we still see the scars across the landscape from Rampion 1's so called 'reinstatement'.

Furthermore, the manufacturing and disposal of the wind turbines pose environmental challenges. The production of these large structures involves the use of huge amounts of energy, probably not green, and of materials that have environmental costs. The disposal of decommissioned turbines is likely to contribute to environmental pollution. All of this must be offset against the positive gains expected from the wind farm in terms of clean energy production.

Sustainability must be at the heart of any such proposal. We strongly believe that this particular project fails to meet this criterion, as it actively destroys the three pillars of: economy, the environment and social community.

There are so many errors in the DCO documents, from repeated sections of tables, repeated or missing minutes, links to explanations in other documents which then don't give you that information, studies with big holes in them, conclusions drawn without sufficient evidence (or no evidence) to back them up, too many 'if possibles' or where necessary'. What looks like a really well-presented document in fact really lacks attention to detail, so everything they say about the impacts of this project have to be carefully scrutinised and cannot be taken at face value. We believe that many of the impacts are significantly downplayed and the mitigations unrealistic in their claims. Also, that the mitigation hierarchy has not been properly followed because Alternatives have not been properly explored first.

There is a continual downplaying of the significance of baseline findings, such as for ecology. If you do not accurately catalogue what is there to begin with, how can you meaningfully propose

mitigations and compensations to replace what is lost. If the viewpoints you choose to assess visual impact are not in the most exposed areas, and show pictures with all the trees and hedges which will have to be removed **still in**, how can you get a feel for what it will look like. If there is no evidence to back up claims, but rely on phrases such as 'we don't believe that' etc. If the references you say in one document give evidence or further detail about something, but actually no such detail exists, how can people judge the true effects of all this and weigh it in the balance against the claimed benefits to the nation, unless of course, like Rampion, you believe you just have to go through the motions and it will be nodded through.

Members of the panel, we have to trust you to do the right thing.

Many of their BNG claims are unrealistic or unachievable:

- They admit that "*losses and deterioration of irreplaceable or very high distinctiveness habitat cannot be accounted for through this metric.*" That means they are effectively excluded from the calculation because they CANNOT be replaced!
- They also expect to just buy credits in the form of biodiversity units from other providers, as yet unknown. Meaning that any benefits to compensate for what they have destroyed are not necessarily local.
- They say they have adhered to the mitigation hierarchy (i.e., avoid, mitigate, compensate, enhance); Yet there is no credible evidence that they have done the first one of these by careful consideration of the alternative locations of either the on or offshore components.
- "Habitats temporarily affected by construction will be reinstated within two years of loss other than in specific locations such as the onshore substation (see embedded environmental measure C-103)". It is utterly impossible to replace the centuries of carbon capture, released from the destruction of all the meadowland, scrub, hedges, and trees they will remove. Does that mean they **also** fall outside the calculations?? The evidence of Rampion 1 reinstatement (see below) confirms that this will not happen even outside the 'specific locations'.

There are many examples of where what is written is nonsense and many instances where the document will say that the answer is given in another referenced document, but in fact that document does NOT contain the answer at all

Some may seem trivial but all are a reflection of the lack of attention to detail which we believe stems from a belief that that they do not really have to try because the application will be nodded through, which has underpinned the entire consultation.

How can you weigh the benefits against the damage done when you simply cannot trust the data you are given?

There are so many shortfalls in the 'evidence' submitted. So many of the ecology studies are flawed- too many 'not accessed', "incomplete', the use of desk top studies to inform where to look, ignoring evidence from locals, and so on.

There are too many 'probably won'ts' or 'we do not expect that's' without any evidence or justification to back this up. References are made to other chapters for more information, but if you follow up the reference nothing is there or it simply refers you back to where you started. They have to give evidence to prove the balance is in their favour; they have not done so. We believe they cannot do so.

In the RVAA, some of the most horrendous-sounding impacts visually are dismissed as 'when considered in the national interest'. This means "we will get what we want, so we don't really have to try". This is not the way to conduct an investigation of this importance.

Rampion1reinstatement:

At the Issue Specific Hearings more evidence was requested about the poor record of reinstatement for Rampion 1. Please see below photographs of the Rampion 1 substation with dead trees around it, also the cable route as it crosses Bob Lane to reach the substation. All the hedging is dead. The photographs of the Albourne Road (B2116) do show living hedging but, after 7 years, it is still not providing adequate screening and certainly not equivalent to the mature hedging which was removed, and which, on either side of it, provides reasonable screening even in winter. The new hedging certainly does not provide equivalent wildlife habitats, and is unlikely to do so for many years to come.

The SDNPA also sent evidence of the damage to the SDNP in their scoping report and, I believe, will be sending more aerial photographic evidence in their WR/LIR for the 28th February deadline.

Please also see below comments from NH, chair of Bolney PC about the Rampion 1 substation screening, sent in an email dated 15th Feb 2024:

"With regards to the tree and hedge planting around the Rampion 1 substation and on the mounds created on two side of the substation to help with screening, there were problems over several years with these plantings and I have been looking through my old correspondence to try to remind myself of the timeline. A brief summary of what I have found:

- the first groups of trees were planted in fields to the north of the substation site in Spring 2016 but immediately AH and I spotted that the wrong height and wrong type of trees had been planted. We were not happy as we had been told the trees would help screen the electrical equipment from the Public Right Of Way close to the site and from the houses to the north. Some replanting was done to correct the mistakes in Spring 2016 but they had trouble sourcing one certain tree and therefore five trees were planted in Q1 2017 instead - a year late.*
- in October 2016 Rampion applied to WSCC who signed off on the DCO Requirements (like Conditions in a normal planning application) to change the planting timetable.*
- In April 2018 Rampion advised WSCC that planting on the bunds around the substation site created to screen some of the electrical equipment was being pushed back but would be finished by December 2018 - a year later than first scheduled.*
- August 2019 Bolney PC raised with WSCC that some of the tree plantings on the bunds had already failed.*
- At a meeting with Rampion in December 2019 we were told the dead trees on the bunds would be replaced 'over the winter'. In fact, this was done in late 2020 - two years after the trees had been planted.*
- It took 2 years for the temporary access track from Wineham Lane to be taken up and the fields re-seeded and planted. Re-seeding of the fields and re-planting of the hedgerows took place in late 2020 - both 3 years later than first timetabled.*
- In Feb 2023 I emailed Rampion and the new owner of the Twineham (R1) substation to find out who is responsible for the planting on the bunds as plantings had clearly failed. The new owners advised that surveys of the bunds had been carried out in 2022 and they were about to embark on 'a series of re-instatement actions along the cable route and around the Twineham substation' in March 2023."*

This does not inspire confidence that there will be any effective screening or indeed habitat loss recreation during what will be a significant part of the lifetime of the Oakendene substation or windfarm.

Screening at Oakendene:

At the Hearings, Rampion were asked to show how the substation could be adequately screened from Oakendene Manor to reduce the heritage impact. The Design and Access statement (Doc Ref 5.8) recognises that this will not be possible nor will it be possible to screen the substation out of view of the manor house from the PRoW. (See paragraphs 3.3.3 and 3.3.4)

The loss of trees will be substantial at Oakendene, and visually damaging. The substation will remain in clear view of, and alongside, the manor house, for much of its lifetime. Non-deciduous screening would be inappropriate to the landscape. With a substation lifetime of around 30yrs the oaks will not have grown back to anything like their original height and girth before decommissioning work will be needed, or even to a size such as could provide any meaningful screening. The habitat loss is unmitigable. We do not believe that it is possible to screen the substation from the house in a manner in keeping with its surroundings, or to irreversibly damage the rural setting.

No pre-planting will be possible to the north or along Kent Street, to get a 'head start' on vegetation growth before construction is completed because the northern part of the site will be used as a vast compound, storage site, car parking and concrete mixing facility and will have 20m fencing around it. Any early planting would be completely destroyed. As can be seen even from the 'best case' Albourne Road hedging, the appearance will be visually stark and shocking for many years after completion, and will radically change and industrialise the rural feel of the whole Cowfold parish.

The Design and Access document makes the extraordinary statement that for the A272 *"except for the construction phase, the rural character of this road corridor, with its existing trees and hedgerows will be maintained and strengthened. Existing hedgerows will be allowed to increase in height and increased native woodland planting provided beyond the hedgerow. The appearance of the access off the A272 will be designed to appear low key, matching the style of existing farm / estate access with limited signage. The site access road will incorporate a curve, with planting to prevent views along a 'straight' access road into the substation, maintaining the rural appearance of views from this road."*

But most of the existing hedge and several trees along the A272 will be removed for a visibility splay and as the photographs below show will take years to provide adequate screening. In addition, our own photographs, in our LIR show that the substation will be very visible from the A272 as it comes a significant way north and hedges running east west will be removed within the site. (see CVR LIR section 6: Addendum Appendix 1 viewpoint analysis).

To make matters worse, it is likely that the final ground level beneath the substation will have to be **raised** because of the flood risk.

The AONB which rises to the north, just a couple of hundred meters away will be looking directly down onto it.

To site the substation at Wineham Lane would also be damaging and unpleasant visually, but far less so than at this location, and would be visible to far fewer people, with a lesser negative impact on surrounding communities or the AONB

This should not be allowed to go ahead.

Please see the photographs below.

Rampion 1 Reinstatement - Mid February 2023



Rampion 1 Substation approach north of Bob Lane



Bob Lane north side

Rampion 1 substation 'Screening'





Bob Lane south side



Bob Lane south side



Bob Lane south side

Albourne Rd (B2116) – February 2024



North Side



South Side



South Side