



*COWFOLD RESIDENTS’
IMPACT STATEMENT
ON RAMPION 2*

Cowfold Residents’ Impact Statement on the
Rampion 2 Windfarm Development Consent
Order (DCO) Proposal

Includes updates following DCO submission.

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Section 1: Introduction and Executive Summary

Introduction

The following document is a collation of concerns raised by Cowfold residents regarding the impact of the proposed Rampion2 substation and cable route on this community, the wider population and the surrounding wildlife habitats. These views are gathered from around 130 Cowfold households who have contacted us. There are approximately 740 households in the parish, so this represents views from around 20 per cent of the population, but double this number have written to WSCC to express similar concerns since the village first became aware of the proposals at the end of 2022. There remains a significant part of the population which is still largely unaware of what the project actually entails.

The lack of adequate, appropriate evaluation of the substation sites before choosing the final option has been highlighted by WSCC, SWT, Natural England and local residents on many occasions. It has meant that inadequate attention has been given to the traffic, health, economic and environmental impacts of the development at this site.

Part of the point of the consultation process is to ensure the least environmentally damaging, most appropriate location is chosen. When a site has been chosen to take the path of least resistance, as in this instance, it has resulted in the retrofitting of actions and designs to deal with the issues they uncovered at a later date. We have a duty as a nation to be as gentle as possible on our environment and not simply to take the option preferred by the applicant for reasons of profit or self-interest.

The failure to properly evaluate the site either by consultation or survey before choosing it has led to a succession of increasingly damaging environmental decisions in order to compensate for the problems they have since uncovered

Sustainability:

When considering the merits of the proposal, both in terms of energy efficiency and biodiversity net gain, the reality of Rampion 1 must be considered. The Protect Coastal Sussex Alliance have provided ample evidence that Rampion 1 has not fulfilled its expectations of energy production and is less efficient than many windfarms in the North Sea. (See Protect Coastal Sussex Adequacy of Consultation and Local Impact report submissions)

SWT and the SDNP have raised concerns about the failure of much of the replanting for Rampion 1. Bolney parish council in their 2020 scoping response raise many issues about the failure of hedge replanting and much of the landscaping. One only has to visit the Rampion one site to see 'replanted' hedges consisting of just plastic tree protectors with dead sticks inside them. This is not biodiversity net gain. There is clear evidence that Rampion did not carry out the promises they made with regard to habitat restoration. There is a low expectation therefore that they will do any better with an even larger project.

Rampion have followed the risky strategy of not producing evidence in a timely manner. It is very hard to justify the choice of substation location on sustainability or environmental impact grounds as will be demonstrated in the following sections.

Friends of the Earth, whilst recognising the urgent need for green energy also comment that “it is vital to empower communities and enable them to have a powerful say in local development, including major infrastructure proposals. The Government’s deregulatory planning reforms in England have side-lined local planning authorities and communities: patterns of development should not be governed by where there is the greatest profit to be made. Community ownership of (for example) energy is essential to link local resources to local populations, and to create inherent incentives to safeguard the long-term viability of natural resources and deliver sustainable infrastructure. Tokenistic consultation for otherwise undesirable development must be avoided and replaced by community rights and influence on the decisions that affect them.”

Even people normally expected to support green energy projects at all costs voice their concerns about the appropriateness of wading in without due consideration for the very environment we aim, by the switch from fossil fuels, to protect:

- Regarding Rampion 2: Green councillor Isabel Thurston (Barnham) said she wanted to see a local impact report, adding: “It is really difficult for me to say this but I don’t think I would be happy with us indicating approval or support until we got this impact report.
- Although it didn't have any councillors at the time, the local Green Party rallied against proposed solar panels within agricultural fields in Hastings Country Park. The Labour-led council then abandoned the project after the government's environmental adviser, Natural England, said the scheme "would result in significant landscape and visual impacts". The proposed site was "not compatible with a solar farm, which would industrialise this very precious landscape habitat".
- Frank Adlington-Stringer is one Green councillor who has opposed a solar farm in the past. In 2021, before he was elected to North East Derbyshire Council, Mr Adlington-Stringer wrote an article explaining why he could not support a solar farm in the county. He said "the loss of green space" and the restriction of "already limited habitats" were among his main concerns. In the end, the application was rejected by government planning inspectors. At the time, one local Green councillor said "younger generations are very concerned about the effects of climate change, and might see things differently". In this case, at least, Mr Adlington-Stringer, 25, did not. He says while he is open to solar farms, he believes such projects should not be a "priority".

"We shouldn't be exchanging green energy for green spaces," he says.

Executive Summary

We have evidence to demonstrate that the local community of Cowfold was not consulted about the proposed substation being located at Oakendene, Cowfold. Furthermore, the decision announced on 14.7.2022 by Rampion selecting that site, was made without sufficient or detailed studies, as evidenced by the contents of the PEIR, and certainly with no local input.

This significant decision should have been supported with proper research, detailed studies, and an understanding of the implications. Instead, it appears to have been selected because there was no local objection. There was no local opposition because the Cowfold community knew nothing about it.

The Rampion 2 team have consistently promised, but failed to deliver, detailed surveys or studies on engineering, the environment, a montage, or traffic modelling, despite numerous requests from various organisations and the public. This deliberate and tactical act will inevitably allow less time for proper and thorough examination and for the determination of correct mitigation measures.

It is an incomprehensible choice of location, given the damage that it will cause both economically, environmentally, and physically.

Ecology: The fact that it is proposed on an untouched flood plain, which contains huge biodiversity and acts as a massive carbon store, makes achieving biodiversity net gain challenging. Based on Rampion 1's poor track record regarding re-planting, numerous breaches of the DCO requirements, which caused pollution and contamination, and on-going regular flooding around Rampion 1, there is a real danger of long-term damage and polluting the watercourses which feed the river Adur. There are a significant number and variety of protected and red-listed species including nesting nightingales, great crested newts, badgers, and turtle doves, that will be adversely affected, by the destruction of habitats, and noise and light pollution from both the construction and operation of the substation. The nightingale breeding sites are, perhaps, amongst the most significant in Sussex, and will not recover.

The evidence would suggest that Rampion are downplaying the impact on wildlife habitats and the environment and the extent to which the losses can be mitigated in this instance. We argue that their choice of substation site and cable route has a negative impact on biodiversity and resilience.

Regarding the local community:

- **Economic Impact:** there are 130 businesses in Cowfold that 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. Sitting in traffic (for 15 mins) is estimated to cost c. £20m pa in lost productivity, not to mention the additional fuel, and potential loss of trade for local businesses, for around six years. The assessments of economic impact of the project in the DCO appear to focus only on the effects on tourism on the south coast
- **Accident rate:** The Oakendene site is 1 mile east of Cowfold along the A272, an accident hot spot notoriously dangerous and would be made worse by the increased traffic to the site.

- **Air pollution:** The standing traffic will exacerbate the existing air pollution problems in this AQMA village and the A272, further affecting the health and wellbeing of the local community.
- **Access to emergency services:** The A272 is a key route for emergency services to local hospitals from the whole southern Horsham area
- **Kent Street and Dragons Lane:** These tiny residential lanes will be used for the construction of the cable route, yet use of the much larger two lane Wineham Lane was assessed by Rampion as inappropriate
- **Picts lane, Bulls Lane, and Longhouse Lane:** the congestion on the A272 will result in the completely inappropriate use of these single-track lanes as 'rat-runs' to avoid delays
- **Noise pollution:** both construction and operational noise will push noise levels for properties on the A272 to beyond tolerable levels. The road noise level at this point is already in the top 1% nationally.
- **Impact on High Weald AONB:** which is only a few hundred metres from the site and looks down on it. The viewpoint from the AONB chosen in the submission is from a location some kilometres away and therefore misleading

These disruptions are likely to be longer lasting than Rampion suggest. Rampion's proposed timescales are also unlikely to be accurate, given the track record for Rampion 1 which was supposed to take two years and took over six years to complete.

Siting the substation at Oakendene, and its consequences, are against many of the key principles of the Horsham District Council Local Plan, the WSCC strategy for the future, and the Cowfold Neighbourhood Plan.

We believe that the following evidence will support our view that the consequences, unforeseen or ignored by Rampion at the time they chose the site, are unacceptable and unnecessary, and that reasonable alternatives exist. This disastrous scenario could be avoided if the substation were located at Wineham Lane North or South site, next to Rampion 1. There are only a handful of businesses in the local vicinity, and the traffic does not back up to Wineham Lane on the A272, making it unlikely to cause as much disruption to road users; as demonstrated during the construction of Rampion 1, and the biodiversity and heritage impacts will be far less.

Addendum to Executive Summary following the DCO Submission:

Lack of consultation:

The DCO consultation chapters do not address any of the issues we raised in our Adequacy of Consultation report. On the contrary, they highlight Rampion's failure to recognise the lack of responses from Cowfold residents in the first part of the consultation or to question why this might be; surely unusual given that the substation will be the only onshore part of the project above ground. They also have been selective in the responses they have chosen to take into account and ignored or not understood the evidence from residents when they have received it, as we will show.

Lack of Attention to Detail:

The information in the DCO is very smartly presented. However much of the data remains largely desktop studies, and is of very poor quality containing many inaccuracies, conflicting statements and details which are too vague to be meaningful. It should not be left to councils and members of the public to spot these errors and omissions.

The first was the identification of Oakendene as being to the west of Cowfold rather than the east in the notification of the opening of the registration period. Correction of this resulted in an extension of the deadline.

The email which was then sent to PLG Representatives to amend the date, says "The period for submitting relevant representations commenced on Wednesday 20th September 2023 and will **end at 11:59pm on Monday 6th 2023.**" i.e. no month.

Whilst these may appear trivial, they are indicative of the general lack of attention to detail which is repeated in the DCO submission documents themselves, where there are many, more serious, examples of inaccuracies and omissions, even looking only at the information related to the onshore substation area.

We have submitted many examples as an Appendix to our Relevant Representation, and all individual examples will be expanded on in the relevant sections of this document. Additional, but not exhaustive, examples, not previously mentioned include:

- In The Outline Construction Traffic Management Plan, (Doc Ref 7.6) there are many maps and diagrams at the end but no reference to any of them in text in the chapter, making them impressive looking, but meaningless.
- An incomplete list of properties in the RVAA, and therefore excluding many of those MOST affected. It is astonishing that they have not included Oak Cottage, Allfreys, Averys, South Lodge, Kings, Ridgelands, nor indeed **any** of the properties on Kent Street or to the west of the substation. Also, a whole housing estate at Knapp Drive south of the monastery. **Nor have they even considered the homes which are actually sited at the entrance to the industrial estate or those within the compound of the industrial estate itself.** Their lives will surely be made intolerable by the vehicle movements and noise at TCC3 (Compound west of Oakendene industrial estate).

- Throughout there are many instances of maps which appear to contradict each other, uncertainty about the exact interpretation of definitions used, or the extent to which HGVs will enter the AQMA in Cowfold

All of this indicates that, what at first sight appears to be a smart presentation, actually contains very poor-quality data, with conflicting or incomplete graphs, charts, maps and statements.

Therefore, the evidence presented clearly cannot be taken at face value and requires careful scrutiny, which must be allowed to take place in order to ensure the best outcome for the project, communities and the environment.

Downplaying of impacts:

As in the PEIR reports, the DCO submission has unfortunately continued to downplay the impacts of this proposal on so many aspects including the environment, health and social wellbeing. This will be detailed in the relevant individual sections and addenda which follow.

Many of the impacts of using this site had clearly not been understood by Rampion until later and therefore they cannot possibly have taken them into account when choosing site. The choice cannot therefore have been made with proper comparison. Instead, they chose the path of least resistance.

We believe that the proposal is now so different from the one consulted on as to require a reopening of the consultation:

- During the informal consultation and the first-round consultation Kent Street was recognised as ‘a single-track lane unsuitable for HGVs’, and in July 2021, James d’Alessandro wrote to a resident who was concerned about the use of Kent Street by construction traffic: **“In January 2021, the Council responded to the Rampion 2 informal consultation process to the effect that Kent Street is not deemed appropriate for temporary construction access...”**. Yet now we discover that Kent Street is expected to bear the significant burden of accessing the various cable routes and haul roads. We are however, pleased to learn that it will NOT be used to avoid the AQMA in Cowfold, although this was not initially denied at the Cowfold meeting in June 2023 when raised as a concern.
- The use of the western Oakendene compound was originally as a storage compound. Now it appears to be intended also as a huge car park from which many thousands of heavy and lighter vehicles will come and go. And where concrete will be mixed.
- The complicated traffic management plans and huge compound at the industrial estate, will cause far greater impacts on traffic flow than anything discussed during the consultation period.
- ‘No HGVs will go through the AQMA of Cowfold’ has now become HGVs ‘from the Oakendene compound’ and ‘unless necessary’. The HGV claims made during the consultation were misleading as in fact there will be thousands of HGVs going through Cowfold to the A281- there is no other way, and half the many thousands of LGVs and private vehicles coming daily

to the Oakendene compounds will come through the village. 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 initially.

- 8040 HGVs at Oakendene was the number presented during consultation. We have heard some people choosing to support the proposal as this did not seem like a large number of vehicles overall. Yet the DCO submission now appears to indicate that there will be nearly 21000 HGV movements in and out of the 2 compounds and 70000 LGVs (possibly up to 7.5T).
- A planning application has been made since the Acceptance of this proposal, for a Battery Storage Farm at Kent Street, immediately to the south of the substation site. At a meeting with four residents, Vicki Portwain and Lucy Tebbutt flatly denied any involvement by Rampion in this and repeated this denial in a follow up email. However, they were well apprised of the proposals. It is not credible that Rampion are not at least collaborating with the applicant, as the storage farm is situated directly over the incoming cable and will connect into it. Therefore, the Battery Farm should have been included in the DCO proposals. It is disingenuous to pretend it is a separate entity as the cumulative impact must be considered.
- At the Ashurst meeting and the Cowfold meeting in 2022, and even at the Cowfold Information event in June 2023, we were told there was the possibility to lower the ground level of the substation to reduce the visual impact. This would now seem to be highly unlikely as they have recognised that the site floods and therefore, if anything, the ground level may have to be raised, making the visual impact even worse.
- The acceptance now of the grim impacts on PRoWs and the Grade 2 listed Oakendene manor (see updated Rampion2 Design and Access statement 5.8)

Cumulative impacts:

We do not agree with Rampion's assessment on the cumulative impacts of this of this proposal. (Doc ref 6.2.18) There are numerous battery storage farm applications around the main substation, one attached to this proposal at Oakendene, and a solar farm of 180 acres to the west of Cowfold. This will radically alter the rural character of the area. (See Landscape and Visual Addendum)

We would like to request a site visit to Oakendene and a topic-specific hearing at the Village Hall in Cowfold to properly examine the consequences of the proposed substation and its impact on Cowfold, its community, businesses and environment.

Section 2: Policy and Legislature

It is understood from advice given by PINs on 9th October, that the DCO will be examined under the current suite of Energy NPS i.e. those which came in to force in 2011. However, the secretary of State will have the power to review under the 2023 legislation; therefore, both have been referenced where appropriate in this document.

The Planning Act 2008 guidance on preapplication consultation states that the Consultation has the purpose to obtain important information about the economic, social and environmental aspects of a scheme from consultees. This helps promoters to identify options which are unsuitable.

Transparency and access to justice underpin the government's approach to the strategy for sustainable development.

The point of consultation is that people should have access to information, put forward their ideas and feel confident that there is a process for considering their ideas. It is also to ensure that local knowledge is taken into account.

It is essential that promoters understand the local communities. If it is to be seen as positive, the consultation process must be seen to be legitimate

Alternatives:

The overarching National Policy statement EN-1 2023 4.2.15 states that "Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. "

We believe that the evidence is overwhelming, with regard to the substation site at least, that by failing to consult properly with the population of Cowfold, they have not properly considered the alternatives to genuinely identify the most suitable option. Rather, they have openly stated that they have chosen the 'path of least resistance' in 'choosing' the substation location because they had no objections from this area, as nobody was aware until after the substation site was chosen. They have then had to 'retrofit' the reasons to justify this. In reality, they have dug themselves into ever deeper environmental holes with regards to traffic, ecology, access etc because they had not consulted at the appropriate time, and were therefore unaware of key facts until too late. The Rochdale Envelope should not be used to explain the holes in their understanding of the situation around the Oakdene site; they could have been foreseen if proper consultation with local residents had taken place.

Paragraph 4.2.22 "The Secretary of State should be guided in considering alternative proposals 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 as the proposed development.”**

The alternative sites at Wineham could deliver this in the same or even less time. (See Section on Alternatives for details)

In addition, para 5.10.31 states "When considering applications for development within National Parks... include an assessment of ... (and) the cost of, and scope for, developing all or part of the development elsewhere outside the designated area, or meeting the need for it in some other way." And, 4.2.17 "Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements."

This means that alternative locations, for both the overall project, and the substation location, must be considered. Rampion have so far been extremely dismissive of suggestions that utilisation of the existing Rampion 1 cable route directly to a substation at Wineham would do far less damage to the SDNP. They have not provided any evidence to support this dismissal. Nor have they considered adequately alternative substation sites.

The onus is on Rampion to provide good evidence that they have considered the alternatives properly, and not on individuals as both national alternative locations and substation locations were mentioned in their original proposals:

4.2.28" It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it. "

Mitigation hierarchies:

Rampion make much of their plans for biodiversity net gain, much of it probably off site. However, before even considering this, they **MUST** show that they have properly addressed the mitigation hierarchy designed to protect the environment and biodiversity in the first place, before trying to replace it.

The urgent need for critical national policy does NOT relieve them of this obligation:

EN-1, 2023:3.3.60 "As set out in EN-3, subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts **not capable of being addressed by application of the mitigation hierarchy.** "

4.5.8 *“Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations.”*

EN-1 2011 4.4.3: *“the IPC should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale as the proposed development;”*

We will argue that, at least with respect to Oakendene and the northern cable route these impacts **are** capable of being addressed and in a timely manner.

By failing to consult, and to complete proper comparisons of the sites before selecting Oakendene, Rampion have not complied with the mitigation hierarchy in terms of limiting damage to habitats and biodiversity, nor have they met the obligation to consider less damaging alternatives:

2011 5.3.7 *“As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives; where significant harm cannot be avoided, then appropriate compensation measures should be sought.”*

2023 4.1.5” *the Secretary of State should take into account: ...its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy “*

4.5.1 *“Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. **Projects should therefore not only mitigate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.** “*

5.4.42 *“As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, **including through consideration of reasonable alternatives** (as set out in Section 4.2 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought. “*

5.4.43 *“If significant harm to biodiversity resulting from a development **cannot be avoided (for example through locating on an alternative site with less harmful impacts)**, adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm and **consent may be refused.** “*

This requirement to consider how the project can be delivered in the least damaging way relates also to impacts on communities and the economy:

4.2.4 To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information **on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy.** This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.

Rampion have done little to understand these impacts by failing to engage with communities at crucial times in the consultation and ignoring them when they have provided evidence

Sustainability:

EN-1 2011 4.1.3 “In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:

- its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
- its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.” This is reiterated in NP-1 2023 4.1.5 including the requirement to follow the mitigation hierarchy.

In failing to properly consult or to consider the alternatives properly at an early stage of the process, we would argue that, on weighing impacts, the balance is **not** in favour of granting this application.

4.5.17 “Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 of the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore¹¹² development in England to which the application relates.”

The 2023 Regulations (4.2.2) specifically refer to effects on population, human health, biodiversity, land, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them.

We will provide evidence to show that they have significantly downplayed the impacts on all of the above, whilst at the same time over estimating the energy benefits to the nation and the mitigations they can achieve.

Other Policies and legislature:

WSCC requested Rampion to follow, the National Grid Company Horlock environmental guidelines of substation siting and design which state that

“In accordance with its duties under Schedule 9 of the Electricity Act, the Company gives due regard to the preservation of amenity and takes reasonable steps to mitigate the effects of its relevant proposals. To achieve these aims the Company therefore has to balance technical, economic and environmental considerations to reach reasonably practicable development proposals. *“We do not believe that Rampion have weighed economic considerations, other than their own, or environmental concerns, in the balance when choosing the site*

“...In each case the effects of the overall development on the environment should be assessed, prior to a commitment to a particular site or design.” *No proper evaluation of the environmental*

impact at Oakendene or its cable route was carried out prior to choosing the site. Desk top surveys were the mainstay of their assessment up to that time and would appear to remain so in the DCO submission

*"...In the development of system options including new substations, consideration must be given to environmental issues **from the earliest stage**" Rampion have consistently ignored pleas from SWT and local wildlife enthusiasts to take into account evidence which may not be in the biodiversity register*

"...Care should be taken in relation to all historic sites with statutory protection e.g. Ancient Monuments, Battlefields and Listed Buildings." Instead, they wish to put it in the very parkland of a listed building

*"...Areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas should be protected as far as reasonably practicable." Locating it in Wineham lane **would** be reasonably practical away from rivers, ponds and a very large lake*

"...Effects on land drainage." Yet they are proposing a location which floods and where the ditches flow into a stream and lake to the immediate south

*"...The design of access roads, perimeter fencing, earth shaping, planting and ancillary development should form an integral part of the site layout and design **to fit in with the surroundings.**" The access road at Oakendene will radically alter the rural feel of its surroundings and require the removal of the already -existing, most effective planting. The Wineham Lane sites already have adequate access and the surroundings already incorporate similar structures*

"...[require] Information describing the site and its environment including: - 2.1 Physical features such as -Flora and fauna -Soil: agricultural quality, geology -Water courses including land drainage generally Climatic factors - Historic heritage and archaeological sites -Landscape and topography - Local recreational uses -Proximity of population and any other relevant environmental features." We do not accept that sufficient consideration has been given to land drainage, the proximity or heritage importance of Oakendene Manor, Kings, or other grade 2 listed buildings on the site or cable route, to the many businesses on the industrial estate or those affected, in Cowfold and the wider County, by delays on A272, or to the recreational use of this location by many residents.

*"...Section 3 Assessment of effects on the surrounding area and landscape including: - 3.1 Visual effects, emissions during normal operation, noise, light, impact on local roads and transport. 3.2 Effects of the development on buildings, the architectural and historic heritage and archaeological features. 3.3 Loss of, and damage to flora, fauna and geology. 3.4 Land use/resource effects such as - quality and quantity of agricultural land to be taken - sterilisation of mineral resources and alternative uses of the site. 3.5 Changes to hydrographic characteristics. 3.6 Air and Climate 3.7 Indirect matters such as - traffic (road, rail, air, water) related to the development, - development associated with the project, e.g. new roads, sewers, power lines, pipelines, telecommunications etc." Again, there is no evidence that any of the above were dealt with in other than the most superficial manner **prior to making the decision to use this location***

As a nation we have a responsibility to choose the most energy efficient ways to develop green energy and to place them in the least ecologically damaging locations. **"We shouldn't be**

exchanging green energy for green spaces," Frank Adlington-Stringer, Green councillor, North East Derbyshire Council.

The Horsham District Council Local Plan seeks to conserve and enhance the beauty of the High Weald AONB, just a few hundred metres away and looking down on to Oakendene:

In addition to the identified Green Infrastructure, a strategic level Nature Recovery Network is being established to which the Green Infrastructure network will contribute. The Nature Recovery Network will be informed by the five year 'Wilder Horsham District' partnership between the District Council and the Sussex Wildlife Trust approved on the 28 November 2019. Nationally, 41% of UK species' populations have reduced since the 1970s, and 15% of wildlife species are estimated to be under threat of extinction. The partnership aims to reverse the decline in species and habitats and to contribute to tackling and reducing the impacts of climate change. The partnership seeks to take a landscape approach to overcome fragmentation and build landscape resilience to help ensure wildlife can move around, and to build a legacy so the work to reverse the decline continues beyond the life of the partnership. It will initially focus on the following landscapes and areas but this focus may change to take into account work by the Sussex Nature Partnership. Development proposals should therefore consider how they can contribute towards to the following:

1. **Hedgerows** in the Low Weald (providing important connectivity between fragmented habitats)
2. **Woodland** – new planting and allowing natural regeneration, important tools in capturing more carbon and helping wildlife
3. The Adur catchment; improve **freshwater and floodplain habitats**, water quality and flood resilience through working with natural processes
4. Join up key sites, such as the Knepp Estate with the woodland to the north-east of Horsham town and The Mens Nature Reserve in the west of the district, creating the core of a District wide **ecological network**.
5. Take action to support pollinating insects throughout the district, in both towns and rural areas.

Every one of these aims would be undermined by the placing of the substation at Oakendene and the cable route across the floodplain of the Cowfold stream, which feeds into the Adur. The ancient hedgerows, trees and woodlands are an important wildlife corridor, and insects abound. There are important nightingale nesting sites across the location; an important red-list species, whose numbers have declined in the UK by almost 90% in the last 50years and are now only found in the south and east of England (British Trust for Ornithology data). Ancient wildflower meadows are under threat.

HDC also recognise the important role that small businesses in rural areas play in contributing to the local economy and as providers of employment; the need to address the serious congestion points on many of the county's roads and the attendant issues around air quality.

In fact, in **the current draft Local Plan, Policy 30 Lists Oakendene as a Key Employment area where Local Employment is to be safeguarded. In particular 9.24 and 9.20. If this goes ahead, the small businesses on the Oakendene Industrial estate will be put at risk.** Had an alternative site been chosen, this would not have been an issue.

The WSCC West Sussex Plan expresses the need to support businesses such as tourism, and wider and local businesses. The proposals **will** significantly impact on many of WSCC's measures for success; business survival and retention, roads, economic growth, and residents who feel it is a good place to live and work.

For both HDC and WSCC, the enhancement of the county's biodiversity, growing the economy and improving the quality of life of residents and visitors by better traffic flows and reduced air pollution are important aims. As will be laid out in the following Chapters, and contrary to all these aims, placing the substation at Oakendene is one of the most environmentally and economically damaging locations it is possible to choose; certainly, much less so than the alternatives in Wineham lane.

EU Taxonomy regulations:

The EU Taxonomy is a framework, to which RWE have signed up, that classifies economic activities as environmentally sustainable based on specific Technical Screening Criteria (TSC). Accordingly, the economic activities only qualify as environmentally sustainable if they:

- Meet **substantial contribution** requirements,
- Meet **Do No Significant Harm (DNSH)** requirements,
- Adhere to **minimum safeguards**.

The DNSH principle seeks to ensure that actions that support one environmental objective do not negatively impact other objectives.

The DNSH principle is outlined in the EU Taxonomy regulation as a requirement to avoid significant harm to any of the environmental objectives set out in the regulation. This is to ensure that economic activities do not qualify as environmentally sustainable if they cause harm to the environment to an extent that outweighs their contribution to an environmental objective. "

"The third requirement in the EU Taxonomy is to meet the minimum safeguards. Similar to the DNSH, the minimum safeguards ensure that economic activities that cause social harm are not classified as environmentally sustainable."

This means that they cannot create an overall portfolio of good behaviour, but that EACH activity must overall do no harm. Given the major concerns from SDNP, SWT residents and wildlife groups around the Cowfold substation and along the coast, a case for environmental, economic and social harm can easily be made

The Hornsea Project Four Offshore Wind Farm application has recently been granted development consent by the Secretary of State for Energy Security and Net Zero. A joint statement from both RSPB and The Wildlife Trusts said: "Today's decision is a damning indictment of the UK

Government's commitment to halting species decline, ignoring the consensus of evidence from leading scientists who have unequivocally stated that this development risks causing further declines to nearby populations of Amber-Listed seabirds such as Gannet and Razorbill, while putting faith in unproven mitigation for Guillemot and in untried and untested compensation scheme for Red-Listed Kittiwake. "Our globally important seabirds are in a precarious state. Decisions like this push already vulnerable species closer to the edge."

Katie-Lo Luxton, director for conservation at the RSPB said: "This must be the last time we trade off nature against climate. We all agree that we must urgently decarbonise our energy system and invest in renewable energy, but we cannot keep selecting areas for new developments that we already know are crucial to wildlife and ecosystems, and then retrofit nature's needs by asking energy companies to perform impossible tasks of compensating for damage."

And Joan Edwards from The Wildlife Trusts added: "This should be a wake-up call for Government that we urgently need a much better plan for managing our seas. This includes identifying and protecting strongholds for seabirds and other marine wildlife, avoiding development in these areas, and investing in marine restoration projects – benefitting nature, climate and industries that rely on healthy seas."

For the sake of the long-term future of the very wildlife green energy projects aim to protect, please let us not repeat these mistakes here.

Addendum to Policy and Legislature Following DCO Submission.

From the evidence provided in the DCO and from the many Relevant Representations already submitted, it is clear that overwhelmingly the harm done to the local habitats and wildlife, communities and the economy far outweighs the benefit nationally from this proposal. The DCO submission has significantly downplayed the former, whilst over-egging the latter; a view clearly shared by many of the statutory consultees. EN-3 (2011) Para 2.4.2 states that *“Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology.”* We will show that the Rampion project fails to meet any of these requirements and instead shows an arrogant disregard of concern for the environment green energy projects are supposed to be there to protect.

As we will demonstrate in the relevant Section Addenda, the DCO provides no convincing evidence of compliance with the mitigation hierarchy or the requirement to adequately consider the alternatives. Many of the ecology studies (Chapter 22 and related Appendices) were only carried out **after** the site was chosen, very late in the process, and there has been no meaningful assessment of the economic impacts or traffic at all.

The Consultation Reports and Alternatives documents in the DCO confirm our view that they have not taken adequate steps in terms of properly making use of local knowledge or putting themselves in a position to appropriately assess the alternatives. This makes it impossible for them to have complied with the mitigation hierarchy. Instead, they appear to rely heavily on the vague and at times untested compensations to replace what they have made little attempt to protect.

Rampion have not properly considered the alternatives. As part of the development falls within the SDNP, Rampion must consider the alternatives (NPS EN-1 Mar 23, 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). Our evidence 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 properly before choosing the site.

Biodiversity, sustainability and net gain:

On December 8th, 2023, the Nimes Court of Appeal ruled that the Bernargues windfarm of seven turbines must be dismantled. They were built in 2016 by Énergies Renouvelables du Languedoc (ERL) in Lunas, Herault in France. They were responsible for the death of over 1000 birds and bats a year, including two golden eagles and the court ruled that their benefits did not outweigh the harm.

The court also ruled that they had not done sufficient studies into the risks when they presented their initial application.

The noise from the wind turbines was also a factor in the court’s decision; again, the applicant had downplayed the expected levels and not provided robust enough evidence.

Apart from Rampion's failure of due diligence in the present case, which mirrors the faults of ERL, the material point here is that a court had weighed the evidence and found it incontrovertible that these wind turbines are harmful to wildlife in a significant way. If only seven turbines can do so much harm, 90 or more turbines of substantially greater size have the potential to do so much more irreparable damage. It is for Rampion to prove that this will not be the case; they cannot. Let us hope that this is not a repetition of the Hornsea project, which the **RSPB and The Wildlife Trusts had described as** "a damning indictment of the UK Government's commitment to halting species decline."

Section 3: Alternatives

There are alternative energies and alternative offshore locations which are more efficient and therefore better value for money for the nation than this one. This is ably set out by the Protect Coastal Sussex group and will not be discussed further here. Instead, I will focus on alternative options for the substation location, as I believe, the site has been chosen for reasons other than those of genuinely seeking to find the most suitable, least damaging location. The Ecology Chapter sets out the case for why the Oakendene site is the worst location from a biodiversity point of view

In the Rampion 1 examination in 2014, the final decision by the secretary of state, para 18, makes the point that when considering alternative substation and cable route alternatives, none of the areas had been sufficiently researched to be included. In the current case, Rampion themselves **must** have done sufficient investigation of these sites in order to meet the criteria for adequate consultation and environmental assessment, as the alternatives were themselves part of the consultation, unlike the first Rampion project. The argument of insufficient evidence cannot therefore be acceptable in this instance. The argument is rather one of timing; these examinations of the sites were not carried out adequately BEFORE the decision was made. Below I set out the reasons why Oakendene is not the best option, being ecologically highly damaging, and disruptive and dangerous to many people because of the traffic implications of access from A272.

Rampion themselves, when considering other sites in publicly available documents at the time the consultation was taking place, make several points against other sites, many of which also would apply to Oakendene, yet were not given the same weight when assessing Oakendene. e.g. the businesses affected at Wineham Lane south; there are far more affected by Oakendene, and the importance given to the Star industrial estate at Partridge Green, but not to the one at Oakendene. The extreme proximity to the Grade 2 listed manor house, and to ancient woods is discounted, yet given weight at other sites. See below for a fuller analysis:

From PEIR Chapter 4 Alternatives:

3.4.135 In order to meet National Grid Code reactive power requirements, dynamic compensation electrical equipment **should be installed ideally as close to the grid connection point as possible.**

Following further design work, it was identified that an area of approximately 9ha is required to site the substation, including areas for temporary construction, permanent infrastructure and embedded environmental measures.

3.4.139 **Snakes Harbour** substation search area was discountedthe site has open views from Snake Harbour House to the immediate west and Snakes Harbour Farm to the north. ***Yet Oakendene Manor's open views are discounted as a problem capable of being landscaped away.***

3.4.141 **Star Road** was discounted from any further consideration in the PEIR. This is adjacent to an industrial estate in the village of Partridge Green (**Figure 3.6, Volume 3 and Graphic 3-17.**) ***As is the case at Oakendene.*** The following constraints were identified associated with this substation search area:

- the substation search area is located in a floodplain with the southern part of

the area situated within Flood Zone 3; ***There are streams and a lake along the southern border of the Oakendene site*** and a ditch through the middle of it running north-south, all of which flood

- several public rights of way cross the substation search area which would potentially need to be permanently re-routed; ***There is a PROW along the northern side of the Lake at Oakendene which has not been mentioned in any of the Rampion or WSCC reports***
- the substation search area encroaches on grazing marsh, and is adjacent to ancient woodland, both of which are priority habitats. ***These same habitats exist at Oakendene***

3.4.143 Wineham Lane South substation search area....

Constraints associated with this substation search area option include its close proximity to ancient woodland which borders the east of the area, and its proximity to a Grade II listed building. ***Just as for Oakendene.***

3.4.144 Desk study data does not suggest a concentration of records of protected species in this substation search area and cable route options leading to this substation search area option requires fewer watercourse crossings than Wineham Lane North and Bolney Road/Kent Street search area options. ***The Oakendene site and cable route DO contain large numbers of red list species as submitted to the biodiversity records office by local residents and the people who live and work at the Industrial Estate.***

3.4.145 This option is less than 50m from the Royal Oak pub and residential properties on Wineham Lane, so there is potential for socio-economic impacts and disturbance to residents. ***The socioeconomic impacts on the much larger numbers of business right in the middle of the proposed compound area has the potential to be far greater, plus the impact of delays on the 100s of businesses whose vehicles travel along the A272 every day. The Royal Oak, however could benefit from trade from the large numbers of workers who would not have to travel anywhere for lunch breaks and other rest periods.***

Local residents have provided feedback that they would prefer this option to be removed. ***The feedback from residents appears to have been the chief reason for removing this site. Cowfold residents were not given the opportunity.***

Information was also received that planning applications for commercial developments cover part of this site. ***Planning applications were indeed put in for a battery storage farm, but have still not received permission. The site could still have been purchased however, but for a greater price. No mention is made of the planning application which had been put in at Oakendene (see later for details).***

3.4.146 As a result of informal consultation feedback and the proximity to sensitive receptors, Wineham Lane South substation search area has been removed from the PEIR Assessment Boundary. ***Where is the evidence of these sensitive receptors and their comparison with Oakendene. It can only be the result of feedback, which, as we have previously shown, was heavily skewed. (See AoC submission)***

3.4.152 **Wineham Lane North substation** search area constraints include its close proximity to ancient woodland which borders the north of the area, and proximity to nearby properties. ***As for Oakendene***

3.4.153 Desk study data does not suggest a concentration of records of protected species in this area and there are no historic environment records identified on or adjacent to the substation search area. The substation search area is bordered by some natural mature screening. ***And these are formal searches from 2012, not just desk top as at Oakendene***

3.4.148 **Bolney Road/Kent Street substation** search area option is located ... on greenfield land adjacent to an industrial estate. Constraints associated with this search area option include its proximity to Oakendene Manor Grade II listed building, proximity to the High Weald Area of Outstanding Natural Beauty (AONB) and nearby residential properties. It is also the furthest substation option from the grid connection point at Bolney.

3.4.149 No designated sites or priority habitats have been identified within or directly adjacent to this substation search area, and desk study data collected does not suggest a concentration of records of protected species in this substation search area. ***This is not true: there ARE priority habitats here. Desk top studies were unlikely to be informative for this long-undisturbed site. There is some natural screening around this site due to vegetation, but this will largely be removed to create access.***

3.4.150 Access to the site would be directly from the A272, which is subject to agreement by Highways England.

Once the two substation locations had been taken forward to the consultation, the published arguments for choosing Oakendene would appear to be weak:

Next steps (July 2021)

3.4.156 Both Bolney Road/Kent Street and Wineham Lane North substation search areas have been retained within the PEIR Assessment Boundary. Further information will be gathered **in advance of the DCO Application to inform the selection of the final substation location.**

3.4.157 This will include:

- consultation with Highways England to understand whether access can be obtained from the A272 to Bolney Road/Kent Street. ***It is WSCC who need to be consulted, not highways England. At the meeting in Cowfold on 21st June 2023 they told residents that WSCC would have to agree access details, traffic lights etc therefore no such agreement could have been reached as to feasibility when the site was chosen.***
- ongoing ecology surveys that will provide further detailed information on the ecological sensitivities associated with both search area locations; ***No such surveys were carried out before choosing the substation site.***
- further site visits to both search area locations are planned to further examine the proximity to sensitive receptors, and engineering issues such as construction and operational site access. ***They did not understand the access issues at Oakendene prior to choosing the site, nor the unsuitability of Kent Street for HGVs.***

- the EIA work undertaken which will continue to be built on for the ES and will continue to inform the design iteratively. In particular this will include any noise monitoring undertaken;
- technical and economic analysis; and
- feedback from informal and formal consultation. ***This was not adequate with respect to Cowfold yet seems to form the main basis for their choice. The evidence that the above surveys and site visits were done in time to inform the substation choice is lacking and certainly not available in any of the PEIR reports available at the time of the 2021, or indeed any, consultation (see evidence provided in AoC submission and comments from WSCC, SWT, CPRE and others). If proper assessment of the sites was indeed carried out before choosing the site, we must be able to see the evidence, and the dates it was obtained. Our assessment of the two sites strongly suggests that the Oakendene location is not the most appropriate (see attached table of comparisons, with details referenced in subsequent chapters).***

Decision to select the Oakendene Substation Site (July 2022)

In identifying a preferred option for the onshore substation site for Rampion 2, we initially started with a long list of possible options. Most of these were subsequently omitted due to space requirements or access constraints. Three sites were then taken to our non-statutory consultation in January/February 2021, following which 'Wineham Lane South' was dropped. This was in response to concerns regarding potential impacts to a number of homes directly opposite, in addition to constraints over the size and orientation of the site. ***Impact on Oakendene clearly deemed to be irrelevant.***

Two sites were then taken to statutory consultation in July – September 2021. The Oakendene site was selected over Wineham Lane North for a number of reasons, including:

- direct access off the A272 with no need to use country roads such as Wineham Lane; ***but there now WILL be a need to use the far narrower Kent Street, Moatfield Lane and the tiny Dragon's Lane, for access to the cable route.***

- larger site with more usable shape and orientation, offering greater flexibility during construction and for designing the substation to allow for adequate space for mitigation landscaping and planting; ***Ironically, the existing, most effective, screening onto the A272 will need to be removed at Oakendene to create access.***

- competing land interests at the Wineham Lane North site. ***NO Planning permission has yet been granted. Competing land interests at Oakendene were not considered relevant. These were proposals to expand the industrial estate and make it carbon neutral*** - (See attached file: Cowfold Residents Impact Statement section 3 Alternatives Attachment 1.pdf)

At the 13th /14th June 2022 PLG meeting, Rampion presented a slide showing their rationale for 'choosing' Oakendene, which contained the same information in different format. By that stage almost no engagement with Cowfold residents had taken place.

At a meeting in Cowfold on 21st June 2023, we were told that the Wineham Lane North site is too constrained. Yet its overall size is within the 9ha needed as above. Also, Wineham La South is adjacent and could be used as a temporary compound in the same way that the site to the west of Oakendene is being proposed. From the attached copy of one of the presentation boards (Appendix 2 below) you can see that they have now added the 'reasons' that no PROW will be interfered with (although not in fact true- see Landscape and Visual Chapter) and greater flexibility for parking, probably because they have since realised it will be a major issue.

At the same meeting, when speaking with a Rampion representative regarding why Oakendene was a superior site compared to Wineham Lane North, all that we could really glean from an engineering perspective, was that it would have better access for bringing in the transformers; but other than that Rampion were not able to demonstrate further reasonable grounds as to why Oakendene would be the better site from an engineering stand point. Oakendene has a 132kv cable running across the site from NW to SE and it will have to be crossed twice more to reach the main substation. Surely an engineering constraint, yet conveniently ignored.

One of the reasons against the choice of Wineham Lane was the 'unsuitability of the single-track roads' at Wineham. However, there appears to be no hesitation in using Kent Street and Moatfield Lane, both of which are far narrower than Wineham Lane, yet between them have more residents than the northern end of Wineham Lane. They are single track lanes, highly unsuitable for HGVs, and yet they will have to be used to access the cable route. They have far more evidence of vehicles getting bogged in on the verges than the at all comparable Bob Lane in Wineham.

The same information board lists among the reasons for discounting Wineham Lane South in Feb 2021 'found to have the most environmental constraints' yet their own PEIR report above does not provide any evidence for this.

SWT made the observation that it is clear that private nature conservation projects have been considered in other areas of the cable route, yet there seems to be no similar consideration of the Jubilee Wood plans on Kent Street; indeed, the owner was told "we'll just dig it up again".

Again, this lends weight to the belief that the 'findings' of any assessment have been made to fit the choice of Oakendene based on the lack of opposition. They 'choose' not to mention comments which do not fit this narrative, such as the scoping response from Henfield Parish Council dated 5.8.20 "regarding the site of the Bolney substation: To reduce the impact on the environment we would prefer that the site of the new Bolney substation to be as near as possible to the existing Bolney Substation, to which it will have to be attached in any event. The existing Bolney Substation already has the necessary access." Nor do they mention the pleas from environmental campaigners regarding nightingale nesting sites and badger setts at Oakendene.

There has been no assessment, other than desk top, prior **to choosing the site** of the biodiversity at Oakendene, the adjacent lake, woods and flood meadows along the cable route. There has been no reason to do detailed studies there before as no disturbance was proposed therefore records are highly unlikely to be complete, as pointed out by SWT and others. Unlike the records for Wineham Lane which would have been detailed in the 2012 assessment

In the Rampion 1 PLG minutes for December 2012: "A couple of representatives noted their surprise at Bob Lane being highlighted as a possible access route to the substation as it is narrow and locally important. It would also require the removal of two hedges. **The whole northern part of Wineham**

Lane was strengthened for the existing substation so [they suggest] Wineham Lane should be used as the access to the new substation.” How, therefore, can it now be deemed unsuitable? The OCTMP (doc ref 7.6) gives the width of Kent Street as 3m, Wineham Lane 5.5m, almost the same as the A281 at 6.3m

From PEIR Ch 24.6:

A272 24.6.6 Within Study Area 1, the A272 routes east/west between the A24 and the A23. The A272 intersects with the A24 via a staggered crossroad and junctions with the A23 are via two grade separated roundabouts which connect to the A23 by on/off slips. The A272 is a predominantly a single carriageway rural road throughout Study Area 1. The speed limit varies between national speed limit and 50mph depending on local constraints. A section of the A272 through Cowfold is subject to a 30mph speed limit as the road routes through a village setting. Pedestrian footways are provided and residential properties front onto the A272 throughout Cowfold.

Kent Street 24.6.27 Kent Street is a single carriageway rural road which routes between the A272 and Wineham Lane and is subject to the national speed limit. **It is not; it is a single-track road, without even passing places for most of its length.** There are no pedestrian footways on this rural road. Wineham Lane 24.6.28 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. Walkers can continue safely on it as vehicles pass by. Wineham Lane is subject to the national speed limit for all sections outside Wineham. **It is almost the same width from the A272 to the substation as the A272 itself.** Throughout Wineham, Wineham Lane is subject to a 40mph speed limit and residential/rural properties and driveways front onto the road. **This residential area is largely to the south of the substation site however.**

It is hard to justify on sustainability or environmental grounds the reasons for destroying the extra 5km of wildflower meadows, hedgerows and trees needed for the current, longer, cable route. Or choosing a site directly adjacent to a lake, in the parkland of a grade 2 listed building and clearly visible from it, the most economically damaging site and the most disruption to traffic and traffic safety, including accidents and pollution. Many of these things were cited as reasons NOT to choose the other sites. The decision was made fundamentally because of the number of objections from Wineham, but there is a flawed consultation process underlying this.

The ecological survey of Wineham Lane would have been completed thoroughly in 2012 as part of the work done for Rampion 1. There has been no reason to do a detailed survey of the land at Oakendene and the northern end of the cable route as these areas have been left untouched for decades. Local resident JC has provided Rampion with detailed studies of nightingale nesting sites, badger setts, reptile habitats and more between Oakendene and Gratwicke. These studies have been selectively ignored.

Overarching national policy statement EN-1: p 72; should refuse consent if harm to habitats and species UNLESS NO ALTERNATIVE-there is, for both the cable route and the substation site. Carbon release from digging through untouched farmland, extra hedges and oaks destroyed by the extra distance resulting from the choice of Oakendene cannot be mitigated against in the lifetime of the

substation or wind turbines. Noise and air pollution impacts will be greater at Oakendene with its more diverse species, and proximity to a lake and ponds.

WSSC, in their scoping report, made several requests for information BEFORE the substation site was chosen, to inform decision making. Many of these actions had not been completed before the decision to choose Oakendene was made.

Rampion's own assessment of the historic environment impact on Oakendene was major, compared to moderate for the worst affected Grade 2 listed building at Wineham Lane North (PEIR chapter 26, pp 148-50), simply based on proximity.

Why else have they chosen the site with:

The most biodiversity

The greatest impact of businesses and the wider economy

An underground high voltage cable

The fastest road, with the worst accident rate and impact on air quality

The greatest flood risk both to the site and to nearby properties and the risk of water loss to the Adur created by the open cable channels and upstream flooding at the substation site

A location in the parkland of a grade 2 listed building

The greatest heritage significance and impact for both construction and operation (PEIR SIR appendices D and G)

The answer? Because there was no opposition as local residents were not consulted: Rampion have been unashamedly clear in later discussions with locals that they took the path of least resistance.

Comparison of Oakendene and Wineham Lane North Substation Sites

Oakendene	Wineham Lane
Requires an extensive new access road with loss of hedges and veteran trees to create both the road and visibility splay	Two lane road with suitable visibility splay already in place both from A272 to substation site and from Wineham Lane to the site access point since 1960s when original substation built. As indeed pointed out by AH Twineham PC chair, during Rampion 1 consultation, as a reason to use Wineham Lane as opposed to Bob Lane for access
Extra cable needed to reach main substation	Already adjacent to main substation
Extra 5km cable required overall. More ecological damage than necessary	5km less destruction on route
Cowfold stream and Oakendene area very biodiverse (see new additions to biodiversity records)	Less biodiversity. Already well mapped due to Rampion 1
Adjacent lake with unique ecology	No lake
Trees and hedges down middle of site will need to be removed	No trees/hedges in centre of site
Jubilee wood destroyed	Jubilee wood unaffected
Heritage assets including the peculiar historic untouched landscape of Kent St, Moatfield Lane and the flood meadows irretrievably destroyed (see Section 26 and PEIR Ch 26, impact on mediaeval landscape pp139-40)	Unfortunately, any such asset already destroyed by 1960s substation and Rampion 1 (PEIR assessment of impact; not significant)
Proximity to high weald AONB; just 500m from A272 access point	3km from AONB
132kv cable to cross running across site	No cable
Traffic impact 1) standing traffic at this point on A272 so queues and delays significant	No standing traffic on A272 at Wineham lane turning so less disruptive, fewer delays. Temporary traffic lights not needed on this main road. Not raised as issue for Rampion 1
Traffic impact 2) 18,000 users a day will face disruption to their journeys every day	Far quieter road, fewer users affected.
Traffic impact 3) dip and bends on A272; very poor visibility, many accidents	A272 at Wineham Lane straight, view clear
Kent Street (single track) required for cable route access. Unsuitable. Far more residents than on Bob Lane. Also need to use Moatfield/Kings Lane and Dragons Lane-tiny no through roads	Bob Lane not really required this time anyway-access can be via Wineham Lane; not single track until much further south
Huge impact on single track lanes of Picts Lane and Bulls Lane	No rat-run effect
Around 100 business on industrial estate, and along A272 opposite Oakendene, directly impacted	On Wineham Lane; Royal Oak, caravan park and a few others only

Thousands of businesses affected by traffic delays	Far less impact on economy as a whole
Impact on AQMA Cowfold by backing up and use to access cable route	No AQMA impact
Houses directly on A272 near access point already at pollution risk from standing traffic. Will be worse	At Wineham La turn off A272 no houses directly on road, no stationary traffic pollution effect
Landscape and visual; nature and magnitude of change enormous	Nature and magnitude of change far less as already damaged, not so close to Grade 2 building. Use of this location would be akin to the HDC local plan re housing to add to settlements rather than building in unspoilt locations
Built heritage; devastating to grade 2 listed Oakendene Manor as effectively in its parkland	Much further away from grade two listed buildings
Change in energy impact and biodiversity much greater as prevents plan to have solar panel energy self-sufficiency for an expanded Industrial Estate and to improve ecological diversity of the remaining park similar to Knepp castle and as an amenity to be enjoyed by local people	Change in biodiversity much less as, if not chosen as a substation site, will inevitably be a battery storage farm with attendant damage to wild life habitats anyway
Flood risk greater both to site and impact on adjacent properties (see section 27 and gov.uk ground and surface water flood risk maps	Much less flood risk
Water loss to the Adur by cable channels being left open across the flood plain of the river Adur catchment. (Water neutrality issues)	Not an issue
High density of nightingale territories	Nightingale territories not significant
8/14 of all Important Hedgerows on proposed development are at Oakendene	No Important Hedgerows (1997 criteria)

Attachment 1 – Cowfold Residents Impact Statement section 3Oakendene Enterprise Park .pdf


See attached file (separate):

Cowfold Residents Impact Statement section 3 Alternatives Attachment 1 - Oakendene Enterprise Park.pdf

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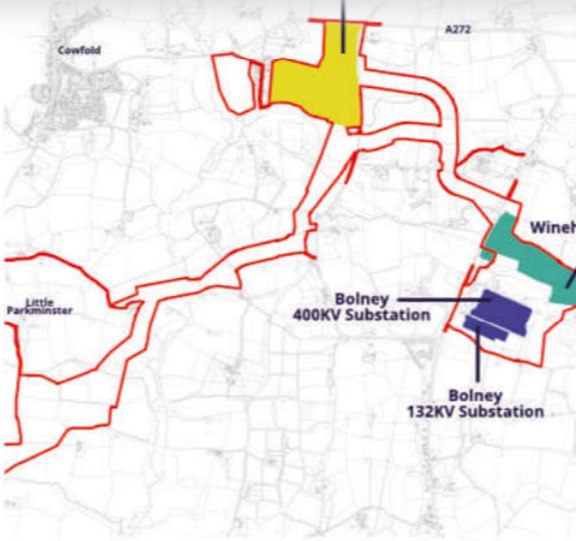
site selection

January/February 2021
 3 sites taken to non-statutory consultation. Following consultation feedback, Wineham Lane South was discounted as it was a more restricted site and was found to have the most environmental constraints and community concerns.



July -September 2021
 Bolney Road/KentStreet and Wineham Lane North taken to statutory consultation.

July 2022
 Following consideration of statutory consultation feedback, environmental and engineering considerations, Bolney Road/Kent Street (now named 'Oakendene') was selected as the onshore substation site.



Reasons for selecting the Oakendene Substation

- Larger site with more usable shape and orientation which makes construction easier and safer
- Greater flexibility during construction to allow for permanent substation, construction laydown areas, welfare and parking etc.
- Greater flexibility for designing the substation while giving space for mitigation landscaping and planting to better screen the site and provide new habitat for wildlife
- Direct access off the A272 with no need to use country roads such as Wineham Lane

om/wp-content/uploads/2022/06/Rampion-Exhibition-Slide-2.jpg

Addendum to Alternatives Following the DCO Submission:

All the main arguments brought up in the main Alternatives Section still stand, and indeed are now confirmed by the DCO documents.

It is now clear that many of the key studies on areas such as flooding, ecology, economy and general impact on the health and wellbeing of populations were not done by the time the decision to choose Oakendene was made, and that the decision was based largely on the opposition from the Wineham Lane area, whose residents had been consulted, unlike in Cowfold. The DCO Consultation Reports (doc refs 5.1, 5.1.1, 5.1.2, 5.1.3) now clearly show a lack of engagement with Cowfold residents in 2021 when the substation site was being considered (See Section 13 of this report; Assessment of Consultation Responses).

There appears to be no detailed costing and technical feasibility of the alternative cable routes running direct to Bolney versus up to Oakendene, no evidence of what the technical and engineering constraints at Wineham Lane actually were, or how the now-understood flooding issues at Oakendene, or the high voltage cable underlying it, might affect this comparison. The only hard evidence they have provided is that there were objections from Wineham! Rampion have not shown there are no alternative solutions. Indeed, they have chosen the site most damaging to people and to the environment.

From NPS EN-1:

4.2.15" Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility." Rampion have not properly studied the reasonable alternatives as the environmental, social and economic effects at Oakendene are far more significant, yet many were not assessed until after the decision was made.

4.2.22 "The Secretary of State should be guided in considering alternative proposals 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 as the proposed development." We believe our evidence demonstrates that there ARE reasonable alternatives, which are far less damaging and could be delivered in the same time or less, given that 5km less cable route would be required and the constraints around flooding would be far less.

From NPS EN-3:

3.8.20 "Where an applicant has shown there are no alternative solutions, and that there are IROPI (overriding reasons of public interest), compensatory measures must be secured to offset the adverse effects to site integrity as part of a derogation. "Mitigations as outlined in the Rampion documents do not apply as there are clear and reasonable alternatives as we will show in the following sections, and that they have not been properly considered.

The following observations are based on statements in the DCO documents and confirm this. The details are in the addenda of the relevant sections:

Design and access:

There is no new evidence in the DCO regarding the 'engineering constraints' said to have formed part of the reasons for choosing Oakendene.

Even from Alternatives, Doc Ref 6.2.3, para 3.6.5 *"It was identified that an area of approximately 9ha is required to site the onshore substation, including areas for temporary construction, permanent infrastructure, and embedded environmental measures"*. Therefore, all sites would be acceptable on the grounds of size, especially as Wineham Lane South could be used as a compound for the North site.

From the virtual exhibition during informal consultation:

"The area to site the permanent substation equipment will be no greater than 4.5 hectares (ha). To put this into context, the three search areas for the substation are:

- *Bolney Road/Kent Street – 21ha*
- *Wineham Lane North - 16ha*
- *Wineham Lane South - 13ha"*.

In other words, ALL sites are more than big enough for the substation site, therefore the comments about size as a factor do not stand up to scrutiny.

Flooding:

Landscaping plans from the Design and Access Statement, (Doc Ref 5.8)-NOW show landscaping to recognise the flood risk. It is clear they had not done this study when they chose the site: the diagram of the substation landscape plan shown at the Cowfold Information Event in June 2023 ('design evolution and mitigation'), differs significantly from that in the Design and Access Statement DR 5.8 in that it is clear that even as late as June 2023 they had not recognised the full extent of the flooding on this site. There are no basins or swales, and it is therefore not possible that this could have formed part of their 'engineering constraints' assessment when choosing the substation site.

From Oakendene:6.4.25.5, para 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.*

In addition, Janine Creaye wrote in her 2021 consultation response:

"Flood plain

The cable route would go through small fields that regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more obvious flood meadow. These are used by herons and grey lag geese and many wild meadow plants and reeds grow across the wetter areas. I have even found a fish (perch) in a field where the Cowfold Stream has flooded and then retreated. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can still use it. “

Because of the cable across the north part and the visibility from the road they have pushed themselves into the southern end of the site, which they now realise floods. How can they have provided evidence to properly assess ‘engineering constraints’ when choosing the site?

- No Traffic Impact Assessment has yet been carried out for Kent Street. This is not acceptable, given the extent to which it will be used, and the fact that the impact assessment on other lanes such as Wineham Lane was used to exclude the Wineham Lane substation sites from consideration.
- From The Landscape and Visual Impact Assessment (Doc Ref 6.2.18): P99: viewpoint surveys were not completed until May 2023 and so could not have been used in the assessment of which site to choose.
- In the Design and Access Statement (doc ref 5.8), for the first time they now mention not only the significant flood risk on this site, but also that there are European Protected Species there, not present at Wineham Lane, and a PRoW through the site, and that the historic parkland of Oakendene WILL be significantly impacted. They cannot therefore have taken this into account when choosing the site or chose not to inform consultees of these facts. (see ecology and heritage addenda for full details).
- Ground conditions: detailed studies have not yet been carried out so cannot have formed part of the engineering considerations, nor the flooding, or the constraints from the UKPN 132 kV cable located under the site.
- Noise and vibration: On reading the Rampion DCO document Noise and Vibration (Doc ref 6.2.21), it can be seen that four Expert Topic Groups were held between October 2020 and November 2022. Whilst WSCC and Mid Sussex district council were invited, it appears that Horsham District Council were not, even though the Oakendene substation site was under consideration from the start, and even after the Oakendene site had been 'chosen'. (see references within the document: 21.3.5 ,21.3.10, 21.3.11, 21,3,12). Whatever the reason, the lack of involvement of HDC will surely have skewed the decision-making process as Mid Sussex were clearly involved throughout. This error has not been taken into account when considering the suitability or impacts of alternatives.
- Similarly, from Soils and Agriculture, Doc Ref 6.2.20, para 20.3.7, it is clear that Horsham DC were also omitted from the soil and agriculture ETG until 2022 and from the flood risk assessment group (see Flood risk Assessment; document 6.4.26.2)
- There is no assessment of the comparison of the amenity value of the two sites. The number of PRoWs which will be closed, the use of the lanes for running walking and horse riding is much

greater at Oakendene as it is quieter and more rural. There will be extensive closure of these PRoWs, unlike would be needed at Wineham.

Ecology:

- From **Outline CoCP (Doc ref 7.2):** " Avoid removing landscape elements, particularly where these are key characteristics and or veteran or mature trees, woodland and hedgerows **as far as practical** (C-21, C-23, C-115 and C-174)." There IS a practical alternative at Wineham Lane, which would involve the removal of fewer of these key characteristics, being a more open landscape.
- Features not assessed/inadequately assessed before the choice was made:
 - Bats - detector failure at Oakendene.
 - No reptile surveys at Cratemans even though they were told by local residents that this area was rich in adders, slow worms and grass snakes.
 - Winter birds-even now no surveys have been done even though there is a large lake at one site, and not the other, and residents and workers on the Industrial Estate report a huge variety of birds around the lake area. Winter birds are also known to come to the flooded Cowfold Stream area.
 - Nightingale habitats: no evidence that they had considered the data provided by a local resident, despite warnings from Natural England and SWT that the biodiversity records data was not accurate, whereas they did have data for Wineham from Rampion 1. Instead, they took 'No Data' as meaning 'Not present'.

Important Hedgerows and trees:

EIGHT of the fourteen hedges they have assessed as important across the whole proposed development are to be found in this area. (Hedgerow Survey Report, Doc Ref 6.4.22.5) There were none in Wineham. It seems difficult to justify the choice of this location when less destructive alternatives exist. This survey, as for many of the surveys, was not completed until 2023: we now know, therefore, that this assessment was not done before the substation site was chosen.

All of the extensive destruction of hedges and trees is the result of the way they have found themselves constrained on the site due to lack of consultation and therefore understanding of the issues this site faces. The alternative sites at Wineham do not require the removal of so much valuable habitat or corridors. They have not considered this in the weighing up of the alternatives.

Heritage Assessment of Oakendene Manor:

Despite WSCC requesting in 2021 that an assessment of the historic parkland was carried out and used to help inform the choice of substation site, a WSCC archaeologist is asking for details as late as October 2022, (The Oakendene Parkland historic Landscape assessment, Doc Ref 6.4.25.5 paragraph 1.1.14) and the report was first issued to West Sussex County Council (WSCC) on 21 April 2023 (paragraph 1.1.1). **This cannot possibly therefore have been used in the evidence considered in deciding which site to choose, nor in a proper comparison of the Alternatives.**

From Oakendene:6.4.25.5, para 6.2.3, using an assessment **done after Oct 22** "The setting of Oakendene Manor is considered to make a moderate contribution to its heritage significance." So, this cannot have been taken into account in the heritage assessment of the sites, yet they had a full heritage assessment for Wineham Lanes nearest listed buildings, such as Coombe House, from the work done in 2012 for Rampion 1. Again, when they chose the site, they have taken 'No data' to mean 'no problem'.

The supposed 'industrialised landscape' created by the Oakendene Industrial Estate is used by RWE as a reason to site it at Oakendene, yet the reverse, the damage already done by the existing substations at Wineham is used to create the opposite argument that it has 'experienced enough'. This is completely illogical, and if one actually looks at the effect of the industrial estate, rather than making assumptions based on desk top surveys, you can see that this 'industrialised landscape' simply does not exist and that this is another selective use of the information they have taken to select the site.

New Assessment evidence from the DCO:

The Alternatives document (Doc Ref 6.2.3) provides no new evidence or further detail about previously supplied reasons for the choice of Oakendene.

The only newly admitted assessments are:

1)Cost: Para 3.6.23: *Oakendene is the preferred option from a commercial perspective, based on the land interests described above.* The battery storage farm mentioned at Wineham Lane North remains unconsented and could be compulsorily purchased. It is an area of potential increased costs but to the Applicant, not the government. Profit cannot be an acceptable reason for so much ecological, social and economic harm. Indeed, from EN-1 para 5.13.12 "*If an applicant suggests that the costs of meeting any obligations or requirements would make the proposal economically unviable this should not in itself justify the relaxation by the IPC of any obligations or requirements needed to secure the mitigation.*"

No details of the projected costs or engineering constraints are in the public domain.

2)*construction traffic and access management restrictions from Wineham Lane at the Wineham Lane North site.* Yet this can apparently somehow be managed for the much smaller Kent Street.

There is an admission that the preference is **MARGINAL**: Para 3.6.25:" *On balance, the Oakendene site was selected and is included in the proposed DCO Order Limits. Oakendene was preferred in terms of engineering (NO EVIDENCE) and land interests. **On balance, there is a marginal preference for the Oakendene site.***"

NB the 'marginal difference' statement was made **before** the full impact of this site was understood by Rampion on traffic, economy and ecology. They had not completed many of the surveys at this stage and failed in their responsibility to ensure adequate input from local residents with local knowledge. This is one of the main points behind consultation, not to manipulate the evidence and take the path of least resistance.

The substation site was chosen partly on the basis of representations received from Wineham Lane. DID THEY look at why almost no representations were received from here. I asked for post code data. As yet, nothing has been made available, although I was assured it would be by Chris Tomlinson.

From Alternatives Doc Ref 6.2.3, para 3.11.7: *“stakeholders raised concerns on loss of woodland relating to the Wineham Lane North onshore substation site. As a result of this, amongst other considerations, Wineham Lane North was removed from consideration as stated in the PEIR SIR (RED, 2022)”*. This is highly selective: no notice appears to have been taken of JHC and her concerns or why they should not carry equal weight. Nor does her response appear to be mentioned in the consultation concerns in Consultation Report Appendices, Doc Ref 5.1.1. (See Section 13: Assessment of Consultation Reports).

The following are some examples of the issues which have been acknowledged by Rampion only after the substation site was chosen, and support the argument that, due to lack of consultation, they were not in a position to properly consider the alternatives:

- 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 the significant burden of traffic to the various cable routes to and from the substation. (Initially it also appeared from Table 6-2 in the OCTMP that it would also be used to avoid the AQMA in Cowfold, but we are pleased to learn that will not be the case.)
- The complicated traffic management plans which they now realise will be necessary and huge compound at the industrial estate.
- The acceptance now of the grim impacts on PRoWs and the Grade 2 listed Oakendene manor (see updated Rampion2 design and access statement 5.8).
- The now well evidenced biodiversity of the Cowfold Stream and Oakendene areas.

Section 4: Health and Social

Public health England's 2020 response to the scoping report asks that there should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the impacts on mental health should be taken. The Mental Wellbeing Impact Assessment (MWIA) may assist. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets. *No such assessment appears to have been carried out locally.*

The applicant should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities, as well as other vulnerable population groups such as those who are young, older, with disabilities or long-term conditions, or on low incomes) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future Development.

The impacts of air pollution, noise and vibration, and light pollution, on health are dealt with in detail in the relevant Sections of this document. Please see Sections: 6 (Landscape and Visual), 7 (Air Quality and Pollution) and 8 (Noise and Vibration) of this document. They are not just nuisance, but at the levels likely, they could have direct effects on cardiovascular and respiratory disease, mental health and indeed, mortality. Indeed, they are all, in fact, non-threshold pollutants in that an exposed population is likely to be subject to potential harm at any level.

Where the impacts to health and/or further assessments are scoped out, PHE say, the promotor should fully explain and justify this within the submitted documentation. This must include the significance or otherwise of the impact of electric and magnetic fields. Main areas for consideration are: access, traffic and transport, socioeconomic and land use

Access

PHE emphasise the important health benefits of access to green spaces for recreational use and physical activity. It should not be assumed that because this area is rural there are multiple opportunities for walking without access to a car to reach them. The south east quadrant of land surrounding Cowfold, which includes all the land on the cable route from the A281 to Oakendene is a major area for recreational walking by the inhabitants of Cowfold as it can easily be reached from the village. The area around Oakendene lake is valued for its beauty and wildlife. The people on the industrial estate also value it as a place to relax during quieter periods in their busy day

The quiet lanes such as Kent Street and Moatfield Lane are also enjoyed by walkers, cyclists and horse riders. They will fear to use these routes as HGVs will put them and their animals in danger

Traffic and Transport

This area is heavily reliant on cars for transport as there is little public transport. The ongoing congestion and delays to movements in and out of the village will cause stress over years to the village population and beyond. The pollution from the increased number of vehicles and the queuing traffic will increase pollution and health risks. Both these issues are dealt with in detail in other sections. Please see Sections: 7 (Air Quality and Pollution), 8 (Noise and Vibration) and 10 (Traffic and Transport).

Doctors' surgeries: "As the village doctor for 30 years, I can say that the village surgery in Cowfold has many patients to the east of Cowfold, mainly accessible from the A272. From previous

experience, disruption on the A272 leads to long delays both in patients being able to reach the surgery and accessing appointments, and problems for the doctors and nurses being able to visit vulnerable patients. It is highly disruptive for the whole practice.” The impact on Wineham Lane, whilst severe also, would affect far fewer people and alternative routes are more readily available.

Many of the residents on Kent Street, Moatfield Lane and Kings Lane, and indeed along the A272, are either already aged and vulnerable, or in the years over which the construction will occur, are likely to become so. They will therefore require increasing access to health care services, including emergency care.

Emergency Services: The A272 is a major access route for the local hospitals from much of the southern part of the Horsham District. Traffic congestion will cause unacceptable delays. Residents within the traffic management area have raised concerns about emergency services being able to reach them if there are tailbacks.

Mental health: The ongoing delays whenever residents and the other many road users travel to and from their homes to work, school or leisure will cause increase stress levels.

The, often very rural, residents to the east of the village face long term disruption to their links to the village and their wider community during the construction period with accompanying social isolation. On the whole these very rural people are extremely resilient, but have a tendency to cope alone, until reaching a critical tipping point, where suicide or other serious mental health problems may arise.

The health and wellbeing of the many people who work on the Industrial estate will be significantly affected. They work hard, often in dusty and noisy environments and the peace and tranquillity of the area around the lake is a haven for them which many of them enjoy in their lunchbreaks and other short leisure moments. During the construction phase, instead they will face a deafening cacophony of digging, pile rigging and generators. During the operational phase there will always be the disturbing noise from the transformers.

Eastridge Manor, a dementia care home is on the cable route from Oakendene to the main substation. People with severe dementia are vulnerable to the effects of loud disruptive noise and are likely to become far more disturbed. It is not good practice to manage this by increased medication, and will add to the stress of both these vulnerable people, and their carers during the years of construction.

Unfortunately, the experience of Bolney residents with Rampion 1 (see Bolney PC scoping response) means that the local community have little confidence that the applicants will apply appropriate weight to the impacts on health of this project, promote positive health impacts and mitigate against negative health effects. Indeed, there is very limited opportunity to mitigate any of these concerns or the health implications of the pollution if this site is used.

Economic impact:

See Section 5: economic consequences of the substation at Oakendene

Pollution:

See Section 7: Air Quality and Pollution, and Section 8: Noise and Vibration

Pre-existing plans and land use:

Before Rampion included Oakendene as a potential substation site, the owner of the manor and industrial estate had put forward a proposal to Horsham District Council and MP Andrew Griffith, which was very well received, and would have 'ticked all the boxes' in terms of providing many of the district and county wide long term aims. Please see Oakendene Alternative Plan (Cowfold Residents Impact Statement section 3 Alternatives Attachment 1.pdf). The industrial estate is home to around 100 businesses with a waiting list of a further 100. The plan included the expansion of the industrial estate and its renovation, along with plans to make it energy and water self-sufficient. The farmland was to be opened up for the use of local farmers and farmed along environmentally friendly lines and the remaining parkland was to be improved ecologically and opened for the enjoyment of local residents.

Unfortunately, the threat of compulsory purchase by Rampion led the owner to drop his idea but he would be pleased to restart them if given the chance. At a recent village event, a survey of residents showed universal approval of the plan and an overwhelming preference over the Rampion proposals, being essentially for the community and to increase job opportunities locally.

In addition to all the health and social impacts of the Rampion proposals themselves, therefore, the additional loss of what will no longer be able to be developed at Oakendene and the attendant loss of the planned health benefits and economic benefits for the community must be considered. It should also be included in any assessment of biodiversity net gain.

PHE's comments include a requirement to consider alternatives, so that the environmental merits of practicable alternatives can be **properly** considered. The impact on health and socioeconomics from the use of either of the Wineham Lane sites would be far less. There are far fewer homes in the area, with reasonable alternative routes on to the A272 via Bob Lane or Kent Street (which would not be unreasonable use for the small numbers involved), very few businesses, no village centre which would be impacted, and no impact on the users of the major A272 trunk road. We would expect to see a detailed analysis of these considerations in the submitted ES. As Rampion have, so they say, only recently finalised the location of the substation within the site, any comparison cannot have been carried out in any detailed way, and certainly not in sufficient time to enable a comparison with other potential substation sites at Wineham Lane. Any such comparison will therefore have been retrospective, rather than used to inform the choice.

Addendum to Health and Social Following the DCO Submission:

Unfortunately, Rampion have not presented any analysis of the issues discussed in the main Cowfold/Rampion Health and Social Impact section, nor is there any comparison of the health impacts of choosing Oakendene as opposed to Wineham Lane in their consideration of the Alternatives.

The concerns discussed in the above section regarding access to emergency services, and stress due to difficulties and delays are of relevance not just to the A272, but to Kent Street and Kings Lane. The poor access via Kent Street being blocked by excessively large vehicles would be an issue to emergency service vehicles and the aging demographic on Kent Street and Kings Lane/Moatfield has a greater need for ambulances, as indeed has happened in recent weeks, and for some, over the years of planned construction, daily access for carers and even palliative specialist care.

Property depreciation and health consequences:

Many of the owners of property in the immediate vicinity of the substation at Oakendene are elderly and realistically, during the lifetime of the project, many will need access to emergency health care, and even daily palliative care. In addition, many of the homes will need to be put on the market before completion of the project. They are unlikely to sell during the extreme disruption of the project which could have health and social care impacts should it prevent them from moving to residential care in the latter part of their lives. There will also be a severe impact on property for a considerable period after the completion. Many people in the village of Cowfold are also worried about the value of their homes as the traffic issues will adversely affect this, as will the changed character of this rural village, all adding to the stress of the community.

Homes cut off from all access:

The following issue is potentially of very grave concern, and has also been highlighted in a number of relevant representations from residents, and by Shermanbury Parish Council. Rampion now understand that there is the need to close Kings Lane/Moatfield Lane for several days in order to create two open cut trenches across it. A resident of the lane received the following from Chris Tomlinson:

*"The proposed cable route for Rampion 2 crosses many roads, rights of way and private means of access. Where this is by means of open cut trenching, there is likely to be disruption to usual traffic. We have proposed temporary diversions in many locations, but this isn't always available. We will need to develop bespoke proposals for managing traffic along private means of access. These could include set closure hours, advanced notice of closure, and provision for emergency access. In all cases, Rampion 2 will seek to reduce the duration of any disruption, **likely to just a few days.**"*

Until relatively recently Rampion were under the impression that this tiny lane had an exit to the south as well as its usual access from Kent Street. This was because they had only considered google maps etc and not listened to residents saying that in fact that was a historic second route only and has not existed for many years. **The reality is that the access from Kent Street is the only access to their homes, farms and businesses.** The residents will therefore be completely cut off for 'just a few days'. There are in fact quite a number of people who live on this lane. Many will need to go to work or school. We have already raised concern about the disruption on the lane given the elderly demographic there and the need to access emergency visits or urgent visits from GPs, district nurses

etc as has been needed several times in recent weeks. There is also a continual need for access to move or feed livestock. This also needs to be looked at in the context of their **disingenuous claim that this lane will be used only for operational purposes**. If it needs to be closed, and also somehow the vehicles to do this work will need to access it, then clearly, access is needed during construction as well operation. In addition, HGVs using the haul road will be repeatedly crossing this road.

Either they are deliberately attempting to mislead, or they just have not thought it through properly. Either way, it is a reflection of how little they have engaged with this community when it mattered.

To show further evidence that Rampion had not properly understood the situation, I draw your attention to the plan from the Access, Rights of Way and Street Plans Document (doc ref 2.5). This appears to suggest that Rampion view the lane principally as a footpath and bridleway rather than the only access to a number of properties (see bridleway 1730, footpath 1782, sheet 32). It also remains in the Draft DCO document as a 'bridleway scheduled for temporary closure'.

The same resident has also provided us with a plan which helps to show clearly many of the homes which would not be accessible if this proposal goes ahead in its present form. (This is detailed in his Relevant Representation RR-293)

Health impacts of Unemployment:

Nowhere have they taken into account the health impacts from the potential loss of employment in Cowfold in terms of stress, poverty, and the physical consequences of these. The businesses on the Oakendene Industrial estate and those along the A272 fear for their survival. Even if they do manage to remain afloat, the working environment for many people at Oakendene will become intolerable with noise from the construction and manoeuvres of the compound vehicles, delivery lorries and concrete mixers. Businesses on the cable route and haul road worry that their farming or equestrian businesses will be disrupted, or in the case of a sculptor specialising in biodiversity, that she will be unable to concentrate and therefore unable to work.

We are already hearing from local businesses in the village itself, that if the traffic becomes much worse than it currently is, they may not stay. This is already a concern as traffic congestion steadily increases year on year in the village.

Leisure and exercise:

From **Population and Human Health** (Doc ref 6.2.28):

Health effects from changes in visual amenity

*28.9.126 Of relevance to health and wellbeing, **Chapter 18: Landscape and visual impact, Volume 2 of the ES** (Document Reference: 6.2.18) have assessed visual effects on the following:*

- *settlements; and*
- *recreational routes.*

28.9.127 The visual assessment relating to transport routes has been excluded on the basis that any impacts while travelling by rail or road would not impact health and wellbeing.

28.9.128 The visual assessment relating to recreational and tourist destinations has also

been excluded on the basis that the only affected recreational and tourist destinations identified are caravan parks, a camp site and a beach, the views from which would not impact health and wellbeing.

We strongly disagree with these observations: the roads around the substation i.e. Kent Street, Moatfield, Kings Lane are enjoyed extensively by local people and the far wider community for, horse-riding, dog walking and running. They are used by the people of the village and surrounding area for rest and leisure, as one can walk easily to this site. The inclusion of only campsites, caravan sites etc is highly selective and inappropriate. In addition, people come here from miles around to walk their dogs, take their families etc as they recognise its tranquil beauty. This will no longer be possible or desirable.

28.9.129 The remainder of this section summarises the construction phase visual changes, and the potential for this to impact health and wellbeing.

Magnitude of impact

Oakendene substation

*28.9.130 Cowfold (located approximately 1.1km west of Oakendene substation) is the only settlement which has been assessed to establish the likely changes in visual amenity associated with construction of Oakendene substation. However, the settlement is largely contained and surrounded by woodland blocks or groups of trees in all directions. Overall, construction works will not be visible from any part of Cowfold village due to screening from intervening landform and the layering effect of intervening vegetation, even in the winter. As a result, there is no potential for adverse impacts on visual amenity and associated health and wellbeing impacts. On this basis, the magnitude of impact on health and wellbeing is **Negligible**.*

Why only include the centre of Cowfold? There are many homes in Kent Street, Moatfield and the area surrounding the substation site on whom the visual impact will be enormous, especially in winter, especially given the outdoor way of life of many people in this rural area. It also fails to take into account the use of this area by the people of the village, as discussed above. The assessment of the Substation in 28.10.27 is similarly disingenuous in only considering the settlement of the village of Cowfold and not the many properties in the immediate vicinity of the substation itself.

PRoWs:

28.9.131 The visual assessment has considered the potential visual effects likely to be experienced by people (walkers/cyclists/horse riders/joggers/others) on the following recreational routes:

- ProW 1786 between east of Taintfield Wood and A272;*
- ProW 1788 between west of Taintfield Wood Oakendene Industrial Estate; and*
- ProW 1775 and 1777 near Eastlands Farm.*

28.9.132 While construction of the Oakendene substation will not be visible from ProW 1775 and 1777 near Eastlands Farm, there would be significant changes to the visual environment from sections of recreational routes ProW 1786 and 1788 where construction works associated with the building of the onshore substation components will be partially visible through gaps and above intervening vegetation.

28.9.133 Overall, while construction works would be visible from some recreational routes, the impact on visual amenity would only be temporary due to the transient use of such routes. Furthermore, as the visual impacts are not anticipated to deter recreational users from using those

*specific or similar routes. As such, the magnitude of impact on health and wellbeing will be **Negligible**.*

This is nonsense, the impacts will be massive, and in the case of 1786 at least, permanent as it passes very close to the substation itself. People do not come just to walk, they come to enjoy the restful tranquillity, so of course it will deter users.

In addition, so many of the footpaths and bridleways from A281 to Oakendene are to be closed, with no rerouting. (see doc ref 2.5 sheets 32-34) This will result in a total fragmentation of PROWs in the area, with nowhere for people to walk, take their horses etc. In the case of horses, this is not just a luxury, but an important need for many of the nearby equestrian businesses.

Noise:

In the chapter on Population and Human Health (Doc Ref 6.2.28), Rampion state:

*“Temporary noise effects from construction road traffic noise 28.9.74 As detailed in **Chapter 21: Noise and vibration** of the ES (Document Reference: 6.2.21), the majority of road links would experience an increase in noise levels of less than 1dB, which is not considered significant in noise terms.”*

We disagree with the methodology used regarding their conclusions for the A272. For many residents on this stretch of road, the noise levels are already at maximum tolerable levels, in the top 1% of the country. The additional traffic, not just travelling on, but turning on and off this road, will push this beyond tolerable, having significant impacts on health. Many people will be unable to be comfortable in their gardens or continue the outdoor way of life normal for this area. The cumulative impact of the concrete mixing, piling and other activities on the substation site is not considered in addition to the increased traffic noise.

28.9.75 *“The following road links that would exceed a change in noise level of more than 1dB are:*

- *B2135, South of Ashurst (+2.4dB).*
- *B2116 Partridge Green Road (+1.6dB).*
- *A281, South of Cowfold (+2.1dB).*
- *Wineham Lane, South of A272 (+2.4dB); and*
- *B2116, Henfield Road, Albourne (+2.2dB).*

28.9.76 *All of the above changes in noise exposure are also not considered to be significant in noise terms.”*

This assessment does not include Kent Street at all, nor take into account the additional effect of the haul road *behind* many of the properties on the A281. In addition, when assessing percentage change, the *nature* of the existing noise levels must be taken into account; for many of these homes the current background noise is largely recorded as ‘birdsong’ or ‘fountain noise’. These natural noises are not disturbing to tranquillity, indeed, quite the reverse.

28.9.77 *“On this basis, the resultant magnitude of impact on human health would be **Negligible**.”*

As demonstrated above, this is not sound reasoning. In addition, they have not considered that the homes along Kent Street are also close to the substation and cable route construction noise.

Vibration:

The same document assesses the health impacts from changes in vibration exposure:

28.9.84 “As detailed in **Chapter 21: Noise and vibration** of the ES (Document Reference: 6.2.21), it is unlikely that the construction and operation of the construction compounds are unlikely[sic] to result in temporary vibration effects. Similarly, it is unlikely that activities during the construction of the onshore substation will give rise to significant effects from vibration. As a result, the potential for vibration relating to these project elements **have not been considered further.** “

Again, we disagree, as many surrounding properties are listed, built with little or no foundations, unable to have double glazing etc. Where is the evidence to support these claims of ‘unlikely’? Given the piling, concrete mixing and sheer size and proximity of some of the vehicles, this seems extremely ‘unlikely’ to be true. It is already the case, for homes such as South Lodge and Coopers Cottage that heavy passing vehicles cause palpable vibration in the house.

It should also be noted that no noise and vibration assessments have been carried out for PRoWs or the cable route.

EMFs:

In the now archived DCO documents for Rampion 1, the Public Health England Relevant Representation notes that when considering the assessment of the EMFs produced by the new onshore cables and substation, as described in Section 2b of the Environmental Statement – Onshore Project Description, “Public Health England advises that comparison with local area substations is not strictly appropriate as these operate at lower voltages than the newly proposed substation for stepping up to the National Grid. Further consideration should also be given as to whether case by case compliance assessments are required for new cables operating at voltages above 132 kV i.e. 150 kV, 220 kV and up to 400 kV in the cables connecting the two substations, and for substations containing air-cored reactors.”

We would like to ask whether the assessment criteria, as suggested by PHE have been applied in this case?

Section 5: Economic Consequences of the substation at Oakendene

Synopsis

The decision announced by Rampion on 14.7.2022 proposing Oakendene / Kent St in Cowfold appears to have been made with minimal research, limited desk top studies and with minimal input from local residents relating to this site, because they were not advised about the proposal for the substation at Oakendene.

Some Cowfold residents, who own land adjacent to the proposed site, were sent a confusing bundle of documents from Carter Jonas, just one month before the end of the two-year consultation. However, most local Cowfold residents knew nothing about the proposed substation.

The economic consequences of locating the substation at Oakendene would be significantly more damaging than locating it at Bolney. If Oakendene is chosen, it would negatively affect between 100-130 Cowfold businesses, around 70 of them at the Oakendene Industrial estate, and those 18,000 commuters who use this stretch of road every day. In contrast, using either Wineham Lane North or Wineham Lane South sites, would affect about five Bolney businesses and considerably fewer commuters, because the congestion does not extend along the A272 to Wineham Lane and no traffic lights would be needed at the Wineham Lane junction.

The Environmental Assessment (IEA) guidelines note that “additional delays are only likely to be significant, when traffic on the network is already at, or close to capacity”. It is worth noting that traffic approaching Cowfold from the West must be close to capacity, considering it consistently suffer from over a mile of traffic congestion on a regular basis.

The significant difference between the two sites is attributed to the proximity of the proposed substation sites and Cowfold village, where the mini roundabouts impact on traffic flow. The Oakendene site near Kent Street is about 1 mile from Cowfold and traffic consistently backs up, beyond this site, heading west towards Cowfold. The introduction of traffic lights, or similar traffic control measures will have an immediate impact on the 18,500 users of this road, for up to six years. Whereas the junction of Wineham lane and the A272, is about 2.5 miles from Cowfold village, and subsequently does not suffer these bottlenecks and traffic congestion to anything like the same extent. The most significant point here is that some form of traffic management would be needed on the A272, for the Oakendene site, but not for the Wineham Lane site, as was evident during the construction of Rampion 1. Additional jams will be exacerbated by traffic lights at Oakendene, which would not be needed at the Wineham Lane junction.

Locating the substation at Oakendene would not be in keeping with the Horsham District Plan of “supporting rural businesses” and “protecting and enhancing the rural character”. Please refer to appendix 3.

Summary of Implications of traffic flow on the A272

The A272 is a main road linking East to West Sussex, it is a major road carrying over 18,000 vehicles per day. The proposed Oakendene site is situated next to one of the busiest and most dangerous stretches of the A272, where existing congestion problems will only get worse. Traffic consistently backs up way past the Oakendene entrance, towards, and frequently past Kent Street. This occurs on a daily basis from around 0630 to 0900 and from 1600 to 1830. If there are any road works or an accident along this stretch of road towards the village, then the traffic is at a standstill and extends beyond Kent Street, resulting in mayhem for the surrounding lanes including Kent Street and Picts Lane. Please refer to Section 10: Traffic and Transport.

Rampion 2 disclosed that over 8,000 HGV's (excluding low loaders) will be needed, (Rampion 1 estimated 6426 HGV's). This equates to approximately 60 movements across the A272 each day. In addition, the number of ancillary workers for Rampion 1 was approximately 3,142 at the substation site, equating up to 250 per day. As Rampion 2 will be a third larger, we have extrapolated, and estimated 4084 workers, equating to about 325 ancillary workers per day, resulting in potential movements of 650 for workers, plus 60 for HGV's, that is an additional 710p/d of traffic movement across two lanes of busy and fast-moving traffic for up to six yrs.

There would be multiple negative consequences. The most wide-ranging would affect the 18,500 vehicles that use this stretch of the A272 on a daily basis, just over 9,000 each way. Several studies conducted by INRIX, CBI (please refer to Appendix 2) have demonstrated that traffic congestion is very costly in terms of lost productivity. If the substation is located at Oakendene, in Cowfold, this is estimated to be approximately £20m pa¹ in terms of lost productivity, as drivers sit in traffic queues. This takes no account of the increased fuel costs of sitting idle in traffic jams.

For local businesses, the prolonged congestion (which could last 5-6years), is likely to be enormously damaging for the long-term prospects of their businesses. Studies have shown that people try to avoid an area of congestion, so any businesses where customers are expected to visit, could be vulnerable to losing trade. Other businesses which rely on deliveries of raw materials or stocks, could also be prone to delivery delays, as some delivery drivers will not want to waste time sitting in queues, as they are paid per delivery. It is highly likely that deliveries will be delayed, transportation costs will rise, profits will fall or prices have to increase, thereby making Cowfold businesses less competitive. Customers may decide to use other more convenient and competitive firms, which have easier access. A number of businesses, predominantly in hospitality, have also mentioned that retaining employees will also be a challenge, as getting to work becomes more time consuming and

¹ An average 15-minute wait will cost £20m in lost productivity, and that does not take account of the increased fuel consumption. (Assuming an average 15 min delay to each journey. 18,000 vehicles @£15ph divided by 4 = £70k pd in lost productivity. Assume 5-day week and ½ day at weekends =£420k pw, equals £20m pa).

stressful. They may have to attract new staff by offering higher wages, which will hit margins and negatively impact profits. (Please refer to appendix 2). In these difficult economic times, this is impossible to justify when a much less damaging alternative is available.

Further studies (Appendix 2) have shown that as “A” roads get busy and congested, drivers find alternative routes and these will include the narrow single tracks of Picts Lane, Bulls Lane, Long House Lane and possibly Spronketts Lane. These lanes are normally quiet lanes used by the residents and businesses located on these lanes to move their livestock and horses. The future of these businesses may be in jeopardy, if these lanes are used as cut throughs and diversions. Please refer to the testimonials, in Appendix 1.

The estimated construction time for the substation is approximately three years. However, with Rampion 1, the estimated construction time was 2 years and it actually took over six years, (72 months). It is highly likely that the construction time for rampion 2, will be nearer five years and with testing and commissioning the disruption could easily last six years, if not longer. Disruption for this length of time can prove absolutely devastating for even the strongest of businesses, let alone those facing a cost-of-living crisis and rising interest rates.

Once the substation is built and operational, the power will have to be stored somewhere. It will be necessary to accommodate several battery facilities which will also have transformers and which will cover several acres of land in relatively close proximity to the substation. We are aware of several proposed battery facility applications being considered around Rampion 1 in Bolney. One application that has already been submitted is for a “Battery energy storage facility with associated infrastructure for transformer and operations room etc” NC/22/0021 & NC/21/0017. This will alter the landscape and future land use and is likely to impact house prices. HDC has raised the safety impact. Research is currently underway concerning the explosive aspects of these lithium batteries and the potential impact on health.

The stationary traffic will increase the air pollution even further in Cowfold, however quantifying the unintended costs of air pollution for the NHS in this AQMA area is difficult. Also, whilst analysing Rampion 1, we discovered a number of breaches of conditions and diesel spillages. Who will pay for policing and monitoring Rampion 2? Will it be WSCC and if so, from which budget? Environmental Health?

Two and a half miles outside of Cowfold village, along the A272 is Wineham Lane, which was used for the access to Rampion 1, and did not require traffic lights on the A272 during its construction. Wineham Lane is a two-lane road, which was constructed in the 1960’s for the installation of the National Grid substation. It has a visibility splay and is on a straight stretch of road, which does not suffer from congestion or suffer from such a high number of road traffic accidents. Locating the substation here, next to Rampion 1, would affect about five local businesses as opposed to over 130 businesses in Cowfold, (please refer to Appendices 4 & 5). Neither would the 18,500 drivers need to sit in unnecessary extended traffic queues for up to six years, because there would be no need for

traffic management at this junction and hence, far less disruption for those using the A272. However, there is no doubt that those five businesses and residents living in the vicinity of Wineham Lane and Bob Lane will suffer enormous and dreadful inconvenience, disruption and noise, and so should be compensated directly by Rampion.

It has been difficult to truly convey the feelings and concerns of the local Cowfold residents, so please take the time to read some of their personal testimonials, in Appendix 1.

Lastly, when we discovered that Rampion were proposing to build a substation at Oakendene in late October 2022, we reached out to a number of landowners who would be impacted by this proposal. We were shocked and horrified that Rampion had threatened them with compulsory purchase orders, which attributed a very low value for their land. They had also been asked to sign non-disclosure agreements, so that they could “negotiate” more favourable terms. Whilst conducting this study on the economic impact, we once again reached out to these land owners, many of whom also own businesses, to see how these proposals would affect them. Sadly, the following response was typical:

“Sorry, I’m not prepared to make any comment about this as my land agent is acting on my behalf with RWE and Carter Jonas and I don’t want to jeopardise any ongoing negotiations.”

Our economic analysis therefore fails to include the people most affected by these proposals, the land owners themselves, who wanted to keep their land untouched and undisturbed, but feel that they have no alternative choice. We have instead asked the opinions of other local businesses, who have not needed to sign non-disclosure agreements.

The Context of Cowfold in West Sussex

Cowfold and its surrounding area are predominantly rural with poor public transport links and no buses running along the A272 through Cowfold, which means that up to 325 workers per day will have to drive to the substation site, in addition to the HGV drivers. It is heavily dependent on cars and roads, and thus economically reliant on the road networks around it. The A272 is the only major road linking East to West Sussex and the flow of traffic along this route varies enormously, depending on the time of day and local events. Cowfold village regularly suffers from heavy congestion with queues extending consistently for about 1.0- 1.5 miles, beyond the Oakendene site, up to and beyond Kent Street. Therefore, any disruption or temporary traffic lights on the A272 approaching Cowfold, one of the most important roads in this network, will have a significant impact locally and on the many thousands of businesses that use this key east-west road daily. Significantly, the queues very seldomly extend to Wineham Lane, which is 2.2 miles from the centre of Cowfold village, and nearly a mile away from Kent Street. Wineham Lane is a two-lane road, with a wide visibility splay, located on a long straight stretch of the A272. The lane was widened to two lanes in the 1960’s when National Grid were building their substation on Wineham Lane.

Local traffic data shows that over 18,500 vehicles use this stretch of road on a daily basis, assumed to be just over 9,000 in each direction, east and west. Increased congestion or bottlenecks on this major transportation route, adjacent Oakendene/Kent St, could result in tens of millions of pounds of lost productivity across Sussex during the construction period. There are likely to be long queues on the A272 and gridlock on the surrounding cut-through lanes such as Picts Lane and Bulls Lane, while nearby towns and villages would also be negatively impacted by the alternative routes.

The Oakendene Site

The Oakendene Industrial Estate is recognized as a key employment area by HDC. The visionary philanthropic provision of the Oakendene Industrial Estate in the 1990s means it contains around one hundred units, providing jobs for local people and the wider Sussex community. The local Parish Council fought hard to get ultra-high-speed broadband in the village to benefit the community, including local businesses. This benefit to the enterprises choosing to locate in Cowfold is sadly now offset by the potential disruption to transport links, putting established businesses under pressure. The Oakendene Industrial Estate, being directly next to the proposed substation site, will suffer from the traffic impacts on the A272 and will also be in the centre of the western compound, interfering with access to the estate and potentially deterring customers, affecting the well-being of the people who work there due to noise and delays.

The businesses on the Oakendene industrial site vary enormously in terms of types of businesses and number of employees. They are generally artisan, specialist small businesses, although some are larger limited companies. A number of business owners admitted that they didn't really know how the substation construction would affect them, and generally what difference could their concerns or objections make, considering they merely rented the units. Other businesses admitted that they had not written to WSCC or the Planning Inspectorate (PI), simply because they were too busy getting on with their work and simply didn't have the time. "What would they write? Who would bother to listen?" Rampion had not contacted them, so who would?

In Cowfold overall, there are over 130 small and medium-sized businesses (SMEs) that will suffer to varying degrees from the consequences of the additional traffic congestion. Whilst if Wineham Lane in Bolney were chosen, then around five businesses would be affected (please refer to Appendices 4 & 5). These SMEs are significant employment creators, with small businesses accounting for 99% of the UK's businesses in 2002, providing 56% of employment (DTI, 2004). SMEs also offer a significant source of job creation, irrespective of the economic cycle, as shown in Dale and Morgan's study (2001) from 1995-1999, which highlighted that 2.3 million extra jobs were in new businesses. Moreover, SMEs play a seedbed role in developing the local economy. Developing small firms can be a positive role model, encouraging others to set up their ventures while employing local people and using local services and suppliers. Small firm growth will encourage existing firms to grow, resulting in a positive local multiplier effect. However, increased congestion and heavy traffic will negatively affect Cowfold's small businesses in several ways.

By contrast, if Wineham Lane were to be used, the impact on traffic flow would be significantly reduced, because existing congestion does not extend as far as Wineham Lane from Cowfold and

there would be no need for traffic lights at this junction. Also, Wineham Lane already has a wide visibility splay on this straight stretch of the A272. As a result, road users would not need to find alternative routes because the congestion would not build up at this junction. In order to verify and confirm this point, kindly refer to the traffic data and road traffic accident data, applicable to the construction of Rampion 1 from 2015 to 2021.

The Institute of Environmental Assessment (IEA) 2012 report for Rampion 1; Chapter 29, sub section 22 p26, concluded that: Wineham Lane “operates significantly below their theoretical link capacity and are unlikely to result in congestion problems.”

Impact of traffic congestion on local businesses:

Rampion 2 have estimated that over 8,000 HGV's will be needed for the substation, (Rampion 1 was estimated at 6426) excluding abnormal loads (equating to 60-80 HGV movements daily), and thousands of ancillary support vehicles (around 250 workers per day were needed during certain stages for rampion 1). Rampion 2 will be thirty per cent larger than Rampion 1, so we have extrapolated that the number of workers will be approx. 4,000 equating to about 325 workers per day, at the busiest phases. Please refer to report completed by RSK Environment Ltd – Chapter 29.5.40 Table 29.6 on p20. If the substation was located on the Oakendene site, Rampion have stated that they will need to construct a visibility splay in order for vehicles to enter the site. However, these thousands of vehicles will need to leave the site, by crossing two lanes of relatively fast-moving traffic (over 18,500 vehicles daily), with average speeds of 60mph. It is inconceivable that temporary traffic lights or another form of traffic management, will not be needed along this winding stretch of A272, in order to allow these vehicles to move safely across two lanes of traffic. Please refer to the Traffic Chapter.

Therefore, incorporating a traffic management scheme on such a busy road for a prolonged period will have a negative economic impact on a number of businesses that have to use the A272 on a daily basis. It is not only the 70 local businesses on the Oakendene site, but also the other small and medium sized businesses in Cowfold village and the thousands of commercial vehicles that pass through Cowfold on a daily basis. Please refer to Appendices 4 & 5.

Local Economic Impact, (if the substation is located at Oakendene/Kent St).

Cowfold already suffers from high levels of existing traffic and congestion, with long queues along the A272 between 0630-0900 and 1600-1830. In the event of any temporary lights or an incident in or around Cowfold, then there is a direct and immediate impact on the villagers and any drivers using the A272 for about two miles east, (past Kent Street) and possibly one mile west (towards Stonehouse Lane). This then has a knock-on effect on the A281 running through the village from Henfield in the south, to Horsham in the north. Visitors and customers may prefer not to visit local companies or local attractions such as Leonardslee Gardens, if faced with the prospect of congestion. This can have a real impact on the level of business won and the level of profitability for an individual firm. This will also have a negative impact on the overall regional economy.

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.

- **Increased costs:** Congested traffic leads to increased fuel consumption and higher fuel costs for both individuals and businesses, resulting in less disposable income and lower profits. An idling vehicle uses about 0.8 litres of fuel per hour, due to the acceleration and braking associated with traffic jams. As a result, traffic jams are costly (Michelin, 2022), placing an increased financial burden on everyone. We spoke with a local driving instructor who uses the A272 several times each day. His running costs will increase as his vehicle will become less efficient whilst sitting in queuing traffic, these are costs which are not easy to pass on. Please refer to the personal testimonials, in Appendix 1.
- **Losing competitiveness and reduced profitability:** The additional costs of fuel and lost time sitting in traffic result in increased inefficiencies, which generally have to be passed on by businesses, resulting in higher prices for the consumer and potentially fewer orders and lower profitability for the business. We have spoken to a number of local businesses who rely on deliveries from third parties and they are concerned that their input costs will rise and that deliveries will be delayed, thereby having a knock- on effect on their business. One sole trader pointed out that delivery drivers cannot afford to sit in traffic queues when they have so many deliveries to make each day. This may result in delayed deliveries and more inefficiencies negatively affecting the competitiveness of local businesses. Another business owner, pointed out that in the past when there have been temporary traffic lights on the A272 with queuing traffic, delivery drivers will simply not waste time sitting in queues and will not deliver items. The customer then gets an automated message along the lines: We tried to deliver, but you were not in.
- **Negative impact on local businesses:** Traffic congestion can deter customers from visiting local businesses in Cowfold. The increased traffic will make accessing shops more time-consuming, discouraging potential customers and affecting the viability and profitability of small local businesses. There is a florist, hairdressers and coffee shops in Cowfold, which could all be affected. According to the INRIX Global Traffic Scorecard analysis, traffic congestion cost UK motorists more than £30bn in 2016. Graham Cookson, Chief Economist at INRIX, stated, "The cost of this congestion is staggering, stripping the economy of billions, impacting businesses, and costing consumers dearly." Please refer to Appendix 2.
- **High Impact Traffic affects:** There will be a need for temporary construction access to accommodate the safe movement of construction vehicles entering and exiting the construction site to avoid unsafe manoeuvring on to the A272. This impact is considered by Rampion one of "medium impact" in normal circumstances with a free-flowing road. However, on a section of road that already has congestion problems, this will be of "high impact" to local residents and road users of the A272. During the excavation and foundations phases of the construction of Rampion 1 substation (which is 30% smaller than Rampion 2), there were 60 HGV daily movements each day. That does not take account of the 325 additional workers per day, that will be needed at peak times during construction.

- According to RSK Environment Ltd, (scoping report, study of 2012 p23), cables will need to be delivered along the cable route. Combined with the low loader the overall weight can be 52 tonnes each. These very heavy vehicles will damage the highways and lanes and will need to undergo repairs, which will cause further disruption.
- **Volume of traffic** will rise from around 9,000 vehicles (each way) to incorporate an additional 8,000 HGVs over 3 years that is an additional 60-80 each day. During parts of the construction phase, there will be in **excess of 325 workers arriving** at the substation site each day, plus the HGV's. According to the RSK Environmental report completed in 2012 (29.5.47) which analysed Rampion 1, (which is 30% smaller than Rampion 2). None of these workers can come on public transport, because none is available, they will all need to come via cars/trucks/vans. During year 1, Rampion had planned to have 1835 workers at the substation site in the first year and 1307 in year 2. However, the scheme did not last 2 years but instead took over 6 years. To complete. This is a significant increase in the number of vehicles accessing and leaving the site each day and given the existing congestion, and the road at near capacity, will ultimately lead to severe congestion and severe inconvenience to other road users.
- **Increased congestion** will not only have an incredibly detrimental impact on small businesses, but motor vehicles have also been identified as the most dominant source of a plethora of air pollutants. Stuck in slow-moving traffic, vehicles spend more time on the road, idling, crawling, and undergoing many stop-go events that inevitably lead to an increase in emissions.
- **Accident hot spot:** The A272 running adjacent to the Oakendene site has one of the worst road traffic accident records in the region. There have been over 50 accidents in recent years, and at least five since Christmas 2022, leading to this section of the A272 being closed on a number of occasions. The A272 at this section is a windy section of road, with very poor visibility, thus making it more dangerous. During the past 12 months, two households along this stretch of road, have had vehicles crashing into their hedges and fences. They have had to involve loss adjusters and re-plant hedges and replace broken fences, which is very costly and will increase their home insurance premiums.
- **The increased risk of accidents**, which is well documented when drivers get frustrated, as outlined in the RSK Environment Ltd report of 2012 (Chapter 29-22), is likely to increase motorists' insurance premiums. Also, the movement of abnormal loads will cause more backlogs and congestion.
- **Muddy and slippery highways:** It is widely recognised that the HGV's have the potential to distribute dust and dirt onto the local highway network. Obviously in the winter months, this could cause the road surface to become slippery and dangerous to other road users.
- **Safety Risks:** The narrow pavements within the village of Cowfold already pose a serious safety risk for both pedestrians, and cyclists. However, more significantly during rush hour, for parents pushing prams, with young children from Oakfield Rd towards St Peter's primary school. The increased volume of traffic and frustrated drivers may lead to more road traffic accidents. The safety of vulnerable road users, such as children and the elderly residents, is particularly compromised. The increased number of accidents and risks of living in certain areas, pushes up insurance premiums for local residents.

- **Safety of Children:** Parents and children travelling to St Peter's primary school will be put at increased risk, not only by the additional number of HGV's and ancillary vehicles on the roads, but by the additional air pollution. Cowfold is already an AQMA. Please refer to Pollution chapter. The vulnerable in the community, which may include the elderly, may also be prone to respiratory problems, thus increasing the costs for the NHS.
- **Employee Retention and Morale:** The increased congestion in Cowfold, could persuade people to change their jobs due to the stress and fatigue caused by the daily commute. At a physical level, everyday traffic can cause high blood pressure, a feeling of being on edge, and impacts on the immune system, reducing the ability to withstand pressures. Furthermore, at a social level, there could be a possibility of not going to the office or taking a day off to avoid traffic stress. During a recent Cowfold Parish Council (PC) meeting, a local business owner, pleaded for help from Cowfold PC, since she was extremely worried that she would lose staff as a result of the hassle of getting to work and that deliveries would be significantly delayed due to the congestion. Prolonged commutes in congested traffic can cause stress and fatigue among employees, affecting their job satisfaction. A survey conducted by Robert Half, a global staffing firm, found that long commutes due to traffic congestion can lead to higher turnover of staff and difficulty recruiting skilled workers. We have heard this from a number of local business owners in hospitality, who are genuinely concerned that they may lose staff, as a result of these unnecessary traffic delays and congestion.
- **Negative impact on Cowfold overall:** Many business location decisions will be influenced by the transportation infrastructure and levels of congestion. This can have an impact on planning, investment levels, and economic development in different regions. The cost and time involved in relocating, is considerable, so would probably be a last resort.
- **From a local perspective,** Cowfold residents and visitors will find that they need to allow more time to get to work and school, which is in direct contrast to the objectives of the West Sussex Transport Plan. Longer travel can lead to frustration and reduced quality of life for individuals living in the area. This concept of "planning time" has been examined in a study provided by TTI's 2012 Urban Mobility Report, found in the INRIX report of 2014 (p4) in appendix 2. It is a measure of the additional time that people need to allow to reach their destination on time. This essentially captures the unreliability of traveling in congested conditions – people know they will experience traffic jams with the need to plan and allow extra time, because it is not possible to know how bad the traffic jams will be.
- Residents and businesses in Cowfold may also find accessing essential services and amenities more difficult. This includes challenges in reaching St. Peter's Primary School, attending the doctors' surgery at St Peter's Close, and getting to the Co-op or Jeremy's Two farm shop. The limited accessibility can hinder the overall well-being of the community
- **Environmental Impact:** Excessive traffic congestion contributes to increased greenhouse gas emissions and air pollution (INRIX study for Cebr, The Future Economic and Environmental Costs of Gridlock, dated July 2014, p4). This can lead to stricter environmental regulations and higher emission-related costs for businesses as they will have to adhere to stricter controls and regulations. (Appendix 2)

- **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, or border on, 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.
- **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.
- **HGV waiting area.** During the construction of Rampion 1 substation, HGVs were obstructing the lane and causing an enormous nuisance to local residents. Rampion executives eventually found a holding area for the HGVs at the junction of the A23 and A272, however this site has now been developed and is no longer available. We understand that the executives in charge of Rampion 2 have not identified an HGV holding area and this could potentially have a massive detrimental effect on local residents, as the HGVs will have to wait somewhere and will potentially block the local roads and lanes, including the A272. **These large articulated vehicles** and abnormal load vehicles are not suitable for the local single track rural lanes around Cowfold, thus causing more damage and disruption. These lanes will then need to be repaired, causing more disruption to the local community.
- The local residents of Cowfold are aware of a number of significant proposed residential developments in the local area, so there is potential for a cumulative impact, such as the one at Buck Barn.
- **Property Prices.** In January 2023 local estate agents, were saying that they did not believe that the substation would affect house prices, once it was built and established. Since that time, a number of properties (within a 2-mile radius) which were for sale, have thus far been reduced by about 10% as they are not selling. One buyer withdrew their offer, when they discovered that the substation was proposed at Oakendene, the second buyer pulled out because they were worried about the construction traffic disruption. Evidently, throughout the construction phase, (which could last around 6 years), the disruption and inconvenience will make selling properties much harder, which will ultimately affect the price. Obviously, it is much easier to sell a property which is in a beautiful location, rather than one that is next to or close to a 14-acre substation, which has the **prospect of additional battery facilities** being constructed nearby. These are generally less favourable visually, and so will have an impact on property prices. National

average house prices, according to Nationwide Building Society (at the time of writing) have fallen by about 5% across the country, however two leading local estate agents have reports price reductions of 10% locally, year on year.

- A number of local businesses have revealed that they are concerned about higher interest rates and the prospect of another recession, putting their customers under more financial pressure. This together with prolonged congestion problems may lead to them losing these vulnerable customers. Some businesses actually fear for their livelihoods, not knowing how their businesses could survive yet more obstacles. Other businesses have resigned themselves to the fact that they will probably have to move location, or will have to get to work before 0630 and leave site after 1830. We spoke to a driving instructor who travels through the village of Cowfold along the A272 to Burgess Hill several times a day with his students. He anticipates that a large proportion of his lessons will be taken up sitting in traffic queues, and that his running costs will increase. Having just recovered from the effects of the COVID lockdown, he now once again fears for the future viability of his business.
- **Tourism:** Even if they survive that period, businesses which rely on tourism and events such as Airbnb, bed and breakfast, and wedding venues will suffer as the rural feel of the area will be lost and the surroundings less attractive. Tourism generally will be affected, perhaps irreparably.
 - WSCC's response to Rampion's 2021 consultation comments that Rampion have assessed the tourism economy in Sussex as 'negligible'. However, the West Sussex visitor economy in 2019 was estimated by WSCC at £2.1 billion, providing 38,520 jobs, and bringing in 23.3 million visitors - hardly negligible.
 - The beautiful countryside around Cowfold is a significant contributor to the tourism economy, not just the seaside on the south coast. WSCC's 'Experience West Sussex' document list named some signature experiences:
 - Sussex vineyards, two of which are accessed from the A272:
 - The Bolney Wine Estate (number 12 vineyard in the UK on TripAdvisor)
 - the Albourne Wine Estate
 - Five main gardens, two of which are very close to the Oakendene site;
 - Leonardslee ("the finest woodland gardens in England")
 - Nymans Garden
 - Numerous local food and drink experiences

All are likely to be directly impacted as well as the B&B or hotel industry which supports them.

Across the county, 207 hectares of land will be affected for at least 3-6 years, much of it agricultural, and there will be further impacts by affecting access. According to WSCC, at least three quarters of the land is Grade 2 or 3a, ie high grade. Oakendene's land is, from national survey data grade 3, but soil impact surveys will be needed to assess the permanent loss at Oakendene.

Employment opportunities from the proposed development do *not* offset local employment losses from tourism, farming and local business impacts, including from the wider Sussex economy due to transport delays, and are in any case not likely to benefit local people for the construction or decommissioning phases. Rampion's claims that the windfarm will be a major tourist attraction are fanciful. I sat outside the Rampion 1 visitor's centre in Brighton for three quarters of an hour one day. During that time, not one person entered. Moreover, there is a great difference in the appeal of a

windfarm from the Brighton city-scape, compared to seeing it looming over an otherwise unspoilt seaside attraction, and nothing to recommend the substation as a tourist attraction at all.

This hugely negatively impactful development does not directly benefit at all the community who will bear the brunt of it. This is in direct contrast to the Oakendene owner's draft proposals submitted to the parish council in 2021 and to MP Andrew Griffith, but not pursued due to threat of compulsory purchase by Rampion. A recent survey of residents showed overwhelming support for Mr Langlands-Pearse's original plans, which were to install solar panels to make the site self-sufficient and also to open the meadows for the local community to enjoy. He recognised the job opportunities and environmental benefits for the local community. (Please see Oakendene Alternative Plan (Cowfold Residents Impact Statement section 3 Alternatives Attachment 1.pdf).

Appendix 1- Personal Testimonials of Local Impact

1. Impact on rural lanes & businesses

Aglands Farm on Picts Lane would definitely be affected, from the fact that they have feed and corn deliveries and collections by lorries that can only come in from A272 as can't come up the little bends on the hill. If they met traffic coming the other way that would cause severe delays for anyone involved and possibly cause the distributor to refuse to come. Same goes for the tractors and combines at certain times of the year. Also, the shoot which is run as a separate business to the farm, is actually the main source of income for the estate. The shoot uses both sides of the lane and occurs twice a week for 4 months of the year, without quiet and clear roads to be able to move the beaters around etc added to the fact that a much busier road would frighten the birds away and might impact on whether the shoot could survive or not. This would then bring to end several livelihoods, after 40 years and our home as we live in a tied cottage. The fact that we have to use the lane to move our horses from the only grazing ground we have up to the farm where they are stabled, is already a risky business. This would be impossible and very dangerous if the road was busier. The lane is used by tractors all year round to be able to tend to crops etc. if that was disrupted then that would severely affect the income of the farm. Also, in Long House Lane - literally a stone's throw from Picts Lane but an integral part of the South Lodge Estate is Long House which is a medieval Manor House and is used as a country House weekend rental (see landedhouses.com) - the whole selling point for their income is that it is located in a rural quiet area of outstanding beauty. I am sure heavier traffic on the lanes would impact that severely.

2. Driver Instructor

Yes, I am very concerned about the impact on my business.
As a self-employed driving instructor, I travel back and forth past the site up to 8 times a day!
4 lessons, so 2 journeys past the site each lesson.
The majority of my customers are in Cowfold area.
Most of my lessons take place between Cowfold and Burgess Hill.
The nearest driving test centre is in Burgess Hill, so it makes absolute sense to go there.
This means A272 Cowfold to Bolney.
Any traffic delays will impact on lessons greatly.
I doubt pupils will want to pay to sit in a traffic jam!
I also have pupils in Bolney, so travelling to collect them will likely also take longer.
Travelling to pick up pupils is not chargeable so that also impacts on my business.

3. Cowfold Local Business

Our fear is that it will kill the passing business, which is significant, we get a lot of people who stop by who are out for the day, to rely solely on locals it would impact our business by 30-40%, which is a great worry especially the on top of the energy & cost of living crisis which is impacting on our business hugely already.

Our fear is with both the 272 & the Henfield road being affected, it will cut us off completely! When exactly were we consulted on this?

4. Business on Oakendene Estate

We are really worried about the planned traffic lights on the A272 and the queues, it's gonna really affect us. We take cars out on the A272 to test them, how's that going to work? When there's been

traffic lights outside the site, delivery drivers don't waste their time sitting in queues and they don't bother to deliver. We then get an automated message saying, we weren't in, even though we were here waiting for them. Our business needs spare parts to fix the cars, and we don't want to be hanging around waiting for them to be delivered, it's bad enough at the moment. Part of our business also supplies spare parts, which we promise to deliver next day. If delivery drivers don't arrive to collect them, that part of the business will dry up.

5. Local Business Owner in Cowfold, with unit at Oakendene

Subject: Objection to Planning Permission for Rampion 2 Electrical Power Step Down Station

I am writing to express my deep concern and objection to the planning permission for the proposed Rampion 2 Electrical Power Step Down Station in the vicinity of my property. As a local business owner and resident directly affected by this development, I believe it is essential to raise awareness of the severe consequences it will have on my business and personal life.

I am the proprietor of a thriving business that encompasses an office and warehouse located in close proximity to the proposed site. The intended construction work and subsequent operation of the power station are predicted to cause significant disruptions, which will detrimentally impact my business for an estimated period of seven years. The repercussions of this development will encompass a wide range of critical aspects, outlined as follows:

1. **Customer Experience:** The A272 is already a busy road and the increased noise, traffic, and potential safety hazards associated with the construction and operation of the power station will undoubtedly discourage customers from visiting my establishment. The negative impact on footfall and reduced accessibility will harm my business's reputation and ultimately lead to a decline in customer engagement.
2. **Deliveries:** The proposed power station will inevitably disrupt the transportation routes in the area, making it challenging for delivery vehicles to reach my premises promptly. Delays in receiving essential supplies and materials will have a cascading effect on my ability to meet client demands and fulfil orders in a timely manner, thus jeopardizing crucial business relationships.
3. **Staff Welfare:** The wellbeing and job satisfaction of my employees are of utmost importance to me. Unfortunately, the construction noise, increased congestion, and potential health risks associated with the power station will create an unfavourable working environment for my staff members. The resulting stress and discomfort will not only diminish their morale and productivity but may also lead to increased absenteeism and employee turnover.
4. **Financial Implications:** The proposed power station's adverse effects will undoubtedly result in a significant loss of revenue for my business. Reduced footfall, delivery challenges, and a diminished ability to attract new customers will directly impact the financial viability of my business. It is disheartening to anticipate such a detrimental financial setback, potentially threatening the livelihoods of my employees and myself.

Furthermore, as a resident living directly opposite the intended building site, I am deeply concerned about the potential depreciation of property values. The presence of a power station in such proximity is likely to deter potential buyers, leading to a substantial reduction in the market value of my property. This decline in property value would be a severe personal and financial setback, as I had envisioned my property to be a long-term investment and source of security.

Given the significant negative impact this project will have on my business, employees, and personal life, I kindly request that you reconsider granting planning permission for the Rampion 2 Electrical

Power Step Down Station. I urge the planning department to thoroughly review the potential consequences and explore alternative locations that would minimize the disruption to local businesses and residents.

I understand the importance of a reliable power supply for the community, and I appreciate the efforts to meet increasing energy demands sustainably. However, I firmly believe that a thorough reassessment of the proposed site selection is necessary to ensure the equitable distribution of any potential adverse effects.

I am more than willing to participate in any further discussions or provide additional information to support my objection to the planning permission. Please let me know of any upcoming public meetings or avenues for sharing my concerns in a more direct manner.

Thank you for your attention to this matter. I trust that you will carefully consider the implications outlined in this letter and take the necessary steps to safeguard the interests of local businesses and residents.

6. Economic Impact – Sole Trader

I live and work on Moatfield Lane adjacent to the cable route, my lane would be crossed twice by the construction work as well as Kent Street being used as an access point for lorries on my way out. I work as a visual artist on public art projects which are large scale wood carvings. Not only do I rely on studying the wildlife I carve which lives around this property, I also complete the work outside the studio at the bottom of my garden, and rely on the quiet and natural environment for concentration. The construction would be in the next field, very close to my studio and outside work area, and I would hear everything from both my house and studio. Prolonged construction work just next to me which generates devastating noise and dust would be terrible for me and I would even consider moving if this proposed route goes ahead. This would have a huge economic effect on my business. My studio was purpose-built and I would have to do that again elsewhere, if I can sell up at all. The wildlife would be impacted so that subject is also compromised.

There are many people who choose to be outside in these locations because of the natural environment and peace and this needs to be considered, not just the visual impact of the substation. It is a web of small properties and landowners. I am very aware of how extensive the construction phase turned out to be for Rampion 1 and know that it is a long period before anything gets restored, if indeed it ever can be. This is not endurable as a working environment.

Janine Creaye

7. Other comments from business owners on the Oakendene Estate

- *'We're all against it'*
- *'A friend of ours has already been in two accidents this year along that stretch' (Outside Oakendene'*
- *'It is too long. When there are temporary traffic lights along here for a couple of days it is a total nightmare'*
- *'We got sent information packs too late'*

Appendix 2- Economic Studies regarding traffic congestion and its impact

- A study conducted by Transport for London (TfL) in collaboration with the CBI estimated the massive economic cost of congestion to businesses in London. The INRIX-CEBR report found that the cost to households in London in 2013 was \$4.3bn in direct costs and \$4.2bn in indirect costs, totalling \$8.5bn. In 2020, it was \$5.6bn of direct costs and just over \$5bn of indirect costs, totalling \$10.69bn for the year. The study highlighted the impact on productivity, increased delivery costs, and reduced business competitiveness, which are the same factors that will affect the businesses in and around Cowfold, albeit on a smaller scale.
- "The Costs of Congestion INRIX CEBR report" Titled "The Future economic and environmental costs of gridlock in 2030" published for INRIX in July 2014, examined the Impact of Traffic Congestion on Business Performance. The research found that traffic congestion led to increased operational costs, reduced productivity, and negatively impacted customer service. The study (p5) found that there were direct costs (fuel and time wasted) and indirect costs (increased cost of doing business). In 2013, direct costs were \$12.6bn, and indirect costs were \$7.8bn, totalling \$20.5bn. In 2020, direct costs were \$15.86bn, and indirect costs were \$9.56bn, totalling \$25.43bn. The projections for 2025 are direct costs of \$8.26bn and indirect costs of \$10.9bn, totalling \$29.19bn. The projections for 2030 are direct costs of \$20.9bn and indirect costs of \$12.47bn, totalling \$33.4bn, an increase of 63% from 2013 to 2030.
- The CBI published a report in 2016 discussing how traffic congestion and inadequate transportation can hamper businesses' ability to operate efficiently, named "Unblocking Regional Growth: Productivity in the UK's transportation networks 2016". 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). This is exactly what we see happening in Cowfold when there are roadworks, an accident, or a broken-down vehicle within a 2-mile vicinity of Cowfold village. Congestion builds very fast, and drivers try to find alternative routes, causing chaos and havoc for surrounding lanes. Under the chapter, titled "Roadwork Coordination and Management," it concluded that "roadworks and construction activity have been identified as a major contributor to the 'non-recurrent disruption of the network.' Regarding network management, it recommends 'investment in state-of-the-art traffic management technology and intelligent data collection and analytics will ensure that the existing network can be utilized with the greatest efficiency, minimizing delays, increasing reliability, and improving network resilience."
- There are also externalities from traffic congestion, including the health impact of exposures to excessive traffic-related air pollution during congestion (Levey et al., 2010). In recent decades, studies have found that traffic congestion has negative effects on people's physical and psychological health. Currie & Walker (2011) suggest that traffic congestion significantly contributes to poor health among infants. According to Sandow et al. (2014) and Higgins et al. (2018), high congestion levels have also shown negative impacts on the psychological health of both adult and elderly populations and lead to higher mortality. Zhang and Batterman (2013) concluded that traffic congestion can significantly increase motorists' pollutant inhalation and thus increase their traffic-related health risks. In a study conducted by van Hooff (2015), stressful commuting delays negatively affect the ability of employees to recover their health and

wellbeing after work (Journal of Transport Geography, Vol. 98, Jan 2022 Zihan Kan, M Kwan). Therefore, it would be detrimental to Cowfold.

- **Opportunity cost:** Increased congestion will mean that workers are sitting in traffic queues rather than being productive, reducing productivity. Data from a transport analytics firm that analysed congestion and transport trends in 2019 estimated that traffic jams on major UK roads cost the economy tens of billions of pounds each year.
- In 2020, the CBI published a report titled "Getting the UK Moving: Investing in Infrastructure." It emphasized the negative economic impact of congestion on businesses, productivity, and regional development. It also placed emphasis, particularly among investors and lenders, on delivering projects that align with Environmental, Social, and Governance (ESG) criteria (p42).
- According to an article in The Economist on 20.4.23, congestion is estimated to cost the UK £10bn a year in lost time, as more vehicles crawl along, and average speeds slow. Motor vehicles are responsible for 10% of the country's air pollution and one-fifth of its greenhouse gas emissions.
- The Centre for Economics and Business Research (CEBR) was commissioned by INRIX to evaluate the direct and indirect economic and environmental costs of idling road traffic congestion to households in the UK. "Direct costs are assumed to equal the value of the time and fuel wasted while sitting in congested traffic during peak periods. The indirect cost to households stems from the increased cost of doing business in congested conditions. For example, it is more costly to transport goods in and out of congested cities and more time-consuming to attend business meetings by road transport while the road is congested. Such cost increases can be expected to be passed onto households through higher prices for final goods and services."
- **Reduced Customer Accessibility:** A study published in the Journal of Transport Geography found a negative relationship between traffic congestion and the attractiveness of shopping centres, which can negatively impact the profitability of businesses located in congested areas.
- **Impaired supply chains:** Traffic congestion can disrupt supply and logistics operations. Delayed deliveries can affect stock levels, impacting production schedules and customer satisfaction. Alternatively, businesses may need to retain higher stock levels, which will add to their ongoing operational costs and reduce profitability. Any business that relies on deliveries of raw materials or goods will be negatively impacted as it will take longer to receive these goods. A study published in the Transportation Research Part E: Logistics and Transportation Review highlighted the negative effects of congestion on supply chain reliability and inventory management.
- 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 could increase injuries. We have found the findings of this report to be accurate and applicable to Cowfold. When there are roadworks or temporary traffic lights along the A272 to Cowfold, drivers try to find alternative routes via narrow single-track country lanes, causing absolute mayhem.

Appendix 3- Horsham District Council Plan

If the substation is located at Oakendene, this will be contrary to the economic aims of the Horsham District Local (HDC) Plan.

The 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." "We recognise the importance of small businesses to the local economy."

"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)."

Appendix 4- Cowfold Businesses Likely to be Affected, approximately 130.

Businesses on Oakendene site – RH13 8AZ.

A Place in the Garden (Oakendene)	Gas 305
A. Plus logistics Ltd	GBP Cars A110
Ace Auto	GHP International Ltd
Ace breakers Ltd	Harridge Stoves
AJ Building & Roofing Supplies	Holder tree services
AM Metal Polishing	JS Engineering
Andrew Grace	Kiwanda Woodworking
Andy & John Engineering Ltd	KSV Exports
APT Autos	Lincoln Binns
Assettrac	Matthew Roberts Carpentry
Atspeed Steels & Lintels	New design 20 Ltd
Auto Colour Works	Oakendene cars
Automotive concepts Ltd	Oakendene Estates Ltd
Cass Joinery	OEP Land Ltd, Oakendene Manor
Conifer Cars	OT facilities
Cowfold Precision Engineering	Panacea Life Ltd
CVBH	Paramed Manufacturing Ltd.
David Stocken Car buying Co	Parasure Ltd
Denne Plating	Pawganics international ltd
Detailed vehicles Ltd Unit	Pottage 2000 Ltd
Digital Growth	Qualife Woodlands.
DRFS Leisure	Resin Things
DTR Newnham	SAS pools
Dudman group of companies	Scaffold UK Group Ltd,
EM Laboratories Ltd	Southern Cabins Ltd
Endole- Explorer. (18)	Southern EDM Ltd
Food 4	Stan S&G Motors
Fordham Joiners	Supplyline Auto ID.

Tarrett Tables

Techniques for change

The Taxi Bus Office

Trimming services

Ultimate Autocare Ltd

Validation and Safety Ltd

Vericlean support services

West Sussex Alfa Romeo

Woodstar Lighting

Yellow Crown Motors

A272 RH13 8AZ

A Place in the Garden, Main Office

AJ Building & Roofing Supplies

Brighthelm-Stone

CAN Associates.

Clare Palling Book Keeping

Clifford interiors

Evasafe Products Ltd

Felicity Thorpe interior design Ltd

O'Neill Smith Ltd- Lochcarron Farms

South Lodge Estate

Central Cowfold and A281

A&H Europe Ltd

ABS Services

Acorn Fencing

Alan Sutton Driving school- Driving instructor

ALB Secretarial

Alice's Dog Grooming

Andrew Shipp Autos

Bus and Bug Vintage Weddings

Chris Waller joinery

Circle 5 consulting Ltd

Clarks Lifting

Complete Barbers

Country Nice Nursery

Cowfold Cottage Tandoori

Cowfold Medical Group

Digital Growth, 360 Degree Marketing

Digital Web World

DL Hilton Properties

East Barn interiors

E-M power IT

Equestrian Vison

Fowlers Group, Swimming Pools

Geoff Hunt, garden designs

Growth & Control Ltd

Hair studio

Hare and hounds

Hibbert O'Shea Ltd

Indigo Tax & Accountancy

Insitu South Coast Preservation

Intent91 Personal Trainer

Jeremy's Two

JET Decorating and Property Maintenance

Joanna Frances Photography

L P Aerials (TV and satellite specialist)

Little Bean Cafe

Living Waters Ministries

Network Mortgages

Orchard Park Homes

PJ Barrow

Robin Lackford Motor Engineering

Rugwash

S M Fencing

Sara Rudkin Architectural services

Sculptureform

Small Beans Photo School

Southern Motor Group

St Peters Primary School

Supremacy Associates Ltd

T. Facer Trading

The Co-operative General Stores

The Mulberries Newdigate

The Real Pie Co

The Still Rooms

Tjo 3d.

Trenchmore Farm, Beef and Silly Moo Cider

UK Risk management Ltd

Vazon Technology

Vraxis Safety Solutions

Wessex IT Ltd

Wheelwise Engineering

Williams Joinery

WP Precision

Xtreme Restoration

Appendix 5- Wineham Lane and surrounding area — affected businesses approx. 5

Royal Oak pub

Maydean Ltd- (electricians)

Ashdar Solutions (management consultant appears to be working from home)

Royal Oak Country Park (wooden holiday lodges, most appear sold)

Twineham Grange- on Bob Lane

The negative traffic consequences for businesses can therefore be significantly reduced if the substation is located adjacent to Rampion 1, on Wineham Lane.

Addendum to Economic Consequences of the Substation Following DCO Submission

Despite having plenty of concerns raised by local residents about the economic impacts of the traffic turning on and off the A272, there is no assessment of this in the DCO submission. All discussion about economic impact, such as it is, continues to focus on the SDNP and coastal areas and is tourism based. The impact on Cowfold is not considered at all, even though the construction traffic will have a negative effect as discussed in our main Economy Section. Yet the Examining Authority are obliged to weigh all negative impacts in the balance when assessing sustainability.

The HDC relevant representation comments:

3.6 *“The Cowfold Road (A272) is a key local distributor, taking traffic east-west across the district and linking several other strategic road networks (A23 to the east and the A24 to the west) with quieter, rural lanes. At Cowfold, the natural restriction created by the staggered A272/A281 junction, combined with the volume of traffic using the A272 as a major link road, results in significant standing traffic during morning and evening peak periods. This is reflected in congestion being raised as a key issue by the community.”*

This therefore recognises the potential impact on businesses in the far wider community also.

With regards to the economic impacts Rampion do discuss, we argue that the impact of the turbines on the picturesque coastal towns or villages and rural landscapes is much greater than the impact of Rampion 1 which was largely on the vibrant city of Brighton and therefore less likely to have an adverse effect. In addition, these turbines are much taller and closer to the coast, together giving a significantly greater effective impact to deter tourism. The projections from Rampion are for hardly any job creation locally, and they significantly downplay the negative impacts on tourism. They have not even considered the economic impacts on other businesses.

Soils and Agriculture (doc ref 6.2.20) does make some reference to the economic impact on farming but overall assesses it as ‘not significant’. We strongly disagree with this, although they do acknowledge that the impact on some individual farms is likely to be much greater. We believe the damage and disruption will be greater and for longer, based on the experience of Rampion 1

The economic damage by far outweighs the benefits. There is nothing in the following evidence provided by Rampion which challenges this:

From Socioeconomics (doc ref 6.2.17):

17.9.6.” *At the Sussex level, the expenditure retained locally is estimated to support around 80 FTE jobs over the construction phase of Rampion 2. “and almost nothing during the operation. This is a poor return for the potential loss of **150 businesses** in Cowfold alone. The remaining 4040 construction jobs will not be met locally.*

17.9.25:” In addition, the analysis presented in Appendix 17.3: Socioeconomics technical baseline, Volume 4 of the ES (Document Reference: 6.4.17.3) states that visitors and tourism related businesses recognise the potential for positive impacts associated with the increase in local expenditure arising from construction activity.” However, on looking at this evidence (Doc ref 6.4.17.3 para 1.4.2), it mainly appears to be based on an ex-ante study i.e. a forecast which means that there may well be a difference between what the interviewee believes it will look like and what they find the reality actually is after construction. This is particularly relevant given Rampion’s failure to provide visual representations during the consultation.

There is absolutely no meaningful mention in this document of any other economy than tourism. There is no discussion of the impact on the rural economy, the Oakendene Industrial Estate, Cowfold businesses or the economic impact of the traffic on the A272.

In Socioeconomic Technical Baseline Doc Ref 6.4.17.3, the ex-post research is quoted:

1.4.7 “The most helpful UK-based studies of offshore wind farm developments are studies carried out in relation to North Hoyle (Arup Economics and Planning, 2002) and Gwynt Y Môr (RWE Renewables, 2005) wind farms off the coast of North Wales”.

The Arup study in fact highlights the importance of **good photomontages** in helping the public to engage and to properly understand what the proposal would look like; something that Rampion have consistently failed to do at both windfarm and substation.

The Gwynt Y Mor study was in fact commissioned from Regeneris Consulting by the Welsh Government for the examination of the project and looks at windfarms in other parts of the country. It concludes:

9.8 While there are examples of wind farms which can be seen from highly protected areas, these tend to be from a long distance, meaning they are not dominant features on the landscape. It is highly unlikely that visitors to these areas would be deterred from making future visits as a consequence. Rampion is not a long distance from protected areas in Sussex or indeed from the shore and so is much more likely to be a dominant feature in the landscape. Its turbines are taller than any other wind turbines yet constructed in the UK.

*9.9 The areas affected by wind farms tend to have relatively low levels of tourism, as reflected in the analysis of visitor accommodation and tourism employment in these areas. However, some of these areas also have a small and narrow overall economic base and so the contribution of tourism, albeit small, is nevertheless quite important to them. **This project is to be situated very close to many areas with a high level of tourism and so is not comparable.***

*9.17 While most of the evidence points toward limited impacts on tourism from wind farms, there are examples of certain locations which are, on balance, more sensitive to wind farm development. This is on account of their landscapes, types of visitor, limited product diversity and proximity to wind farms. This is particularly the case where the key visitor markets are older people visiting for the tranquillity, remoteness and natural scenery offered in some parts of Wales. Remoter parts of Powys are the most notable examples of where this may be the case. **The south coast of Sussex is also visited by older people, a landscape where windfarms would have a major impact, and people visit for the tranquillity and natural scenery, so again the impact is likely to be worse.***

They provide 'evidence' for little or no impact on tourism:

1.4.10 Overall, the research typically finds a large majority of visitors and tourism-related businesses in local areas affected by potential developments do not expect any impact".

Yet the studies they quote are not particularly supportive of this:

The BiGGAR study is about *Onshore* windfarms and therefore is not directly relevant and was ably criticised by Wynn in 2016. For instance, the study does not look at the smaller, family enterprises and makes the assumption that there would be no impact on them (Douglas Wynn (2016), A Critical Appraisal of 'Wind Farms and Tourism Trends in Scotland' by BiGGAR Economics, July 2016)

Alem et al:

"When comparing offshore oil, nuclear energy and offshore wind [the difference is] that far fewer people are employed in offshore wind projects. While peak employment for one project can be over 5,000 jobs for offshore oil or nuclear energy, large offshore wind projects employ 5,000 people or less over the entire lifecycle of the project. Therefore, the [positive] changes due to offshore wind farms can be expected to be less significant compared to observations in the nuclear and offshore oil industry".

And: *"Concerning tourism and housing prices, negative impacts are minimised when the offshore wind farms are located more than 40km away from the shore"* **Rampion is only 13km from the shore.**

And *"Studies argue that with more wind farms under construction, tourists start shifting to other places (Voltaire et al., 2017). Authors confirm that there is a strong correlation between lower housing value and drops in tourism (Etherington, 2014; Riddington et al., 2010). In addition, some studies have also found that negative relations exist between tourism and wind turbines construction, particularly with projects carried out in the near surroundings."* **The Rampion wind turbines are very close to areas of tourism.**

From the Bournemouth council Written Representation to the Navitus Bay examination, section 5.

The paramount importance of primary data:

"5.1 For the reasons set out above, there is only a very limited value in considering data from other wind farm developments. All resorts are different. All resorts have their unique characteristics that appeal to different customers. Desk top research and literature reviews cannot answer the essential, site specific, impact questions."

Section 6: Landscape and Visual Impact EN-1 5.10

Much of the focus in the early stages of the consultation by the media and by conservation groups was on the undoubtedly important visual impact of the windfarm along the coast, on the South Downs National Park, and historically extremely important buildings such as Arundel Castle. The second consultation mainly concerned the cable route. This has allowed the substation location to be 'chosen' without the consideration and attention it should have received.

Horsham district council's Local Plan recognises that within the district "areas which are not designated are still highly valued by local communities." The national policy framework also recognises the importance of such areas (5.10.11) The substation area and northern end of the cable route are such an area, being highly valued by Cowfold residents and by ramblers from much further away as an amenity much enjoyed for leisure and for its spectacular wild life. It has been for years a well-kept secret and remained off the radar of officially documented biodiversity sites and records. For Oakendene, it is partly the very fact that most people beyond the local population do not know it is there that has resulted in the failure, beyond the local community, to recognise its importance, particularly in respect of the flood plain habitats, nightingale nesting sites and badger and reptile habitats

It is quintessentially representative of the low weald historic character. There are small fields, streams, lakes and ponds and a good network of scattered woodlands, shaws and hedgerows with hedgerow trees, including a high proportion of mature and veteran trees It is an area the world has passed by. In the words of JRR Tolkien, it gives the visitor a 'heart-racking sense of the vanished past'; a journey back in time.

Sadly, Wineham Lane lost this special character in the 1960s when the first substation was built. It is a local policy not to build housing in isolated places but to join it to existing communities. In the same way, it would make sense not to destroy yet more areas of our precious landscape, but to keep the new substation as close to the old one as possible.

The historic centre of Cowfold is ancient in character with rapid change to a rural landscape immediately outside the confines of the built area, even on the very busy A272, which, though busy, very much retains a rural feel. The substation will mean a great change to the whole visual character of Cowfold. Currently, the only dominant structures are the village hall and St Peters church within the Conservation Area in the village centre, and outside the village, the beautiful spire of St Hugh's Monastery to the south.

5.10.8 Developments outside nationally designated areas which might affect them.

The construction and operation of the substation will have a major impact on the High Weald AONB, just a few hundred metres to the north of the substation access. (See map Appendix 1). The three-storey high structure will stand out and be permanently visible from the AONB, especially in winter. This effect must be considered by the Planning Inspectorate (EN-1; 5.10.8) and such considerations are also important to the HDC local plan. It will be impossible to mitigate as the AONB rises to the north and looks down on to the site. The large oaks along the A272 and in the northernmost fields of Oakendene are to be removed, destroying some of the most effective existing visual protection. Replacements will take decades, if not centuries, to reach a similar size. In

any case, screening will be particularly problematic in winter when any screening from native, largely deciduous trees and shrubs is lost. Any fast-growing trees such as Leylandii would be completely inappropriate in this landscape. Any reinstatement must be carried out with what is characteristic locally and visually right i.e. deciduous native trees and hedges, in addition, the record of reinstatement for Rampion 1 is very poor (see comments made during the consultation by residents, Bolney Parish Council, SWT and SDNP among others). Planting of larger trees to try to create quick screening is much less likely to survive and maintenance must be part of any reinstatement promised.

There is a **132kv cable under the ground** running north-west to south-east across the substation site from the A272. This was put in in the 1960s when the main substation was built in Wineham. It will impose significant landscaping constraints, both in terms of earth moving and planting, which will further impair the effectiveness of any screening to the north. It will also make it extremely difficult and dangerous to remove any hardstanding built over the field for parking purposes after the substation has been built, leaving it as a permanent eyesore.

In PEIR Ch 4 The Proposed Development, the 2km scoping boundary is arbitrary, and does not take into account the effect of winter and the deciduous trees which form the character of the landscape, nor the removal of the hedges and trees to the north for the access visibility splay, or even the destruction of hedges and trees which will take place on the cable route to create the haul road. In reality, a lot of the existing screening afforded by existing vegetation around the site will have to be removed to facilitate construction and access.

The impact is not just visual, but especially during construction, also destructive to the nature and character of the AONB as traffic will use the single-track quiet lanes of Picts Lane, Bulls Lane, Longhouse Lane and Spronketts to avoid the congestion on the A272

The removal of vegetation to create a compound at the access to the substation, and indeed at the western compound also, will make the site even more exposed to view.

Especially in the bare branched, long dark evenings of winter, light pollution from the 24-hour lighting at the site will be visible from the AONB, residents around the substation site and generally in the surrounding countryside and the A272 and will be significantly out of the current character. This is directly contrary to the HDC 'dark skies' policy, especially with regard to the AONB.

From PEIR Ch 27: 4.4.4 "Once all construction activities have been carried out, the onshore substation site will be secured, and the temporary construction area returned to its original use and condition." This will not be possible, especially for the eastern compound, when they have destroyed hedges, ancient trees, and put in a road, as well as the effect of the 6-hectare concrete raft which will affect flooding.

With regards to Kent Street, the need to widen the road for HGVs to pass each other, which at some points is not possible, and the visual impact of the substation itself, which at 12m high cannot be hidden from the lane by shrubbery, will so alter the appearance of this beautiful time-capsule of a lane as to utterly change its character for ever.

No consideration appears to have been given to the impact of the substation from the PROWs around the Oakendene lake and through Taintfield wood. Indeed, these PROWs appear to have been ignored throughout the Rampion PEIR documentation.

The footpaths by Westridge to the east of Kent Street are enjoyed by many people and are at a high point, looking down on the substation area. Again, the timeless rural view from here will be substantially negatively affected.

WSCC comments

In their consultation response in 2021(19.4.30) WSCC made the comment that more viewpoint data was needed on how the substation would look from sensitive receptors and that this must include all individual properties in the vicinity which might be impacted. To date, including at the Cowfold Information Event in July 2023, supposedly designed to inform the residents about such matters, all we have seen is very sketchy outlines of a small green box in the midst of trees from the north east and the south; hardly an attempt at true representation, and if done on submission, certainly not done to inform decision making about the substation location. There will be significant visual intrusion into these receptors and the AONB. The impact on ALL residents must be considered, not just the larger settlements such as Cowfold village. It would, I imagine be a relatively simple to take the height and footprint of the substation and track the visibility from around the whole substation area, the village and the AONB, and to do this for **the worst-case scenario of the winter months, and at night; they should be asked to do this as part of the examination of the proposal.** They have been repeatedly asked for such visual representations by WSCC and by residents. The boards they presented at the Cowfold information event were another example of their tick -box approach to consultation rather than anything meaningful. It was also one of the criticisms of Rampion 1, from which they claim to have learned lessons, yet clearly have not.

WSCC also raise concerns about visual impacts of the compounds and the fact that viewpoints for these should be considered also. No attempt has been made to do so, yet they will profoundly change the appearance of the entry into the village during construction and for years to come. It remains a complaint across the county that the visual representations of this project have been utterly feeble.

WSCC also comment that there will be a high magnitude of change from the removal of mature trees, hedgerows and woodlands and that the priority must be to avoid removal in the first place. Because of the choice of Oakendene as the substation location, as opposed to the 'ready-made' access at Wineham Lane, in order to gain access to the site and create a 300m visibility splay etc it is not possible to achieve this without the removal of a significant number of trees and metres of hedgerow.

The county council report of 2021 also highlights the need to take account of the impacts on residential visual amenity according to the Landscape Institute's technical guidance note 2/19 **to aid the choice of substation location.** No such report appears to have been published in order for consultees to be so aided. Certainly, no access to properties close to the site has been requested to carry out such studies.

The Zone of Theoretical Visibility includes the view on arriving or leaving a property from private driveways or access tracks. Individual houses are amongst the most sensitive receptors. Consideration should be given to the relative heights, seasonal variations, the direction of aspects of the property, night-time impact of lighting, garden views and principal rooms and the contrast to existing features. Rampion have failed to identify the correct properties, only settlements, or have

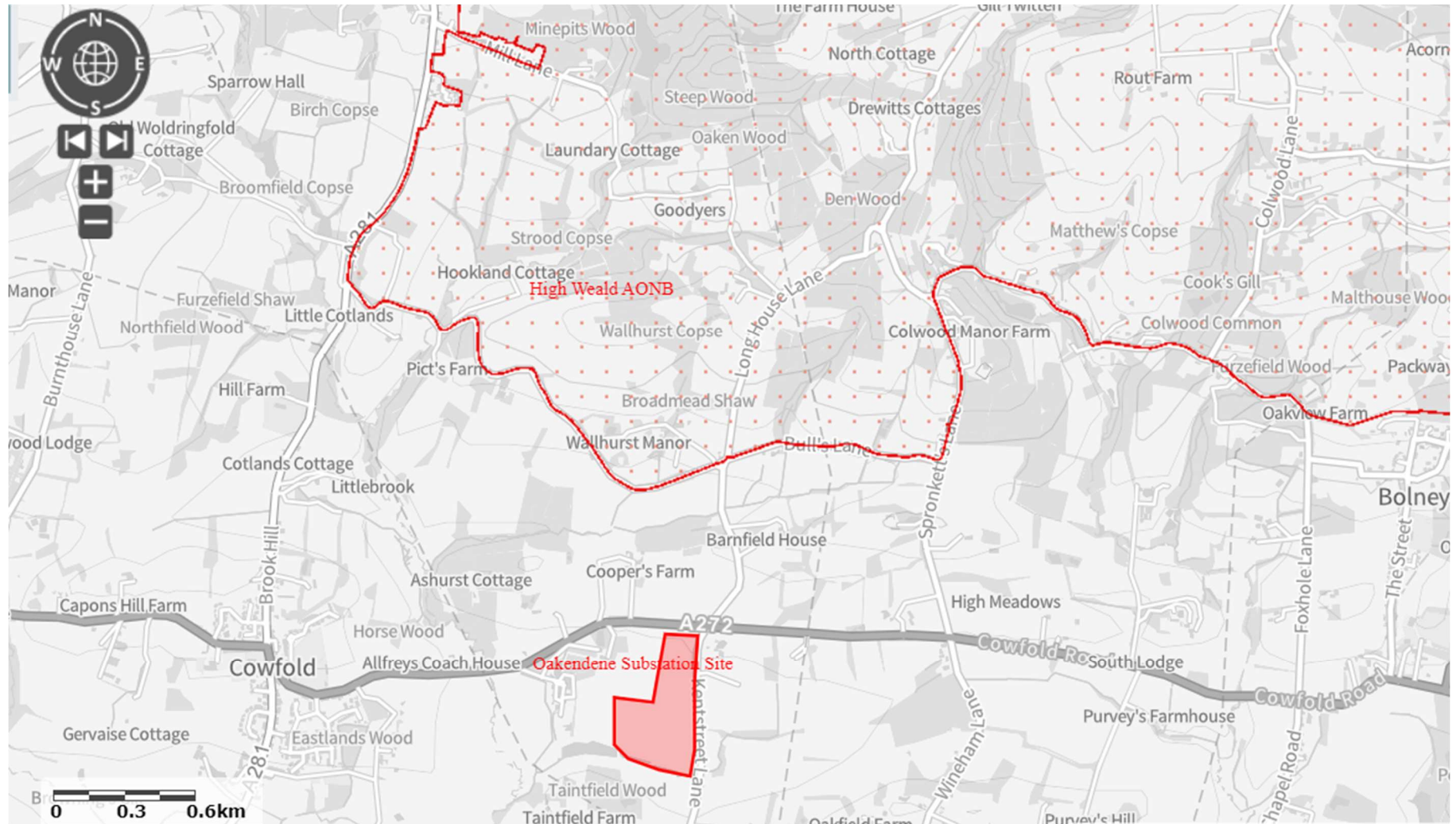
dismissed the effect as 'not significant'. They have therefore failed to carry out an appropriate RVAA prior to the choice of substation site. The magnitude of change is enormous; the size of the structure is overwhelming and overbearing. The impact is to change from an incredibly rural, quiet landscape to semi-industrial. The effect is massive and unacceptable, unlike the relative impact in Wineham Lane. It is an example of the failure of consultation with the people most affected.

In the case of major development proposals in or adjoining protected areas, applicants are required to demonstrate why the proposal is in the public interest and what alternatives to the scheme have been considered. The secretary of state must judge whether the visual effect on local residents, and the thousands who pass along the A272 every day is worth the benefits (EN-1; 5.10.13). We would argue that in this location it is not.

Mitigation is impossible during the construction phase, and there will be a long-term impact visually as the substation will be hard to screen, taking many years to hide, if at all. Smaller distribution substations can be camouflaged fairly easily with fencing, or landscaping. However, larger substations, similar to Rampion's proposed substation, that interconnect transmission lines, can appear quite industrial in nature.

The nature and magnitude of the change to the landscape must be considered when assessing the acceptableness or otherwise of that change. (EN-1;5.10.4). We would like, if possible, for the Planning Inspectorate to consider a site visit.

Appendix 1- AONB Map



Addendum to Landscape and Visual Impact following the DNO Submission

Introduction:

EN-3 (2011) Para 2.4.2 states that *“Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology.”* Instead, we find that there is nothing in the DCO documents which provides reassurance for any of the concerns we have raised in the main Local Impact document. Indeed, with the concerns about flooding at the site, there is a likelihood that the baseline ground level will have to be raised, having a significant negative impact on all viewpoint analyses.

We disagree with the level of impacts as stated by the applicant and believe they are significantly downplayed in the DCO submission. The long duration of construction and the high structures involved, including 20m high concrete batching plants at both Oakendene compounds, is not fully taken into consideration, nor the 20m tall lightning conductors (presumably also with lights on) and highly visible perimeter fencing.

Viewpoint analysis is selective as to locations with often, less affected, viewpoints being chosen, both with reference to roads and PRoWs, and does not take into account the effects of winter, or the impact at night. The poorly representative photomontages they *have* produced do not take into account the removal of hedges or trees, or the creation of visibility splays. A number of nearby properties have been excluded from the analysis. We provide our own analysis of visibility from A272 (Appendix 1)

Residential Visual Amenity Assessments (RVAA) seriously downplay the true effects and miss out a number of key properties.

We disagree with the assessment of both impacts on the view of the Oakendene Manor, and the view from it.

In addition, from Doc Ref 6.2.18 P99 we can see that the viewpoint surveys were not completed until May 2023 making it impossible for them to be used in the assessment of which site to choose, yet concerns about the possible visibility of the Wineham Lane North site from the AONB is raised as a legitimate concern in the decision process, even though it is several kilometres away from Wineham, and in reality, the site is completely hidden from the AONB. This is another example of highly selective use of information in the consideration of Alternatives.

P30 of 6.2.18: *Paragraph 5.10.26 of the draft EN-1 states “Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, ...”* They have not done this: instead, the site is chosen within the plot by constraints from the high voltage cable, flooding, etc, because they did not properly understand the site first.

Viewpoint Analysis:

In Viewpoint analysis, vol2 App18.2(Doc Ref 6.4.18.2) there is gross downplaying of all the visual impacts from both the roads and the PRow's and highly selective choice of locations to place the viewpoints.

Instead of being able to minimise the adverse effects by appropriate siting within the site, as in the Draft EN-1, the site is chosen within the plot by constraints from the high voltage cable, flooding, etc, because they did not properly understand the site first.

Roads:

In the Design and Access statement, Doc ref 5.8, section 3.3.3 they write, regarding Kent Street: *"existing mature trees and hedges along this wooded road corridor will be retained and strengthened with additional native woodland planting provided to ensure limited views of the substation even in winter. The wooded, rural character of Kent Street will be retained."* Yet this is directly contradicted by the Viewpoint analysis of this area:

"SA1-Kent Street 'greatest impact'". They get round this by going on to add "but people will be focussed on driving 'so the impact is reduced to 'medium'." This is utterly disingenuous: firstly, drivers have passengers who like to look around, and secondly **this statement is to totally misunderstand the main use of this tiny, quiet lane.** Yes, there are farms and residential properties requiring access, but it is also greatly enjoyed by walkers, dog walkers, joggers, cyclists, and people on horseback all of whom are there to enjoy the peace and beauty of their surroundings and look around them as they go. Testimony to its amenity use is given in the many relevant representations which bring this up. In addition, the proximity of the perimeter of the substation to a substantial length of Kent Street, a situation enforced by the constraints of the site, will make it impossible to screen the view effectively from a large part of Kent Street.

The likely need to widen the road for HGVs to pass each other, which at some points is not otherwise possible, (and which, it should be noted, has not featured in the consultation) and the visual impact of the substation itself, which at 12m high cannot be hidden from the lane by shrubbery, will so alter the appearance as to utterly change its character for ever.

SA2 A272; This viewpoint is taken from the east and is claimed to be zero impact after a number of years. The Viewpoint should be taken from directly north of the site and take into account the enormous loss of hedging and mature trees to create the substation site and compound. It is not credible that the substation will not be visible; instead, it will totally alter approach to this busy but rural feeling village. (See Appendix 1-CowfoldvRampion Viewpoint Analysis)

Both of these will show far more of the substation in winter and when there is lighting. The 1960s main substation on Wineham Lane is as close to the road as the proposed substation will be to Kent Street and yet over 50 years later it remains highly visible by day, but especially at night and in winter. Kent Street is far more rural, and the effect would be far more damaging.

Winter photographs of Oakendene from the A272 directly north, with the hedge cut to represent the view from a bell mouth, and the trees bare, show a clear view down to the shrubs and small trees along the tributary of the Cowfold Stream which feeds into the lake. This means that the substation, to the north of this, would be highly visible. (See appendix 1 below: Viewpoint Analysis).

The Landscape and Visual Impact assessment para 18.9.27 comments regarding the onshore substation planting” *Some of this will have been ‘advance planting’ planted in the preceding four-year construction phase prior to Year 1, but not yet be established.*” It is a nonsense to claim that screening planting can be carried out early in the project as the whole northern part will used as a giant compound and vehicle park. But even when planting has been done, it cannot alter the winter visibility of the substation location to a meaningful degree.

PRoWs:

SA3 is from PRoW (1786) at Taintfield wood and is accepted to be severely impacted. Yet why have they chosen only to use the viewpoint up by the wood more than 100m away, when this same PRoW actually comes down to the lake and then between the two lakes and into the substation site itself. How much worse will this be! Yet until the DCO was submitted, there was not even any acknowledgement from Rampion that there is actually a PRoW running into the site of the proposed substation at all (e.g. see first admission, unlike in PEIR documents: updated Design and Access statement (Doc Ref5.8) paragraph 3.2.5 “*Public access is limited to Public Right of Way (PRoW) 1786 which crosses the southwest corner of the site*”.

This updated statement also updates to severe the impact on Oakendene Manor and the visual effect this will have on this Grade 2 listed building. **Neither of these were taken into account when assessing the choice of substation site.** *“Cowfold Stream and PRoW 1786 Taintfield Wood: views of the onshore substation from PRoW 1786 where it crosses high ground to the north of Taintfield Wood; and where it is routed near the lake to the south of Oakendene Manor are likely unavoidable. Whilst landscape planting has been maximised, the rural character and views across the parkland landscape at Oakendene Manor from part of PRoW 1786 will be adversely affected and the Architectural Strategy (determining building colour and roofline) will be required to soften this effect”.*

We argue this view will be irreparably damaged. The view from the wood looking across to the lake and Manor house and the High Weald AONB beyond, with no other structures visible, is a principal reason for walkers to enjoy this route. It will be destroyed forever as the pathway looks down on to the substation from the wood and is directly next to it to the north of the beautiful lake.

SA5 ProW 1730 Dragons Lane to Cratemans. This viewpoint has not been assessed as ‘the substation is not visible from this point’ This is misleading as the cable route actually passes across the path in several places and the impact will be severe for many years. A large temporary compound will also be highly visible just a few metres away from Cratemans Farm

The PRoW 1789 to the east of the substation is on high ground and the substation will be very visible from there, especially in winter.

Viewpoint M from AONB: the substation is not visible. From Doc Ref 6.2.18 “18.6.12 *Conversely, ZTV, site visits and viewpoint analysis indicate that there will be no visibility of the onshore substation at Oakendene from the HW10 High Weald Fringes LCA and this has been excluded from the assessment.*” We disagree with this reasoning -it **is** visible from the AONB due north, especially in winter. Why have they chosen a location so far away rather than directly to the north, just a few 100 meters away, from where it **is** visible?

Oakendene Manor:

We dispute the claim in the Design and access statement 3.3.4 *“To conclude, the appearance of the Oakendene substation in the wider landscape setting will be limited to views from part of PRow 1786 and private views from Oakendene Manor. For the vast majority of visual receptors (people viewing the site from the surrounding landscape including settlements, residential properties, roads and PRow) there will generally be no view of the substation and the existing rural character of the landscape will be retained.”* This is not the view of the people who actually live here and know the area.

Indeed, the DCO pictures of the Viewpoints from Taintfield show the terrible impact from Taintfield footpath (DR 6.3.18: 2of6). However, even they do not give a true idea of the impact. If instead, if the view from SA3 used in the Cowfold Information event is used, it shows the whole panorama, which is decidedly industrial, where **currently the only built structure visible is the Manor house itself, with a splendid view of the High weald AONB beyond.**

There is a high voltage cable running under the Oakendene site. Have they confirmed with UKPN the exact location and that any proposals for roads, hardstanding, planting, bunding, excavation etc are acceptable to them? Surely it will restrict the ability to landscape and reduce the visibility of the substation from the road? What if UKPN need urgent access-cabins, storage units, HGVs, hardstanding, roads even, will be placed over the top

During construction, the visual impact over 3-4 years (but it should be remembered how much longer Rampion 1 took than anticipated) will be appalling: Doc ref 6.2.18, para 18.9.19 *“the construction of the substation at Oakendene and associated works, which will change the character of the landscape”*. This is not consistent with saying *“there will generally be no view of the substation and the existing rural character of the landscape will be retained.”*

Para 18.9.21: *“The construction of the onshore Oakendene substation will result in a high magnitude of change to the local character of this landscape”*. During construction, concrete batching plants up to 20m high will be in position at both compounds and enormous fences to protect equipment will be installed.

Hedges and trees:

The Landscape and Visual Impact Assessment (doc ref 6.2.18), P9, says that: *“The onshore substation at Oakendene will have a significant effect on the landscape character within which it is located, namely the J3 Cowfold & Shermanbury Farmlands Local Character Area (LCA) throughout the construction, operation and maintenance and decommissioning phases. These effects are **tightly contained by the mature vegetation** on Kent Street, A272, Oakendene Manor and Oakendene Industrial Estate and Taintfield Wood which surround the Oakendene substation site.”*

The visual assessments do not take proper account of the removal of large amounts of dense tree and hedgerow planting both on the substation site, and to the south of it to enable the cable route to access from the south. Many of these have taken decades to develop, if not centuries, and to suppose the cover can be adequately replaced in a few years by location appropriate planting is facile. The scars will be apparent for decades to come:

From 6.2.18: "Round Oakendene to south:

*The dense network of trees and hedgerows are indicative of higher susceptibility as some of these will need to be removed to allow for the Proposed Development. The landscape susceptibility of the onshore substation is therefore assessed as **High – medium,**" and from A272 and the north:*

18.9.20 "There are approximately three hedgerows with trees and approximately one field tree within the onshore substation footprint and 75m of hedgerow and associated trees along the A272 which will be permanently lost." This is an enormous change to the landscape and the visual impact from all directions. At the bellmouth on the A272, screening is impossible if visibility onto the A272 is to be maintained.

There are discrepancies in the plans about how much hedge will be removed from along the A272 to form the visibility splay; compare figure 7.2.1k in the OCCP (Doc Ref 7.2) to the Arboricultural Impacts plan Inset 47 of 47, taken from the Arboricultural Impact Assessment chapter, annex 2, Doc ref 6.4.22.16).

All of this extensive destruction of hedges and trees is the result of the way they have found themselves constrained on the site due to lack of consultation and therefore understanding of the issues this site faces. The alternative sites do not require the removal of so much valuable habitat or corridors. They have not considered this in the weighing up of the alternatives.

Bellmouths:

Access points 61 and 59 on Kent Street are new. New accesses have to comply with new regulations as to size depending on the road speed. Kent street is a derestricted road, with official speed limit therefore of 60mph. This means **the visibility splay must be 215m wide**, as in the case of the new access to Oakendene off the A272, with the attendant destruction of potentially several hundred metres of hedge., depending on the visibility at this point.

Even worse is that access points A59, A61 and A64 off Kent Street are all listed for operational access. As no roads currently exist at these points, it is not clear whether there will be, not only visibility splays, but actual roads created, thus having a permanent effect on this landscape and making it impossible to restore habitats including scrub and hedgerows as they claim they can do. This is additionally unclear as A59 and A61 in the OCTMP (doc ref 7.6) are listed as 'construction and operational access' but at the same time 'temporary bellmouth construction'. The claim that the landscape of this quiet, ancient landscape can be restored are utterly false.

The access road to the main substation site, A63 is also described as 'temporary' yet it is needed for operational use. In fact, there is considerable confusion in the OCTMP (doc ref 7.6) about bellmouths and access road sizes generally. In some instances, the current visibility splay size seems to be described, e.g. 5m for Dragons Lane(A58) yet it is only a 3m wide unmade road, 3m for A61 which does not exist yet, yet N/A for A63, which also does not yet exist.

In addition, what is the justification for the need for operational access from Kent Street A 61 in addition to access from A272?

The planting is to be maintained from years 1-10(design and Access statement) section 3.3.9. Given that much of the replanting will not be possible until completion, we would suggest an obligation, if granted, to ensure it runs for 10 years **after completion.**

Light pollution and security measures:

Design and Access (Doc ref 5.8) para 2.5.4 assures us there will be “*no operational light except for maintenance, emergencies etc.*” Yet there is to be a large perimeter fence with CCTV (para 2.5.4). It needs to be confirmed that there would be no lighting associated with this. Also, confusingly, C-105 from the Commitments Register (Doc Ref 7.22) mentions that the only permanent lighting will be at the onshore substation. This is apparently at odds with ‘no lighting’.

In any case, after SIX YEARS of construction, the lighting impacts on ecology will be severe and much of the biodiversity on the site will have died out by the time it is finished.

We are told the perimeter fence will be “*a visible feature of the site along the external boundary,*” so a radical, industrialising feature in the landscape in its own right. In addition, “*Signage will be located in conspicuous positions along this perimeter fence.*” A far cry from hiding the site away behind appropriate planting and screening.

RVAA (6.4.18.5):

Whilst we accept that a significant view of the Proposed Development is not the same as an unacceptable effect on the visual or residential amenity, it does seem that the selection of properties for assessment and the outcomes of assessment has been excessively limited, and the effects downplayed. No properties have actually been visited; this is largely a desktop exercise. Why have they chosen only to assess impacts from ground floor rooms and ‘main areas of gardens’ (whatever that means)? They can have no understanding of how people actually live in this area, often largely outside and in the fields and less well cultivated areas of their properties. It is also must be remembered that Rampion’s poor record of reinstatement does not give confidence that any of this can be put right when the development is completed.

Table 1-1 screens for those properties to be included in the assessment. It is astonishing that they have not included Oak Cottage, Allfreys, Averys, South Lodge, Kings, Ridgelands, nor indeed any of the properties on Kent Street or to the west of the substation. Also, a whole housing estate at Knapp Drive south of the monastery is missing. **Nor have they even considered the homes which are actually at the entrance to the industrial estate or those within the compound of the industrial estate itself, and one outside the Industrial Estate but in the parkland.** Their lives will surely be made intolerable by the vehicle movements and noise at TCC3 (the Compound west of Oakendene Industrial Estate)

Table 1-2 assesses the RVA. The individual assessments for each property are also shown. ALL properties are listed as NO effect. This cannot be a true reflection of how the people who live there feel, many of whom are wondering how they will endure this. This assessment is based on a **ten year timeframe**; an awfully long time to be living in a “*residential property rendered an unattractive place to live*” and is a conclusion which is in fact based on the assumption that national interest

overrides these individual concerns, or as they have said “*when judged objectively and in the public interest.*”

With regards to Oakendene, we would utterly refute the claim that “*at distances of 180-200m the Proposed Development will not compromise the residential visual amenity, affect living standards, or render the residential property an unattractive place to live when judged objectively and in the public interest.*” It is a grade 2 listed manor house which is defined by its relation to its surroundings and will be utterly changed by these proposals. There **are** alternative sites in Wineham which have not been adequately considered. In addition, they are intending, as part of their mitigations towards biodiversity net gain, to plant the area between the house and the lake with trees and shrubs, which will destroy the vista from the house (See Doc Ref 2.2.2)

It is unacceptable that at this stage of the application they have only done desk top surveys rather than visiting, and only considered those properties visible on an OS map (1:25000). This, by its very nature, **will tend to exclude the assessment of smaller properties, whose residents, in their smaller homes, are likely to be more affected and less able to escape from the impact.**

We accept that the purpose of the RVAA may be to consider whether lives will be made impossible by the construction or presence of the proposed development, and would argue that, again, they are downplaying the impacts significantly. It will then be for the planning inspectorate to decide whether the misery to people’s lives is in the national interest and whether there are less disruptive alternatives, as indeed we have argued.

At least as significant is the poor quality of the data they have presented, which is, we believe, indicative of the standard of accuracy and attention to detail of the submission as a whole, and why it is unacceptable for so little time to be available for statutory bodies and the public to be able to review it in a meaningful way.

The RVAA of Cratemans does not even mention the large temporary compound which will be 10metres away from the house! The property will be almost surrounded by cable and haul routes, the compound and the coming and going of vehicles to the compound. These surveys are simply not fit for purpose.

This failure to include some many of the worst affected properties in their assessments is repeated in the Design and Access Statement (Doc Ref 5.8, section 3.2.4) where again, properties such as Kings and Ridgelands on Kent Street and Coopers Cottage, Allfreys and the Oakendene cottages are excluded. Nor does this section assess the view from the properties they do mention, in winter when the trees are bare.

Substation height:

All of these visual impacts depend on the overall height of the finished substation.

At the Ashurst meeting and the Cowfold village hall meeting in 2022, and even at the Cowfold Information event in June 2023, we were told there was the possibility to lower the ground level of the substation to reduce the visual impact. In view of the severe flooding at this site (see Water Addendum) this would now seem to be highly unlikely. **Now it seems much more likely that they will have to RAISE it instead. The baseline ground height should be clearly stated when any consideration of the height of the substation structures is being discussed, e.g.:**

From Design and Access statement (5.8) para 2.4.1 Design Principles: *“The majority of the Oakendene substation buildings are not expected to be taller than 10m (and in most cases much lower) – however, some of the equipment may extend up to the maximum 12.5m height above finished ground level.”*

Cumulative Impacts:

From the Landscape and Visual Impacts Assessment Doc Ref 6.2.18, para 18.9.48 “There are no other cumulative developments within close proximity to the onshore substation at Oakendene, the nearest being the cluster of energy related development (ID 50, 51, 52, 54, 56 and 57as set out in Table 18-39) which includes Solar farm and battery storage development to the north-east of the existing National Grid Bolney substation and south of Coombe Farm at 1.3km distance to the south-east.” We strongly disagree with this statement. The cumulative impact on this rural farming landscape of the various energy related proposals is catastrophic, utterly changing the landscape.

They do not mention the 160-acre Cobwood Solar proposals just west of Cowfold or even the Battery Storage Farm at Oakendene itself, directly to the south of the substation, even though Rampion must have some, if only collaborative, input into this, as it connects to the Rampion cable.

Appendix 1- CowfoldvRampion Viewpoint analysis from A272:

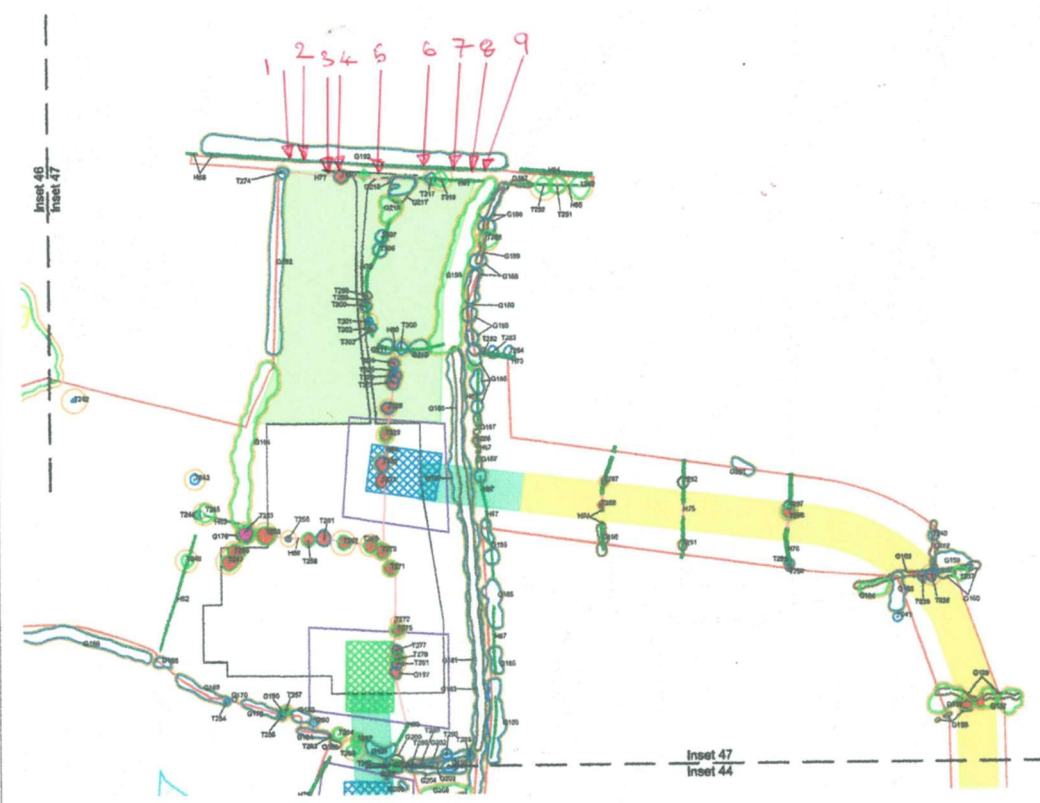
No meaningful tree and shrub planting can take place until construction is finished because of the extensive use of the northern area of the site as hard standing for a compound for storage, car parking, concrete mixing, wheel washing, rest rooms etc, and the need for a high security fence around the whole site for the duration of the construction work. For at least 3 years this will all be highly visible from the A272, seen by over 18000 drivers a day and their passengers. (See Fig 18.11b in Chapter 18 figures, part 2 of 6)

With regards to the visual impact of the operational substation, much of the hedge H77 and several roadside trees will be permanently removed for the visibility splay. Any planting further south will not reach a suitable height for screening for much of the life span of the substation and wind turbines. The following photographs show how exposed the site is visually from the A272 on the north side, especially in winter even now, and before the extensive removal of hedges and trees which will be carried out as shown on the attached plan (taken from the Arboricultural Impact Assessment chapter, annex 2, Doc ref 6.4.22.16). The images should be seen in conjunction with the plan and with the Oakdene Onshore Substation Indicative Landscaping Plan from the Design and Access Statement (Doc Ref 5.8)

The photographs are arranged in order, moving along viewpoints from tree T274 (photo number 1) eastwards to the eastern end of hedge H81 (photo number 9). Some are taken from the south side of the A272, some from the north. As can be seen from the diagram, the substation itself will extend at least 2/5 of the way up the nearest (northernmost) field to the road and therefore will be highly visible.

It is clear from the following evidence that the visual representation by Rampion from viewpoint SA2 does not give a reasonable idea of just how visible the substation from most of the A272 to the north of the site will actually be. It casts doubt therefore on the credibility of much of the 'evidence' Rampion has produced in the DCO as a whole and none of it should therefore be taken at face value.

It is nonsense to suppose that the substation can reasonably be screened from the A272, especially given the appalling reinstatement record of Rampion 1. This 'smoke and mirrors' is representative of the mitigation claims made generally throughout the DCO.





1

Tree T274 on RHS, then hedge H66/512 (to be removed), H64 in middle section (removed), H79 on LHS (retained). Substation will occupy most of this view, including much of the field in the foreground, as in the following photos also.



2

Distant hedges right to left are H66 and H64 and will be removed.



3

Foreground branches are from T274. RH hedge is DCO boundary. All other hedges and trees to be removed.



4

All hedges and trees to be removed, including T280 in the foreground.



5

The hedgerow and trees are in H66, and will all be removed. The rest of the substation plot can be seen behind. Beyond this, the higher ground on the south side of the stream running in to the lake is visible, and Taintfield Wood (ancient). The substation will be very visible from the PRowWs etc on that side too.



6

View between G218 and T318. Hedge is H79 and will largely be retained but many of the trees are in H64 beyond and will be removed. 12m high substation will be clearly visible behind H79.



7

T318 to RHS in foreground and H81. H79(retained) with H64 and H66 behind (removed). Many of the trees are in these back hedges and will be removed. Substation will be highly visible behind H79.



8

View from near eastern edge of DCO boundary. Hedge H81 in foreground. H79 beyond with hedges and trees to be removed behind, Substation will extent northwards behind much of North-South part of H79 and be very visible.



9

Viewpoint near eastern boundary of DCO, just west of Rampion's viewpoint SA2. H 81 in foreground. The substation will be clearly visible behind H79.

Section 7: Air Quality and Pollution (EN-1: 4.11)

Introduction

The A272 in the vicinity of Oakendene is extremely busy, and, because of its proximity to the double roundabouts in the centre of Cowfold, behaves in a completely different way from the stretch of the A272 from which Wineham Lane is accessed. The A272 approach to Cowfold from the east is already almost at capacity in normal times. Anything which slows the flow even slightly, immediately causes congestion (see traffic chapter for details). When traffic flows freely, and is below capacity, additional vehicles do not significantly cause delay. Once traffic volumes cause congestion every additional vehicle impacts on the congestion. This then affects pollution levels in a number of ways. First, congestion lowers the average speed, which increases travel time and exposure on a per vehicle basis. [Schrank and Lomax, 2007](#))². Second, congestion diminishes dispersion of vehicle-related pollutants since vehicle-induced turbulence depends on vehicle speed ([Benson, 1989](#))³. Thus, lower vehicle speeds can increase pollutant concentrations from roadway sources. Third, congestion can change driving patterns, resulting in an increased number of speedups, slowdowns, stops and starts, which increase emissions compared to “cruise” conditions, especially with high power acceleration. For example, [Sjodin et al. \(1998\)](#)⁴ showed up to 4-, 3- and 2-fold increases in CO, HC and NO_x emissions, respectively, with congestion (average speed of 13 miles per hour, mph) compared to uncongested conditions (average speed, 38–44 mph). Thus, it is important to separate congestion-free and congestion-related impacts since emissions, impacts and risks can differ greatly, and because such analyses can better inform decisions related to traffic and air quality management, as well as impact and risk assessments.

Rampion did not do this, but assessed traffic merely in terms of numbers travelling along the road and the percentage change, which is indeed small, but that does not mean it is not significant. They have not, despite exhortations from residents, considered the effect of turning on or off the road or of traffic lights.

The situation on the A272 east of Cowfold is one of recurring congestion every peak rush hour, twice a day, backing up to beyond Kent Street, plus whenever anything puts pressure on vehicle numbers. Traffic lights on this part of the A272 would cause significant congestion, making life difficult for residents, emergency services and the 18000 people who use this road every day.

Health Impacts

Diesel engines are one of the main sources of nitrogen oxides and particulate matter (PM) pollution in the UK. There are no safe limits of air pollutants, as the WHO acknowledges. Pollution impacts are non-threshold, i.e. there is no cut off above which harm starts. At any level, the greater the levels, the worse the potential for ill- health effects. For instance, exposure (for a year or more) to

² Schrank D, Lomax T. [Accessed March 22, 2008]; *The 2007 urban mobility report*. 2007

³ Benson P. *FHWA-CA-TL-84-15*. Sacramento, CA: California Department of Transportation; 1989. CALINE4 — a dispersion model for prediction air pollutant concentrations near roadways.

⁴ Sjodin A, Persson K, Andreasson K, Arlander B, Galle B. On-road emission factors derived from measurements in a traffic tunnel. *Int J Veh Des*. 1998;20(1–4):147–58.

nitrogen dioxide levels of 30mcg leads to a 5.5% increased risk of disease related mortality compared to the WHO limit.

They are responsible for respiratory diseases such as asthma and COPD, diabetes, ischaemic heart disease and strokes, neurodegenerative conditions and lung cancer; and death. Also, those with pre-existing heart and respiratory disease may become more unwell at higher levels of exposure.

These pollutants also have a significant negative effect on wildlife and habitats (see Section 9 Ecology).

Cowfold AQMA

Cowfold is already an Air Quality Management Zone. Pre pandemic Annual Average Daily Traffic had reached about 18,500 vehicles along the A272. There appears to have been a significant change in the traffic profile post pandemic. Car journeys have reduced, while delivery and HGV movements have increased. Using April 2022 as a current example, the 5-day average was 18,582 vehicles. HGVs are responsible for 35% of the excessively high emissions. Stop-start traffic is known to create the highest emissions. [See Appendix 1].

The queueing traffic coming from the west of Cowfold will back up into the AQMA very quickly every time the traffic management traffic lights are used. Screenshots from Google maps show extent of queueing traffic along A272 :On 10/1/23 mid-afternoon due to small temporary traffic light, around midday on 7/6/23 when a small delivery vehicle was parked, and the example from 18/5/23 at 17.15 represents a normal week day at peak time. See Appendix 2 (a red line represents stationary traffic).

An email from AC from HDC environmental health 26th April 2023 confirms that in 2022 NO2 levels to the east of the roundabouts, at Huntscroft Gardens were 32mcg/m3

Rampion are careful to word 'no HGVs for the substation will go through the AQMA of Cowfold, *unless necessary*'. But importantly, they have NOT said the same for the ones going down Kent Street, or the compound, or the ones which need to get to the cable route. In fact, for the latter, there is no other realistic route. Nor have they said this for any of the many thousands of 'light support vehicles', (many not that light ie small lorries and trucks) which will be needed for all these areas, or the workers cars etc. It is therefore unrealistic to imagine that there will not be a significant impact on the Cowfold AQMA

(5.2.14-17) The IPC must give substantial weight to air quality considerations and must take into account statutory air quality limits and *even consider refusal of the project where this cannot be mitigated.*

Pollution impact on the A272 outside the AQMA

There has been no formal monitoring data for the traffic on the Oakendene part of the A272, but addresspollution.org modelling, using traffic data from Imperial College, suggests Nitrogen Dioxide levels here, affecting those properties very close to the road, are likely to be at least as high as on the eastern part of the A272 within the AQMA, as are PM 2.5 and PM 10 levels, (see Appendix 3). The PM2.5 levels at this location are already around 10.96mcg/m3. A study of air pollution in Rome

(Amoatey, Sicard et al⁵), indicates that 19.9% of strokes were attributed to exposure for a year or more of PM2.5 concentrations exceeding 10mcg/m³.

The significant increase in HGVs at this point will add to the congestion and queueing traffic, and slowing down or stopping to turn into the substation site will push emissions even higher, as will the queues at the traffic lights they propose to manage the flow. The HGV holding area used during the construction of Rampion 1 is no longer available to help manage the flow of traffic. **The effect on air quality along the A272 at this point has not been considered by the PEIR, or assessed as 'not significant'.**

Add to this the intention to use the adjacent and totally unsuitable Kent Street to access the cable route and the need to access the Oakendene industrial estate compound and there will be a complex series of vehicles coming in and out from various points. Vehicles will be turning in and out of the Industrial Estate entrance either to go back to the A23 or to turn in to the other Oakendene access point, again causing congestion which will back up into Cowfold.

The addresspollution.org results are based on pollution modelling devised by Imperial College London and take into account the prevailing wind, funnelling effects from trees or buildings, traffic numbers and rates of flow. South Lodge and Coopers Cottage are directly adjacent to the road, the prevailing wind carries pollution north from the road to the properties, and in the case of South Lodge in particular, there is a funnelling effect from mature trees. In addition, their garden runs along the road, in which they spend many hours in the summer. Horsham District Council questioned the validity of this modelling as it is not the one they use and therefore refused to monitor the pollution levels outside South Lodge. I contacted the team at Imperial (clearly a highly reputable and respected centre for research) and received a reply from Professor Gary Fuller confirming that the underlying modelling work for addresspollution.org was indeed done at Imperial, and that it should represent exposure near main roads fairly well. By main roads, he clarifies, he means A roads where we have good data about the traffic flow, as is the case for the A272. A better understanding comes from looking at the concentrations rather than the categories, and comparing them to WHO guidelines and UK legal limits. Thus, the modelling is likely to be fairly robust, and indeed coincides roughly with the data from the direct monitoring at the Cowfold AQMA monitoring points. Also, South Lodge is shown as a hot spot on the DEFRA pollution map, supporting the validity of these findings

It should be noted that these figures are annual averages and that given that 14500 of the approximately 18500 vehicles travel along the A272 between 6 am and 6pm, the actual levels during daytime, i.e. exposure, hours will be much higher.

35% of NO₂ currently comes from HGVs and other large vehicles (HDC data). The increase in HGVs and LGVs will increase this further

At the Cowfold information meeting on 21st June 2023, when asked about assessment of pollution on the Oakendene part of the A272, Nick Coombes said they had looked at the WSCC data. This only includes the AQMA area of Cowfold. 'Legally we don't have to consider pollution elsewhere', he said. This is simply untrue; indeed, regarding the scoping report on the assessment of effects on both human and ecological receptors, paragraph 6.3.46 states that 'It is likely that the construction

⁵ Amoatey, Sicard et al, Clinical Epidemiology and Global Health, Volume 8, Issue 2, June 2020, Pages 531-535

and decommissioning road traffic will be below IAQM thresholds for scoping out.' PINS comments "If this is the case the ES should include justification for its exclusion from the ES."

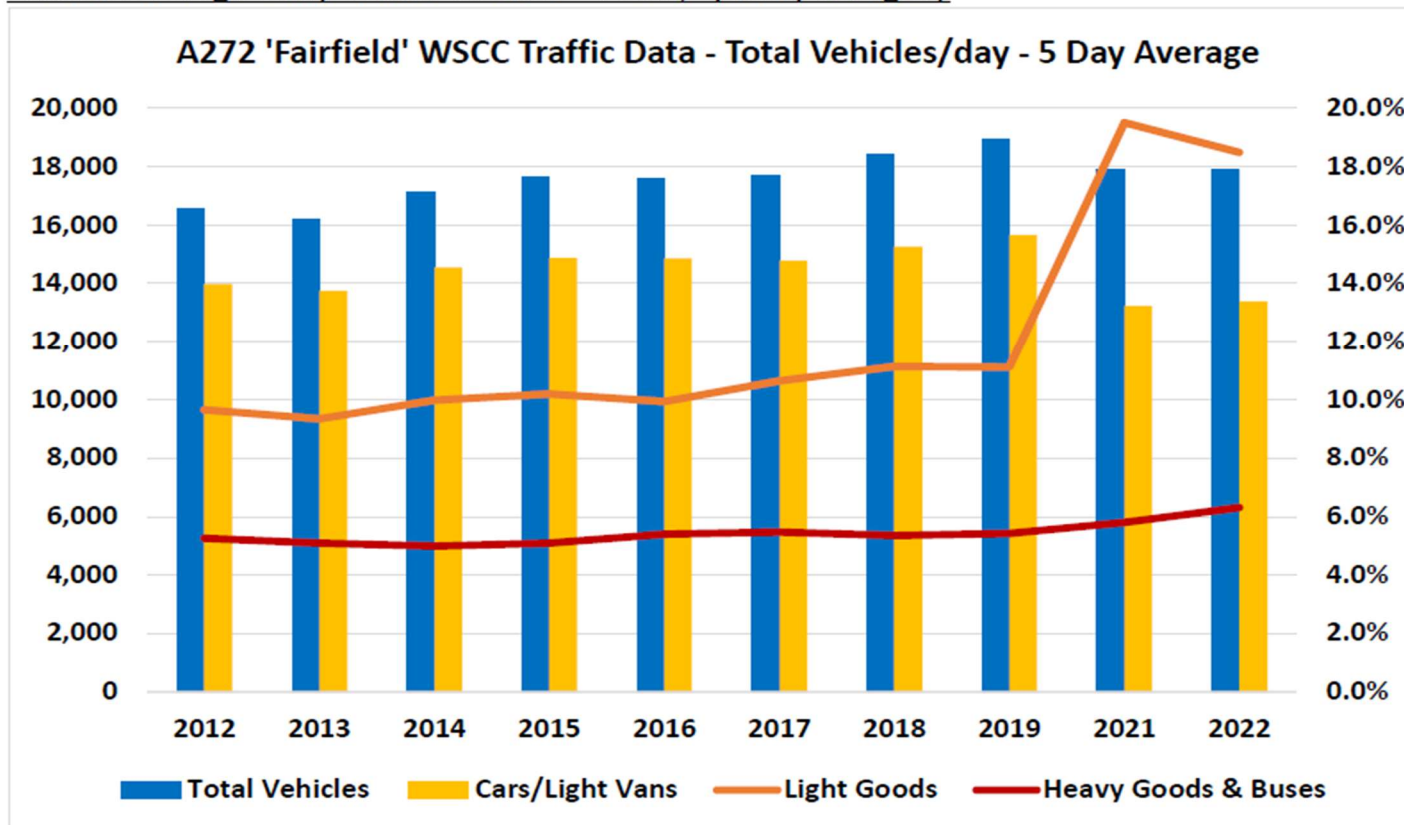
Recommendations are also made to "set out in the environmental statement any proposals for Air quality monitoring during the construction" and that they should "assess broadly to look at possible areas affected and *how* traffic and transport might impact on AQMAs"

In keeping with the comments made by Nick Coombes, and in contrast to these recommendations, Chapter 20 5.2.11 suggests there is no intention to carry out a full transport assessment, or to do any site-specific air quality monitoring (20.3.10).

Current levels of pollution on the Oakendene stretch of the A272, particularly at South Lodge and Coopers Cottage, must be assessed before deciding whether it is reasonable for this project to go ahead at this site. The starting point of both noise and air pollution levels at Wineham Lane will be much lower and therefore impact on residents much less damaging. Also, Wineham would be a less ecologically harmful site in terms of pollution. However, if allowed to go ahead at Oakendene, air quality must also be closely monitored throughout the construction, both at the Cowfold AQMA and A272 by Oakendene.

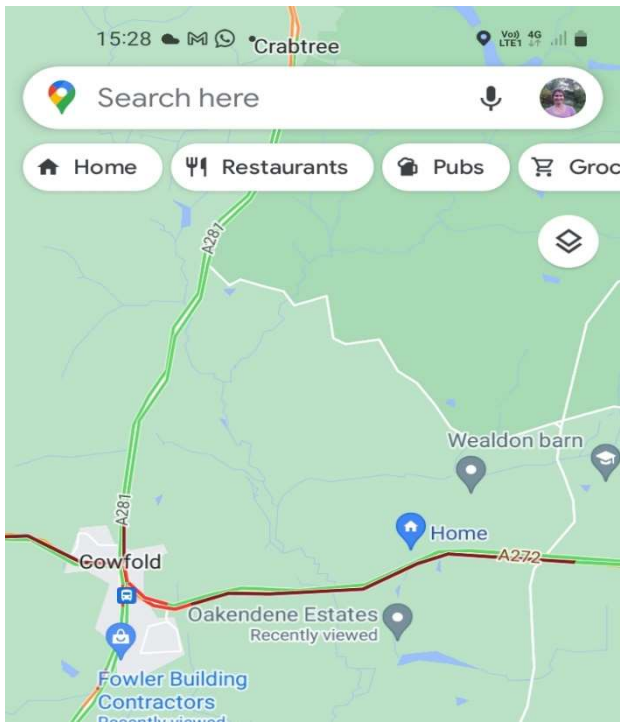
Traffic – WSCC 5 Day AADT Data

Annual Average Daily Traffic Volume – A272; split by category

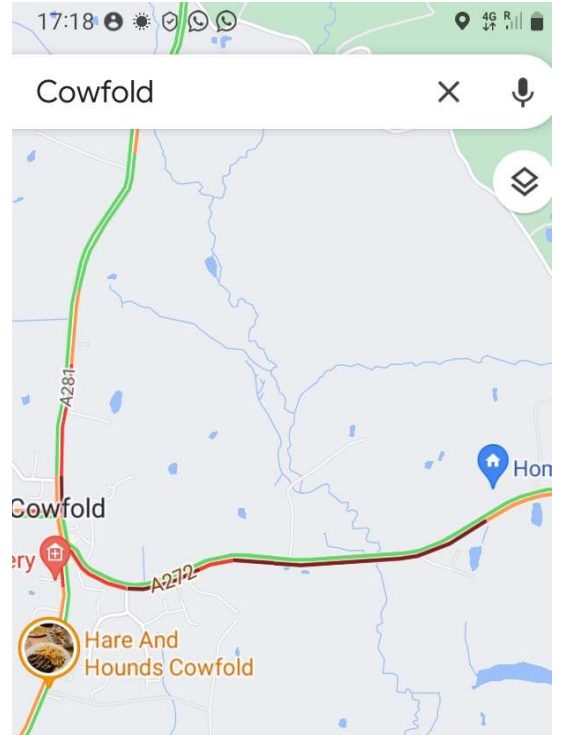


Appendix 2- Screenshots from Google Maps

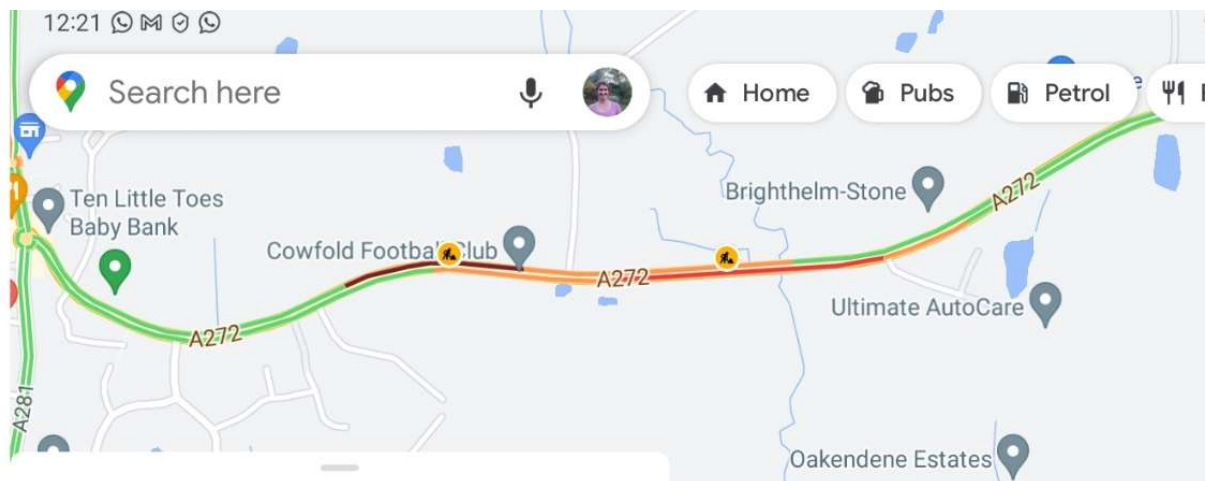
10 Jan 2023 Temporary Traffic Light 15:28



18 May 2023 – A normal day 17:18



7 Jun 2023 – Parcel Delivery 12:21



Appendix 3- Air Quality Report, South Lodge, Bolney Road, RH13 8AZ

AIR QUALITY REPORT

SOUTH LODGE, BOLNEY ROAD
HORSHAM
50°59'28.66278"N 0°15'8.81551"W

VERY HIGH AIR POLLUTION

88

This address is in the 88th national percentile

EXCEEDS THREE W.H.O. LIMITS

DEMAND ACTION

LEVELS & HEALTH EFFECTS

Pollutant one: PM2.5

Addendum to Air Quality and Pollution Following DCO Submission.

PINs highlighted, in advice notes to Rampion, a number of discrepancies and omissions in the Rampion DCO submission, which needed to be resolved before beginning the Relevant Representation process. Unfortunately, Rampion chose not to do this.

In looking at just a few of the documents submitted by Rampion with their DCO, and concentrating only on areas directly related to Cowfold, we have found a number of other anomalies and discrepancies which will also need to be addressed. These are detailed throughout this document. Some of the ones relating to Air Quality are as follows:

AQMA Cowfold

Consultation Report (DR 5.1.3) p240: “In addition, Chapter 23: Transport, Volume 2 of the ES (Document Reference: 6.2.23) presents the methodology and calculation of construction traffic, confirming that **no traffic will be routed through the Cowfold AQMA**”

But: **outline CoCp C-158:** “The proposed heavy goods vehicle (HGV) routing during the construction period to individual accesses will avoid the Air Quality Management Area (AQMA) in Cowfold **where possible.**”

And From **Commitments register (DR 7.22):** “Routing of heavy goods vehicles (HGV) during the construction period to avoid Air Quality Management Areas, the A24 through Findon and major settlements, such as Storrington, Cowfold, Steyning, Wineham, Henfield, Woodmancote and other smaller settlements, **where possible;**”

Obviously, ‘**where possible**’ is quite a different situation from the first statement (WHO decides what is possible?) and must be seen in the context of the concerns raised by Cowfold residents about this. There is little realistic possibility of traffic reaching the cable routes either side of the A281 near the Monastery without entering Cowfold. Please refer to the main Sections of this document, in particular Section 7, Air Quality and Pollution, and Section 10 Traffic and Transport.

It is also misleading in that in fact many thousands of LGVs (up to 7.5T) and private vehicles will come and go the Cowfold. The above statements given the *impression* that therefore *no* vehicles will be going through Cowfold. This is certainly the take-home message that Cowfold Parish Council understood earlier in the consultation and may have contributed to them not opposing it and choosing not to share any knowledge of the project with residents.

Side road and haul route pollution

There has been no assessment of the polluting effects of the traffic on Kent Street or the haul road, either with respect to people or to wildlife. During the latter part of the consultation, when the haul road was revealed to residents for the first time, the reason for its existence was as access to the cable route, there being no farm tracks, even though their own earlier assessment had been that Kent Street was unsuitable for HGVs. They even suggested at the Cowfold Information event

that it might be used to bypass the AQMA in Cowfold, but we now understand this to be impossible as the haul road is not continuous.

Traffic modelling

In addition, there has been no additional traffic modelling since the PEIR reports, and Rampion appears to still be unable to understand the impacts of the congestion at the mini roundabouts and the way traffic backs up to Kent Street. No assessment of the pollution levels on the static part of the A272 has been done, even though we have highlighted the Imperial Studies and feedback from the designers of the study, suggesting already concerning levels close to some properties.

Section 8: Noise and vibration.

Rampion have chosen not to do any noise or vibration level assessments for the substation in PEIR as the site was not then chosen. There were therefore no studies available to inform the choice of substation site. These studies must be carried out to assess the impacts on individual local properties and on wildlife.

Human Impact:

Construction:

The A272 is already extremely noisy, being very busy with traffic. The properties along the Oakendene stretch of the A272 are old and of a construction likely to limit sound insulation. Allfreys and Oakendene are Grade 2 listed and therefore further limited in terms of sound proofing; others are directly adjacent to the road. The noise levels at South Lodge and Coopers Cottage are likely to be already well above acceptable levels, even though there is no legal limit for road noise levels. It is not possible to have a conversation in their gardens at busy times. Indeed, **Defra Noise Maps indicate the A272 at South Lodge as an area of particular noise level concern. It is designated as an Important Area** (Appendix 1). Important Areas with respect to noise from major roads outside agglomerations are **where the 1% of the population that are affected by the highest noise levels from major roads** are located according to the results of the strategic noise mapping. This approach has been taken because the population at these locations is likely to be at the greatest risk of experiencing a significant adverse impact to health and quality of life as a result of their exposure to road traffic noise.

The proposed hours of working are unacceptable, allowing no respite from the ongoing din. For Rampion 1 their hours were often extended and work occurred on Saturday afternoons and Sundays to catch up when behind.

Noise is not just a nuisance; it has an impact on human health. The most common health problem it causes is Noise Induced Hearing Loss. Exposure to loud noise can also cause tinnitus, sleep disturbances, disturbance of the circadian rhythm and stress. These health problems can affect all age groups. Cognitive impairment is especially significant in children.

The House of Lords Science and Technology Committee report into the effects of artificial light and noise pollution on human health was published in July 2023. It recognises that the disturbance to circadian rhythms result not only in insomnia, but increased levels of type 2 diabetes, obesity, cardiovascular problems, especially ischaemic heart disease, high blood pressure, depression and cancer. They also report secondary impacts on economies by decreased productivity and concentration.

The European Environment Agency report 2020 estimates that environmental noise contributes to 48,000 new cases of ischaemic heart disease a year as well as 12,000 premature deaths. **The effects are cumulative so the existing level of noise must be taken into account when assessing noise impacts of construction and operation.**

Loud noise can not only create physical and psychological stress, but reduce productivity, interfere with communication and concentration, and contribute to workplace accidents and injuries by making it difficult to hear warning signals. For the people working on the Industrial Estate and using

potentially dangerous machinery, not only may they suffer potential mental ill health from the increased noise, and time off work, but their safety at work could be affected.

In general, the bigger the vehicle, the louder the noise. The increased number of HGVs using the A272 since the pandemic has made noise levels worse. The extra HGVs and light vehicles using this road to access the substation, compounds, and cable route will exacerbate the problem, but also the noise from construction work itself will have a major impact on many residents, including in the very ancient listed buildings to the south and east of the construction site, pushing the already significant noise pollution to beyond tolerable limits.

The prevailing wind carries sound from south to north, and therefore will make the construction noise worse on the A272. Piling activities and generators, which will be operating 24 hours a day will further add to sound disturbance. The generators, and work carried out at night to avoid the busy traffic, will make it impossible for nearby residents to sleep. The Defra maps show that the sound from A272 at this point is already over 60db.

The effect in winter, when there are no trees to absorb the sound, and on frosty days when sound travels more, must also be considered. For operational noise, this, plus the increased level of noise on a wet day, especially in winter, will increase the levels still further.

Also, the intention to remove mature trees and hedgerows from the north side of the Oakendene site to create an access road and visibility splay, will have a double impact on the properties to the north as they currently act as a sound absorber for the road, but also their removal will make construction and operational noise more audible.

The operational phase will also be significantly noisy. The louder, noise emitting plant must be carefully sited. The pH treatment plant at Rampion 1 would appear to be particularly noisy. **Bolney residents report that the reality of the noise from Rampion 1 is far greater than the levels they were promised it would remain below.**

The cumulative impact of not just the road, but of existing noise from the industrial estate must be considered.

The vibration impacts of both increased traffic and piling etc are of concern to the several old or listed buildings in the vicinity.

Operational:

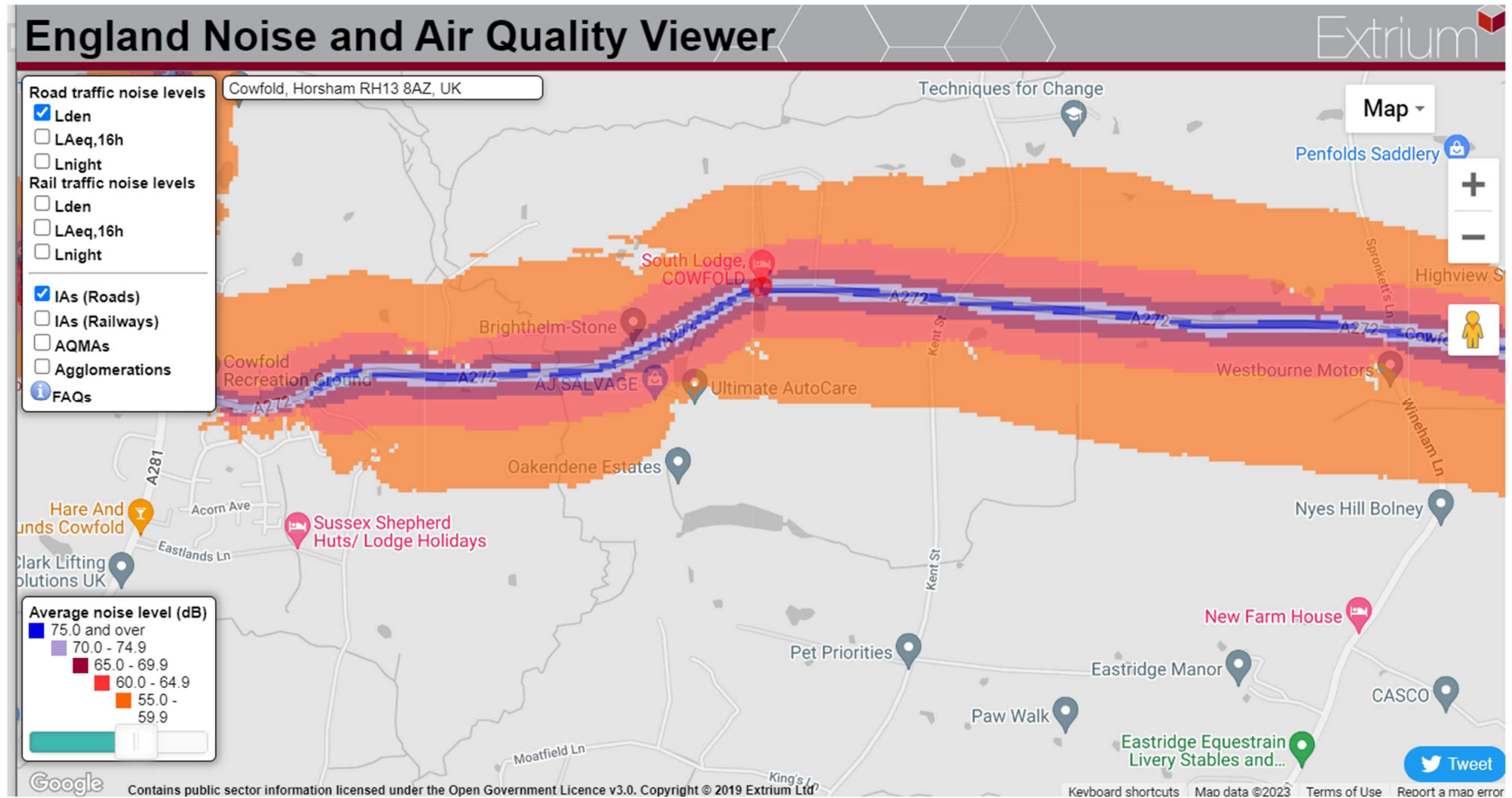
The noise from Rampion one is far louder than predicted by Rampion (see scoping response from Bolney Parish Council 2020.) The current level of ambient noise in Kent Street and Moatfield lane is very low. Many of the properties around Oakendene are old, some are listed, with minimal opportunities for soundproofing, in addition, many people lead an outdoor life in this community. The prevailing wind will carry the sound northwards to Oakendene manor, the properties on the north side of the A272, and to the AONB.

The sound can travel for several hundred feet, and may be especially noticeable on wet days and during night time hours when ambient noise levels are lower.

Impact on wildlife and ecology:

See Section 9: Ecology and Nature Conservation.

Appendix 1: DEFRA Noise Map RH13 8AZ



Addendum to Noise and Vibration Following DCO Submission

The DCO documents clearly show that Rampion have downplayed the effects of noise and vibration across the project, a view also held by WSCC (See PADs). The impacts of noise are described as 'negligible' with no evidence to back this up. Many key properties have been missed out of the assessment. In many rural areas the background noise is described in the documents as 'birdsong'. Whatever the decibel level it cannot be credibly equated with the health impacts from ongoing loud manmade noise and vibration. There is no ecological impact assessment of the construction or operation noise levels.

On reading the Rampion DCO document Noise and Vibration (Doc ref 6.2.21), it would appear that four Expert Topic Groups were held between October 2020 and November 2022. Whilst WSCC and Mid Sussex district council were invited, it appears that Horsham District Council were not, even though the Oakendene substation site was under consideration from the start, and even after the Oakendene site had been 'chosen'. (see references within the document: 21.3.5 ,21.3.10, 21.3.11, 21,3,12). Even though HDC had raised concerns about noise in the first consultation (see table 21-7), no engagement took place until April 2022.

We wonder why they did not invite HDC. *Could it have been because they were not initially expecting to put it at Oakendene?* This would fit with the comments made by HDC in 2020 (see CowfoldvRampion Adequacy of Consultation document Item 31 – AoC and Horsham DC).

Whatever the reason, the lack of involvement of HDC will surely have skewed the decision-making process as Mid Sussex were clearly involved throughout.

Paragraph 21.3.16 *“Consultation with HDC was conducted via email between April 2022 and April 2023 regarding the monitoring and assessment methodologies for the construction and operational noise associated with the onshore substation site at Oakendene.”*. Yet Mid Sussex were involved from as early as May 2020 (paragraph 21.3.18). Furthermore, *“it was agreed with MSDC that, whilst not considered standard procedure, an additional indicative noise ‘break-in’ assessment would be undertaken to predict indoor noise at the nearest residential properties to further mitigate the risk of low frequency noise.”* . Has such an assessment been Carried out for all the properties in the vicinity of the Oakendene site?

On p31, Arun Council raise the following: *“Selected roads/lanes may be unsuitable for HGV traffic, not only from the point of view of noise exposure to gardens and habitable rooms but given that houses/gardens may exit directly onto currently quiet roads, with no provision for pavements and pedestrian safety.”* Rampion’s response is *“An assessment of effects from construction traffic noise is presented in Section 21.9. However, the traffic noise assessment has not identified significant effects.”* *“We strongly dispute their conclusions; it cannot be credible that for virtually every property supposedly assessed, they have ‘not identified significant effects’.* Many of the Kent Street, Dragons Lane, Moatfield Lane properties, and those at the entrance to Oakendene, indeed do access directly onto currently quiet roads with no pavements.

Nothing in the DCO reports has altered our view of the failures of the Noise and Vibration assessment:

Site surveys:

21.5.4 “Baseline sound surveys at the proposed onshore substation site were undertaken between February and May 2023.”

21.5.7 “Any measurement of existing ambient or background sound levels will be subject to a degree of uncertainty. Environmental sound levels vary between days, weeks, and throughout the year due to variations in source levels and conditions, meteorological effects on sound propagation and other factors. Hence, any measurement survey can only provide a short-time sample of the ambient levels”. **Many of the surveys were very short and therefore unrepresentative of the true picture. Nor do they distinguish between types of noise i.e. natural but loud wildlife sounds versus manmade.**

21.5.9 “Furthermore, due to **land access restrictions**, baseline noise data was not obtained at several representative noise sensitive receptors near to HDD compounds and temporary construction compounds.” See below: **this includes several key properties on the haul road and A272 and is an unacceptable situation. From discussion with relevant property owners, we do not believe any attempt has been made to contact these affected properties.**

From Table 21-19: “Temporary noise and vibration effects from the construction of the Onshore Substation: work will commence during core working hours only; site works will not be within 60m of residences” This is misleading as all vehicles will have to travel along the A272, directly adjacent to the homes at the entrance to Oakendene industrial estate, Coopers Cottage and South Lodge. Also, ‘temporary’ means at least 3 and a half years; not exactly short term, and currently proposed core hours are unacceptably long.

Data quality and omissions:

Baseline monitoring is of dubious quality and omits a number of significant properties. Throughout all the assessments there is no mention of South Lodge, Kings, Wilcocks, or Lower Barn Farm (as opposed to Lower Barn), yet all are very close to Kent Street or the cable route and haul road. The baseline Sound Report (Doc Ref 6.4.21.1) omits Allfreys, Coopers Cottage and the Oakendene Cottages by the western compound, yet all appear in the Noise and Vibration Chapter. They have completely missed out the small cottage in the parkland by the lake which will be severely impacted by both construction and operational noise. How can they have been meaningfully assessed against their baselines therefore, if baselines were not measured. This is particularly important as they are properties directly on the A272, as is South Lodge, **and additional noise will tip them into an intolerable situation. Yet, as they had no baseline assessments, Rampion are allocating them as category A, the lowest ambient noise level (paragraph 4.3.6) This is absurd as they are on a section of road in the top 1% for noise levels.**

Although Cratemans (Listed as Dragons Lane), Moatfield and Oak Cottage are mentioned in the sound report, they appear to be amongst the properties **not** accessed for the baseline assessment as there are no results for them. One has to question why they were not monitored, as Cratemans in particular has had frequent visits from Carter Jonas and other Rampion agents.

When looking at the monitoring results (annex B) even those which were carried out would seem in a number of cases, to have had hardly any readings. Furthermore, in many cases the causes of the noises were listed as ‘Noise from Birdsong,’ ‘Fountain noise’ or ‘dog barking’. These are hardly background noises in anyway similar to noise from mechanical diggers, piling rigs and HGVs.

We share concerns raised by WSCC in their PADs document about the lack of noise assessment on the cable route, and the fact that it will be of long duration due to the haul route etc:

iii. No noise contours for the cable route have been provided and the full extent of receptors are not identified in the accompanying figures.

Assessment of Effects

vi. There is a lack of consideration and/or noise impacts of cable route construction and side access routes are downplayed. Consideration of impacts of cable route construction and use of side accesses are largely excluded as considered short in duration, despite having the potential to result in noise levels above 75dB at sensitive noise receptor locations. The assessment fails to take into account longer duration works associated with construction and does not recognise that the cable route will likely serve as a key haul route in rural areas and thus remain in place for long periods.

vii. Noise impacts from construction compounds at night-time are underplayed. “

In the Noise and Vibration Document, paragraph 21.8.9, Rampion say haul roads are assessed differently because of the lack of baseline data. There is no excuse; data could easily have been obtained by measuring. By definition, baseline levels are likely to be extremely low as these are quiet locations without proper roads and in the case of the haul road from Kent Street to the A281, extremely ecologically sensitive. We have no doubt that whatever assessment they *have* undertaken will significantly downplay effects on both residents and habitats. Similarly, the assessment of Trenchless Crossings and temporary compounds significantly underestimates the impacts of noise on local residents and ecology. Regarding those in the vicinity of the Cowfold Stream, Cratemans, mentioned as “**a property on Dragons Lane,**” is assessed as very low impact. Yet it is literally surrounded by a Temporary Construction compound, trenchless crossing, the cable route and a haul road. It is simply not believable that the residents of this property will experience anything other than the most appalling noise and disruption for the duration of the whole project. In addition, there is a failure to take into account the extremely low noise levels normally experienced in many of these locations.

No noise and vibration assessment has been done of the impact on Kent Street. Many of these properties are right on the road, and people lead outdoor lives. The noise levels will be significantly above the expected levels for such an area.

There appears to be no assessment of the impact of noise or vibration on the sensitive ecology of Oakdene or the haul road for either construction or operation (see Noise and vibration addendum for more detail), or indeed any PRoWs, even the one which passes close to the substation by the lake.

Construction Noise:

In the Noise and Vibration Chapter (Doc Ref 6.2.21) para 21.8.7 “*The estimation of traffic is based on access traffic flows of HGV and LGV. The following assumptions were applied to the access traffic flow data:*

- *Light construction routes were not included as the traffic flows of LGV in a day were very low.*

• *A-roads with flows above 20,000 a day were not included in the assessment, as it would not be possible for the worst-case flows to have a significant effect on the noise from these heavily trafficked roads;*

The assumptions made regarding LGVs are false; LGV routes should **NOT** have been excluded, especially Kent Street. This is a very quiet Lane which is expected to bear a huge burden of LGV and HGV traffic, as is the new haul road from Kent Street to the A281 and the percentage changes on these roads will be enormous.

They have used a 10m noise distance for assessment of noise impacts on properties. We disagree with this assumption as Coopers Cottage, South Lodge, and the homes at Oakendene are right on the road. As are many of the homes on Kent Street and Dragons Lane.

The DCO documents appear to have included Oakendene Farm Cottages and Coopers Cottage in the assessment of the construction of temporary compounds but not South Lodge or Allfreys, which will both be heavily impacted, or the cottage by the Oakendene Lake.

Noise levels at Oakendene and Coopers Cottage (and indeed the other two properties) will be much higher than 'medium impact' levels for both construction and operation of the compounds. They are old properties, with no insulation, and it appears that they have not taken in to account the traffic *passing them* to reach the compounds, just the noise levels on the compound.

In **Population and Human Health** (Doc Ref 6.2.28) para 28.9.74, it states that *"As detailed in Chapter 21: Noise and vibration of the ES (Document Reference: 6.2.21), the majority of road links would experience an increase in noise levels of less than 1dB, which is not considered significant in noise terms.*

28.9.75 The following road links that would exceed a change in noise level of more than 1dB are:

- *B2135, South of Ashurst (+2.4dB).*
- *B2116 Partridge Green Road (+1.6dB).*
- *A281, South of Cowfold (+2.1dB).*
- *Wineham Lane, South of A272 (+2.4dB); and*
- *B2116, Henfield Road, Albourne (+2.2dB).*

28.9.76 All of the above changes in noise exposure are also not considered to be significant in noise terms.

*28.9.77 On this basis, the resultant magnitude of impact on human health would be **Negligible.**"*

We disagree that the arguments given for major roads. Firstly, it does not include ALL roads, particularly Kent Street; and secondly it does not consider the core working hours of the works and the fact that for either end of the day the ambient noise levels may be quite a lot less, or the cumulative impact of construction traffic noise PLUS construction site or compound noise. In those locations there will be concrete mixing, piling etc.

The assessment of the A281 does not take into account the haul road traffic **behind** many of the properties as well as in front of them along the road.

And with regards to vibration, they argue *“it is unlikely that the construction and operation of the construction compounds are unlikely [sic]to result in temporary vibration effects. Similarly, it is unlikely that activities during the construction of the onshore substation will give rise to significant effects from vibration. As a result, the potential for vibration relating to these project elements have not been considered further. “This claim itself seems extremely ‘unlikely’, given that they also say, regarding the vibration impacts of traffic on Kent Street, that the effects will be major: para 21.9.92 “The predictions show that at 30 mph, any residence within 2 m of the irregularity, would experience an impact of high magnitude and any residence within 5 m of an HGV travelling over an irregularity at 50 mph would experience a **high impact.**”*

Operational noise from the substation:

In the Design and Access Statement (Doc ref 5.8) para 3.8.2, the cumulative impacts of road noise on the A272 have not been taken into account. Many properties, including some of those closest are missing from assessment e.g. those at the Oakendene entrance, Oakendene Industrial Estate, and the small house on the parkland itself by the lake, Kings, Coopers cottage, South Lodge. The last 2 in particular are already experiencing significant road noise and this needs to be included.

Operational vibration from the substation:

We do not agree with the rationale for scoping assessment of this impact out of the assessment:

Table 21-12: *“In response to the Planning Inspectorate’s commentary in ID 5.4.3 (Planning Inspectorate, 2020a) in Table 21-6 regarding vibration from the onshore Oakendene substation being scoped in, further justification has been given to scoping this out as follows. Within the onshore substation, there would not be any large items of rotating plant that could give rise to significant vibration outside of the onshore substation boundary. Antivibration pads would be used underneath reactive plant (e.g. transformers) to minimise the transfer of vibration to the ground. Any residual vibration is not likely to be perceptible beyond a few metres from these sources.” ‘Not likely’ is a subjective answer and given the vagueness and inaccuracies of many of Rampion’s calculations regarding noise and vibration, this should not be considered acceptable. Nor does it take into account the peculiar sensitivities of many wildlife species to vibration.*

Impact on wildlife and ecology:

See Section 9: Addendum to Ecology following DCO Submission.

Conclusion:

Overall, there are far too many inconsistencies and omissions in these documents for their conclusions to carry any weight. They downplay the noise and vibration impacts, which whilst technically temporary, will be suffered in the case of the substation and haul road vicinity for many years; at least 3.5, but the actual versus predicted duration of the construction of Rampion 1 must be taken into account. For many properties, the conclusions drawn do not adequately reflect the cumulative impacts of noise and vibration at the construction sites and compounds *in addition to* the traffic noise from accessing these sites. Many of these concerns are also raised by WSCC and HDC in their Principal areas of Disagreement.

Section 9: Ecology

This section should be read in conjunction with the report sent in by Janine Creaye for the 28th February deadline.

By referring to the substation site as 'land adjacent to the Oakendene Industrial Estate' Rampion creates an image of a semi-industrial wasteland or perhaps even a brownfield site. The reality could not be further from the truth. The Industrial estate is very well hidden and low lying. The proposed substation site is in the parkland of Oakendene Manor and is a beautiful, tranquil site adjacent to a large lake. The fields, lake and stream support a precious ecosystem and the land from there to the A281 along the suggested cable route sustains a biodiversity similar to that at Knepp Castle. Nobody, quite rightly, would wish to disturb the Knepp estate by such a project; there is no sound ecological reason to put it here either. Yet its very untouched nature is what makes this habitat so remarkable. Knepp castle is rightly praised for its rewilding project. This area does not need rewilding; it needs to be left alone.

The people who work on the industrial estate have long been aware of the enormous range of wildlife which is present on the land around Oakendene manor, the lake and Taintfield wood, as are the many walkers who enjoy this place. Red kites, badgers, nightingales, bats and adders are just a few of the species frequently seen. The biodiversity from Oakendene to the A281 has been meticulously recorded over 18 years by Janine Creaye, a local artist working on biodiversity. Her records, which have been sent to you separately, and submitted to the biodiversity register, show an extraordinary range of species, including numerous badger setts, an important reptile habitat all around Cratemans farm and possibly one of the most important nightingale breeding sites in Sussex. Indeed, her records are increasing all the time. Some examples are shown below (See Appendix 1).

This area is remarkable in that it has been left untouched for decades: much of it is a catchment area of the Cowfold Stream, the meadows have been uncut during the summer for years, creating a very special ecosystem, full of wildflowers, where grasshoppers and butterflies abound. **Lowland meadows in this area are key habitats.** The scrub around the stream and beyond supports the nightingale sites (see Appendix 2; nightingale maps) along with skylarks and turtle doves. SWT, in their response to the first consultation, emphasise the importance of listening to local knowledge as often records are incomplete. Natural England, in their 2020 scoping report comment that "Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and **individuals**; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment." This is exactly the situation with this area; unlike around the Wineham Lane substation sites, **there has been no need to carry out any official surveys in this area. It means that reliance on desk top surveys is wholly inadequate and the knowledge of local residents and landowners is therefore crucial.**

Yet repeated pleas about the biodiversity of this location were ignored by Rampion, who chose Oakendene as the substation site as the path of least resistance due to the lack of consultation with

Cowfold-see letters from Janine Creaye (Appendix 3). Despite her evidence for the abundance of reptile habitats around Cratemans and the anecdotal evidence from the land owner and his neighbours, who for years have been given adder skins by him, Chris Tomlinson has written that **desk top surveys will suffice for the cable route.** (“We have undertaken reptile studies at the substation location, although desk studies are normally considered sufficient for the cable route.”). Natural England’s scoping report in 2020, p19, states that “The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.” Instead, for many instances on the cable route Rampion have chosen to do desk top surveys alone which will not show the true extent of the destruction of trees, hedges, scrubland, flood plains and other significant habitats

Nightingale breeding sites:

Sussex supports about 13 per cent of the UK’s Nightingale population, so maybe up to 760 singing males, but the general trend is a decline in numbers and a contraction in range. (Data from SWT 2019)

Janine Creaye’s evidence of the nightingale sites has been met with the comment “The mitigations planned for birds are not necessarily species specific, but include restrictions during the breeding season at some locations. Notably the planting on the fringe of the substation (wet woodland, combining water management, visual screening and habitat creation) is a suitable habitat for nightingales.” This is surely to miss the point; even if the habitat could be successfully reinstated, the nightingales will have long since died out before this can happen. In any case Rampion’s record on reinstatement with Rampion 1 is extremely poor.

In 2021 WSCC’s response to the consultation includes the comment “Overall we are very concerned that there is currently no nuance in the PEIR regarding the differences in impact on species and habitats dependant on their vulnerability and condition. For example, there appears to be no discussion of potential impacts on Nightingale despite it being red listed.” It seems they have taken no account of the need to be species specific.

Quote from Knepp castle’s website:” In 2021, 40 singing males were identified, singing from Knepp’s billowing hedgerows and patches of scrub. In addition to these males, and their mates and offspring, many other nightingales utilise the Knepp scrub in passing as they feed up for their autumn migration “. “In 2022, we counted over 50 males singing from territories in Knepp’s billowing hedgerows and patches of scrub – a remarkable increase from only seven territories prior to rewilding, twenty or so years ago”.

For comparison, please see the attached Nightingale Survey from the northern cable route to Oakendene (Appendix 2). 37 recordings are noted. This represents at least 22 single territories, and this is a very small section of this part of the cable route. There are almost certainly more as we have been unable to enter private land in places such as Moatfield Farm to identify individual territories with certainty. (SEE Territory map, also at Appendix 2). There were 16 territories in one survey, but there are some other outlying ones nearer Oakendene and also along the Cowfold Stream in the Gratwicke area. Considering the small space covered by this survey compared to Knepp, this is still a very significant population, and all have now been verified. Mark Mallalieu of SOS has called it significant and highlights the value of the dense hedge habitats; see statement

below (Appendix 4) from SOS in 2021 even before the true extent of nightingale breeding sites in this location was highlighted. The nightingale survey map is important evidence as it so closely follows the cable route, as is clear from the maps, so all the territory would be destroyed; **no other cable option had this issue.**

SWT response to 2021 consultation raises the following concerns: “There appears to be no discussion in the PEIR of the likely impacts on threatened species such as nightingale and turtle dove, which may be found along the route and particularly around the substation area. There appears to be no consideration of the scrub habitat that is needed for nightingale to nest, only blackthorn is mentioned in the native hedgerow section.” It is precisely in these increasingly rare areas of scrubland, which abound in this area, that many of the nightingale nesting sites are found.

Approximately 8 years ago some of the undergrowth was removed from Taintfield wood, resulting in a steep decline in the numbers of nightingales breeding there. The numbers still have not recovered, which shows how fragile they are and how slow to recover, if at all.

The other problem Rampion have failed to understand by not consulting, with regards to the whole area around the cable route from the A281 to Oakendene is that **there are no farm tracks at all** as it has not been farmed. Rampion simply have not understood the implications of this. When choosing the cable route, they announced that ‘access to the cable route in the SDNP would be along existing farm tracks where possible’. It is not at all possible here. Much is made of their intention to use trenchless crossing under the stream and ancient hedgerows, yet **the only access to any of the cable route for the equipment to do this will have to be via a constructed haul road** which will have to cut through the very hedges and fields they are claiming to wish protect! Similarly, it will result in widespread devastation of breeding habitats. The small size of the ancient, seasonally flooding fields also leads to far more destruction of hedges and oak trees than might occur in other sites with larger fields and fewer boundaries. In addition, given that trenchless crossings involve 24-hour lighting, impacts on breeding nightingales could be significant. See also impact of air and noise pollution below.

The only tracks are those created by the ancient hedgerows and green lanes, for animals to safely travel along. The whole area is a wildlife corridor through to the lakes at Oakendene, encompassing the Cowfold Stream and various ponds and ancient woodlands on the way. The High Weald AONB is just a few hundred meters away to the north. Although slightly to the east of Knepp and the main Weald to Wave route, it nevertheless forms an important wildlife connection linking the SDNP to the High Weald AONB.

Trees and hedges:

On the cable route from Oakendene to Wineham there is a group of 5 veteran oaks which will be removed in just one small part. Hedges and ancient oaks will have to be dug out at Oakendene to accommodate the substation and to create a visibility splay. Many more are at risk along the cable route from the A281 to Oakendene. And hedgerows and mature trees along the Cowfold stream are important habitat corridors. We have asked for exact numbers of hedges and trees to be lost—they have not been forthcoming with an answer. Sussex Wildlife Trust (SWT) and the Woodland trust have asked for numbers of permanently lost hedgerows and the length in kilometres, and for the number of permanently lost trees; they have not received this information yet have been asked to comment on the proposals. Yet these losses and the biodiversity supported are impossible to

mitigate in the lifetime of the substation and windfarm. SWT also pointed out the risk to Taintfield wood by its proximity and therefore impact on it from the construction, and from the disturbance of the valuable scrubland nesting sites adjacent to it. Also, of the operational impact on the area from noise, light pollution and vibration. Furthermore, they emphasise the importance of even small areas of woodland, of which there are many, along the cable route, which may not be officially registered, and therefore not noticed on desktop surveys, especially if less than 2 hectares in size.

The green lanes from the stream to the ancient Buckhatch lane are centuries old and an important safe route for badgers. (See badger path photograph, Appendix 1). Chris Tomlinson's response to the numbers of badgers in the area was "we will move them," but they live and move in the green lanes. Where will they go?

Over 97% of wildflower meadows have been lost since the 1930s with flower-rich grassland now only covering a mere 1% of the UK's land area. How can it make sense to destroy a large area of unimproved lowland meadow at Cratemans and seasonally flooded grasslands when an alternative site and route are available?

Oakendene:

The beautiful area around the manor house supports a huge diversity of wildlife as witnessed by the workers and residents on the industrial estate in their leisure moments, and by the large number of local people who love to walk in this area.

There is a very large lake, home to a huge variety of birds, insects, bats and other species. Adjacent woodlands and numerous small ponds plus the mature hedging and trees in the fields where the substation is proposed add up to create a richly diverse habitat. Not only the water is important, but the habitats adjacent to ponds are known to be important for amphibians, grass snakes and other reptiles. The cable route passes very close to several of the southern ponds and the substation itself is to be built along the wetland border of the stream which feeds the lake and very close to the lake itself, all of which feed into, and will affect, the Adur River.

The ecological importance of wood-edge habitats is also well known. The cable route into and out of the substation lies very close to some ancient woodlands. It is known that woodland edges are a favoured location for nightingales. The exit from the substation passes through undisturbed flood land and nightingale nesting sites before reaching Kent Street. There are numerous badger setts along the cable route and in the vicinity of Oakendene and Great Crested Newts are to be found along the water edges (see Appendix 5).

WSCC in 2021 raised concerns about the size and environmental impact of the substation on this site. They commented that there had been poor assessment of the vulnerability of climate change and a playing down of the carbon loss impact especially from the construction. It is clear that the carbon loss from the disturbance of the untouched meadowland will be immense.

The upset from the construction noise to this carefully balanced system which has evolved over many years, will be such as to prevent it from ever fully recovering, and the ongoing **noise pollution, vibration and light pollution** will permanently affect the resilience of this area to climate

change. Ancient Taintfield wood is only a few metres away from the noise and light pollution from the construction and operation of the substation, as is the lake and adjoining stream. The concrete raft is likely to have an impact on the flooding which occurs around the site, and the cable trench will cause water to be diverted from the streams, reducing the flow into the river Adur downstream (see section on Water Environment).

Light pollution:

There is a serious risk that artificial lighting from the substation will disrupt the natural behaviour and patterns of wildlife, particularly nocturnal species including the many badgers, nightingales, owls, bats, toads and moths. It can interfere with migration patterns, disrupt feeding and breeding habits, and cause disorientation. Glare from the substation's artificial lights may also impact wetland habitats that are home to amphibians such as frogs and toads, whose nighttime migration is part of the breeding ritual. **It should also be noted with regards to the toads, that construction traffic in the winter will further put them at risk as it can be dark by as early as 3pm.** Artificial lights disrupt this nocturnal activity, interfering with reproduction and reducing populations. The trenchless crossings also require 24-hour lighting.

In 2021 WSCC recommended that the Bat Conservation Trust and the Institute of Lighting should be consulted about the effect on the bat population. Nothing has been fed into the consultation about this, if indeed it has been done. Dr Fiona Matthews of Sussex University (personal communication) confirms the breeding and foraging sensitivity of many bat species to light.

Nocturnal pollinators are increasingly recognised to have a crucial role. Her work from Sussex University suggests they are more efficient than day time pollinating insects (Anderson et al)⁶

Light is also known to affect the ability of insects to breed. (Moubarak et al)⁷. This article demonstrates the impact of light pollution on the ability of male glow worms to find a mate and suggests they can be seen as the 'canary in the mineshaft' regarding the impact on insect populations in general. This impact will then extend upwards through the food chain. This area is known by locals to provide a rich spectacle of glow worm activity on summer evenings. Glow worms are in decline in the UK. The area also supports a huge diversity of butterflies, moths, grasshoppers and demoiselles. Photographs and videos will be submitted by Janine Creaye separately.

The House of Commons Science, Innovation and technology Committee published their report in July 2023 into insect decline. Professor Dicks acknowledged that protected sites such as nature reserves tend to have higher biodiversity, but this is insufficient to reverse the decline of insects - and some metrics indicate that insect numbers are declining more in protected areas compared to non-protected areas. Mr Bennett, CEO of the Wildlife Trusts said that addressing insect decline requires a broader approach encompassing the entire countryside, rather than solely focusing on

⁶ Anderson, Rotheray and Matthews, 29 Mar 2023. Marvellous moths! pollen deposition rate of bramble (*Rubus fruticosus* L. agg.) is greater at night than day

⁷ Moubarak, Fernandes Stewart and Niven: *J Exp Biol* (2023) 226 (11): jeb245760. Artificial light impairs local attraction to females in male glow-worms

reserves or protected sites. In other words, the importance of sites such as this one cannot be underestimated just because it is not a recognised nature reserve.

Whilst the DCO submission suggests that Rampion may be attempting to comply with the recommendations to minimise the impacts on species from light pollution at the substation site, the key word is 'minimise'; the effects are not zero. It makes no sense to put this in such a biodiverse area when alternatives are available.

Noise and Vibration:

Many animal communications systems are affected by noise pollution, from mating and breeding, to predation, movement and migration. Delayed nesting means that birds hatch fewer chicks and therefore have fewer young. Not only birds are affected, but many species such as frogs, fish and bats, all of which thrive in the Oakendene site. Plant and tree diversity reduces where there is increased noise.

Currently, the hedges and ancient trees along the A272 and running north to south from the road help to absorb much of the road noise before it can reach the ecosystems around the lake and stream. Unfortunately, the proposals for the substation involve the removal of much of this protection, making the area doubly vulnerable; not just to the construction and operation noise, but the road noise also.

Kunc and Schmidt⁸ from Queen University Belfast provide evidence for the impact of noise and vibration on more than 100 species across amphibians, arthropods, birds, fish, mammals, molluscs and reptiles. Many species rely on acoustic signals for communication, making them more vulnerable to predators if this is disrupted, they may not communicate well to find a mate, and bats and owls rely on sound to find prey. Noise can inhibit this, leading to failure to thrive and decline in numbers.

Cooke et al in 2020⁹ looked at the impact of noise on bird numbers. They found that bird numbers are impacted by loud road and other noise. In particular the rarer species tend to reduce where there is a lot of noise, unlike more common ones, resulting in less biodiversity. The effect was noticed up to 1km away from the source of the noise. There are very few areas in the UK where birds can move to get away from road noise. 70% of the UK lies within 700m of a road including 40% of the total area of terrestrial protected sites. **It is probably therefore no coincidence that the dense nightingale breeding sites along the cable route are there partly because this area is away from all roads and noise** (Appendix 7). The only two encroaching roads, Dragons Lane (to Cratemans) and Moatfield (past Lower Barn Farm) are in fact no through road tiny lanes just providing access to a few homes. It is quite distinct from any neighbouring area in that respect, clearly away from roads. This fact, together with the lack of farming and intensive management of the land has made it the ideal safe haven for species which struggle in other locations. The haul road and HGV activity will therefore have a major impact on the breeding sites and the ongoing

⁸ Kunc and Schmidt: The effects of anthropogenic noise on animals: a meta-analysis. J Royal Soc:20 Nov2019.

⁹ Cooke, Balmford, Johnston, Newson: Variation in abundances of common bird species associated with roads Journal of Applied Ecology, 21 April 2020

noise from the transformers will mean that these sites can never recover, regardless of what is replanted by Rampion, even if it survives their restoration attempts, because if the substation is built, there is nowhere far enough away from noise to provide a suitable habitat any longer. **Yes, wildlife will return to the area, the study suggests, but not the rarer species which currently have a safe habitat there, nor the range or abundance of flora and fauna.**

The generators and piling equipment during construction are likely to severely impact on the wildlife around the substation and the ongoing noise from transformers, especially in wet weather, will permanently impair their ability to recover. It does not make sense to maximise damage by choosing such a richly diverse habitat for the substation location when alternatives are available.

Air Pollution:

Diesel engines are a main source of nitrogen oxides in the UK. They are emitted to the atmosphere and can contaminate land and water. Nitrogen in air pollution acts as a fertiliser, making conditions too rich for many wild fungi and plants. It is one of the reasons why mile after mile of cow parsley and nettle which are nitrogen-tolerant species are seen on our rural highways, road verges and field margins, rather than the large variety of wildflowers that 30 to 40 years ago decorated these same roadside verges. This has negative consequences for animals, including pollinating insects, that depend on wild fungi and plants for food, nutrients and shelter.

Increased levels of nutrients in watercourses encourage plant growth, which can lead to problems such as algal blooms which reduce light and oxygen levels. This process, known as eutrophication, affects ecosystems, killing fish and altering plant communities.

Nitrogen deposition also damages the growth of lichens, which are very sensitive to air pollution. They are recognised worldwide as useful indicators of air quality.

These impacts can be a serious threat to protected habitats and conservation areas and affects us all as biodiversity is vital to our health and wellbeing, our culture and our economy.

The impact of the change in nitrogen levels both above and below the critical load is an important measure of plant diversity and species composition. Experiments indicate that nitrogen pollution is responsible for community changes and significant losses of plant diversity across large areas of the UK. (Natural England Commissioned Report 210; 2016)

The lichen patterns on the hedges and trees along the cable route are such as to indicate very low levels of pollution currently. The meadowlands have not been farmed and so are low nutrient habitats ideal for the wildflower meadows so rare now in many parts of the country (see Appendix 1). As a result, this landscape teems with insects and supports a population of badgers, nightingales and many more. The lake and the stream which feeds it are close to the substation construction site, the haul road runs right through the flood meadow, crossing Cowfold Stream. For 6 years all of this interconnected ecosystem is likely to be subject to much higher levels of nitrogen oxides than it has previously been used to, affecting the delicate ecological balance, both on the land and in the water. The damage done to this area would weaken the resilience of the nature to cope with the climate change challenges it faces. To destroy the very habitats we seek to protect, and indeed, the ecosystems on which we depend, by shifts to green energy, is not a rational response by humans to mitigate those challenges.

Horsham District Council's local plan for biodiversity would clearly not support the routing of the cable through the area from the A281 to Oakendene:

Strategic Policy 31 - Green Infrastructure and Biodiversity:

Green Infrastructure

7.31 Green Infrastructure is a term used to describe a multi-functional and connected network of green spaces, water and other environmental features in urban and rural areas. It includes trees, parks, road verges, allotments, cemeteries, woodlands, rivers and wetlands. Green Infrastructure can contribute to the provision of 'ecosystem services'. This includes flood protection, water purification, carbon storage, land for food production, places for recreation, landscape and nature conservation. Without these services, life as we know it would not be possible, and increased flooding or drought episodes would have severe economic consequences.

7.34 In addition to the identified Green Infrastructure, a strategic level Nature Recovery Network is being established to which the Green Infrastructure network will contribute. The Nature Recovery Network will be informed by the five year 'Wilder Horsham District' partnership between the District Council and the Sussex Wildlife Trust approved on the 28 November 2019. Nationally, 41% of UK species' populations have reduced since the 1970s, and 15% of wildlife species are estimated to be under threat of extinction. The partnership aims to reverse the decline in species and habitats and to contribute to tackling and reducing the impacts of climate change. The partnership seeks to take a landscape approach to overcome fragmentation and build landscape resilience to help ensure wildlife can move around, and to build a legacy so the work to reverse the decline continues beyond the life of the partnership. It will initially focus on the following landscapes and areas but this focus may change to take into account work by the Sussex Nature Partnership. Development proposals should therefore consider how they can contribute towards to the following:

6. **Hedgerows** in the Low Weald (providing important connectivity between fragmented habitats)
7. **Woodland** – new planting and allowing natural regeneration, important tools in capturing more carbon and helping wildlife
8. The Adur catchment; improve **freshwater and floodplain habitats**, water quality and flood resilience through working with natural processes
9. Join up key sites, such as the Knepp Estate with the woodland to the north-east of Horsham town and The Mens Nature Reserve in the west of the district, creating the core of a District wide **ecological network**.
10. Take action to support **pollinating insects** throughout the district, in both towns and rural areas.

The area from Gratwicke to Oakendene supports wildlife as diverse as Knepp, just 2 miles away. Important nightingale nesting site, home to adders, badgers and many other red list species and ancient hedgerows and trees. It can be no more acceptable to build this here than at Knepp. Flood

meadows and Cowfold stream feed directly into Adur and support a host of insects from rare butterflies to glow worms

1. Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure, the Nature Recovery Network, natural capital and biodiversity. Proposals that would result in the loss of existing green infrastructure or part of the Nature Recovery Network will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained.

We cannot mitigate the effect of carbon capture loss, ancient flood meadows, veteran trees and ancient hedgerows which will be lost from this area

West Sussex County Council (WSCC) (see 2021 response to consultation, appendix D); extracts:

The experience of Rampion 1 reinstatement has not been wholly successful, with numerous and repeated planting failures; partly due to weather conditions but crucially, the lack of timely interventions to suppress weeds and provide other routine maintenance requirements which are seasonally dependent. The planting of larger, more mature tree stock has, yet again, demonstrated that without high maintenance inputs, these trees routinely fail, either entirely or partly, which is wasteful and loses several seasons' worth of potential growth. Continual replacement year on year is wasteful and, at worst, could result in trees/hedgerows at year 9 (of a 10-year maintenance plan) being replaced yet again instead of being well established and showing up to 10 years' worth of growth – the target condition.

23.10.57 WSCC wish all veteran trees (once identified) to be avoided by careful placement of the cable route.

There will be a need for the applicants to show biodiversity net gain.

The poor reinstatement of Rampion 1 must be included in the balance when weighing this up-large swathes of replanting over the South Downs have died, hedgerows along the cable route at this end are dead, with just the plastic cylinders visible and dead saplings. Much of the planting around the substation has died due to lack of maintenance. There is a low expectation therefore that any of the mitigations they plan to use will be successful. In any case, the thousands of species supported by the ancient trees and hedgerows they plan to destroy, cannot be mitigated against in the lifespan of the windfarm. Nor can the nightingale breeding sites; the nightingales and turtle doves will have died out before their habitats are restored, and lost forever. The wildlife food chain around the Lake at Oakdene will forever be affected by the light, noise and vibration pollution and the impact on breeding and pollination. Again, this is not realistically possible to mitigate against.

Henfield Parish Council scoping response dated 5.8.20 “regarding the site of the Bolney substation: To reduce the impact on the environment we would prefer that the site of the new Bolney substation to be as near as possible to the existing Bolney Substation, to which it will have to be attached in any event. The existing Bolney Substation already has the necessary access”

EN-1

The National Policy Statement EN-1 tells us that:

5.4.42 As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, **including through consideration of reasonable alternatives**. Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.

5.4.43 If significant harm to biodiversity resulting from a **development cannot be avoided (for example through locating on an alternative site with less harmful impacts)**, adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm and **consent may be refused**.

There is a suitable alternative at Wineham, where the ecological impact, though not negligible, will be far less. Unfortunately, the biodiversity is much less there because of the damage already done by previous substations and road infrastructure.

In addition, if not used for the substation site, the land at Wineham will eventually be given over to Battery Storage, which, apart from the need for a cable route, will be almost as damaging locally. The alternative plans for Oakendene include a biodiverse ecosystem, open for the enjoyment of local residents, electricity self-sufficiency for an expanded Industrial Estate, protecting both the existing wildlife corridor and local jobs into the future, with little or no transport required to reach either of them, and enhancing the climate change resilience of this community and its environment. It also protects the area for the future; if the substation goes ahead at Oakendene, this area too risks ecological destruction from the relentless march of battery storage farms.

5.4.13 National planning policy expects plans to identify and map Local Wildlife sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.

Ancient woodland, veteran trees and other irreplaceable habitats:

5.4.14 Irreplaceable habitats are habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.

5.4.15 Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Ancient or veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

Protection and enhancement of habitats and other species:

5.4.16 Many individual wildlife species receive statutory protection under a range of legislative provisions.¹⁸¹ Other species and habitats have been identified as being of principal importance for

the conservation of biodiversity in England and Wales, as well as for their continued benefit for climate mitigation and adaptation and thereby requiring conservation action.¹⁸²

“Healthy, naturally functioning ecosystems and coherent ecological networks will be more resilient and adaptable to climate change effects. Failure to address this challenge will result in significant adverse impact on biodiversity and the ecosystem services it provides.” This proposal will have a devastating impact on the resilience of this precious ecosystem and its ability to adapt to the effects of climate change. In assessing the impact, consideration must be given to the alternatives available.

Finally, there must be an obligation on all of us to find the least damaging solutions to the undoubted energy crisis.

"We shouldn't be exchanging green energy for green spaces," Frank Adlington, Green councillor, North East Derbyshire Council, regarding a solar energy proposal, but the same applies:

“How can they justify destroying swathes of green land in order to solve the climate crisis?”

There is a nature crisis. We need more trees, flowers, bees, butterflies and wild spaces in our country. If we destroy these to build energy plants then we have just fuelled another crisis. Bees pollinate crops and trees store carbon; without them we are all in deep trouble.

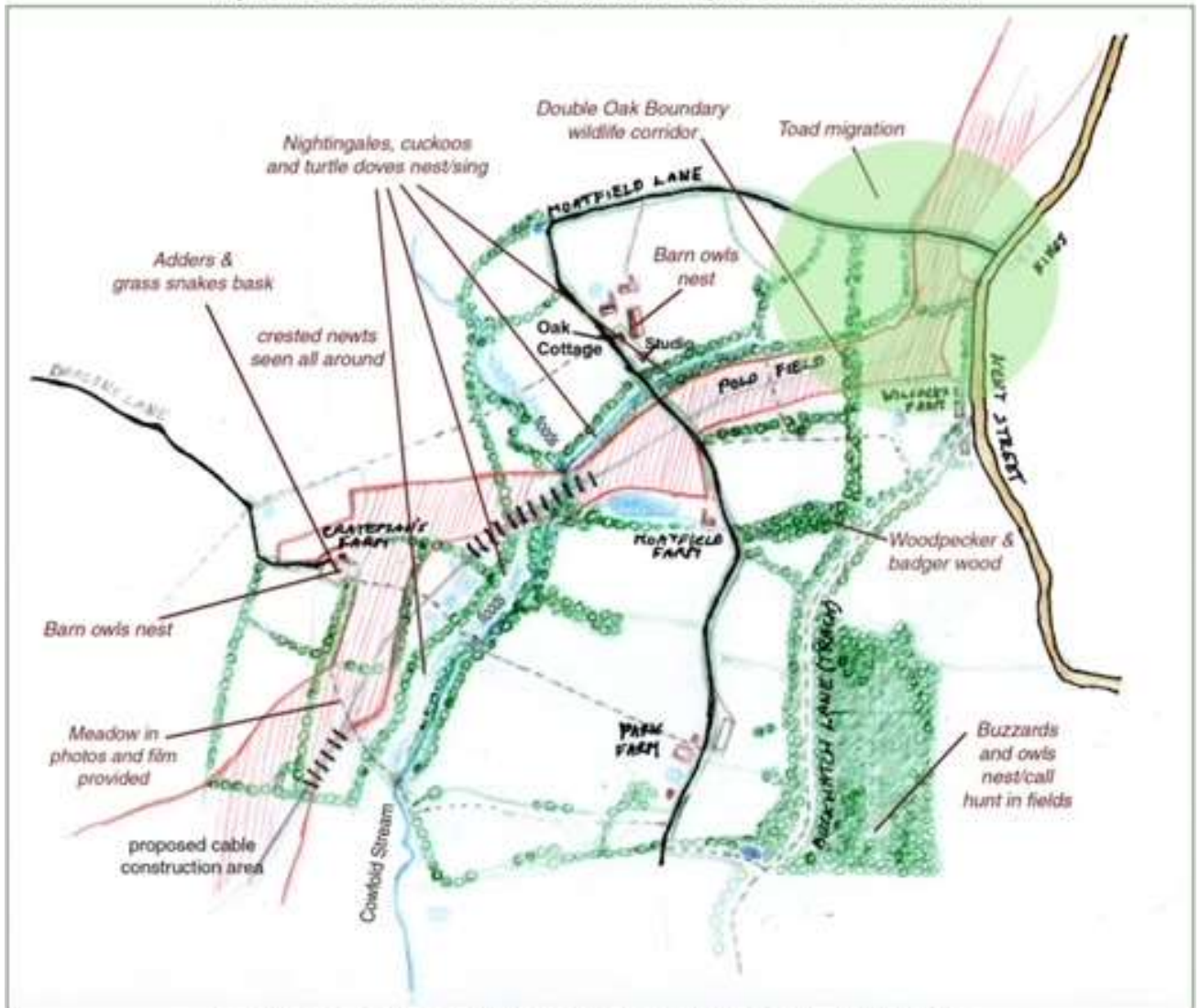
Yes, there must be a focus on decarbonisation and a rapid move to renewables but to do this at the expense of the natural environment is contradictory and wrong. **The climate crisis cannot be solved by destroying our environment.** We need joined up thinking and a new approach to how we produce energy. We must value nature for what it is and allow it to flourish. We must work around the constraints of the natural world and not fence it out of ours.

We must not push 'green' solutions without consideration for the wider impact. [we need] a holistic, joined up and well thought out plan for the climate crisis. Hurrying through half-hearted and poorly thought-out solutions such as this risk making things worse.”

Almost everybody now recognises the need to move away from fossil fuels, as their continued use is destroying the ecosystems on which we depend. We must ensure that in turning to green energy, we do not make the same mistakes: kelp forests are the lungs of the ocean; putting the wind turbines on the sea bed where regenerating kelp beds are just regaining a hold, and choosing a location for the substation where maximum damage to carbon storage in fields and trees occurs, and special habitats are destroyed just does not make sense.

Appendix 1 – Wildlife Records

Key wildlife sites around 6f South of Cowfold area of Rampion 2 cable construction route



Janine Creaye at Oak Cottage, RH13 8BF janine.creaye@sculptureform.co.uk tel: 07966 439858



Butterflies June/July2023 Cratemans and Cowfold Stream



Marbled whites



Red admiral

Peacock



Gatekeeper



Meadow brown

Comma





Little owl hunting in cable route below Oak Cottage, Moatfield Lane



Toad Migration every March on Moatfield Lane/Kent street right in cable construction route



Nightingale by the Cowfold Stream, which is crossed by cable construction



Crested newt on the tarmac at Oak Cottage, adjacent to cable construction route



Hedgerows and meadow at Moatfield Farm, in construction route



Badger path between double oak boundary, cable construction goes through not underneath



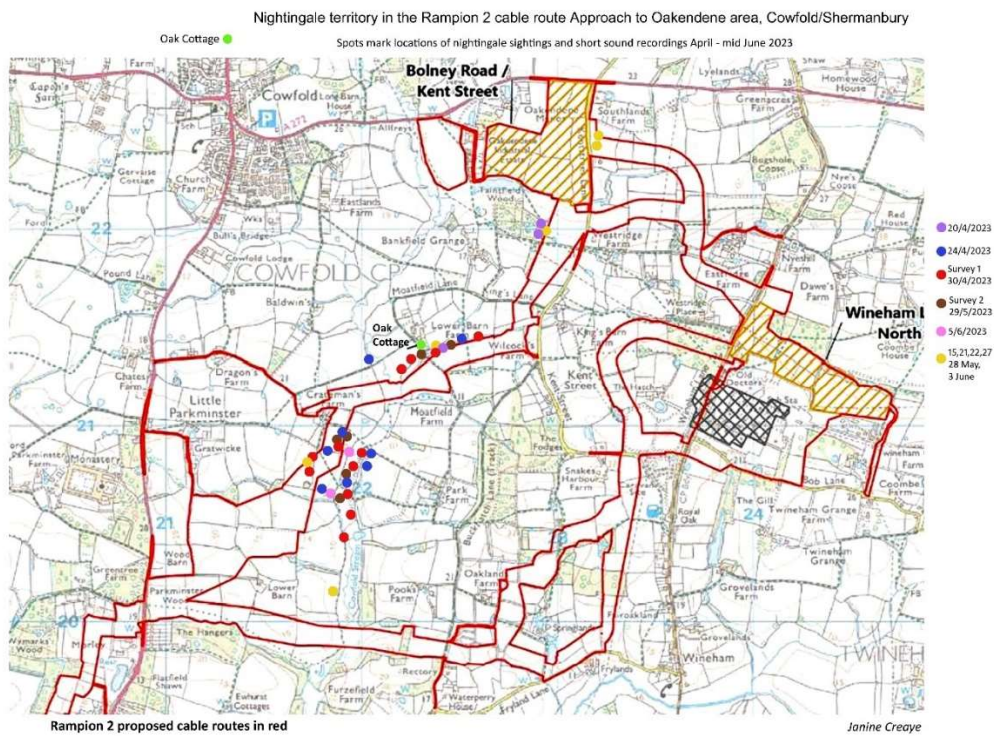
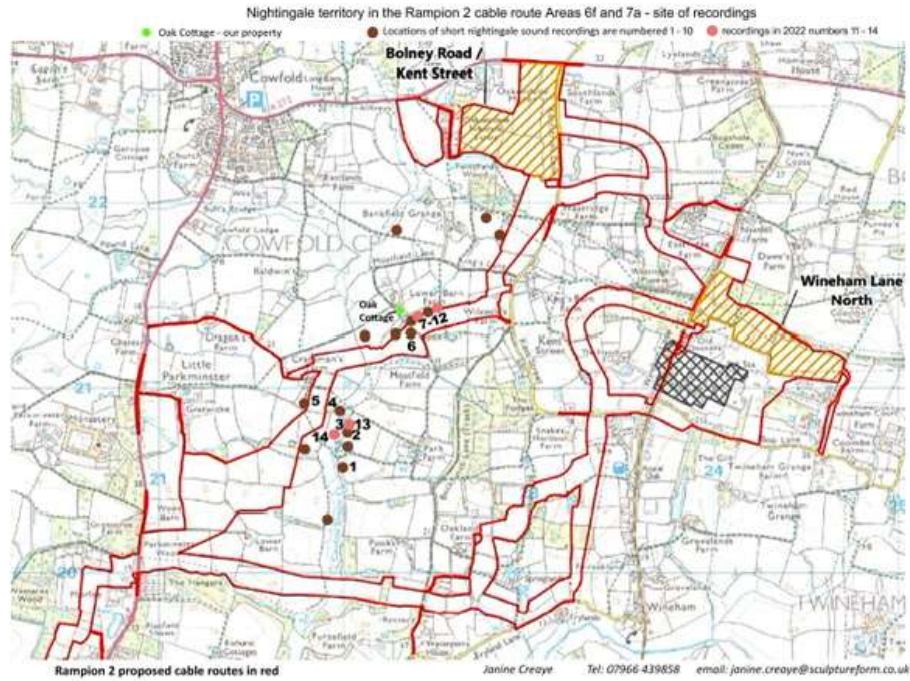
Meadow at Cratemans, not ploughed for decades, in construction route



Some of the meadow plants at Cratemans farm in the construction route

Appendix 2 – Nightingale Maps

2022 Recording Map

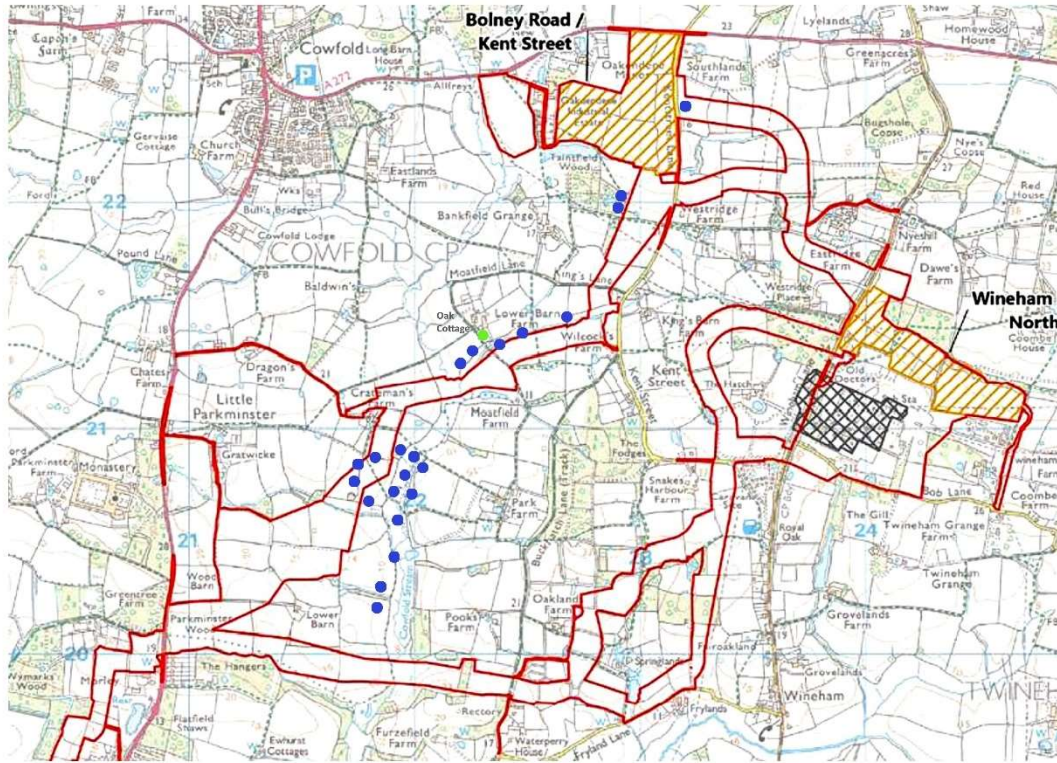


2023 Recording Map

Nightingale Territory Map 2023

Nightingale territory in the Rampion 2 cable route Approach to Oakendene area, Cowfold/Shermanbury

● Spots mark locations of nightingale territories (heard/recorded several times in the same spot 20/4/2023 - 10/6/2023)



Survey 1
30/4/2023
Survey 2
29/5/2023

Rampion 2 proposed cable routes in red

Janine Creaye

Appendix 3 – Letters JC and Rampion2

12 August 2022

Dear James D'Alessandro

We are happy that wind farms are being proposed to supply 'green' energy, however we are devastated to hear about the final choice of onshore cable route for the Rampion 2 windfarm which was released to the press on 14th July this year, with no information given to the people effected except the direct landowners. The destruction of habitats for wildlife around this small quiet network of lanes leading to the new substation would take decades to put right and if the trees are cut down, many generations. How 'green' is this proposal with such destruction caused by its installation? There has been no information given to local people about how this is going to be managed when it will so impact our lives here. Even on the practical side, it crosses our privately maintained lane twice and the traffic is already often a serious problem on the A272 where the substation is proposed to be located. How will this be managed so that we can continue to live here?

I am shocked that there has been no consultation with local people about what the wildlife here actually is when we have been here all year round for many years but the surveyors are from another part of the country and just drop in for a few hours, largely at less active times of year. One example is that we have nightingales nesting at the bottom of our garden every year and the cables would be installed right across the field directly behind where they feed. The PIER report failed to note these red list species or the turtle doves and to my knowledge nobody visited during the nesting time. We need to know that wildlife is actually being considered and how it will be dealt with both in the construction timing as well as the speed and care of reinstatement. We know how poorly reinstatement was managed after Rampion 1 and can still see the plastic tubes in the struggling hedge on Bob Lane these 7 or so years on.

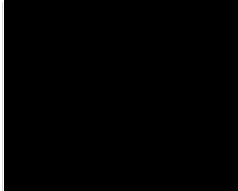
I sent RWE recorded evidence last August of nightingales, flood sites, toad migration down this lane, exceptional meadows at Crateman's farm where we all walk, and the double row of oak trees in the hedgerow directly behind us where at least 25 could be in the path of the cables. This led to a site meeting with Eleri Wilce and a member of the Carter Jonas team 2nd September last year. We walked round the location and she admitted that reinstatement had not been ideal with Rampion 1. She knew little about the flood meadows and how long the water remains across large areas of the cable route through winter and even flash floods regularly in summer. She promised that I would receive copies of what was passed on to add to the environmental reports but I received nothing. I totally refute that 'extensive consultation' has been carried out with local communities as is says on your website.

Please contact us and tell us how this is to be managed. Why should we be left like this, not knowing how issues can be mitigated? How will local people actually be included in working out the construction phase? Please send me copies of what was sent to the environmental surveyors following on from my meeting with Eleri last year. Please send me copies of the environmental reports so that we can understand what is actually being considered about the wildlife that we see every day. I look forward to a response.

Yours sincerely

Janine Creaye

Janine Creaye



Rampion 2 Project
Rampion Extension Development Ltd

c/o RWE Renewables
Greenwood House
Westwood Way
Westwood Business Park
Coventry
CV4 8PB



[Sent by email]

23rd December 2022

Dear Janine,

Thank you for your letter of 12th August, and for the information that you have previously provided of various wildlife records and information for the area within the catchment of the Cowfold Stream.

I apologise for my delay in replying to your letter. Having consulted with colleagues on the Rampion 2 project, I am now able to provide you with the following response.

Please rest assured that the information that you have provided to us will be referenced and included within the desk study that will accompany the Environmental Statement, that will accompany the Rampion 2 Development Consent Order application.

We have undertaken a range of surveys in this general area (Shermanbury to Oakendene) including:

- Phase 1 habitat survey
- Hedgerows Regulations Assessments
- Bat surveys (activity transects, static detectors and ground based visual assessment of potential tree roosts)
- Breeding bird surveys (following a 6 visit common bird census style methodology)
- Great crested newt surveys (eDNA sampling)
- Dormouse survey (nest tube deployment)
- Badger survey
- Otter survey
- Water vole survey
- Reptile survey (at Oakendene only)

We have been using this information to refine both the cable route design and the mitigation that accompanies it: to ensure that environmental effects are avoided where possible, and minimised where they can't be avoided. This work will see a large reduction in the worst case amounts of hedgerows, woodlands etc. that would be temporarily lost to development (as reported in the Preliminary Environmental Information Report submitted last year). Further, the project has committed to using Natural England's Biodiversity Metric 3.1 to quantify biodiversity losses and ensure that a measurable biodiversity net gain will be delivered for the onshore cable route and substation.

All of this information will be provided within the Environmental Statement and other documents supporting a future planning application. It is also notable that in the area of most interest to yourself, the design is seeking to use trenchless crossing methodologies to retain strong corridors of vegetation to avoid fragmentation of the landscape.

The data gathered does reflect the information that you kindly provided to the project, including the confirmation of breeding nightingales. This species and many others have been considered within the design, and will be assessed within the Environmental Statement. For nightingales the emphasis has been placed on the retention of scrub in damp areas (i.e. along the course of the Cowfold Stream and its tributaries) as preferred nesting habitat. The baseline data reports will be compiled and published alongside the Environmental Statement to enable the assessment provided to be considered by stakeholders in light of the data available.

As part of the process we have liaised with a number of stakeholders including Natural England, West Sussex County Council, South Downs National Park Authority, Forestry Commission, Sussex Wildlife Trust, Sussex Ornithological Society, RSPB and a range of others (such as district councils) to identify the best available desk study information. We have also gathered information from landowners over which the proposed infrastructure would be installed and members of the public through the informal and formal consultation process. Rest assured that the information gathered and the views expressed have been taken into account when designing the survey programme, and designing the scheme and the mitigation that supports it.

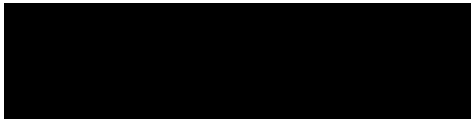
Unfortunately, any development of this nature (e.g. linear developments such as cables, pipelines etc.) will result in damage to the natural environment, and it has therefore been our focus to minimise these effects (either when comparing between options on the basis of biodiversity or when focused on an individual stretch of cable) whilst being cognisant of other driving factors such as electrical design needs, other environmental drivers (e.g. cultural heritage, transport, noise etc.) and efficiency. Once deliberations within the project team, consultation with the public and engagement with technical stakeholders is complete a final design (and its accompanying mitigation) will come forward that will be assessed on a wide-range of grounds. This will be submitted to the

Planning Inspectorate, who will then run a further stage of the project (known as the examination) where anyone can submit representations for consideration. The Planning Inspectorate will take the information they receive, consider it and then write a recommendation report for the Secretary of State to make a decision based on legislation and planning policy.

With regard to the effect of traffic arising from the windfarm-related activities upon the A272, we have conducted an assessment of traffic on this road for the purposes of our forthcoming Development Consent Order planning application. The measures that we take in respect of traffic will ultimately be agreed with the relevant highway authorities.

I hope that the above information is helpful, but if you have any further questions then please contact me (at james.d'alessandro@rwe.com) and Lucy Tebbutt (at Lucy.Tebbutt@carterjonas.co.uk) and we will be happy to help.

Yours sincerely,



James D'Alessandro
Commercial Manager
Rampion 2, RWE

31st March 2023

Dear James D'Alessandro

Following on from my letter dated 12 August 2022 and your response dated 23rd December (arrived 28th December after the consultation) I absolutely refute your statement that you have 'gathered information from landowners ...and members of the public' on the biodiversity of where the proposed Rampion 2 infrastructure would be installed. If you are relying on who responds to the consultations, many did not realise that the cable could come to this substation site in consultation one, and the second consultation was about 'cable route modifications as if it was all agreed already. Where is the evidence of how you have deliberately asked and listened to the people who live on or adjacent to your proposed cable route and at the substation site, of their local biodiversity knowledge? The Oakendene substation site was only announced as chosen 14th July 2022 in a small article in the local press that few noticed. My neighbours only received a leaflet with offshore wind turbines on the front when the subsequent consultation was advertised, yet it crosses our dead end, private lane twice, and cuts through the small flood meadow fields all round us. I have talked to the three key landowners in this section of the proposed cable route, none of whom feel that they have been asked about wildlife and biodiversity in this area. I will repeat again that the people surveying would neither tell us what specifically they were looking for in our lane, nor listen to a word we were trying to tell them, and there has been little place in either official consultation for adding the extensive knowledge people like myself and my neighbours have on the local ecology, flood patterns and wildlife.

I have no reassurance that what has been given is being acted on as no reports have been sent to me. A case in point is that I have sent in evidence of adders and grass snakes at Cratemans Farm in both 2021 and 2022. I pointed the basking sites out to Eleri Wilce, and Lucy Tebbut when they visited 2nd September 2021. The proposals show a line all around the field next to the farmhouse at Cratemans on the Rampion 2 plan and there is extensive construction work through the fields to install cables. How does this impact the reptiles? Had you asked Mr Facer at Cratemans he would have told you about how he commonly sees adders and has given the shed skins away to friends. These are UK Biodiversity Action Plan Priority Species and are protected from disturbance in law. There is a legal obligation to survey where planning applications are made, yet I can see no survey here in your list. My neighbour has seen adders here in Moatfield Lane and we commonly see grass snakes (I submitted evidence of grass snakes each consultation), yet you list no reptile survey here for Moatfield Lane. How have you responded to my local evidence? I was assured again at the Ashurst drop in event 11th November 2022 that my evidence would be taken into account. How have you fulfilled your obligations to assess the situation?

There is a toad migration that converges at the property Kings, in Kent Street which the residents down this lane and on Kent Street have witnessed over decades and I submitted photo and map evidence to Rampion, both 22nd August 2021 and again 2022 (signed as received 28 November). The cable construction crosses the migration route on Kings Lane. Toads are also are UK Biodiversity Action Plan Priority Species and there is again a legal obligation to survey the site if a migration is present, yet I see no survey listed in your letter. How has this been responded to?

I have sent you evidence of nightingale locations and recordings both in 2021 and 2022. They were not even featured in Pier report as significant or the supplementary report and finally you say that they are only being considered at the Cowfold Stream and Tributaries. They are far more wide-spread than this in this area and right up to the Oakendene site. At the tributary that crosses Moatfield Lane you are constructing all along their nesting sites. What are the assessments of how this impacts their ground level breeding? These are a Red List species, both habitat and nesting sites are protected in law and they must be taken seriously. I will be collaborating with Sussex Ornithological Society and in the next 3 months we will be adding new evidence to public record, as they are already very concerned about this situation. They have now verified my retrospective nightingale, cuckoo, swallow and skylark sightings and added them to the SOS database. All these are endangered species and this is precious remaining habitat for them. Other route options did not have this density of nightingales.

I have also submitted my retrospective evidence of sightings of other notable species like adders, toads and stoats, through iRecord and most have already been verified, so will also enter Sussex Records Office database.

I want to draw attention again to the loss of oak trees and hedgerow in this specific section of the cable route to Oakendene. This substation option brings the worse devastation because it is a patchwork of tiny fields and flood meadows with many Oak, hawthorn and blackthorn boundaries. We need to know how many oak trees are under threat. We know of at least 33 mature oaks that would be lost in this chosen option and it is possibly many more. Please correct this if this is not so. How is this the least devastating choice of substation location? I will ask again about the boundary between the polo field (off Moatfield Lane) and Wilcocks Farm, where there is a potential loss of 25 oak trees and the destruction of a badger path and rabbit warrens in between. Why is there no trenchless crossing marked for here? How will the wildlife corridor be protected as well as the whole ecology of all those trees? We are now in dialogue with the Knepp Wildlands Foundation who are very concerned about reinstating linked wildlife corridors, and now they see that here there is such an unnecessary loss of wildlife corridors in this proposal. We question that any 'net gain' for ecology can ever compensate for this level of loss. How does this notably inconsistent windfarm energy merit the loss of so much carbon storage by destroying so many trees, hedges, and undisturbed meadows?

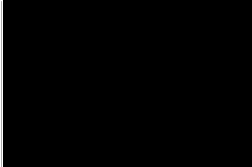
You say that it has been your 'focus to minimise these effects when comparing between options on the basis of biodiversity or when focused on an individual stretch of cable'. How was this section the right choice? You have to listen to local people, not just put out a poorly advertised consultation on a different subject, and then pay little heed to those who do respond. Had ecological information been properly and proactively gathered from the local people who are affected, a balanced overview would have come to light, then we would have listened your justifications for making this the site of substation and cable approach. As it stands due process has not been followed and it is completely wrong to proceed.

I look forward to answers to my questions and ask again for copies of the surveys you have done in advance of the Development Consent Order application, so that we can put forward our informed and balanced representation.

Yours sincerely

Janine Creaye

Ms Janine Creave



Registered office:
Rampion Extension Development Ltd
Windmill Hill Business Park,
Whitehill Way
Swindon
Wiltshire
SN5 6PB

Contact the team at:
Rampion2@rwe.com

For More Information:
www.rampion2.com

26th May 2023

Dear Ms Creave,

Rampion 2 enquiry response

Many thanks for your letter dated 31st March addressed to James D'Alessandro and please accept my apologies for the delay in replying.

I set out below a detailed response to the issues raised in your letter and I have grouped the issues raised to help navigate my response.

Decision to select the Oakendene Substation Site

In identifying a preferred option for the onshore substation site for Rampion 2, we initially started with a long list of possible options. Most of these were subsequently omitted due to space requirements or access constraints. Three sites were then taken to our non-statutory consultation in January/February 2021, following which 'Wineham Lane South' was dropped. This was in response to concerns regarding potential impacts to a number of homes directly opposite, in addition to constraints over the size and orientation of the site.

Two sites were then taken to statutory consultation in July – September 2021. The Oakendene site was selected over Wineham Lane North for a number of reasons, including:

- direct access off the A272 with no need to use country roads such as Wineham Lane;
- larger site with more usable shape and orientation, offering greater flexibility during construction and for designing the substation to allow for adequate space for mitigation landscaping and planting;
- competing land interests at the Wineham Lane North site.

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Company Number: 12091939
Website: www.rampion2.com

Consultation process

Our project-wide non-statutory consultation in January/February 2021 and our project-wide statutory consultation held in 2021 included the substation proposals, followed by a public announcement, after consultation, on the Oakendene location in the summer, 2022.

In terms of how we have conducted our Statutory public consultations, we are required by the Planning Act 2008 to produce a Statement of Community Consultation (SoCC), which sets out how, when, about what and with whom we intend to consult. We consulted local authorities on the SoCC to ensure it met their requirements, and the document was published during both statutory consultations and is a public document available on our website here [Statement of Community Consultation \(rampion2.com\)](https://www.rampion2.com).

Alongside the SoCC, a Consultation Report will set out the consultation feedback we received, our response to that feedback (including any changes made to our proposals), and a detailed description of how we developed and delivered the consultations in accordance with the SoCC, the Planning Act 2008, Gunning Principles and other forms of guidance for consultation. Our Consultation Report will form an integral part of the DCO application we are aiming to submit later this year.

You will of course have an opportunity to make representations should you wish, during the Examination phase of our application, later this year.

Wildlife and ecology concerns

Where to find our wildlife & ecology surveys

These will be appended to the final Environmental Statement, an integral part of our development consent order (DCO) application, which you will be able to view on the Planning Inspectorate website after application acceptance.

Landowner claims we have not carried out wildlife and ecology surveys on their land

We have undertaken surveys on the cable route where we have permission from landowners. Alternatively, we have used Public Rights of Way if access was not available, in addition to the findings of our desk studies and environment records.

The evidence you have kindly submitted to Rampion 2

Many thanks for providing this; we have referenced it as part of the desk study and it will form part of Appendix 22.2 of our final Environmental Statement submitted with our DCO application, later this summer. However, please note we do not mention individual names in order to protect privacy and accord with the Data Protection Act.

Our surveys of adders, grass snakes and toad migrations and how our proposals may impact them

We have undertaken reptile studies at the substation location, although desk studies are normally considered sufficient for the cable route. Mitigation will be managed on site by the Ecological Clerk of

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Works. Note that all ponds are retained, and our efforts to maintain hedgerows (by notching the narrowest route possible) will reduce disruption to reptile migration.

Our assessment of Red List species such as nightingales, cuckoos, swallows and skylarks

The mitigations planned for birds are not necessarily species specific, but include restrictions during the breeding season at some locations. Notably the planting on the fringe of the substation (wet woodland, combining water management, visual screening and habitat creation) is a suitable habitat for nightingales. The Commitments Register and Ecology chapter in the final Environmental Statement will contain details of these mitigation proposals.

Protection of the wildlife corridor between the polo field off Moatfield Lane and Wilcocks Farm

Detailed design should allow us to avoid major warrens and setts, noting that interfering with badger setts would require a Natural England licence. Trenching in any given area should be swift, and thereafter the badgers may choose to traverse the work site at night as they would any ploughed field.

Oak trees

We will be able to discuss the finer details with you at the Cowfold Information Event on 21st June at the Allmond Centre. However, I can tell you that the permanent substation equipment will be taking up a much reduced area of the original site area, so we are able to avoid most of the mature trees. For those that cannot be avoided, we will be planting up areas around the rest of the site as part of our mitigation plan. We have also voluntarily committed to 10% biodiversity net gain, meaning that we will calculate the habitat lost as result of our project (in biodiversity units), and ensure that this is replaced elsewhere, with a 10% uplift. Use of biodiversity units takes into account the significant value of mature trees. Please note, we are also electing to drill underneath mature trees to the south of the substation site, to avoid their removal in siting our underground cables.

I do recognise the vital contribution mature trees make to carbon storage and our commitment to biodiversity net gain recognises this. However, I would like to mention that Rampion 2 is set to provide power for the equivalent of over 1million homes (annual average equivalent) and save as much as 1.8million tonnes of carbon dioxide every year, for the lifetime of the project. The complete carbon cost of manufacturing and constructing the project will be offset in less than a year by the generation of clean, green energy from Rampion 2.

I hope this provides a comprehensive response to your concerns and demonstrates our approach to environmental assessment and mitigation for the Rampion 2 project.

I look forward to meeting you at our Cowfold Information Event on 21st June.

Many thanks for your interest.

Chris Tomlinson
Development & Stakeholder Manager
Rampion 2

Registered office is:
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Company Number: 12091939
Website: www.rampion2.com

Janine Creaye MRSS

E.mai

16th June 2023

Chris Tomlinson
Development and Stakeholder Manager
Rampion Extension Development Ltd
Windmill Hill Business Park
Whitehill Business Park
Whitehill Way
Swindon
Wiltshire
SN5 6PB

Dear Chris Tomlinson

Your response dated 26th May to my letter (of 31st March) is so dismissive of all my points about biodiversity and how its loss will be mitigated in this Gratwicke to Oakendene section of the Rampion 2 cable construction. These answers cannot be acceptable to local people or the planning process. We have government strategies on biodiversity which must receive attention. This demonstrates that your 'approach to environmental assessment and mitigation for Rampion 2' is to deny that it matters. How can you believe that there is no need to properly assess priority species in the cable route? Historic data records are just not good enough.

I will say again that your biodiversity survey results to date need to be provided to stakeholders in advance of the project being submitted to DCO. Without issuing survey results, following up with public consultation and then subsequently making the choice of substation based on local people's comments and additions, the whole process is flawed. Instead, you leave stakeholders to make their own surveys and assessments without any idea of what already has been done or what mitigations may be offered. How is this consultation? How is this a proper dialogue with the community as you keep emphasising in articles? Even in this letter you cannot put in writing that you have consulted with local people and landowners on their knowledge of biodiversity and wildlife, because it has not been done. You only state considering your surveys, and desk studies (which have rarely covered this private land). I also understand from landowners that the surveyors did not cover their land widely even when allowed to do so, but stuck to public footpaths, which give a very limited picture.



How are we to trust Rampion to reinstate or provide biodiversity net gain?

Please see above photo taken this year showing the 'reinstated' hedge in Bob Lane just round the corner from the substation in Wineham Lane after cable construction was completed in Rampion 1. It is now six years on and the hedge has failed with no sign of follow-up to put it right. South Downs National Park authority reproduced drone photos in their response to your Rampion 2 consultation which showed the failure of many areas of reinstatement, Sussex Wildlife Trust also pick out reinstatement failures, particularly chalk grassland in Tottington Mount. How are we expected to believe that any reinstatement or attempts at biodiversity 'net gain' will be successful or receive any

after care? You have to commit to return and work with local people and the appropriate organisations over a ten-year period or more as promised in your proposal document, to ensure any success in reinstatement. What assurance can you give that things may be different this time? What is happening about all the Rampion 1 failed reinstatements?

You say that 'the mitigations planned for birds are not necessarily species specific'. The breeding birds cannot be lumped together and dismissed like this. We have a number of red list species. Sussex holds around 13% of the national population of nightingales and this site has a dense and successfully breeding number of them. We have surveyed this year and they are present throughout this part of the cable route, even nesting within the parameters outlined. I have entered all the grid references into iRecord so that will reach the Sussex Records Office and Sussex Ornithological Society databases who are supporting us in this work.

Your suggestions of new planting on the fringe of the substation 'being suitable habitat for nightingales' show a complete lack of understanding of what you are dealing with. There is currently little habitat for them at the substation site, but they are concentrated in the hedgerows around the Cowfold Stream, all through the flood meadow that crosses Moatfield Lane, in hedges south of Taintfield Wood and in the hedges on the east side of Kent Street. The hedges are often more than 5 metres thick, mostly blackthorn and established over many, many years to the point where they are dense right to the ground and hung with lichens. This is necessary and special habitat for these and many other birds to breed, and the cable construction will tear out many metres of this rare habitat. There is no way that you can reinstate this by putting a few whips into plastic tubes in a different place, then leave them unmonitored to re-establish, despite droughts, as was done in Rampion 1.

I walked yesterday and a skylark flew up from within the cable construction route in Crateman's Farm. These birds are also a priority species and actually nest on the ground in fields in undisturbed undergrowth. They nest each year around Crateman's Farm particularly in an area that you have marked as a depot for materials and vehicles. We are also hearing turtle doves in this area. They also breed low down, feed on fine weed seeds and their numbers are in steep decline. The disruption of the habitat will lose the continuity of breeding birds in the construction process. This does not even take into account the miles of meadow with all the wildflower seeds and insects that birds feed on, being dug up and left while waiting for the construction to be completed elsewhere. This is the wrong site to use.

You dismiss my question about reptile studies in this area of the cable route by saying that 'desk studies are normally considered sufficient for the cable route' without any consideration of the priority species of grass snakes and adders. Why would data have been entered into the records before this major planning application? They are not easy creatures to photograph or record. Desk studies are not good enough. This year I am finding more and more evidence of grass snakes, adders and slow worms all round this part of the cable route out to Kent Street. I have new photos and many local witnesses to the ongoing presence of snakes. The construction activity at Cratemans is right by adder and grass snake hibernations sites. Adders have so declined in numbers that they are now considered under threat of extinction in this country. They hibernate in the same places year on year and loss or disturbance of this habitat is given as one of the main causes of their decline. This location has this very special habitat and is an established breeding snake site so must be taken into account.

You dismiss the toad migration to Kings with the phrase 'our efforts to maintain hedgerows will reduce disruption to reptile migration' shows a total lack of understanding. Toads (not reptiles) walk/crawl to breeding ponds often along tarmac because that is the easiest access, which is why there are toad patrols all across the country where people pick them up and carry them across busy roads. In this case they can be found all around the junction of Kent Street and Kings Lane on tarmac, for some distance in any direction. Their numbers are in decline so they are also a priority species. The Rampion construction work has marked accesses on Kent Street at Wilcocks Farm and is right in the middle of their migration. It also crosses Kings Lane twice, where migrating toads can be found as far down as Moatfield Farm. This needs consideration not offhand dismissal.

We have undertaken a badger survey (which I have entered into iRecord) and we now have good evidence of an active badger sett right in middle of the cable construction route and a major sett very nearby with a large very active population of badgers.

The boundary between Moatfield Lane Polo field and Wilcocks Farm was determined as 'a green lane' in the badger survey and we have traced it back over 150 years so far. There is a double row of trees with a bank one side, a very old line of twisted field maples and many oak trees some of which are classed as 'veteran' because of their unique features that serve wildlife so well. It is a 'wildlife corridor' and track for deer, rabbits and badgers coming off Woodcock Shaw and Buckhatch Lane (which dates from before 1649). There is no 'net gain' which could offset this both current and historical value. One oak tree is over 200years old (385cm girth) in this field and another right in the middle of the construction route is over 150 years old (290cm girth). What can the justification be of destroying all this to create a windfarm that lasts only 25/30 years?

You will not detail how many trees will be lost in this section of cable route alone so I question how your carbon figures are worked out. I have now met other landowners who are devastated by the lack of coherent discussion and clarity on which trees will be cut down. One who is close to the substation where the cable returns to Wineham Lane, stands to lose more than 6 mature oaks (three are around 200 years old, one in excess of 4m girth) and many horse chestnuts and other trees in his field boundaries. How is this acceptable that people cannot find out what devastating loss would be incurred, but just have to guess for themselves. The lack of open dialogue is what will drive so much more of the opposition that you face. How is this meaningful consultation?

Yours sincerely

Janine Creaye

CC: Planning Inspectorate; WSCC; Andrew Griffiths MP; Sussex Ornithological Society; Sussex Wildlife Trust

Appendix 4- Extract from Sussex Ornithological Society Response to Rampion 2021

5) Substation location

5.1 Kent Street: Section 3.4.153 states that desk study does not suggest concentrations of protected species in this area. We disagree for two reasons:

- Barn Owl has been recorded breeding every year very close to this site. Although we do not know exact hunting locations, there is no doubt that this breeding pair will be impacted, especially given the site cabin, service road(s) and general construction disturbance in the vicinity.

- The 2012 Sussex Nightingale Survey, which the SOS organised, also identified 4 Nightingale sites around Taintfield Wood immediately to the south of this site. We would presume that such birds would be disturbed and not use these breeding sites during the substation construction. Moreover, one of the cable routes looks as though it would result in the potential loss of hedgerow where two of the Nightingale were recorded.

5.2 Wineham Lane North. Again, we have serious concerns about this site because of the presence of Nightingale. The 2012 survey referenced above identified 4 singing males using the hedges surrounding this site, and we fear that they would abandon this area. However, we have no records of Barn Owl being present near this site.

5.3 As Nightingale habitat is under pressure all over Sussex, we are uncomfortable with either of these sites being selected. It may be that if the surrounding thick hedges can be protected from any damage that Nightingale might be protected (albeit not during the construction period), but we would like to have discussions about the practicality of this so that we can agree with you the likely outcome of developing either of these sites for this species.

6) Impact on Breeding Birds

23.10.126 states that Without further field survey information, it is not possible to understand the magnitude of change that may occur. 23.10.77 notes several kilometres of hedges are scheduled to be removed, but just how many kilometres has not been established. Many trees will be cut down, but how many is not known. All of this will affect the large numbers of birds that nest in hedgerows and trees – it will reduce their nesting habitat – in some cases permanently (trees being cut down), in other cases for substantial periods, as hedges that are replanted will take many years to grow dense enough to provide equivalent nesting habitat and to provide foraging habitat.

23.10.126 goes onto say that: The preliminary conclusion is therefore that the effect is Not Significant on a ecological feature of International to Local significance.

We believe that to try and assess the impact of the onshore cable route on breeding birds by assessing whether it affects a few designated species of birds in a conservation area of international importance misses the point. It means that important species such as Nightingale get ignored. We feel that what should be considered is the impact on all birds of conservation significance and concern, and not just on those few species designated in a nearby (or not so nearby) International site to be of conservation

importance.

23.14.1 states that the preliminary assessment is that the residual effect on semi-natural broadleaf woodland, calcareous semi-improved grassland, and native hedgerows (Species rich and species poor) is likely to be significant for all three habitats. All these are nesting habitat for birds. Therefore, we believe that the cumulative effect on breeding birds, could also be significant, especially given the amount of hedgerow that will be destroyed. These habitat losses will also affect residential bird species all year round as they will also cause a long-term loss of foraging habitat, especially the loss of hedges and broad-leaved trees.

Whether these significant impacts will only effect abundant species of birds which are not of conservation concern, or whether they will affect any scarce species or species of conservation concern (including Section 41 and Schedule 1 species) cannot be assessed until details of what is going to be removed where is known and the results of detailed breeding bird surveys are published. Until this information is available no judgement can be made on whether the overall impact on birds (breeding and residential) will or will not be significant.

And, as mentioned in 3 above, one of the species we know will be affected is breeding Lapwing and another (as mentioned in 5 above) could be breeding Nightingale.

Appendix 5 – Great Crested Newt Survey (Magic Maps)

The screenshot displays the MAGIC web application interface. At the top, the 'MAGIC' logo is on the left, followed by a search bar containing 'RH138AZ'. To the right of the search bar is a toolbar with icons for home, search, layers, info, zoom, print, and other functions. Further right, the map is identified as 'OSGB36' with a scale of '1:10,000'. Below the search bar and toolbar is a 'Table of Contents' panel on the left side of the map. This panel lists various data layers, including 'Birds', 'Mammals', 'Plants', 'European Protected Species Licensing', and 'Land Based Schemes'. Under 'European Protected Species Licensing', the 'Great Crested Newt Class Survey Licence Returns (England)' layer is checked. Below this, a legend shows symbols for different survey results: 10 FIG present (blue circle), 10 FIG absent (orange circle), 10 FIG inconclusive (grey circle), 8 FIG present (blue circle), 6 FIG present (blue circle), 4 FIG present (blue circle), 4 FIG absent (orange circle), and 4 FIG inconclusive (grey circle). The 'Land Based Schemes' and 'Landscape' layers are also visible. The main map area shows a detailed view of the RH138AZ area, including roads like A272 and Kentstreet Lane, and locations such as Taintfield Wood, Taintfield Farm, and Westridge Farm. A scale bar at the bottom of the map indicates distances of 0, 0.15, and 0.3 km. An inset map in the top right corner shows the location of the main map area within a larger regional context. At the bottom right of the map, there is a copyright notice: '(c) Crown Copyright and database rights 2023. Ordnance Survey 10002286'.

Dear Natural England

I understand from a drop in event in Cowfold for Rampion 2 Windfarm substation proposal that they are finally releasing their biodiversity surveys including the approach to the substation, but only to statutory consultees not the locally impacted residents, who know the area. We have asked for these surveys and what mitigation may be offered over the last two years but received nothing.

As residents we have gathered much knowledge of the biodiversity that is here over years but are finding that Rampion are taking little notice. Particular red list species information given to Rampion in 2021 has not been acted on, so we have been making our own assessments, which include breeding nightingale numbers and sky larks (red list species); adders (now considered likely to become extinct in the next twenty years), grass snakes and slow worms, badgers which have active setts right in the cable route, a toad migration (UK Biodiversity Action Plan Priority). Unusual plant species and those that denote ancient hedgerow. All these records have been submitted this year through iRecord but not all have been verified yet.

Rampion now say that they do not consider breeding bird species separately (see attached Rampion 2 response) yet the habitat for these can be very specific and rare. We have made two surveys of the nightingales and also noted the spread of breeding sites in the whole of this section of the cable route, during April – mid June (see map attached). There is a very significant population which nest low down in the blackthorn scrub absolutely where all the construction takes out hedging and the cable channel will be left open potentially for years before reinstatement. The hedges have grown over decades so are 5 metres thick in places where the cable cuts directly through. Skylarks which nest on the ground in field edges also are found every year throughout the middle section of this 'approach to Oakendene' cable route, where there is a materials depot as well as cable construction marked on the proposal. We have entered the location grid references into iRecord and have sound recordings for each location. These red list birds and the habitat they require, surely must be assessed in detail?

We have significant testimony and photographic evidence of adders, grass snakes and slow worms all around the Dragons Lane and Moatfield area, and adders very particularly have been noted around Crateman's farm for years. They hibernate in the same places every year and the loss of this continuity of safe habitat is one of the elements cited as reason for their decline in numbers. Yet despite **having been made aware of this information**, Rampion do not believe that they have to consider reptiles in the cable route (see letter attached). They rely on desk study, but where land has been undisturbed and retained in the same family for many decades little would be found on record to date.

The toad migration to Kings' pond on Kent Street also met with a dismissal of need to survey from Rampion and the comment that the hedges would help where the toads

migrate is incorrect as toads come out onto roads to travel the distances required to return to breeding ponds. The cable crosses Kings Lane and involves Kent Street right in their path. Yet Rampion dismiss the need for surveys (see letter).

We do not believe that a proper assessment has been made of veteran tree losses that would be incurred for cable and substation construction. The property Oakfield farm has 3 oaks at around 200 years old (4m girth) which are in the path of the cable and another 3 mature oaks to the side of the field with a row of mixed horse chestnut and other trees all in the path of the cable, but Rampion will not confirm which, if any, would be retained.

There is a green lane located between Wilcocks and Moatfield Farm which has potentially 25 veteran field maple and oak trees that would be lost (as the letter attached implies). All trees are twisted, with cracks and hollows that are so good for wildlife, there are oaks that measured to be 150 and 200 years old. There is a bank to one side and an animal path in the middle of this which dates back at least to 1870s, coming off a track which dates at least from 1649 (Buckhatch Lane). We will continue to research this green lane.

There is a very active main badger sett to one side of the green lane and an outlying active badger sett in the middle of the cable route here. We had a Badger Survey completed in May which notes this sett, and activity has increased at that location since. The records have been submitted to Sussex Records Office. This surely cannot be ignored by the Rampion project, and only considered when construction starts. We keep being told by them that badgers move to other sites but if wildlife corridors have been used for many decades and by many species why should that pattern be so unnecessarily destroyed? The offer of net gain will not put any of this back and anything equal would take many decades. This should not be dismissed as necessary loss, for the temporary gain of power for a windfarm's lifespan, especially when this loss could be avoided.

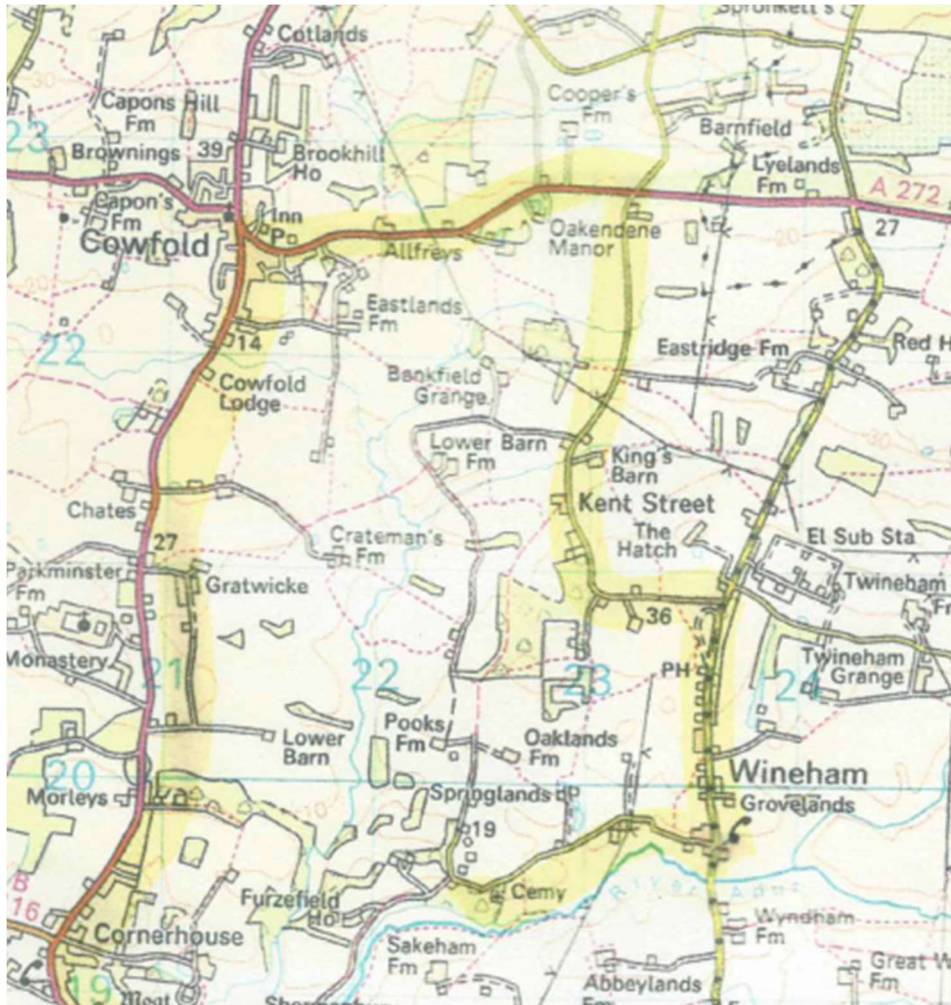
The final point is: has there been a botanical assessment of this section of the cable route? This is all undisturbed hedgerow and flood meadow because it is all catchment area for the River Adur. There are reeds in many of the fields and spectacular meadows which include tufted vetch, birds foot trefoil, knapweed and clover. There are early purple orchids on Kings Lane in the cable route, wood anemones on Moatfield Lane and the Green Lane and greater and lesser stitchwort grow in the cable route. Wild service trees grow on Dragons Lane and Buckhatch lane. Spindle grows at the edge of Cratemans field where the cable comes through. These suggest that there is valuable age and biodiversity to all of these hedgerows and meadows, which should be assessed.

Please take this in to consideration when judging the adequacy of biodiversity surveys that Rampion are putting forward for the Development Consent Order.

Thank you

Janine Creaye

Appendix 7 – Map Showing Undisturbed Area to SE of Cowfold



RAMPION 2 CABLE ROUTE TO THE NEW SUBSTATION AT OAKENDENE – ENVIRONMENTAL ASPECT
How green is this green energy?

RWE have opted to site the new substation at Oakendene, on the A272 near Cowfold, with very little consultation and with no opportunity for people living in the area to question the choice when the option was made. The only consultation following this decision was about details of alterations at

specific points on the whole cable route from Climping to Oakendene. This substation option brings the 50 metre wide construction route across the river Adur and all through the undisturbed patchwork of hedges and flood meadows around the Cowfold Stream (the named tributary that flows into the river Adur). This would cause the destruction of the many small meadows that have not been ploughed for decades, many areas of native hedgerow (some over 3 metres wide) and many mature oak trees that are commonly amongst the hedge boundaries. This location is home to nightingales (red list 91% decline in 40 years), cuckoos (65% decline since 1980's), sky larks, great crested newts (protected in law), turtle doves (77% decline since 1970's), purple hairstreak butterflies, adders and grass snakes, toad migrations, wild service trees, wild flower meadows and more. RWE say that it can be 2 years or more before the land is reinstated in any form. West Sussex County Times has reported that there is a River Adur Landscape Recovery project which has just received funding from Defra, is spearheaded by Knepp Estate's Wildland Foundation, and is supported by the Wilder Horsham District policy. This aims to improve the flood areas of the river, join up wildlife corridors and increase biodiversity along and around the tributaries, yet I cannot even get answers about how this massive construction project for Rampion 2 will mitigate against the loss of carbon, wildlife habitat, wildlife corridors and biodiversity in this arm of the River Adur in

any form. It is not so much rewilding that is needed here but mitigation and preservation.

As RWE have not consulted local people on their experience of the locations in this cable route, and their environmental surveyors have not been allowed to say what they are surveying if asked, there has been no way of communicating what local people know so well and care about concerning the wildlife here.

A representative of RWE, the engineering company walked around the site with me (September 2021), yet I have no evidence that any of the photos and recordings that I had sent then and what was seen at the time was added to the reports nor have I heard any detail of how species may be protected. Copies of what was included in the surveys were promised at the time of the visit but I have asked for this subsequently by email and again by letter in August 2022 when the substation route option was confirmed. No detailed environmental surveys have been sent or are available online. This is not just an issue for the landowners and very local residents, it is a much bigger environmental question which has not been adequately addressed by RWE who stand to profit so much as a commercial business.

The carbon storage lost through so much destruction of hedgerow and mature oaks cannot be offset

by new planting. There are field boundaries in this route that are made up of double rows of oak trees with animal paths between. To cross these could cause the loss of 25 trees in one boundary alone. We are meant to be planting trees to aid carbon storage, not destroying them because that is the cheapest way to get cables through. We saw for ourselves that restoration after Rampion 1 cable construction was poor and there are still struggling hedges 7 years on. A phrase in the Sussex Wildlife Trust's Response to the first Rampion 2 consultation was 'It is apparent in the aerial

photography that there are still clear gaps in the hedgerows along the Rampion 1 cable route' and that reinstatement had clearly failed in a number of places. Lost mature oak trees cannot be reinstated in our lifetime, and most trees in the cable path would not be considered significant enough to merit the extra cost of laying cables deep under their roots to save them.

Rampion contractors are meant to restore habitat or even improve biodiversity at the end of the construction phase, but it is just not possible without losing the continuity of habitat that builds this level of wildlife, and the many trees in its path are irreplaceable. We know that Rampion 1 took years before starting field and hedge restoration, and some boundaries at Wineham are still tiny plants in plastic tubes after all this time. The sequence is the same this time, that restoration waits until the construction is complete, potentially years after it has begun. The work would start in 2025/2026 and is only planned to be complete 2030. The diversity of wild flowers and therefore insects, birds and mammals that rely on the meadows for food cannot just be put back. When the continuity is lost the birds like nightingales, cuckoos, turtle doves fail to breed and so do not return and decline further. Adders and grass snakes would be disturbed by the vibration of construction then find the habitat remains as soil heaps and trench for years so would likely not return. Toads that migrate on a very specific location, directly on the cable route would be crushed in the process.

Yet we cannot find out why this route was considered appropriate and can get no answers about how this wildlife would be protected. I believe that this level of destruction of sensitive habitats is not necessary to provide green energy. It needs to be weighed up and the least damaging route opted for in order to supply the required infrastructure. This is not the site.

SPECIFIC WILDLIFE IN THE GRATWICKE TO OAKENDENE CABLE ROUTE

Nightingales, turtle doves and cuckoos feed, call and nest all across the cable route around the Cowfold Stream and all the way towards Oakendene from April to July (see map showing recording sites). The nightingales and turtle doves nest in thick thorny scrub which is often many metres wide and at 2/3 metres high. SWT states that it takes at least 15 years for hedge plants to get to this density. I have many recordings of nightingale song from over the last few years and they return to the same sites year after year. The cable route is all along as well as across their territory. It is not limited to the Cowfold Stream area (see map). This is a territory, which has already been reduced when the landowner of Gratwicke cut back all scrub from along the West side of the Cowfold Stream.

in the last 2 years. Taintfield Wood was cleared of scrub a few years before this. Both sites were abundant with nightingales each April until this happened, now their territory is compressed. The construction threatens a further decline to this already 'red list' species. Nightingales are not even mentioned in the published Preliminary or Supplementary Environmental reports for Rampion 2. We do not believe that the RWE environmental surveyors came here during nesting times. This is a hotspot for **crested newts**. These have been in the pond at Oak Cottage, under the suspended floor, on the doorstep and come across the flood area between there and the field where these cables are proposed to come through. I have taken photographs over the years. These are endangered and protected by law. We cannot find out if they have been noted as being in this section of the cable route or what may be done to protect their habitat.

There are **adders** that nest in Crateman's farm grounds where the cables come through, these are also a protected species, yet no surveys so far mention them or detail whether the vibration of construction will be a problem to their hibernation and breeding seasons. **Grass snakes** also

commonly bask at the sides of Crateman's farm fields as well as the field across the bridlepath nearby. I have a photo of an adder skin found at Crateman's and a grass snake in the garden at Oak Cottage. There are also **slow worms** here which I have photos of. As these creatures are sensitive to vibration they are unlikely to remain because of the sheer scale of this construction and prolonged work.

In March each year there is a **toad migration** along the narrow private lane of Kings Lane/Moatfield Lane towards the property Kings on Kent Street. This is to be crossed twice by the 50m wide construction route, but this also gets no mention in any published reports. An increased number of vehicles on Kent Street will also be devastating to this population during March. Nobody from the Rampion team will say how this toad breeding season is to be protected.

Oaks are in many of the thick hedge boundaries that would be cut through by the cable construction process. On the cable route, the boundary of Wilcox Farm and the Taintfield polo field is entirely made up of a double row of oak trees with an animal path between, coming from the nearby woods.

If these are not drilled underneath for cable laying they will be lost and cannot be replaced in our lifetime, even with the stated intentions of putting habitat back or better. This is not marked as a trenchless crossing on the recent maps sent by Rampion so I suspect that all the tree would be cut down. The construction vehicles have to get through and as Kings/Moatfield Lane is narrow and unadopted it cannot take this commercial construction lorries so there seems to be no other way for them to get round.

Mature oaks are ecosystems of ivy, insects, fungi, caterpillars, birdlife as well as being impressive carbon stores. Even successful Jubilee Planting cannot replace what will be lost if mature trees are not protected.

Wild service trees are all round this small area including on Dragons Lane near Crateman's farm and on the bridlepath that goes up from Wilcox Farm where the cable is planned to go. This is an indicator of ancient woodland and ancient hedgerow boundaries along with wood anemones which grow in abundance in nearby woods. Strips of woods like this are all around this location and digging for the cables would threaten the many established wildlife routes that the animals use to get between them.

Purple hairstreak butterflies are in the oaks here each summer. Some will lose their oak trees when the boundary trees are cut down to make way for the cables.

There are **Badger setts** [REDACTED], it will disrupt the established pathways that they use. It is easy to find the active setts but they are on private land so were most likely not found in the RWE sponsored surveys as they stuck to the footpaths.

There are **weasels** and **stoats** all around this area. I have taken photos of both over the years.

Glow worms shine out their green light to attract a mate all along Moatfield Lane between June and the end of August. There can be as many as 14 in one grass verge area. They are always along by Moatfield Farm and right in the middle of the proposed cable route.

Greater spotted Woodpeckers are on our feeders every day which come across from the Badger

wood the other side of the cable route. Many green woodpeckers come down on the lawn to dig out crane fly larvae. This search for food sources is likely to be disturbed by prolonged construction. **Little owls** hunt on the polo field that is within the cable route behind Oak Cottage. I have a photo as one stayed so long there. Little owls are also often seen on Kent Street where they hunt very low to the ground and have become a hazard to traffic in past years. These will be under threat with construction, a change in traffic and noise disturbance.

Barn owls very prominently hunt across Crateman's farm fields and are seen many times in the trees that hang over Moatfield/Kings lane and Kent Street. They have been known to nest in Lower Barn Farm sand school next to the cable site, the shelter adjacent to the cable route in the field on the other side, and the barns at Crateman's Farm. The cable route would be in many areas of their hunting ground.

We hear and see **Tawny owls** very often, anywhere along the lane and around our property.

Buzzards and **red kites** are also a common site here and the surrounding fields where the cable is proposed to go. Therefore there must be a good rodent population to supply this amount of hunting. With the loss of so much hedgerow and undisturbed field here how can the continuity of this hunting be maintained throughout the construction phase?

Bats The wildflowers of the meadows and field edges bring many insects. The meadows particularly at Crateman's Farm are a constant buzz of insect life until the hay is cut, which means that there are bats skimming around the area for many months of the year. The Oakendene lake in the site of the proposed substation is also a key location for bats and the loss of meadow along the cable route along with light pollution at the substation would be devastating for the bat population through here. I acknowledge that there was something of this in the PEIR report but it did not specify the locations that were affected.

Meadow plants Two of the landowners have told me that their fields have not been ploughed for decades, but are only grazed or used for hay. There must be many meadow plant species that are particular to the lack of disturbance. I have many photos over the years. This cannot just be put back after the years of construction phase. You cannot restore time.

Insects are attracted by the meadow flowers and the Cowfold stream. These include, **beautiful demoiselles, banded demoiselle, emperor moths, elephant hawk moths, gatekeeper butterflies, marbled white butterflies, white admiral butterflies, speckled wood butterflies, crickets and grasshoppers in abundance, stag beetles and cardinal beetles**. All these go on to feed many bats and birds.

Floods The cable route would go through small fields that regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more immediate flood meadow to the Cowfold Stream. These are used by **herons and grey lag geese** and many wild meadow plants and reeds grow across the wetter areas. A perch fish was found in a field where the Cowfold Stream has flooded and then retreated. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can use it.

RAMPION 2 NEW SUBSTATION AT OAKENDENE – THE WRONG SITE 24 Nov 2022

Further to the article in 1st November issue 'Cables threat to Royal Woodland' I am also questioning the choice of location for the new Substation that would serve the Rampion 2 Windfarm. There is the second consultation underway about the onshore cable route and the first since RWE decided to opt for a new substation at Oakendene, on the A272 near Cowfold. This brings the 50 metre wide construction route across the river Adur and all through the undisturbed patchwork of hedges and flood meadows around the Cowfold Stream (a named tributary that flows into the river Adur). With this comes the destruction of meadows that have not been ploughed for decades, many areas of species-rich hedgerow (some over 3 metres wide) and many mature oak trees. RWE say that it can be 2 years before the land is reinstated in any form. West Sussex County Times has reported that there is a River Adur Landscape Recovery project which has just received funding from Defra, is spearheaded by Knepp Estate's Wildland Foundation, and is supported by the Wilder Horsham District policy. This aims to improve the flood areas of the river, join up wildlife corridors and increase biodiversity along and around the tributaries, yet I cannot even get answers about how this massive construction project for Rampion 2 will mitigate against the loss of carbon, wildlife habitat, wildlife corridors and biodiversity in this specific area. It is not so much rewilding that is needed here but mitigation and preservation.

There are red list bird species that nest all along and across the cable route around the Cowfold Stream from April to July. These include nightingales, turtle doves and cuckoos, which are not even mentioned in the published Preliminary or Supplementary Environmental reports for Rampion 2. We do not believe that the RWE environmental surveyors came here during nesting times. In March each year there is a toad migration on our narrow private lane which is to be crossed twice by the 164ft wide construction route, but this also gets no mention. There are adders that nest in nearby farm grounds where the cables come through, these are also a protected species, yet no surveys mention them or detail whether the vibration of construction will be a problem to them. I sent photos and recordings last year and in September 2021 I had a representative of the engineering company walk around the site with me, yet I have no evidence that any of this was added to the reports nor have I heard how things may be considered and protected. Copies of what was included in the surveys were promised at the time of the visit but I have asked by email last year and again by letter in August this year when the substation route option was confirmed. I have had no replies.

We saw for ourselves that restoration after Rampion 1 cable construction was poor and there are still struggling hedges 6 years on. A phrase in the Sussex Wildlife Trust's Response to the first Rampion 2 consultation was 'It is apparent in the aerial photography that there are still clear gaps in the hedgerows along the Rampion 1 cable route' and that reinstatement had clearly failed in a number of places. Lost mature oak trees cannot be reinstated in our lifetime, and most trees in the cable path would not be considered significant enough to merit the extra cost of sending cables deep under their roots to save them. There is a boundary behind our property that could stand to lose 25 mature oak trees in a double row. Between these rows is a sheltered and well-used route for wildlife that leads out from an area of woodland nearby. There are badger setts, rabbit warrens and deer are often seen. This boundary would have to be breached to get the cables and the

construction vehicles through. Mature oaks are ecosystems of ivy, insects, fungi, caterpillars, birdlife as well as being impressive carbon stores. Even successful Jubilee Planting (like that proposed in the article mentioned above) cannot replace what will be lost if mature hedges and trees are not protected.

This is not just an issue for the landowners and very local residents, it is a much bigger environmental question which has not been adequately addressed by those who stand to profit so much from creating Windfarms.

Janine Creaye

Environmental cost of 'Green Energy' - 2 Sep 2021

Further to the earlier thread of letters on the proposed Rampion 2 wind farm and its high financial cost and unreliable energy output (July 22nd Robert Bishop, August 5th, Mick Bridle), I am sitting here in a rural pocket of the Horsham District, devastated by the biodiversity destruction which would come if one of the cable route options goes ahead, and the new substation is located next to the A272 at Oakendene (Bolney road/Kent Street option). If you care about the environment, endangered species or just walking in the quiet countryside in Sussex, and particularly around this area around Cowfold/Shermanbury take a good look at the Rampion proposals while there is time to respond to the consultation. There are still some options.

The cable construction would take out a 50m (164 ft) wide section of invaluable habitat of undisturbed hedgerow, blackthorn scrub, lichen, and interconnected flood meadow round here – let alone what it does elsewhere along the route. It is apparently that wide to accommodate a road for construction vehicles and the excavated soil, as well as the cable channel. This location is home to nightingales (red list 91% decline in 40 years), cuckoos (65% decline since 1980's), sky larks, great crested newts (protected in law), turtle doves (77% decline since 1970's), purple hairstreak butterflies, adders and grass snakes, toad migrations, wild service trees, wild flower meadows and more. This habitat contains many small tributaries and follows a significant part of the Cowfold stream which feeds into the river Adur. All of this floods regularly to cope with water coming off the fields. It shares many elements with Knepp Castle's 'Wilding' project, yet it has not been a monitored process, but has just been left for flood meadow, grazed, or cut for hay for decades. It has not needed rewilding. The undisturbed nature of the soil, trees and hedgerows is a great benefit, including for carbon storage, that will also be lost with this process.

Yes, Rampion contractors are meant to restore habitat or even improve biodiversity at the end of the construction phase, but it is just not possible without losing the continuity of habitat that builds this level of wildlife and the many trees in its path are irreplaceable. We know that Rampion 1 took years before field and hedge restoration, and some hedges at Wineham are still tiny plants in plastic tubes 5/6 years on from that. The sequence is the same this time, that restoration waits until the construction is complete, potentially years after it has begun. The work would start in 2025/2026 and is only planned to be complete 2030. The diversity of wild flowers and therefore insects, birds and mammals that rely on the meadows cannot just be put back. When the continuity is lost the birds like nightingales, cuckoos, turtle doves fail to breed and so do not return and decline further. Adders and grass snakes would be disturbed by the vibration of construction then find the habitat remains as soil heaps and trench for months or years so would likely not return. Toads that migrate on a very specific path, directly on the cable route would be crushed in the process. Yet none of this appears to be in the Rampion biodiversity reports presented for this consultation.

Many field boundaries which are to be crossed contain oak trees, and one boundary is a double row of oaks with a ditch between. These are right in the path of the cable construction and around 25 in this one field alone would either be cut down or drilled under where their tap roots are likely to be damaged. These cannot be put back in our lifetime. We are meant to be planting trees to aid carbon storage, not destroying them because that

is the cheapest way to get through. The nightingales and turtle doves nest in thick thorny scrub which is often many metres wide and at least 3 metres high. It takes decades to get to this density. I have many recordings of nightingale song from over the last few years and they return to the same sites year after year. The cable route is all along and across their territory. This is a territory, which has already been reduced when one landowner cut back metres of scrub from along the Cowfold Stream last year. This compresses their territory further, even if they can survive the construction process.

The new substation in this option, would be constructed by the junction of Kent Street and the A272, just after Oakendene. There are likely to be security lights on all night and it will inevitably be massively visible from the road. Around this new substation are open fields, with hedges, oak trees and a large lake used by wildfowl, and all the other creatures like bats and dragonflies that depend on this quiet habitat. The lake is much enjoyed by local people as there are key footpaths along the perimeter. This would become dominated by industrial building, noise and light and the peace and wildlife lost.

Local people have not been asked to share their knowledge of this landscape, its use and its wildlife to create the 'Preliminary Environmental Information Report' (PEIR). During the consultation Rampion Extension Development Ltd is meant 'to be on hand to help with queries' yet to date they have not responded to either phone calls or emails. They are based in Coventry and the land agent based in Birmingham. There will be very few wildlife surveys done in this area to date as it is very undisturbed land and is largely private land with public footpaths across it, so the 'desk study' relied on in the report has yielded little of concern.

A final issue that may interest people even if they do not care about local biodiversity is that the construction traffic for this option brings obvious issues on the A272 and all through Kent Street, which is a single carriageway road with inadequate structure for any extra traffic, let alone construction vehicles to create the cable route. Whereas Rampion 1 substation (which we had no objection to) was built on a 2- way road and a fair distance from the A272.

We are all meant to welcome Green Energy options but the more people look into the details they realise that those championed by the government are not always proving to be so good financially and can also be devastating for endangered species, biodiversity, and public access for exercise and wellbeing. This proposal has to be far better researched and planned out.

Rampion2.com Public Consultation is asking for comments until 16th September.

Janine Creaye

Addendum to Ecology following the DCO submission.

Introduction:

Sussex Wildlife Trust have stated that they are unable to adequately assess the DCO evidence given the time constraints. The Sussex Ornithological Society have sadly had to withdraw altogether (See RR-236). This is of serious concern for the proper assessment of the true impacts on biodiversity and we wish to ask that the panel take this into account when considering the Rampion evidence.

Much of the following is mirrored in the concerns raised by the SDNPA in their Written Representation, section 3.8: Terrestrial Ecology and Nature Conservation.

The overreliance on desk top studies in the PEIR reports continues into the DCO submission and has been too frequently used to inform the search areas, along with the focus on designated habitats, meaning that too often, the ecology at Oakendene and the Cowfold Stream area simply has not been properly assessed, if at all. Too often, field studies have been inadequately performed due to 'lack of access', many of these sites are here in this area.

Rampion have downplayed the impact on wildlife and habitats in the Oakendene to A281 area. There are too many vague statements in their documents allowing too loose an interpretation of their intentions, as evidenced below in the data from the few documents we have so far been able to examine. We have largely only assessed data as it relates to Oakendene and the cable route from the A281 to Oakendene, but already find a number of conflicting statements, errors, and caveats. In accordance with EN-3 (2011) Para 2.4.2 "*Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology.*" Instead, Rampion's management of the consultation process and assessment of the impacts demonstrate a callous disregard for ecology, as we will show.

We strongly disagree with the Applicant's assessment that there will be little or no significant impact on biodiversity in the Oakendene and northern cable route area. The proposed development interrupts or compromises existing wildlife corridors here, and more widely, planned biodiversity connectivity corridors such as the Weald to Wave. The abundance of wildlife and ancient habitats co-exists in a balanced way and interference is therefore likely to have severe and potentially unmitigable consequences. We do not agree with the scoping out of some species from the local areas, both the Cowfold Stream and the substation itself, e.g. see Birds, Reptiles and Otter sections below, or their mitigations e.g. see Toad and Dormouse sections.

By the Cowfold Stream, the cable route would go through small fields that regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more immediate flood meadow to the Cowfold Stream. These are used by **herons and grey lag geese** and many wild meadow plants and reeds grow across the wetter areas. A perch fish was found in a field where the Cowfold Stream has flooded and then retreated. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can use it.

Rampion's own documents now prove the special ecological importance of this area, as from their surveys, many of the important or protected habitats and species occur either highly significantly, or exclusively, at this location. Eight of the fourteen Important Hedgerows they have identified are in this area, three of the seven veteran trees, plus three near-veteran, it is the only location to have

hazel dormice or otters, a high proportion of the Great Crested Newts, even though a high proportion of local ponds were not surveyed, and one of the few to have water voles.

It has proved very difficult sometimes to compare to the other substation sites at Wineham, because quite often, as in the tree survey, the data from areas now outside the DCO is removed, 'for clarity'. But it is possible to obtain the survey data from Rampion 1 and there is nowhere near the same level of biodiversity.

In the Ecology and Nature Conservation Statement (Doc Ref 6.2.22) they quote from EN-1 mar 23:

Paragraph 4.5.5 states: *"In England applicants for onshore elements of any development are encouraged to use the current version of the Defra biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data **should be presented in full as part of their application.**"*

They cannot possibly have completed this calculation in anything other than a tick-box way, when, as we will show, they have not yet begun studies on so many topics such as reptiles at Cratemans, ecology on the Oakendene lake, and in some instances, appear to have no intention of doing so. In addition, so many studies remain incomplete or inadequate, such as the one on Great Crested Newts. Another example of Rampion showing that they know what to do, but not doing it.

Birds:

Winter Bird Report (Doc Ref 6.4.22.14 app 23.3):

Ref 1.1.2-surveys were carried out between September 2020 and March 2021, and November 2021 to February 2022. They said:

"2.1.2 Due to the scale and nature of the proposed development, it is not proportionate to undertake winter bird surveys across the entire site, instead a sampling method was used, with surveys focusing within areas most likely to support aggregations of wintering birds (particularly those associated with nearby designated sites). Survey areas and ornithological interest features were identified during the desk study."

The term 'Wintering water birds' is defined in note 2, P6:" Waterbirds are here considered to be birds that frequent water, especially habitual wading, or swimming birds. This term includes ducks, geese, swans and their relatives; seabirds; herons, egrets and storks; grebes and divers; wading birds; gulls and terns; and rails, crakes and allies. All waterbirds are considered non-passerine. "

As a result of these two statements, they have not assessed Oakendene and its lake **at all**, indeed, nothing to the north of Henfield. Yet there is a flood meadow associated with the Cowfold Stream, directly in the path of the cable route, and a large lake at Oakendene which feeds into the Cowfold Stream. People at the industrial estate and walkers around the lake go there to enjoy the remarkable range of water birds. Herons, geese and ducks frequent the ponds and fields immediately to the north of the Oakendene site on the other side of the A272. Knepp castle, Southwater country Park and Warnham nature reserve are close by, to the west and north of here. In the County Times on 5/10/23 are pictures of grey herons, Canada geese, cormorants and gulls at

Southwater and Warnham. **Why therefore, should this area have been excluded from their area of consideration? It is a significant failing which underplays the true biodiversity of this site.**

Breeding Birds (Doc Ref 6.4.22.13):

The actual survey is extremely limited to the cable route and a 50m buffer and the exact site of the substation. Figures 22.13.1g-h *show this very limited search area around cable route, considering the disturbance to be caused by the haul route across this site as there are no farm tracks. Also, it does not appear to include the area between the substation site and the industrial estate even though this is marked for mitigation planting, which will cause further habitat disruption along the north border of the lake.*

The rest is desktop and covers a 5km buffer around the proposed development; but as we have repeatedly said, there has been no reason for this area to be well surveyed up to now.

Access to the site was made from one hour after dawn to before midday and comprised six visits between May and June 2021 and the same in 2023. *Access was restricted in some.* NB our surveys show nightingale activity in this location for far longer than two months, so again their findings will underplay the true picture.

Indeed, on Page 17, table 3-3, only 5 nightingale territories appear to be listed for the whole proposed development. And no turtle doves, yet we have heard them in this area. Janine Creaye has submitted evidence to the Biodiversity Records Office showing 22 nightingale territories in this area alone. This has been verified and continues to be updated. Also see maps at CowfoldvRampion Local Impact Statement Section 9 Ecology, appendix 2.

Page 17 does, however, at least recognise the density and diversity of breeding sites in this area:

“3.4.4 There was a notable increase in both density and diversity of the breeding bird assemblage within the northern section of the proposed DCO Order Limits, centred around the large woodland / scrub and hedgerow mosaics, and within the River Adur and Cowfold Stream floodplains; in areas of suitable breeding habitat.”

It also, therefore, leads us to question how up to date their biodiversity records office searches are.

Nightingale habitats:

The Vegetation Retention Plan which accompanies the Outline Code of Construction Practice shows *“hedgerows, tree lines, woodland, **scrub**, calcareous grassland, semi-improved species-rich grassland, ponds and watercourses which are to be retained. Should any of these highlighted habitats require removal due to unforeseen circumstances at the detailed design phase, they will be highlighted to the relevant competent authority with a reasoned justification provided. These unforeseen, additional losses would be accounted for through commitment C-104 covering the commitment to the provision of biodiversity net gain.”*

The maps to be submitted by Janine Creaye during the examination **show far more extensive scrub** around the cable route near Cratemans and the Cowfold Stream. It will not be possible to create the cable trench and haul road without far more extensive destruction of the nightingale territories than the Rampion maps suggest. The **extent of this destruction is NOT unforeseen** as she has been highlighting this issue to Rampion since the informal consultation. (As detailed in Section 13:

Assessment of Consultation Reports). The wording above, and their decision not to do formal surveys for nightingale or reptiles (see below) is inexcusable. They should have been done BEFORE the choice of substation was made as they had been made aware of them. Leaving them out of their records prior to examination could be seen as a cynical manipulation of the examination process.

Claims that the habitat can be restored afterwards should be vigorously challenged: these areas have taken years to grow as they have. Rampion have an extremely poor record of reinstatement in any case. The nightingales will not be able to return for many years, the noise and lighting will deter them also. They will die out.

Demonstrating a lack of understanding of what is required, Chris Tomlinson wrote in a letter to Janine Creaye: mitigations for birds *'are not necessarily species specific but include restrictions during the breeding season at some locations. Notably the planting on the fringe of the substation (wet woodland, combining water management, visual screening and habitat creation) is a suitable habitat for nightingales.'*

Without being species specific, this is unlikely to be very useful to nightingales as they nest in dense thorny scrub, which takes years to establish. They just move on until there is no longer anywhere left. Rampion has no good track record of managing habitat after the project is complete or in some cases even during the project.

Rampion 2 will massively diminish the nightingale population here. At Crateman's they take out whole sections of scrub and hedge where they nested this year and there are two trenchless crossing compounds to be set up in within their territory, plus the haul road.

The Rampion 2 Design and Access Statement (Rampion 2 Wind Farm Category 5: Reports Design and Access Statement Date: August 2023 Revision A) paragraph 3.5.4 advises that at Oakendene: *"Compensatory habitat is proposed from woodland and scrub features lost in the locality and this will provide breeding habitat for nightingale as a species of interest in areas associated with the Cowfold Stream catchment."*

And that *"habitats created following construction will provide suitable habitat for many of the notable species known to be present in the area, including breeding nightingale (through provision of damp scrub and woodland for nesting and foraging)".*

Comment:

To be a 'suitable habitat' for breeding nightingales, appropriate post-planting management would be essential. It would appear, however, that no provision has been made for managing habitats post-planting. Indeed, whether such management could satisfactorily be achieved is doubtful:

On 3/11/23 David Attenborough's Wonder of Song was broadcast on BBC2. The last 10 minutes were about Knepp's rewilding and the 44 nightingale territories they have managed to create, in an area of 3500 acres. Compare this to the confirmed 22 nightingale territories in the very much smaller area around the Cowfold stream and Oakendene. (See evidence now available. on the Biodiversity Records). He reminded us of the shocking fact that there has been a 90% loss of this species in the last 50 years. He made the point that **Knepp is one of the very few places in the country which has been successful in increasing its nightingale population.** Rampion recognise at

last in their ecological data there are significant nightingale populations and breeding sites at this location and that the cable route will lead to their destruction. They claim that they can mitigate this by planting scrub at Oakendene, adjacent to the substation. (see Design and Access Statement, Doc Ref 5.8). Knepp have succeeded by investing a huge amount of time, determination and energy. It is almost inconceivable that Rampion could do the same at Oakendene. Our experience of habitat loss at this site is that once lost the nightingales do not return, despite efforts to reinstate habitats (see evidence in the Written Representation from Janine Creaye).

The Weald to Wave Scrubland Superheroes project points out that *“Historically, scrubland was a thriving sanctuary for native wildlife across the UK. However, over centuries, steady clearance has threatened these important ecosystems and led to a decline in many iconic species that rely on the dense thorny habitat.”* How can it make sense then, to destroy yet more of our precious habitats when alternatives exist?

Knepp Wildland has played a major role in demonstrating the value and beauty of restored scrubland as an integral part of a landscape.

Reptiles:

Commitments register (DR 7.22) P98 *“Onshore Pre-construction surveys for **reptiles** at the location of the substation **will be undertaken prior to construction to determine current distribution**. Where necessary appropriate mitigation will be implemented to ensure legal compliance. This will include trapping and translocation (within the immediate area). Along the cable route the Ecological Clerk of Works will implement destructive search techniques to avoid the death or injury of individual animals in localised patches of suitable habitat.”*

We have highlighted to Rampion the profusion of grass snakes, slow worms and adders in the fields around the Kent Street and Moatfield Lane and in particular around the Cratemans Farm area. This is well known by locals (see main Local Impact Statement). It is unacceptable that they have not properly surveyed this area or imagine that they can search for these elusive creatures when coming through on a daily basis with their heavy vehicles and equipment on the haul road through the area.

The British Herpetological Society’s Survey ‘Make the Adder Count’ warns us **that adders will be extinct in the UK in the next 15-20 years**. One of the issues is vibration and the impact on breeding and feeding (adders have no ears and rely on vibration sense) The vibration from trenchless crossings, machinery and HGVs on the haul road will affect them, and the area will be destroyed by the cable route and haul road. How can it be acceptable to allow this wanton disregard for biodiversity loss?

The Reptile Survey (appendix 12 Doc Ref 6.4.22.12) confirms that only the immediate substation location at Oakendene (north survey) and around the existing substation at Wineham (south survey) were surveyed.

2.1 Defining survey scope.

2.1.1 The methods to establish a baseline for reptiles comprised the following:

- desk study of reptile records; **Figure 22.12.3c demonstrates the total lack of results for Oakendene compared to the Wineham area. This confirms how dangerous the conclusions drawn from desk top studies of this area are.**
- field based scoping of suitable reptile habitat, refugia deployment; and reptile presence / absence survey.

2.1.2 In line with good practice guidelines (Froglife, 1999), reptile surveys focused on those areas where reptiles could be significantly affected by the Proposed Development, or for which the Proposed Development could result in the contravention of relevant legislation, and that therefore required more detailed assessment. **No, they have not: the area around Cratemans WILL be significantly affected as the haul road, compound and general destruction needed for the cable route will hugely impact the habitat.**

2.1.3 The areas where reptiles could be significantly affected are at the locations of permanent above ground infrastructure namely the onshore substation at Oakendene and the connection to the existing National Grid Bolney substation. These areas are referred to in this appendix as the North and South Survey Areas respectively. We dispute their reasoning at this point; **Surely additional areas must include those highlighted to them as significant e.g. Cratemans.**

2.3.4 Habitat suitable to support reptiles within the North Survey Area and South Survey Area comprised of rough grassland, scrub and tall ruderal vegetation connected by a matrix of ditches / waterways and hedgerows (**Table 2-1**). If such areas are considered of importance, then similar, or better, areas. **Like the area around Cowfold Stream/Cratemans should be included.**

2.3.11 Reptile activity is highly dependent on the weather, as reptiles must bask in order to warm themselves and become active. April, May and September are key months for basking reptiles, as more continuous mid-summer heat means reptiles require less basking time to become active, however successful surveys may still be carried out from June to August and in October if weather conditions are suitable. **(Were they?)**

2.3.13 Outside of these conditions weather may still be suitable for surveying (for example, surveys during light summer showers interspersed with sunny spells can be very productive). As such, while survey visits were conducted **as far as was practically possible (too vague, typical Rampion)** in optimum conditions, an element of professional judgement was applied by the experienced surveyor leading the survey work as to what constituted suitable conditions.

Field surveys were in fact carried out from 6/September to 21st October 2021. **It must be questioned why Wineham Lane North was not surveyed as the substation site had not then been decided.** Tables 3-3 and 3-4 show the survey results. Reptiles were only recorded at Oakendene apart from one juvenile at Wineham. The tables would indicate also that the surveys **were not** done at optimal times of the year as there is a significant fall-off in numbers at Oakendene from mid-September.

Figure 22.12.1a and b show the survey sites. The Refugia deployment locations however, in the North Site are **markedly less dense in the north survey area compared to the south (figures 2.12.2a and b), yet even so, they are considerably more productive.**

Bats:

Doc Ref 6.4.22.17 Bats

Desk top surveys: NB again, there is no reason for the biodiversity register to be up to date. It should not be taken as accurate.

Ref 2.2.1: Field Surveys: surveys all *accessible* trees, and only from the ground using binoculars, and in late autumn /early spring *where possible*. **Figures 2.17.2a-h in Annexe A clearly show that most of the land in this area was either inaccessible or only partially accessible.** Given the large lake and the biodiversity in this area generally, it makes it extremely unlikely that their finding, in their field survey, of only one tree (TR681) with positive identification of a roost is accurate. Nor is it consistent with the experience of local residents when out at night or in the evening.

Figures 22.17.6 look at trees for roost suitability-Very few are rated as high suitability. Again, this is highly unlikely to be correct.

Doc Ref 6.4.22.8. Bats

Some studies are desktop, Biodiversity records were requested 2023 and other records. Some direct monitoring of bat calls was carried out but Table B3-1 shows a **high number of passive detector faults in 2021** in AT10 area (Oakendene) giving only 5 and 6 nights of data collection (across 2 locations a) and b) in 2021 so data was not comparable between sites especially when choosing the substation site. Similarly, Table B2-2: no manual transects surveys were done in Oakendene until April 2022. Both result in far fewer passes than at Wineham sites so a far greater total would of course be expected at Wineham. In fact, it is only slightly higher so presumably more recordings per night at Oakendene?

Hazel Dormice:

22.5.62 *"Data returned by SxBRC included 255 records of hazel dormouse outside but within 5km of the onshore part of the proposed DCO Order Limits. None relate to land inside the onshore part of the proposed DCO Order Limits **Appendix 22.2: Terrestrial ecology desk study, Volume 4** of the ES (Document Reference: 6.4.22.2) shows the distribution of these records.*

22.5.63 *Suitable habitats for dormouse are present within the onshore part of the proposed DCO Order Limits in the **form of woodland, scrub and hedgerows that form a well-connected network with the wider landscape.***

22.5.64 *Dormouse presence/likely absence surveys took place between 2020 and 2022 across eight areas (see **Appendix 22.9: Hazel dormouse report 2020-2022, Volume 4** of the ES (Document Reference: 6.4.22.9)), comprising ancient seminatural woodland, scrub and hedgerows. Evidence of dormouse was only recorded at the onshore substation site in October 2022 with a single juvenile located in a nest tube."*
And Doc ref 6.4.22.9:

4.1.2 *Presence or likely absence, and nut search surveys were conducted in suitable habitat within or in proximity to the proposed DCO Order Limits between September 2020 and November 2022. A single dormouse was found at Survey site 7 during the October 2022 survey, thus confirming*

dormouse presence at this location only. No other signs of hazel dormouse were identified during these surveys.

This supports the fact that SxBRC records were inadequate for this area when the decision to choose Oakendene was made. Also, one juvenile MUST mean parents and likely more juveniles.

This was the only place they found dormice, but they DID NOT even check the Cratemans area, where significant scrub exists, i.e. suitable habitat for dormouse.

From 6.4.22.9, It should be noted that 3 of the 8 sites selected as having a high probability of dormice were actually in the immediate vicinity of Oakendene (see Survey Site Locations, fig 22.9.2c)-site 5, although named Wineham, is actually immediately to the east of the Oakendene Substation site on the other side of Kent Street, site 6 is to the south west of this and site 7 is Oakendene itself, not the Industrial Estate. **This means that 3 of the 8 sites were in this area: another indication of its habitat potential and value.**

None of the surveys at Oakendene were done until October 2022, after the decision was made to use it. See data on nest tube locations figures 22.9.4 h-j and hazel nut search locations figures 22.9.5 e-f). Wineham was surveyed in 2021.

it is clear there were many issues with the survey in terms of inadequate positioning of the tubes, (2.6.6), table 2-1 shows the highest index of probability of finding dormice was in fact August and September, these studies were done in October and November.2021 was a poor mast year so hazel nut evidence was not likely to yield many results.

Common toad:

Rampion say: "Although toads are known to be widespread across this area of West Sussex, Rampion 2 will not result in the loss of any ponds and installation of cables will be rapid (150m per day) and Ecological Clerk of Works (EcoW) present minimising the effects of any potential fragmentation of migration routes".

We disagree with this statement: how can it be possible that a clerk of works will be present along the entire haul road for the long hours that Rampion propose to work. Migrations occur at night. In the winter months this could be as early as 3pm. It is not credible that they will be standing on the road crossings, where toad migrations are known to occur, from dusk to dawn to protect them. They survive currently because of the extremely low usage of roads such as Moatfield and Kent Street.

Badger, Otter and Water Vole survey Report (Appendix 22.1 Doc Ref 6.4.22.11):

Even the Desk study was only done in 2023 so none of it available when the decision was made.

3.3.4 The southern-most section of the proposed DCO Order Limits has the greatest suitability to support riparian mammals. This area supports the River Arun and tributaries, brooks/streams, and ditches considered suitable for water vole and otter. This is also where much of the habitat meets the Priority Habitat criteria for coastal and floodplain grazing marsh.

3.3.5 In addition, within the northern extent of the proposed DCO Order Limits is the River Adur and associated tributaries and floodplain, which are also suitable for otter and water vole.

3.3.6 Refer to **Figure 22.11.4a to j and 22.11.5a to g, Annex A** for full field surveys results and habitat suitability.

3.4 Deviations, constraints and limitations

3.4.1 The dense nature of some areas of scrub/hedgerow and the presence of vegetation may have reduced the visibility and presence of protected species' field signs. **Areas have been described as having suitability for badger, otter and water vole where the habitat was assessed as suitable, but field signs were not observed often due to dense scrub or limited access. Indeed, 4 of the 6 very suitable otter sites which could not properly be assessed were in the Cowfold Stream area (see below) precisely because they were dense scrub with difficult access, surely making it more likely that otter may have been present.**

Figures 22.11.1c and 22.11.2 confirm no desk top study reports in this area, supporting the view that there has been no previous reason to survey here, and that **lack of data does not mean absence.**

3.4.2 For watercourses where access was limited, detailed habitat-based assessments were carried out from the nearest accessible point with the aid of binoculars. **During the water vole and otter assessment, there were eleven watercourses with a constrained view due to the presence of dense vegetation. Again, like around the Cowfold Stream.** Yet even with these constraints, this area although not promising from a desk top study point of view, proves to be one of the richest in findings.

Otter:

Figure 22.11.7 shows the otter survey results. Even though this site is undesignated, it was the only place with positive evidence. Despite the finding of otter spraint at Oakendene, Rampion have scoped out Otters: *"this species is not considered to be resident in West Sussex, or present in small numbers only."* **But it is here at the substation, as they have shown. If rare, surely even more important to look after it?**

They then go on to admit *"Although it may occur occasionally (as evidenced by field survey) the mobility of this species will allow it to bypass any works ongoing (noting that works are locationally restricted at any point of time) easily. As a precaution embedded environmental measures C-135 and C-210 (see Section 22.7) ensure that this species will be considered during the implementation of the Ecological Clerk of Works role."*

They are dismissive of the spraint they have found at Oakendene, saying that it was near a 'stocked pond' at the northern end of the substation site. Yet it was there, and they have not looked at the Cowfold Stream or the Oakendene Lake area. The pond is old, unlikely to be being currently restocked. We disagree that their findings show it is likely that this is necessarily an isolated otter. **Instead, it is another indication of the special nature of this site.**

Again, a significant number of very suitable sites in the area were NOT assessed. Many suitable sites around Cratemans were not assessed due to dense scrub i.e. precisely *because* they were suitable sites! They account for 4 of the 6 sites across whole project not assessed See Table B-2 Doc Ref 6.4.22.11):

TQ2220721219 High potential for otter holt, unable to fully assess from bank.

TQ2220921164 High potential for otter holt, unable to fully assess from bank.

TQ2282621490 High potential for otter holt, unable to fully assess from bank.

TQ2195921582 Moderate potential for otter holt, unable to fully assess from bank.

Water voles:

Figure 2.11.6, Water Vole Survey Results shows there are significant numbers of water voles in this undesignated area.

The following are all found at Gratwicke-again, indication of the rich biodiversity in the area See Table B-3 in DR 6.4.22.11):

TQ2163720651 Yes Moderate Feeding remains of water vole cut at 45 degrees.

TQ2165620647 Yes

TQ2166120648 Possible

TQ2167220644 Yes

TQ2170920632 Yes

Rampion state *"the area is known to support water voles. The potential effects will depend on whether the watercourses crossed by open trenching methods support this species.*

Approximately 150m of cable duct has been assumed to be installed (including dressing back of sub-soil and topsoil) each day.

Habitat reinstatement will begin within 2 years of the loss occurring in all areas other than around the substation, at temporary construction compounds, some construction access routes and haul roads and at the landfall.

Temporary lighting will be used at trenchless crossing compounds, temporary construction compounds, the landfall and the onshore substation site only.

Cable is installed in sections with less than 150m of cable trench open in a single location at any one time". This is a disingenuous statement as the haul road will have to be open for long periods to allow access. It is irrelevant that 150m cable will be done daily.

Badgers:

They recognise that badger populations are "at risk of fragmentation and are susceptible to light, noise and vibration pollution." All these pollutants will be occurring continuously at the Oakendene site and where Trenchless crossings are along cable route by the Cowfold Stream. These areas are

known to be home to many badgers. Not only will their lives be made intolerable by these pollutants, but their habitats will also be severely disrupted-see evidence provided by Janine Creaye.

Great Crested Newts:

In Appendix 22.7(doc ref 6.4.22.7) it is clear that not all waterbodies were surveyed. In particular, it should be noted that we contest the statements that '65 were not accessible' or that '16 were not revisited due to access restrictions' as several of these fall within our members' land and nobody was contacted to arrange access, so no real attempt was made to conduct the survey properly. This is particularly unacceptable as several of these waterbodies are actually on Oakendene land, which is to be so devastatingly affected. We would like to see evidence of the attempts which were actually made to contact the appropriate landowners, especially at Oakendene.

Also, some, including Oakendene, were then surveyed but outside the correct surveying window resulting in 'inconclusive constrained' results.

In total, 14 of the 31 inconclusive or constrained results were from this area. This is yet another example of inadequate surveying of this important site, making the likely actual biodiversity findings even more important that they have already been shown to be.

From App 22.7: "2.4 Survey limitations

2.4.1 Of the waterbodies identified within the Study Area, land access was permitted for 199 of 264 waterbodies. The remaining 65 were not accessible (Figure 22.7.7a to m, Annex A and Table C-1, Annex C).

2.4.2 A total of 31 waterbodies were sampled 12 days after the recommended survey window in July 2021 as a result of land access restrictions. Where land access was possible in 2022 or 2023, update eDNA surveys were undertaken at these waterbodies. However, 16 were not revisited due to access restrictions or as design changes meant they were no longer of relevance. When a sample is taken outside the recommended survey window, only a subsequent positive result from the lab analysis can be deemed as being a robust result, for instance, a negative result cannot be relied upon due to the degradation of DNA over time. The resultant negative results are noted as 'inconclusive constrained' within Section 3.

2.4.3 A total of 21 waterbodies were subject to HSI, but no eDNA samples were taken due to them being dry. An additional 16 waterbodies were subject to HSI but no eDNA samples were taken due to availability of sampling kits."

They had 36 positive results, 18 of them in the Oakendene, Kent Street and Cowfold Stream area, including 3 of the 4 within the DCO boundary (130, 190, 210):

3.3 eDNA sampling

3.3.1 A total of 113 waterbodies were sampled for eDNA analysis, including 12 of the 17 waterbodies identified within the proposed DCO Order Limits. Pond 37 was subject to HSI only, whilst waterbodies 81, 276, 278 and 280, which fall within the proposed DCO Order Limits, were not accessible within the survey period.

3.3.2 GCN eDNA was detected in 36 waterbodies. A summary of these results is shown in Table 3-2 and Figure 22.7.6a to n, Annex A.

3.3.3 Of the 36 positive eDNA results, four were recorded within the proposed DCO.

Order Limits.

3.3.4 A total of 46 negative results were received from the laboratory: while the remaining 31 samples were inconclusive.

3.3.5 Those samples that were inconclusive were due to a combination of analysis error, as well a constraint on samples collected outside the recommended sampling period and therefore classified as “inconclusive constrained results.” Of these inconclusive results, one sample, that from Pond 204, was taken from a water body within the proposed DCO Order Limits.

3.3.6 Where inconclusive or inconclusive constrained results were received from the laboratory, the presence of GCN within these waterbodies cannot be discounted.

In other words, many of the positive results were here, even though a high proportion of likely positive sites were not assessed in this area, making the true total likely to be even more, and yet another indicator of the biodiversity range and richness in this area.

Veteran trees:

From **Outline CoCP (Doc ref 7.2):** “Avoid removing landscape elements, particularly where these are key characteristics and or veteran or mature trees, woodland and hedgerows **as far as practical** (C-21, C-23, C-115 and C-174).”

But 5.6.21: **“No veteran trees will be removed to facilitate the delivery of onshore infrastructure.** C-174 ensures that there will be no ground works within a buffer zone of 15 times the diameter of the tree or 5m from the edge of the tree’s canopy (see Arboricultural Impact Assessment, Appendix 22.16 (Document Reference: 6.4.22.16) of the ES for location of veteran trees). This stand-off distance is that recommended by Natural England and the Forestry Commission (2022). Should detailed design require cables to encroach the buffer zone, the onshore cables will be installed using trenchless methods, with a minimum depth under the buffer zone of at least 6m (C-216). **Currently the use of HDD under veteran trees is not expected in any locations.”**

From **Vol 2 Ch 22 (DR 6.2.22) :** “Veteran trees have been identified within the onshore part of the proposed DCO Order Limits. **All veteran trees will be avoided through design.** Embedded environmental measures in **Section 22.7** provide methods for avoidance.

The Proposed Development outlined in: Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4) has avoided land take within any Ancient Woodland and ensured that **all veteran trees will remain in-situ.”**

Natural England, the woodland trust, the National Trust, and many others are in agreement as to the definition of ancient and veteran trees. Yet Chapter 22 details above, states that “There are seven veteran trees that lie within the proposed DCO Order Limits or are located within 30m of it.”. This appears to have been taken from a limited interpretation of the somewhat unclear definition of ancient and veteran trees from the NPPF, which appears to lump the definition of ancient and veteran: “Ancient or veteran tree: A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.” Even using this vague definition, we

would argue they have chosen to interpret it extremely narrowly and downplayed the importance of many of the trees.

In a mature county such as West Sussex, it is not credible that *only 7 veteran trees* lie within 30m of the proposed development from Oakendene to the coast. To illustrate, please see Hedge map 1 **figure 7.2.1k (Outline Code of Construction Practice, Doc ref 7.2** Hedges H511 and H512 are to be removed to construct the substation. Please see the attached photographs. Image 1 shows H511 with H512 in the background, Image 2 shows a more northerly section of H511. These trees would appear to be veteran in size and character, some possibly ancient. All lie within the hedges scheduled for removal. All hedgerows have clear well used wildlife corridors running along them.

Image 1



The landowner at the point where the cable route from Oakendene arrives at Wineham Lane also tells me that there are 5 veteran oaks, possibly ancient as they are over 150 years old, which are earmarked for destruction by Rampion.

Image 2



So, between these two locations, Oakendene and the final cable route, we already have far more than seven veteran trees in a very small area of consideration. Indeed, Annexe D of Oakendene 6.4.25.5, which lists the trees on the Oakendene land, would suggest that many of them are indeed of significant ecological importance.

They also talk of 'mature' trees: "*There are seven veteran trees that lie within the proposed DCO Order Limits or are located within 30m of it. These trees are described in Table 22-23 (listed*

from south to north). Horsham District Council identified two further trees within the proposed DCO Order Limits as veterans. The arboriculture survey undertaken has identified these as being mature trees with some veteran characteristics, as opposed to applying veteran status (as per methodology

discussed with Horsham District Council and West Sussex County Council in July 2023 – see Section 22.3).”

The use of the word ‘mature’ tree as opposed to ‘veteran’ in Chapter 22 is further confusing. They have also not been clear about the use of veteran where perhaps they actually mean ancient throughout these documents. I am therefore led to the conclusion that Rampion are either confused about the definition or are intentionally misleading in their use of ‘veteran’ where perhaps they mean ‘ancient’ or are downplaying the importance ecologically. Either way, if left unchallenged through lack of clarity, the biodiversity adverse impact will be terrible.

Even if not considered as Veteran trees, the sheer number to be lost on this site, in combination with the hedgerow loss, cannot be considered of insignificant impact on wildlife and sustainability or resilience.

Appendix 22.16 of the Arboricultural Impact Assessment Document includes diagrams and maps of trees to be lost or retained. However, the trees are divided into T1/G1/W1 without it being clear what this means. We have assumed that T is a standalone tree, G are groups of trees and W is woodland. Unfortunately, the lumping of trees together into G categories makes it impossible to accurately assess the likely tree loss as it is impossible to count them. On the maps they do not look significant. However, site visits to Oakendene, the Cowfold stream area and the cable route from Oakendene to Wineham Lane confirm that many of them contain trees of significant size and importance. The method of cataloguing therefore underestimates the tree loss, potentially very significantly, and when duplicated across the entire DCO area within the county. Our site visits estimate at least 26 significant trees will be lost on the Oakendene site alone, even though we were unable to access the whole site.

There are also too many trees on the cable route not surveyed ‘due to access availability’ (in yellow on the maps). These are again likely to be significant in terms of biodiversity given their antiquity and locations in wildlife corridors.

We have measured and assessed several of the trees to be removed on the site. The tree numbers are taken from the Arboricultural Assessment Document, Annexe 1. Photographs of T265 and T262 attempt to show important features for supporting biodiversity such as rotten older branches and shelter for animals and insects (See Appendix 1 below)

Tree circumferences are as follows:

- T281 247cm
- T279 253cm
- T273 256 cm
- T270 311cm
- T265 390cm
- T262 424cm

Rampion’s Arboricultural Impact Assessment (doc ref 6.4.22.16) identifies three of the seven veteran trees as in this area, (T367, T 319, T308) and three further near veteran trees at Oakendene, two of which are to be removed. They are T242, T262, T247, two of which will be removed.

Hedges:

Inconsistencies:

Regarding the hedge map **figure 7.2.1k (Outline Code of Construction Practice, Doc ref 7.2)** a large part of H520 is apparently to be retained or notched. Only section H520 b is to be removed. How can this be compatible with the need to create a bell mouth and visibility splay large enough to comply with the regulations for the 60mph A272? Indeed, conflictingly, Trees map 7, taken from the **Arboricultural Impact Assessment (DR 6.4.22.16)** clearly shows that large parts of it WILL in fact be removed. Also confusingly, the hedge numbering appears to be different between these two maps.

Access points 59 and 61 on Kent Street are new and will involve the destruction of potentially many metres of hedge to comply with the regulations. The significance of the combined value of **all** hedges in this area cannot be underestimated given the very high number of Important Hedges in this small area.

Important Hedgerows:

6.4.2.2.5 Hedges

Under the Hedgerow Regulations 1997 Important Hedges are protected. Rampion do appear to have used the 1997 criteria for assessment of Important Hedgerow status. However, they have been more strict, for example, why exclude hedges which form boundaries of houses or gardens, particularly in country locations? **EIGHT of the fourteen hedges they have assessed as important across the whole proposed development are to be found in this area** (see Hedgerow Survey Report DR 6.4.22.5, List of hedges P 9, ref 3.1, maps figures 22.5.2 p, q, r, 22.5.3d, and 22.5.4 p, q, r. They are H483, H492, H489, H495, H509, H484, H488 and H491. It seems difficult to justify the choice of this location when alternatives exist.

However, again, access to properly assess many of the hedges has been limited, making the likely true number higher, especially in this location, where so many are concentrated in such a small area. There are also too many let out clauses such as 'where access possible'. We would in particular question the status of the hedges on the Substation site, such as H512 and H511 and why these are not classified as Important: they would appear to satisfy the Hedgerow Regulations criteria (See section above regarding Veteran trees)

Please note (from Figures 7.2.1j and k from outline CoCP Doc Ref 7.2) that many of the Important Hedges lie directly in the path of the cable routes to and from Oakendene, some are to be removed to form access points and bell mouths on Kent Street. Others are to be crossed using trenchless crossings, but this is a misleading statement as in this area, where there are no farm tracks, a two-lane haul road will be constructed along the cable route cutting through at least 30m of the hedge adjacent to each trenchless crossing and others, not designated as Important, yet which together, add up to create corridors and habitats. (Figures 22.5.4 p-r)

It is also noted that access points A59, A61 and A60 and A64 off Kent Street are all listed for operational access. As no roads currently exist at these points, apart from Kings Lane, it is not clear whether there will be, not only visibility splays, **but actual roads created, thus having a permanent effect on this landscape and making it impossible to restore habitats including scrub and hedgerows** as they claim they can do. This is additionally unclear as A59 and A61 in the OCTMP

(doc ref 7.6) are listed as 'construction and operational access' but at the same time 'temporary bellmouth construction'. On the A281 A57 and A58 remain for operational access. Since they currently do not lead anywhere, and the 'access' is to the cable, presumably the intention is to create a permanent road across the entire cable route from A281 to Kent Street even though this is not explicitly stated anywhere, with permanent devastation to scrub, hedges and corridors.

The sheer number of Important Hedgerows in this small area is surely a reflection of its ancient and unspoilt character. It is likely to be a reflection of the general biodiversity which also thrives here. Indeed, Ms Creaye's records show a huge diversity of wildlife in this area, including badgers, nightingale territories which must make up a significant proportion of the total population in Sussex, reptiles, toads, lichens and a proliferation of insects from grasshoppers to glow worms, demoiselles to butterflies and moths. All are living in the hedges, scrub and wildflower meadows in this previously undisturbed area. The State of Nature report highlights the sad state of Britain's wildlife. Cutting into these hedges, churning through ancient meadows and tearing up precious scrub habitats will disturb the balance of this precious ecosystem, causing damage to species beyond just the immediate vicinity of the cable route, but the whole area. These species live, feed and breed across the area; ripping out sections of their home could upset their entire pattern of living.

From the Landscape and Visual Document (doc ref 6.2.18) the landscape and visual impact on the Oakendene area is assessed as severe. This is surely indicative of the impact on ecology and habitats in the area, especially as a result of hedge and tree loss:

"Overall sensitivity

18.9.17 The overall sensitivity to change considering all of the factors within the landscape character assessments, and the assessment of High - medium to Medium value and High - medium to Medium susceptibility is considered to be **Medium-high**.

18.9.18 **Landscape elements (trees, hedges and woodland) are indicative of higher levels of sensitivity as they are not easily replaced.**

Magnitude of change and significance of residual effects: during construction:

18.9.19 There is potential for both direct changes to landscape elements and landscape character resulting from their alteration / loss; as well as the introduction of new features i.e. the construction of the substation at Oakendene and associated works, **which will change the character of the landscape** and pattern of elements within this localised area during the construction phase.

18.9.20 *There are approximately three hedgerows with trees and approximately one field tree (what is meant by approximately one?) within the onshore substation footprint and 75m of hedgerow and associated trees along the A272 which will be permanently lost. (Appendix B: Vegetation Retention Plan of the Outline CoCP (Document Reference: 7.2)).*

18.9.21 *The construction of the onshore Oakendene substation will result in a high magnitude of change to the local character of this landscape The scale and magnitude of these changes will be high. "*

If the landscape and visual impact of the loss of these hedgerows and trees is assessed even by Rampion to be severe, surely this is indicative of the severe impact on ecology and habitats, especially due to tree and hedge loss.

Other Protected Species:

In addition to Badgers, Nightingales and Important Hedgerows, several other European protected Species have been found in the Oakendene site (Design and Access Statement Doc Ref 5.8 section 3.2.7) , including bats, Hazel dormice , water voles and otters. Hazel Dormice are facing extinction in the UK. and are now extinct from 17 of the English counties; numbers have halved since 2000. We refute Rampion's mitigation measures. Dormice nest in trees, favouring ancient woodland, scrub and old hedges. Even if they could recreate that quickly, they hibernate on the ground so are likely to be disturbed and killed by the concreting, piling rigs and huge quantity of vehicles which will pass over this land. If they do manage to survive that, the noise and light will disrupt their habits and nesting. Again, to quote from Weald to Wave's super scrubland project "*the rejuvenation of scrubland will have a positive impact on a wide range of other species that are either rare or missing from our landscape; such as the black-veined butterfly and the sloe carpet moth, and small mammals like our elusive dormice*". How can it be sensible, then, to destroy this precious habitat?

Indeed, in the case of Dormice and Otters, the Oakendene substation site was the ONLY location across the whole project from coast to Cowfold, where these species were found, and one of the very few where they found water voles. It should be remembered also, that they were extremely selective about where they looked, and many of these surveys were NOT done at the Cowfold Stream/Cratemans area. This is despite evidence from locals about the abundance of species there. They have also refused to do reptile surveys at Cratemans even though locals have reported an abundance of grass snakes, adders and slow worms there for years. They were done at Wineham, however, where none were found. Many of the surveys they did do are incomplete with far too many exclusions and claims they could not access land to carry them out.

It is also quite clear that since scoping was done with Natural England about the level of investigation needed and where, that far more has come to light about the ecological sensitivity of the habitats around Oakendene and the northern cable route, so agreements made (see 6.2.22) are now inadequate. Also, when many of the conference calls were done in 2021 with ecology groups (p30) most of the studies for Oakendene and Cowfold stream area had not been done, and as we have previously shown, little existed on databases, so again, the picture was inadequate. What they do mention is highly selective e.g. there is no mention of the ecological concerns raised by Janine Creaye in 2021 (see Consultation reports Appendix Doc Ref 5.5.1) although residents' concerns about ancient woodland and hedges at Wineham are mentioned in detail.

Pp51-54: almost all surveys were carried out after the decision to choose Oakendene was made, or not at all-too many areas are scoped out or described as not accessible.

Oakendene and the Lake:

There appears to be a lack of data, or good data, for the lake at Oakendene, but also Oakendene generally. This is of particular concern given the proximity of the lake to the substation, with attendant habitat destruction during construction and noise and light pollution during all phases. Also, the abundance of wildlife in the adjacent Kent Street and Cowfold Stream areas would suggest that there is likely to be a lot to find here and the anecdotal evidence of people on the

Industrial Estate and walkers on the PRoW around the lake would support this. Simple examples of this failings are to be seen in the sections on Breeding Birds and the Winter Bird Report above.

There appears to be no assessment of the impact of noise or vibration on the sensitive ecology of Oakendene, the lake or the haul road for either construction or operation, (see Noise and vibration addendum for more detail), or indeed any PRoWs, including the one close to the substation , by the lake. Indeed, they have scoped out vibration impacts altogether, **(Noise and Vibration Chapter: Table 21-12:”** *In response to the Planning Inspectorate’s commentary in ID 5.4.3 (Planning Inspectorate, 2020a) in Table 21-6 regarding vibration from the onshore Oakendene substation being scoped in, further justification has been given to scoping this out as follows. Within the onshore substation, there would not be any large items of rotating plant that could give rise to significant vibration outside of the onshore substation boundary. Antivibration pads would be used underneath reactive plant (e.g. transformers) to minimise the transfer of vibration to the ground. Any residual vibration is not likely to be perceptible beyond a few metres from these sources.”* **Given the known sensitivity to noise and vibration of many species, and the proximity of the lake and sensitive habitats, this argument is weak, without any evidence to back it up and does not take into account at all the effects on wildlife with regards to breeding, mating or tracking food . Many affected species are already in a perilous state.**

Furthermore, the Industrial Estate itself, painted by Rampion as an urban landscape on the doorstep of the site is in fact a part of the ecosystem. Workers in the businesses enjoy seeing redwing, fieldfares and thrushes, alongside badgers, bats and buzzards, red kites and other wildlife in the gardens of the Industrial Estate itself.

Habitat surveys and State of Nature Report 2023:



This highlights the severely depleted situation of England’s habitats and species. Over 97% of wildflower meadows have been lost since the 1930s with flower-rich grassland now only covering a mere 1% of the UK’s land area. In the small area between the A281 and Oakendene there are unimproved meadows and seasonally flooded grassland around Cowfold stream, directly in the path of the cable route. (See evidence from Janine Creaye, and further surveys will be completed in the summer) it cannot be sensible to destroy these species rich habitats. Simply scraping the soil aside and then putting it back afterwards cannot restore what was there. Similarly, irreplaceable nightingale breeding sites, reptile habitats, badgers, even turtle doves are to be found there, and an extraordinary abundance of insect life from grasshoppers to glow worms and demoiselles to butterflies and moths enjoy the wildflowers in great numbers.

Please see also the testimony from Tim Facer (RR-398) confirming the ecologically sensitive way that Cratemans farm has been managed for many decades. In addition, the same is true for Wilcocks Farm a little further along the cable route (RR-066), where there has been no ploughing on their land for over 100 years and meadow plant species abound. And in between these two, the ancient green lane, which is to be torn apart by the cable route and haul road. Yet none of these areas have been surveyed by Rampion.

Rampion have surveyed some of the cable route near there. (See National Vegetation survey report Doc Ref 6.4.22.4). Firstly, they used desk top surveys to define where to search. The only places they have surveyed are Gratwicke (Talbot and Baker 1) and east of Cratemans (Talbot and Baker 2). See map p65 for locations. However, these sites are either side of the wildflower meadows on the maps sent to them by Janine Creaye. TB1 is to the south, on a field that is ploughed, TB2 is close to the Cowfold stream to the north. Why, when they came in June, when the flowers would have been plain to see, did they ignore them? Not surprisingly, neither field was found to be priority habitat. There was just one short survey for this area, compared to a much more extensive survey of Wineham(p111). Our understanding of a phase one survey such as this is that it consists of a review of records plus a superficial non-invasive survey. Many local sites were not actually looked at (Doc ref 6.4.22.3)

The problem is, this area has been unknown to official bodies and so has no formal designation. Its very untouched nature means that there has been no need for a formal assessment of it until now, when it might be too late.

Sussex Biodiversity records office do not currently have a mechanism for designating new Local Wildlife Site in Sussex, due to lack of resources. However, they have said that they are willing to consider the site for assessment in the future on the basis of the evidence we have presented, should funding become available. If we do not act now, by the time the funding is available, the site may no longer exist.

Habitats Regulations:

EN-1 (2011):

Section 5.3.7 *“As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.4 above); **where significant harm cannot be avoided**, then appropriate compensation measures should be sought”.*

Section 5.3.8 *“In taking decisions, the IPC should ensure that appropriate weight is attached to designated sites of international, national and local importance; **protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment”.***

And draft EN-1(2023):

Section 5.4.4 *“The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas”.*

Section 5.4.5 *“As a matter of policy, the following should be given **the same protection** as sites covered by the Habitats Regulations and an HRA will also be required:*

*(a) potential Special Protection Areas and **possible** Special Areas of Conservation; “*

We believe this area is such a site and should be designated. There is an alternative which would be less harmful. We offer evidence that Rampion have downplayed its importance by not seeking adequately to gain access, to carry out studies such as reptile studies, or to visit the site sufficiently frequently to come to a proper judgement about its importance. Failure to conduct proper surveys denies the Examining Authority the detailed information necessary to make their decision as to the appropriateness of this proposal.

Section 5.4.2 “The government’s policy for biodiversity in England is set out in the Environmental Improvement Plan¹⁷⁴, Biodiversity 2020¹⁷⁵, the National Pollinator Strategy¹⁷⁶ and the UK Marine Strategy¹⁷⁷. The aim is to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. This aim needs to be viewed in the context of the challenge presented by climate change. Healthy, naturally functioning ecosystems and coherent ecological networks will be more resilient and adaptable to climate change effects. Failure to address this challenge will result in significant adverse impact on biodiversity and the ecosystem services it provides.”

This aim was reinforced in the King’s Speech on 7/11/23 “My Government will continue to lead action on tackling climate change and **biodiversity loss**, support developing countries with their energy transition, and hold other countries to their environmental commitments.”

These proposals run directly contrary to these aims and should be rejected in the interests of the very ecosystems we are supposed to be trying to protect by green energy.

Appendix 1 – Veteran Trees: T262 and T265

T262



T262



T265



T265



T265



Section 10: Traffic and Transport – EN-1, 5.14

Many Cowfold residents have concerns about the traffic impact of the proposed plans for a substation at Oakendene, but due to failure of the consultation process with regards to Cowfold, these concerns were not raised during the first round of consultation at the time when the substation site was being chosen.

We believe that therefore Rampion have essentially chosen the ‘path of least resistance’ or so they thought at the time, without any real understanding of the impact on the enormously busy, congested A272 at this location. The disruption to the traffic on this road will be considerable, with attendant delays, lost productivity, increased pollution and unacceptable increase in accidents.

The proposed substation site at Oakendene lies just to the south of the busy A272, one mile to the east of the centre of Cowfold where there are two mini-roundabouts at the intersection of the A272 and the A281. In contrast, the turning to Wineham Lane from the A272 is 2 miles away from any restrictions or intersections (See map at Appendix 1). The traffic backs up on the A272 the whole way between Cowfold and to at least Kent Street twice a day, or more. It is almost never stationary by the Wineham Lane junction. (See example from 18/5/23 in Section 7-Air Quality and Pollution: Appendix 2; screenshots).

The Cowfold Neighbourhood plan reflects the issues *already* experienced by the community: “2.6.5 The road network provides good connectivity but the natural restriction created by the staggered A272/A281 junction, combined with the volume of traffic using the A272 as a major link road, results in significant standing traffic during morning and evening peak periods. This is reflected in Air Quality and Pedestrian Safety being raised as key issues by the community.”

Rampion PEIR reports estimated an average of 54 HGV movements to and from the site each day. These vehicles will be slowing down to turn in and waiting for the oncoming traffic to clear before being able to do so, or stopping the traffic by the use of traffic lights, either way causing tail backs on this busy road. The congestion will cause ongoing disturbance to the lives, not just of residents, but also to the many thousands who use this road daily and to those living on the small unsuitable lanes to the north which tend to be used as alternative routes by vehicles whenever congestion occurs. Emergency vehicles will also struggle to get through safely, and this is a major access route for them from the local hospitals to the residents of much of the Horsham district. Access to Cowfold surgery will also be impeded for the residents who live to the east of Cowfold. From previous experience, congestion along the A272 causes major disruption to patients accessing appointments on time and doctors being able to visit sick patients. This is manageable for the short period when there is for example an accident, but would be a source of major stress for staff and patients and operational difficulty at the surgery if long term.

One only has to look at what happens when, say, the Ardingly Show is running. At peak times the A272 is gridlocked, but even during the day, the trickle effect, as visitors go to or leave the show, causes major tailbacks along the part of the road between Kent Street and Cowfold. This does not happen at the location of the Wineham Lane junction with the A272. Furthermore, the traffic monitoring systems used on motorways with variable speed limits understand that small increases in vehicle numbers can have large effects on traffic flow. Traffic is a huge issue for the residents of Cowfold and the surrounding area. But Rampion themselves have only in recent months recognised

the importance of the traffic impacts from locating the substation at Oakendene, strongly lending weight to the belief that no proper consultation took place here in the early stages when developing their plans.

Air quality impacts:

They have stated that because the HGVs will not come through the AQMA of Cowfold, the village will not be affected. This is clearly disingenuous as they do not take into account the many support vehicles which will also be needed or the vehicles, including HGVs, which will be using these roads to access the nearby cable routes, a fact which they admitted at the information meeting held in Cowfold on 21st June 2023, as **there is no practical alternative**. Neither have they included the vehicles of the workers who will come into the village to use the shop or the transport café each day as these are the only places locally which have such facilities. Also, any worker who lives to the west of the village, or goods coming to the substation from that direction will realistically have to pass through the village. The effects of all these additional vehicles, plus the many coming in and out of the compound by the industrial estate, will be cumulative, and on a road where the traffic is already at capacity, it will inevitably be considerable. It should be remembered that Wineham Lane, from A272 to the main substation, is a two-lane road, similar in width to the A272, but much quieter and with fewer businesses which could be affected by its use.

In addition, the air pollution impact of increased congestion, or standing traffic from traffic lights on the Oakendene section of the A272 has not been considered. Indeed, it was assessed as 'not significant' in the PEIR report. (See Section 7: Air quality and Pollution, for more detail)

5.14.7 There is no public transport or safe means of walking or cycling to this site which could possibly mitigate transport impacts.

5.14.14 The IPC must ensure that there is sufficient provision for HGV parking without compromising safety and traffic movement on the road, and to mitigate the damaging effects of traffic on adjacent roads, and should not relax its obligation to meet this standard even if the applicant suggests meeting these requirements would make the proposal economically unviable. **Car parking facilities** for the many construction workers are very limited without causing further major congestion on the roads, or massive environmental damage by tarmac to prevent them becoming bogged down in fields during the winter. Even for the much smaller Rampion 1, around 250 workers vehicles per day needed somewhere to park.

Road capacity:

When assessing the A272 for road capacity for Rampion 1, E-on made the following comments in their environmental statement on transport:

- "Congestion and driver delay: Delays to non-development traffic can occur on the network due to additional traffic generated by a development. The Institute of 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, the capacity of the system. Normal fluctuations in traffic flows are expected up to 10% and therefore only increases in traffic above this threshold are likely to cause additional congestion. In this case, the only link where this threshold is exceeded is Wineham Lane. However, the affected sections of road will continue to operate significantly below their theoretical link capacity and are therefore unlikely to result in congestion problems.

This represents an impact of low magnitude on a receptor of medium sensitivity resulting in a not significant impact. “

Rampion have made the same assumption again in their calculation for the percentage increase in traffic on the A272 at Oakendene. This assumption is based on Theoretical Capacity. Theoretical Capacity is of the number of vehicles per hour a road can sustain and yet run smoothly, based on a calculation using the vehicle speed and intervehicle distance. Using figures from WSCC traffic camera at Huntscroft Gardens to the east of the mini roundabouts in the AQMA of Cowfold, *even taking in to account the need to drop to 30mph on entering the village, if one simply looks at traffic numbers, Rampion’s calculations regarding capacity would appear to be correct.*

But the empirical observation of local residents and anyone who travels along this road is that this is simply not the case and that there is already a major problem with traffic flow in to the village from the east, with standing traffic backing up to Kent Street at least twice daily, usually for some length of time.

The reason behind this anomaly is simple. It is well recognised that such capacity data is too simplistic and that the reality is far from straightforward, is often quite different and is affected by many things, including, crucially at this point, intersections, restrictions, pedestrian movements and the number of HGVs as opposed to passenger vehicles. (Transport for London Technical note 10). Thus, the *Effective Capacity* of the A272 at this point is not fundamentally dependant just on traffic numbers, but on the congestion caused by the roundabout system, pedestrian crossings, and flow of traffic on the A281 through Cowfold. The situation is further affected by the inappropriate use of the 24-hour average vehicles per hour, when in fact, as shown by the WSCC traffic camera data, 80% of the vehicles actually travel in the 12 hours 6am to 6pm and that 80% of those are between 7-9am and 4-6pm! These factors push the congestion beyond its tipping point very easily, *at any time of day* as witnessed daily by residents. Parked delivery vehicles, or anybody turning on or off the road quickly causes the traffic to build up. Therefore, a second restriction of traffic lights at the proposed new junction into Oakendene, and a third restriction as HGVs move backwards and forwards to the western compound will result in major delays.

Therefore, simply using theoretical values makes the wrong assumptions based on traffic numbers, although it is a not unreasonable judgement at the Wineham Lane turning point. For a more accurate assessment, a full traffic measuring exercise must be undertaken at the Oakendene junction.

Traffic Numbers:

Traffic numbers and types are however also important in assessing the extent of the congestion which will result. WSCC data to 2022 (See Section 7: Air Quality and Pollution: Appendix 1) shows that pre-pandemic Annual Daily Traffic had reached about 18500 (total for both directions) and while this dropped during and to some extent after the pandemic, please note the dramatic increase in light goods vehicles, and to some extent HGVs, which between them now make up around 24% of total traffic, (previously around 15%). This would fit the impression, held by most residents that the traffic appears to have become worse along the A272, whereas actual numbers have not. It may also explain the increased accident rate as delivery vehicles, unused to the area, try to find addresses. Moreover, the numbers are not spaced regularly over a 24-hour period but,

using April 2022 as an example, the 5-day average was 18,582 vehicles a day but 14,896 of them passed between the hours of 06.00 and 18.00. **That is an average of one vehicle in just under every 3 seconds!** Rampion's use of the average daily figures is therefore misleading. We know that it is highly likely that the majority of the many thousands of support vehicles, particularly workers cars, will be targeted at peak times, when the road is already beyond capacity, resulting in major congestion. It is known that, unlike when roads are flowing freely, when there is already congestion, ie the number of vehicles exceeds capacity, then every extra vehicle counts, increasing travel time (Zhang and Batterman)¹⁰

Rampion estimate over 8000 HGVs will visit the substation site during construction. There will also be a considerable number turning in and out of Kent Street, going to and from the western compound, and travelling through the village to the A281 cable route access.

In the Rampion 1 Environmental Statement on transport p 22, it was estimated that 250 worker's vehicles per day would visit the substation site, based on an assumption of 2 people sharing every car. Rampion 2 is considerably larger and the number of HGVs to the substation is approximately one third more, so roughly, there are likely to be up to at least 330 worker vehicles per day. If they are unable to share, this could be doubled. Parking is extremely limited in the area and in the winter the compounds will be boggy and inaccessible. They will therefore be driving around looking for places to park, adding to the congestion.

These impacts will be magnified if this project occurs at the same time as other significant work on the A272 such as the nearby housing developments planned at Buck Barn and Ansty. Indeed, any additional lights for repairs etc between Cowfold and A23 would bring the road to a halt. In the PEIR transport chapter p93 they judge the impact on A272 to be minimal. It is assessed as a whole as 'A272 to west of A23' and is not divided to look at the Wineham lane turning and the Oakendene area separately. This shows no understanding of the actual pattern of traffic movements on this stretch of road; mere percentage increase in numbers do not show the extent of the disruption which residents know actually occurs every time traffic is slowed or halted on this busy part of the road.

Even in the PEIR SIR App J, because they assessed the percentage change of **flowing traffic on A272** as not significant, they did not look further at this site but only at quieter lanes such as Wineham Lane (access 26). This reasoning is not sound, as shown above. **Before accepting this site as suitable, traffic modelling must be done based on the impact of traffic slowing to turn in and out of Oakendene.**

I note that the Post Office were consulted as statutory consultees in 2020. This needs to be revisited when proper modelling has been carried out as the post office is unlikely to be able to meet its obligations regarding delivery times

Kent Street was identified by Rampion's own scoping report as "single track, unsuitable for HGVs" but they will still need to use it as access to the cable route both approaching Oakendene and leaving the site; there is no other access. This is confirmed in a letter from Vicky Portwain of

¹⁰ Zhang and Batterman: Air pollution and health risks due to vehicle traffic, Sci Total Environ 2013, Apr 2015 pp307-316

Rampion to a Kent Street resident: "Cable route construction traffic, including HGVs, will use Kent Street to access the cable route which runs East and West from Kent Street. There are two exits (from Kent Street) onto the Cable route at distances 200m and 700m from the A272. Traffic measures will be implemented to ensure safe passage of all construction and public vehicles." It is difficult to imagine what possible traffic measures could make this acceptable on a very narrow single lane track. Chaos ensues on this tiny lane when accidents on the A23 occur and people try to use it to bypass them.

This should have been taken into account when assessing the substation site, but local people were not adequately consulted. By contrast, Henfield Parish council's scoping report response from 5/8/20 includes the comment "the existing Bolney substation already has the necessary access".

There also appears to be the intention (See Appendix 2: map from Vicky Portwain to resident) 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. They will face severe problems accessing their properties. Similarly, the residents of Kings Lane and Moatfield Lane have no other access to their homes and will suffer years of difficulty. These considerations do not seem to have been taken into account at all when choosing the site, and make no sense when Rampion in their reasons for choosing Oakendene cite the fact that they will not therefore need to use 'country lanes such as Wineham Lane', which is in fact much larger and was enlarged in the 1960s for this very purpose.

Kent Street, Dragons Lane and Kings Lane/Moatfield Lane are all quiet very narrow lanes, much enjoyed by walkers and horses as is Picts Lane to the north (see below). Access onto the A272 for both Kent Street and Picts Lane is extremely dangerous as visibility is poor.

If this is allowed to go ahead, the repair of all side roads affected by this scheme, including those indirectly affected to the north, must be carried out at the Applicants expense, at the end of the construction period.

Accidents

This stretch of A272 from east of Kent Street to the Oakendene industrial estate has one of the highest accident rates in the area and West Sussex Traffic accident data shows that the number and severity of accidents is increasing (Attachment 3: accident data). Driving from the west, this part of the A272 is the first for some distance where the speed limit is derestricted and drivers speed up, not expecting that vehicles frequently slow down to access the several side roads. Also, the visibility when turning out of the side roads, especially Picts Lane and Kent Street, is very poor due to the bends in the road and the elevation of the road to the east of Kent Street. The proposed access point is at exactly this location making this already very serious situation even more dangerous. The risks will inevitably become worse by the turning of heavy slow lorries in and out of the access site. Traffic on the main road cannot see vehicles turning out of side roads until they are on top of them, nor do they expect vehicles to slow down to turn in to these side roads.

The road is already extremely congested and traffic daily backs up from Cowfold to Kent Street. This will become an even more problematic situation as lorries block or congest the road. Frustrated drivers will then cause accidents on the totally unsuitable Picts Lane as they try to bypass the traffic jams. It should also be noted that Picts Lane is in the process of acquiring Quiet Lane status.

In their PEIR Rampion do mention the number of accidents between Cowfold and A23 but they do not highlight that a significant number of these occur at the exact part of the A272 which would be affected i.e., from Kent Street to the Oakendene industrial estate. In the past **the original entrance to Oakendene Manor was moved from close to the point where the proposed access from the A272 is located, to a drive entered from the Oakendene estate, almost certainly for safety reasons.** The owner of Oakendene confirms this fact. The traffic has become much greater over the years, making this even more dangerous.

The accident rate and significant traffic emissions to the east of Cowfold have been a matter of concern to Cowfold Parish Council for some years.

Rampion's HGV growth assessment data is based on a percentage increase per annum from 2019 (PEIR Ch24, 24.6.50) The baseline traffic increase is likely to be significantly higher due to the accelerated and sustained change towards online shopping noted during covid. Rampion's assessment of the existing accident record uses Crashmap data from 2015-19. It shows 37 casualties during this period along the A272 between Wineham Lane and Cowfold. WSCC data shows that for the same period, 2015-2019, 15 of those were in the vicinity of Oakendene, with a cluster at the industrial estate entrance. They also show that the numbers of accidents are increasing year on year: indeed, 49% of all casualties at that site in the 10 year period 2012 to 2022 occurred in the period 2021 to 2022. Rampion's assessment, therefore, is likely to represent a gross underestimation

WSCC's response to the 2021 consultation, Appendix D recognises the dangers at the Oakendene area:

- Oakendene (west) – this compound option is off the A272, where there might be issues in achieving adequate visibility in this location. There is a double white line system which implies an existing visibility issue. There is also a PRow which cuts through the north east corner of site.
- Oakendene (east) – it is assumed access would be required off the A272. This is on a straighter, but potentially faster length of road and needs due consideration.

Cowfold Parish Council's Road and Traffic issues document states that "Mean Average Traffic Speed has decreased as volumes have increased. This is as a result of increased stationary traffic indicated by the increased percentage of vehicles travelling at below 15 MPH during peak traffic times." And when considering accidents in the parish it recognises that "the Kent Street junction and the Oakendene Industrial Estate access pose particular issues."

Mud on the road will further add to the danger and risk of accidents. Eon's Environmental Statement for Rampion 1 recognised that "HGVs have the potential to distribute dust and dirt from the construction site onto the local highway network. These effects would be most pronounced in the immediate vicinity of the site entrances. The potential for road soiling to occur would already be controlled by standard appropriate measures, such as wheel cleaning and road sweeping. This represents an impact of low magnitude on a receptor of up to medium sensitivity resulting in a not significant impact." Wineham Lane was the road affected by the risk from mud during Rampion 1. It is a relatively quiet road. The A272 on the other hand, is extremely busy and fast moving. The risk from losing control of a vehicle in the mud could be fatal. Wheel cleaning is not practical on the Oakendene site as it will just create a mud bath on site. Not only HGVs, but hundreds of cars will also be parked on the site, churning the mud and bringing it onto the busy road. If the area is

covered in tarmac or concrete that will extend the flood risk both to the A272 and the substation site, but also the contamination risk to the stream and lake to the south.

Traffic lights:

Without traffic lights there will be more accidents. With lights, the accidents might be reduced but the congestion will be far worse, especially at peak times, when many of the support vehicles in particular will also be coming or going. The situation on the A272 east of Cowfold is one of recurring congestion every peak rush hour, twice a day, backing up to beyond Kent Street, plus whenever anything puts pressure on vehicle numbers. Traffic lights on this part of the A272 would cause significant congestion, making life difficult for residents, emergency services and the 18000 people who use this road every day. Not only will the HGVs be turning in and out of the sites but all the ancillary vehicles as well.

In addition, with traffic lights, there would need to be a way to ensure that people coming out of side roads within the traffic light area know whether or not they are activated, to avoid serious, possibly fatal, collisions. Depending on exact location of lights, this could include Kent St, Picts La, access to Coopers Farm, Applecross, Wealden Barn, South Lodge, New barn farm and beyond, to the west. There is also the combined problem of access to both Oakendene sites; there cannot be two sets of lights without complete chaos.

Their proposed working hours are very extensive and unacceptable, both from a noise and traffic management point of view. Each day the traffic backs up to Kent Street heading in to Cowfold; the traffic jams caused by the additional traffic turning on and off will be very disruptive.

It is a fallacy to assume that without traffic lights there would be no congestion. All residents know that whenever anyone is turning off this road along this part of the A272 queues quickly develop. **In peak weeks there are estimated to be more than 1200 ancillary vehicles coming and going per week.**

Holding bay:

Rampion do not appear to feel the need for a holding bay to the east of the site to control the movement of HGVs. This proved very necessary for the far less problematic turning off the A272 into Wineham Lane during Rampion 1

5.10.8 Developments outside nationally designated areas which might affect them. The lanes to the North of the site, such as Picts Lane, Bulls Lane, Long House Lane and parts of Spronketts Lane, fall within an area of Outstanding Natural Beauty. The traffic and traffic management proposals during the construction of the substation at this site will have impacts on these small lanes throughout the construction period, significantly altering their character and spoiling the visual appearance. It remains a matter of considerable concern to the residents of these lanes that the inevitable use of these single-track side roads as 'cut-throughs' will destroy the verges and cause impossible levels of traffic and congestion, causing considerable distress to the people who legitimately use them. This already happens when accidents occur on the A272, and it is not uncommon for farmers to have to pull vehicles out of the ditches they have fallen into, but in the case of this development this impractical use would be sustained over 3-6 years. By their own admission Rampion had not considered this when choosing the site (Appendix 4) and, as they had

not informed the local residents of their plans until the end of the consultation, they therefore remained unaware of the impact on Picts La and the neighbouring lanes until that point. A number of residents have sent photographs and videos demonstrating the total unsuitability of these lanes for such purpose.

WSCC transport plan 2022(7.99) identifies

- Congestion on the A272 during peak periods;

- Rat-running on less suitable routes to avoid congestion;

as amongst the current key transport issues in Horsham district. Both these problems will be amplified by the choice of this site.

One of the biggest failures of data provision to inform the consultation when choosing the substation location has been any real assessment or understanding of the way in which the traffic behaves on A272. Nor has any proper study of the visual impact of the substation from the road or from the AONB been carried out taking into account the fact that much of the existing screening will need to be removed in order to create a visibility splay onto the A272. The following letter discusses this further:

Letter sent to WSCC, including Joy Dennis, PI and HDC 18/5/2023

Dear Mr Elkington,

The failure of Rampion to properly evaluate the Oakendene site before choosing it has led to a succession of increasingly damaging environmental decisions in order to compensate for the problems they have encountered as a result.

We have on multiple occasions raised with them the issues regarding traffic turning on and off the A272 in the vicinity of Oakendene.

At the Bolney Consultation event on 15th May we were asked by Rampion representatives what the difference was between traffic turning off at Wineham Lane and traffic turning off at Oakendene. The very fact that they need to ask this question would strongly suggest that they have not completed any detailed traffic modelling studies. The reasons why there is an enormous difference between the two locations are as follows and are immediately obvious to anyone who understands how this road actually works:

1) There is already a wide visibility splay on to the A272 from Wineham Lane. Access from the A272 is onto a two-lane road so vehicles can go in and out at the same time. In order to achieve the same result near Kent Street on the A272, several hundred metres of ancient hedge and mature Oaks will need to be removed. Also, two lane access to the substation site from that point will mean the ability to screen the substation view and noise from the road, neighbouring properties and the AONB to the north will be significantly compromised.

2) The visibility when turning out of Wineham Lane is far better than at Oakendene, with straight road in each direction, no dips or bends as at Oakendene. The holes in the hedges between Picts

Lane and Oakendene Industrial Estate bear witness to the number of accidents already occurring on this stretch of road.

3)At Wineham Lane traffic does not back up for a mile at least twice a day as it does at Oakendene heading west. Any, even small, obstruction also rapidly causes it to build up at other times of day

4)If the traffic is backed up, the HGVs, which will be coming and going from the A23, will not easily be able to get out of Oakendene as they will not be able to see past the queue to see traffic coming from the west. This will lead to further accidents.

5)If traffic lights or a roundabout are put in place to deal with this, traffic will back up even further heading west and the eastbound traffic will quickly back up into the Air Quality Management Area of Cowfold village. The proximity to the roundabouts in Cowfold will rapidly lead to even further congestion in the village.

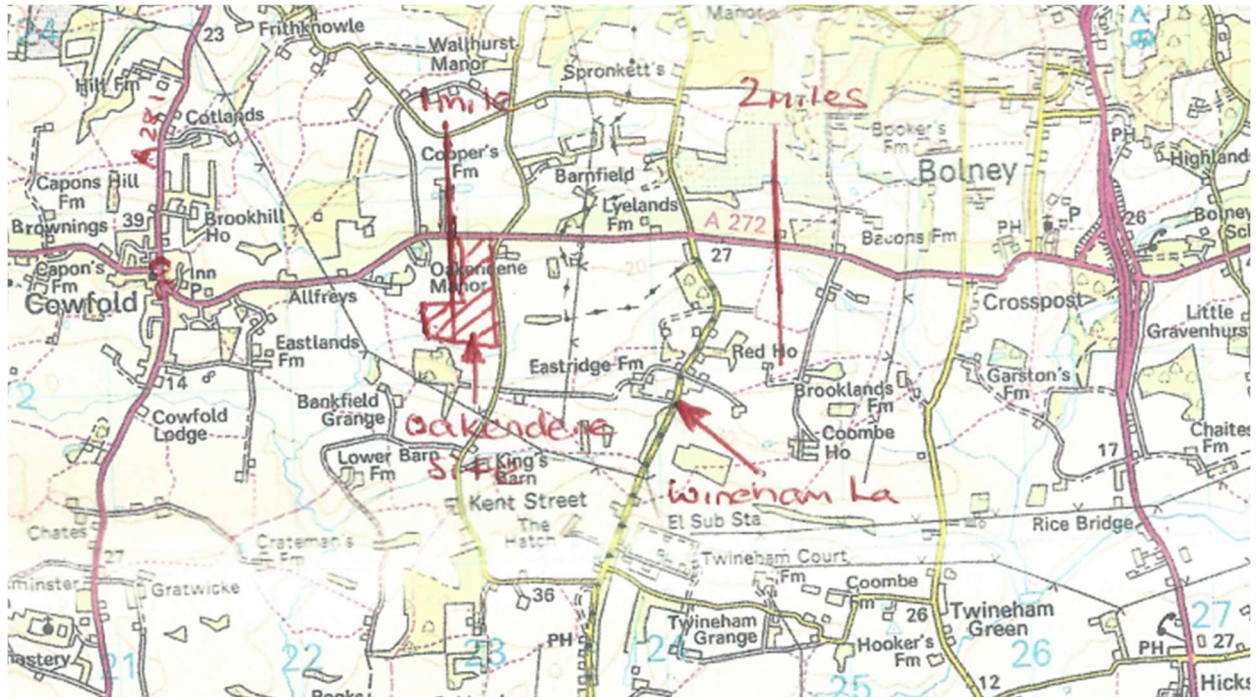
6)The construction of any significant change in the layout of the road to assist turning would be completely unacceptable to residents, as it would in itself be extremely disruptive, both to the traffic on the A272 and to Picts Lane, which would bear the brunt of traffic redirection. It would also surely be an unreasonable alteration to the rural characteristic of this stretch of road just to facilitate an already flawed decision.

Yours sincerely

Meera Smethurst

CowfoldvRampion

Appendix 1 – Map showing distances from Cowfold to Oakendene and Wineham Lane.



Appendix 2- Map from Vicky Portvain to Resident



Appendix 3 – WSCC Accident Data

I have attached a report showing the recorded injury collisions for the 10 years to 31 October 2022. Any collision records still being reconciled by the police may not appear until next month. The latest 5 years data can be found on our [Internet page](#) which is updated monthly. There are 3 collisions at or near the junction with Kent Street and I have highlighted them in the report.



David Newman

Senior Technician, A25 County Road Safety Group, Highways, Transport and Planning

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Report a problem with a road or pavement or raise a highways related enquiry. Follow us at [@WSHighways](https://twitter.com/WSHighways)

PIC Search 22079 - A272 E. of Cowfold - 10yrs to 31 Oct 2022

Accident Date BETWEEN '01-Nov-2012' AND '31-Oct-2022' AND Accident Severity IN LIST 1,2,3

ACCIDENT SEVERITY UPTO 2022

	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
Fatal	0	0	0	0	0	0	0	0	0	0	0	0
Serious	0	0	0	0	0	0	0	0	2	3	2	7
Slight	0	0	2	5	0	1	3	1	1	2	3	18
Damage	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	2	5	0	1	3	1	3	5	5	25
%	0%	0%	8%	20%	0%	4%	12%	4%	12%	20%	20%	100%

CASUALTY SEVERITY UPTO 2022

	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
Fatal	0	0	0	0	0	0	0	0	0	0	0	0
Serious	0	0	0	0	0	0	0	0	2	3	4	9
Slight	0	0	2	7	0	1	5	2	1	6	6	30
Total	0	0	2	7	0	1	5	2	3	9	10	39
%	0%	0%	5%	18%	0%	3%	13%	5%	8%	23%	26%	100%

West Sussex Injury Accident Engineers Report
PIC Search 22079 - A272 E. of Cowfold - 10yrs to 31 Oct 2022
 Accident Date BETWEEN '01-Nov-2012' AND '31-Oct-2022' AND Accident Severity IN LIST 1,2,3

Accident 1 of 25	1404469	Severity: Slight	Mon 04/08/2014	at 14:10	on the A272	Police Officer Attend:	No
A272 COWFOLD ROAD HORSHAM 227M WEST OF U KENT STREET LANE							
Light: Light - Weather: Other - Road Surface: Wet - Speed Limit: 60mph							Easting / Northing 523418 / 122730
Veh 1	Goods > 7.5t	Going ahead other		from W to E	Skidded	Impact: Front	Male Aged Between 35-44
Veh 2	Car	Waiting to go ahead but held up		from W to E	No Skid	Impact: Back	Male Aged Between 45-54
Veh 3	Van/Goods < 3.5t	Waiting to turn right		from W to E	No Skid	Impact: None	Male Aged Between 25-34
Cas 1	Driver or Rider	of veh 2	Slight	Male	Aged between 45-54		
Accident 2 of 25	1407461	Severity: Slight	Thu 18/12/2014	at 13:55	on the A272	Police Officer Attend:	Yes
A272 BOLNEY 50M EAST OF U KENT STREET OUTSIDE PETROL STATION							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							Easting / Northing 523626 / 122717
Veh 1	Car	Stopping		from W to E	No Skid	Impact: Front	Female Aged Between 17-24
Veh 2	Van/Goods < 3.5t	Stopping		from W to E	No Skid	Impact: Back	Male Aged Between 45-54
Cas 1	Driver or Rider	of veh 1	Slight	Female	Aged between 17-24		
Accident 3 of 25	1500089	Severity: Slight	Tue 06/01/2015	at 17:22	on the A272	Police Officer Attend:	Yes
A272 COWFOLD ROAD COWFOLD 600M EAST OF U KENT STREET							
Light: Dark/no lights - Weather: Fine - Road Surface: Wet - Speed Limit: 60mph							Easting / Northing 522181 / 122563
Veh 1	Car	Going ahead other		from W to E	No Skid	Impact: Front	Female Aged Between 17-24
Cas 1	Driver or Rider	of veh 1	Slight	Female	Aged between 17-24		
Accident 4 of 25	1500974	Severity: Slight	Tue 17/02/2015	at 09:11	on the A272	Police Officer Attend:	Yes
A272 BOLNEY ROAD COWFOLD 250M EAST OF U FAIRFIELD COTTAGES							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 50mph							Easting / Northing 521931 / 122553
Veh 1	Car	Going ahead other		from E to W	No Skid	Impact: Nearside	Male Aged Between 25-34
Veh 2	Car	Going ahead other		from W to E	No Skid	Impact: Front	Male Aged Between 65-74
Cas 1	Driver or Rider	of veh 1	Slight	Male	Aged between 25-34		
Cas 2	Driver or Rider	of veh 2	Slight	Male	Aged between 65-74		
Accident 5 of 25	1504539	Severity: Slight	Thu 06/08/2015	at 07:33	on the A272	Police Officer Attend:	Yes
A272 BOLNEY ROAD. COWFOLD. 500M WEST OF U NYES HILL OUTSIDE NONE NEAR.							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							Easting / Northing 523809 / 122713

Print date: 28/11/2022 Page 1 of 6

Veh 1	Car	Going ahead RH bend		from W to SE	Skidded	Impact: Front	Male Aged Between 25-34
Cas 1	Driver or Rider	of veh 1	Slight	Male	Aged between 25-34		
Cas 2	Passenger	of veh 1	Slight	Male	Aged between 25-34		
Accident 6 of 25	1507157	Severity: Slight	Wed 02/12/2015	at 08:15	on the A272	Police Officer Attend:	Yes
A272 BOLNEY ROAD COWFOLD 872M WEST OF U KENSTREET LANE							
Light: Light - Weather: Fine - Road Surface: Wet - Speed Limit: 60mph							Easting / Northing 522346 / 122578
Veh 1	Van/Goods < 3.5t	Going ahead other		from W to E	No Skid	Impact: Front	Male Aged Between 55-64
Veh 2	Car	Going ahead other		from W to E	No Skid	Impact: Back	Male Aged Between 45-54
Veh 3	Car	Going ahead other		from W to E	No Skid	Impact: Back	Male Aged Between 35-44
Cas 1	Driver or Rider	of veh 3	Slight	Male	Aged between 35-44		
Accident 7 of 25	1507192	Severity: Slight	Fri 04/12/2015	at 13:55	on the A272	Police Officer Attend:	Yes
A272 COWFOLD ROAD COWFOLD 530M EAST OF U OAKFIELD ROAD							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							Easting / Northing 522058 / 122542
Veh 1	Car	Going ahead other		from W to E	No Skid	Impact: Front	Male Aged Between 55-64
Veh 2	Car	Going ahead other		from E to W	No Skid	Impact: Offside	Male Aged Between 25-34
Veh 3	Car	Going ahead other		from E to W	No Skid	Impact: Front	Female Aged Between 25-34
Cas 1	Driver or Rider	of veh 2	Slight	Male	Aged between 25-34		
Accident 8 of 25	1702427	Severity: Slight	Tue 02/05/2017	at 17:30	on the A272	Police Officer Attend:	No
A272 COWFOLD ROAD BOLNEY 131M WEST OF U SPRONKETS LANE							
Light: Light - Weather: Rain - Road Surface: Wet - Speed Limit: 60mph							Easting / Northing 524103 / 122726
Veh 1	Car	Stopping		from W to E	No Skid	Impact: Front	Female Aged Between 17-24
Veh 2	Car	Waiting to go ahead but held up		from W to E	No Skid	Impact: Back	Male Aged Between 25-34
Veh 3	Car	Waiting to go ahead but held up		from W to E	No Skid	Impact: Back	Male Aged Between 25-34
Cas 1	Driver or Rider	of veh 1	Slight	Female	Aged between 17-24		
Accident 9 of 25	1803679	Severity: Slight	Thu 28/06/2018	at 18:10	on the A272	Police Officer Attend:	No
A272 COWFOLD 826M WEST OF U KENTSTREET LANE							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							Easting / Northing 522372 / 122588
Veh 1	Car	O/T moving veh on its O/S		from W to E	No Skid	Impact: Nearside	u/k Aged Between 35-44
Veh 2	Pedal Cycle	Going ahead other		from W to E	No Skid	Impact: Offside	Male Aged Between 45-54
Cas 1	Driver or Rider	of veh 2	Slight	Male	Aged between 45-54		
Accident 10 of 25	1805573	Severity: Slight	Mon 08/10/2018	at 14:15	on the A272	Police Officer Attend:	No
A272 COWFOLD ROAD COWFOLD AT JUNCTION OF U UNNAMED ROAD OUTSIDE SUSSEX STUD							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							Easting / Northing 522787 / 122770

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Veh 1	Car	Going ahead other			from W to E	No Skid	Impact: Front	Male Aged Between	N/A
Veh 2	Car	Stopping			from W to E	No Skid	Impact: Back	Male Aged Between	35-44
Veh 3	Car	Waiting to turn right			from W to S	No Skid	Impact: None	Female Aged Between	35-44
Cas 1	Driver or Rider	of veh 2	Slight	Male	Aged between	35-44			
Cas 2	Passenger	of veh 2	Slight	Female	Aged between	25-34			
Cas 3	Passenger	of veh 2	Slight	Male	Aged between	55-64			

Accident 11 of 25 1805829 Severity: Slight Mon 22/10/2018 at 13:46 on the A272 Police Officer Attend: Yes

A272 COWFOLD ROAD COWFOLD 30M EAST OF U UNNAMED ROAD

Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph Easting / Northing 522906 / 122779

Veh 1	Car	Going ahead other			from E to W	No Skid	Impact: Front	Male Aged Between	55-64
Cas 1	Driver or Rider	of veh 1	Slight	Male	Aged between	55-64			

Accident 12 of 25 19903821 Severity: Slight Thu 21/11/2019 at 10:57 on the A272 Police Officer Attend: Yes

OAKENDENE INDUSTRIAL ESTATECOWFOLD ROAD (A272)

Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph Easting / Northing 522427 / 122570

Veh 1	Van/Goods < 3.5t	Going ahead other			from W to E	No Skid	Impact: Front	Male Aged Between	65-74
Veh 2	Van/Goods < 3.5t	Going ahead other			from W to E	No Skid	Impact: Back	Male Aged Between	25-34
Veh 3	Van/Goods < 3.5t	Stopping			from W to E	No Skid	Impact: Back	Male Aged Between	25-34
Cas 1	Driver or Rider	of veh 2	Slight	Male	Aged between	25-34			
Cas 2	Driver or Rider	of veh 3	Slight	Male	Aged between	25-34			

Accident 13 of 25 20937047 Severity: Serious Thu 05/03/2020 at 17:15 on the A272 Police Officer Attend: Yes

COWFOLD ROAD (A272) - 116 METRES FROM JUNCTION WITH UNCLASSIFIED ROAD

Light: Light - Weather: Rain - Road Surface: Wet - Speed Limit: 60mph Easting / Northing 523741 / 122716

Veh 1	Car	Going ahead other			from E to W	Skidded & O/Turn	Impact: Front	Female Aged Between	17-24
Cas 1	Driver or Rider	of veh 1	Serious	Female	Aged between	17-24			

Accident 14 of 25 20970994 Severity: Serious Sun 09/08/2020 at 10:10 on the A272 Police Officer Attend: Yes

COWFOLD ROAD (A272) - 175 METRES FROM JUNCTION WITH UNCLASSIFIED ROAD

Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph Easting / Northing 523800 / 122710

Veh 1	M/cycle > 500cc	Stopping			from E to W	Skidded	Impact: Offside	Male Aged Between	45-54
Veh 2	Car	Stopping			from E to W	No Skid	Impact: None	Female Aged Between	55-64
Veh 3	Van/Goods < 3.5t	Parked			from Pkd Pkd	No Skid	Impact: None	u/k Aged Between	N/A
Cas 1	Driver or Rider	of veh 1	Serious	Male	Aged between	45-54			

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Accident 15 of 25 20993039 Severity: Slight Mon 26/10/2020 at 08:00 on the A272 Police Officer Attend: Yes

BOLNEY ROAD (A272) NEAR JUNCTION WITH UNCLASSIFIED ROAD

Light: Light - Weather: Other - Road Surface: Wet - Speed Limit: 60mph Easting / Northing 522389 / 122581

Veh 1	M/cycle 50 - 125cc	Stopping			from W to E	Skidded	Impact: Front	Male Aged Between	17-24
Veh 2	Car	Stopping			from W to E	No Skid	Impact: Back	Male Aged Between	25-34
Veh 3	Car	Turning right			from W to SE	No Skid	Impact: None	u/k Aged Between	N/A
Cas 1	Driver or Rider	of veh 1	Slight	Male	Aged between	17-24			

Accident 16 of 25 211029499 Severity: Slight Fri 19/03/2021 at 14:18 on the A272 Police Officer Attend: Yes

BOLNEY ROAD (A272)

Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph Easting / Northing 522022 / 122543

Veh 1	Van/Goods < 3.5t	Starting			from N to S	No Skid	Impact: Offside	Male Aged Between	55-64
Veh 2	Car	Going ahead other			from W to E	No Skid	Impact: Nearside	Female Aged Between	45-54
Cas 1	Driver or Rider	of veh 2	Slight	Female	Aged between	45-54			
Cas 2	Driver or Rider	of veh 1	Slight	Male	Aged between	55-64			

Accident 17 of 25 211059945 Severity: Serious Sat 26/06/2021 at 17:27 on the A272 Police Officer Attend: Yes

COWFOLD ROAD (A272) - 74 METRES FROM JUNCTION WITH UNCLASSIFIED ROAD

Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph Easting / Northing 523699 / 122717

Veh 1	Car	Going ahead other			from W to E	Skidded & O/Turn	Impact: Front	Male Aged Between	17-24
Veh 2	Car	Going ahead other			from E to W	Skidded	Impact: Front	Female Aged Between	55-64
Veh 3	Car	Going ahead other			from E to W	No Skid	Impact: Front	Female Aged Between	25-34
Cas 1	Passenger	of veh 1	Serious	Female	Aged between	10-16			
Cas 2	Driver or Rider	of veh 3	Slight	Female	Aged between	25-34			
Cas 3	Driver or Rider	of veh 2	Slight	Female	Aged between	55-64			
Cas 4	Driver or Rider	of veh 1	Slight	Male	Aged between	17-24			

Accident 18 of 25 211067793 Severity: Serious Mon 19/07/2021 at 16:40 on the A272 Police Officer Attend: Yes

BOLNEY ROAD (A272) - 58 METRES FROM JUNCTION WITH UNCLASSIFIED ROAD

Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 50mph Easting / Northing 522647 / 122727

Veh 1	Car	Stopping			from SW to NE	No Skid	Impact: Back	Male Aged Between	25-34
Veh 2	M/cycle > 500cc	Going ahead RH bend			from SW to E	No Skid	Impact: Front	Male Aged Between	17-24
Cas 1	Driver or Rider	of veh 2	Serious	Male	Aged between	17-24			

Accident 19 of 25 211072013 Severity: Serious Thu 29/07/2021 at 20:20 on the A272 Police Officer Attend: Yes

COWFOLD ROAD (A272) NEAR JUNCTION WITH UNCLASSIFIED ROAD

Light: Dark/no lights - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph Easting / Northing 523639 / 122721

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Veh 1	Goods > 7.5t	Going ahead other		from W to E	O/Turn	Impact: Back	Male Aged Between 17-24
Cas 1	Driver or Rider	of veh 1	Serious Male	Aged between	17-24		
Accident 20 of 25 211110261 Severity: Slight Mon 15/11/2021 at 17:10 on the A272 Police Officer Attend: Yes							
BOLNEY ROAD (A272) NEAR JUNCTION WITH KENT STREET							
Light: Dark/no lights - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							
Veh 1	Car	Starting		from SW to E	No Skid	Impact: Nearside	Male Aged Between 17-24
Veh 2	Car	Going ahead other		from W to E	No Skid	Impact: Front	Female Aged Between 65-74
Cas 1	Driver or Rider	of veh 2	Slight Female	Aged between	65-74		
Accident 21 of 25 221134684 Severity: Slight Fri 21/01/2022 at 03:00 on the A272 Police Officer Attend: Yes							
BOLNEY ROAD (A272) - 51 METRES FROM JUNCTION WITH UNCLASSIFIED ROAD							
Light: Dark/no lights - Weather: Other - Road Surface: Ice - Speed Limit: 60mph							
Veh 1	Car	Going ahead RH bend		from NE to W	O/Turn	Impact: Front	Male Aged Between 17-24
Cas 1	Driver or Rider	of veh 1	Slight Male	Aged between	17-24		
Accident 22 of 25 221148005 Severity: Serious Sun 27/02/2022 at 16:26 on the A272 Police Officer Attend: Yes							
BOLNEY ROAD (A272) - 23 METRES FROM JUNCTION WITH PRIVATE DRIVEWAY							
Light: Light - Weather: Other - Road Surface: Dry - Speed Limit: 60mph							
Veh 1	Car	Going ahead RH bend		from SW to E	O/Turn	Impact: Front	Male Aged Between 55-64
Cas 1	Driver or Rider	of veh 1	Serious Male	Aged between	55-64		
Cas 2	Passenger	of veh 1	Serious Female	Aged between	55-64		
Cas 3	Passenger	of veh 1	Serious Male	Aged between	25-34		
Cas 4	Passenger	of veh 1	Slight Female	Aged between	25-34		
Accident 23 of 25 221175915 Severity: Serious Wed 11/05/2022 at 07:15 on the A272 Police Officer Attend: Yes							
BOLNEY ROAD (A272) NEAR JUNCTION WITH KENT STREET, COWFOLD, WEST SUSSEX							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							
Veh 1	M/cycle > 500cc	O/T moving veh on its O/S		from W to E	No Skid	Impact: Front	Male Aged Between 25-34
Veh 2	Car	Turning right		from W to S	No Skid	Impact: Offside	Female Aged Between 55-64
Cas 1	Driver or Rider	of veh 1	Serious Male	Aged between	25-34		
Accident 24 of 25 221200167 Severity: Slight Tue 19/07/2022 at 08:06 on the A272 Police Officer Attend: Yes							
COWFOLD ROAD (A272) NEAR JUNCTION WITH KENT STREET, BOLNEY, WEST SUSSEX							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							
Eastings / Northing 523202 / 122751							

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Veh 1	Car	Going ahead other		from E to W	No Skid	Impact: Front	Male Aged Between 55-64
Veh 2	Car	Stopping		from E to W	No Skid	Impact: Back	Female Aged Between 35-44
Cas 1	Driver or Rider	of veh 1	Slight Male	Aged between	55-64		
Accident 25 of 25 221206439 Severity: Slight Sat 06/08/2022 at 08:45 on the A272 Police Officer Attend: Yes							
BOLNEY ROAD (A272), COWFOLD, WEST SUSSEX							
Light: Light - Weather: Fine - Road Surface: Dry - Speed Limit: 60mph							
Veh 1	Car	Going ahead other		from E to W	Skidded	Impact: Front	Male Aged Between 35-44
Veh 2	Car	Going ahead other		from W to E	No Skid	Impact: Front	Male Aged Between 25-34
Cas 1	Driver or Rider	of veh 1	Slight Male	Aged between	35-44		
Cas 2	Passenger	of veh 1	Slight Female	Aged between	25-34		
Cas 3	Passenger	of veh 1	Slight Female	Aged between	10-16		

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Appendix 4 – Rampion email regarding Picts Lane

----- Original Message -----

From: Rampion 2 <rampion2@rwe.com>

To: [REDACTED]

Sent: Tuesday, 29 Nov, 22 At [REDACTED]

Subject: Rampion2 Consultation

Dear [REDACTED]

Please see page 36 of the consultation booklet for the location of the substation. The Proposed Development Chapter of the Preliminary Environmental Information Report describes what will be at the substation location and the graphic on page 63 includes an indicative layout of the substation.

Rampion 2 recognise the importance of construction traffic in the local area and confirm we will be producing a Construction Traffic Management Plan to effectively manage traffic and transport and reduce impacts on the local community.

The Preliminary Environmental Information Report includes an appendix on Transport. In this appendix highways Link26–Wineham Lane, South of the A272 has been identified at 7.3.1.4 as one of the four highways links where the volume of Proposed Development traffic exceeds the impact threshold percentages and therefore requires further assessment. The other 3 roads are not in this local area and further west. On all other highways links, the percentage change in traffic flows or HGVs does not trigger the need for an assessment of environmental effects. Picts lane is further north and not identified as triggering the requirement for assessment.

The original Environmental Report from 2021 PEIR transport chapter states at Paragraph 24.3.14 that HGV route enforcement will be addressed within the Construction Traffic Management Plan (CTMP) prepared to support the onshore elements of the Proposed Development and agreed requirements of the Development Consent Order. The Outline CTMP (Appendix 24.1, Volume 4) includes details on timings on the local highways network for all construction vehicles including HGVs as well as HDD proposals and details on visibility splays. Section 24.6 sets out the locations of the highways links assessed at PEIR. This CTMP is updated in the PEIR SIR at page J37.

Sent on behalf of the Rampion 2 Team

If you are not already on our regular email update list, you can sign up here: <https://rampion2.com/keep-in-touch/>

Registered Office:

Rampion 2 Offshore Wind Farm

RWE Renewables UK Limited: Greenwood House, Westwood Way, Westwood Business Park, Coventry, United Kingdom CV4 8PB. Registered in England and Wales no. 03758404

RWE Renewables Management UK Limited: Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB. Registered in England and Wales no. 12087808

Addendum to Traffic and Transport Following DCO Submission.

Introduction:

The DCO submission does not include any further assessment of the traffic impact on the A272 at Oakendene and Cowfold. Indeed, it continues to assert that there is no need for further assessment and still refers to traffic impact modelling based on the whole of the A272 from the A23 to Cowfold (Highways link 27). The traffic predictions in **Chapter 23: Transport, Volume 2** of the ES (Document Reference: 6.2.23) indicated “low daily traffic flows across a majority of the links assessed and discussions with WSCC and NH identified no need for detailed junction assessment or the provision of a Transport Assessment for the DCO Application.”

This is to fundamentally misunderstand the effect of the mini roundabouts and the fact that the traffic is already at capacity for much of the time at this point in the road (see detailed assessment in main document, Section 10, Traffic and Transport). The traffic therefore behaves in a very different way from Oakendene to Cowfold compared to around the turning for Wineham Lane (highways link 26) a fact recognised by the Horsham District Council’s Relevant Representation, Para 3.6 “At Cowfold, the natural restriction created by the staggered A272/A281 junction, combined with the volume of traffic using the A272 as a major link road, results in significant standing traffic during morning and evening peak periods”.

There is also a concerning intention, not previously part of the consultation information, to use Kent Street to avoid the AQMA. (This has in fact since been denied by Rampion as the haul road will not be continuous at the Cowfold Stream, but came about as a result of Table 6-2 in OCTMP where circular routes are mentioned. We still seek clarification of exactly what this table means however)

Traffic is a serious concern for not only those in the immediate vicinity but the whole village and those who use the A272 regularly. This is in striking contrast to the situation at Wineham Lane- nobody raised traffic on the A272 as a concern in the Rampion 1 Relevant Representations. Indeed, there were no Relevant Representations from Bolney village at all. Far fewer people were really impacted and hardly any to the extent that is occurring widely in this case. For Rampion 1 the impact on nearby villages was minimal; many people did not know it was happening. There is much more congestion as one approaches Cowfold, this project is much larger than Rampion 1 and the movements of vehicles in and out of Kent Street, Oakendene and the western compound will be much more complex than just entering and leaving Wineham Lane, yet no holding area to control the traffic has been deemed necessary, whereas it was for Rampion 1. There is no new evidence in the DCO that Rampion have carried out appropriate studies on traffic flow and pollution. Nor have they adequately considered the accident rates at this particular part of the A272, which are frequent.

Their assumptions about baseline HGV numbers are false. In the Traffic Generation Technical Note (doc ref 6.4.23.2) para 3.2.14 HGV projections are based on linear growth of 0.38% growth pa from 2019 (as was the case between 2018 and 19). In fact, we see a huge hike in HGV and LGV traffic as the trend toward home delivery which became so great in Covid has been maintained post pandemic. Cowfold Parish Council’s Road and Traffic Report shows a doubling of the number of LGVs and an accelerated increase in the numbers of HGVs. (See data in Section 7: Air Quality and Pollution, Appendix 1- Data from Cowfold Parish Council Traffic Report.)

Policy compliance:

This same DCO document (p14) claims compliance with the Horsham District Local Plan, and lists the conditions where development will be supported, including where it “provides safe and suitable access for all vehicles, pedestrians, cyclists, horse riders, public transport and the delivery of goods. With regards to Kent Street and the A272, these proposals are directly at odds with these aims. Similarly, instead of “addressing an existing traffic problem” it makes an already problematic situation on the A272 and our side roads considerably worse.

The NPPF EN-1 (2011) paragraph 5.13.2 states “The consideration and mitigation of transport impacts is an essential part of Government’s wider policy objectives for sustainable development as set out in Section 2.2 of this NPS”. The Traffic Generation Technical Note (Doc Ref 6.4.23.2) Table 2-1 outlines how the proposals will comply with the traffic mitigations in the NPPF. Many of the references they list as links do not actually provide the information, they say they do. We do not believe they have adequately considered or mitigated the transport impacts in Cowfold. Many issues are ignored altogether, such as the effects of the junction congestion, the effect of traffic on minor roads such as Kent Street and the economic impacts of traffic delays.

Para 5.13.11 covers the control of numbers of HGVs at specified times. The Outline CTMP link which is supposed to provide this data in fact makes no attempt to do so.

National Highways request updated traffic modelling based on post covid patterns. (p37 doc ref 6.2.23). The only assessment which has been done (see table 23-15) is in March 2023 where a visit to study area 1 was undertaken to “*assess all roads, and junctions, all proposed access sites and the PRoWs affected by the onshore elements and confirmation of the suitability of roads for HGV traffic*” Yet there is no documentation of the findings of this study. Nor is there any mention of whether Kent Street was assessed for ‘suitability for HGVs’.

Highways England also ask for the numbers of trips to be expected during peak time hours. The Outline CTMP reference does not give this information.

Guidelines for the Environmental Assessment of Road Traffic (GEART) identify a number of ways in which a proposed development may create environmental impacts as a result of traffic generation. Driver delay has not been properly assessed as no consideration is given to the effect of junctions at capacity. Rule 2, which requires the full assessment of impacts if the percentage increase in traffic is likely to be greater than 10% has not been fulfilled with respect to Kent Street, as Kent Street has not been included in the assessment, even though wider roads such as Wineham Lane have. In this case, Rule 1 probably also applies as the increase in HGVs is likely to be well over 30%.

Routes:

There will be two vast compounds in Cowfold, one to the west of the Industrial Estate, (TCC3, Access point A62) and one at the substation site (TCC 4, access point A63). There will be 4 access points on Kent Street (A64, A61, A60 and A59) and several on the A281(see access point maps at: Chapter 18 Figures Part 1 of 6, figures 18.8 s and t. “Landscape Elements along Cable Route Corridor”). The table 6-2, from Outline Construction Traffic Management Plan (CTMP) (Doc Ref 7.6)

shows the proposed circular routes from the two compounds, along the A272(route 3). There is a complicated system of in and out movements from the two compounds for HGVs and LGVs

From table 6-2 there will be 4548 HGV movements from A62 west to the A281, through the AQMA. However, it should be noted there is a duplication of the two halves of this table and it is not clear whether additional data is missing as a result. Certainly, access points 51,54, 58 and 59 are missing from the table. **2212 HGVs will cross the carriageway to head east to Kent Street** and 1630 will turn east to Wineham Lane. The rest will turn east from A63 to Wineham Lane. In total there will be 20814 HGV movements. (addition of figures from Table 6-2 Doc ref 7.6). **This is dramatically different from the 8040 vehicles consistently mentioned in the consultation.**

11440 LGVs will carry out a circular route from A 62 via Kent Street to the haul roads and to Wineham Lane and the A281. **59436** will come and go from A63 eastwards on the A272.

NB the numbers Rampion give in this table, although it says weekly numbers, they, confusingly, actually mean total numbers but that should be confirmed with them, as other traffic movement tables are for weekly numbers.

This movement of traffic in and out of the three points (A62, A63 and Kent Street), which are very close together, will cause significant disruption on the A272, with congestion and pollution from standing traffic, especially for Coopers Cottage and South Lodge, the residences and gardens of which are directly on the main road, and the people who live at the entrance to the industrial estate. It is also likely to require traffic lights to manage it safely. The congestion will result in traffic backing up into the AQMA in Cowfold, and increased difficulty for residents getting in and out of Kent Street and Picts Lane and access roads to properties along the A272. The industrial estate will be very difficult to get in and out of as will the compounds themselves. Picts Lane and Bulls Lane will also face being used as a cut through to avoid the congestion. There appears to be no traffic modelling for the impact on these side roads, or on the surrounding villages, yet this impact on side roads and nearby villages is well recognised (see CBI 2016 report 'Unblocking Regional Growth')

There is also likely to be an increase in accidents on this busy and already dangerous part of the A272. Please see Section 10 Traffic and Transport for further details. I would also remind you of WSCC's own concerns about the accident rate at Oakendene, where there are double white lines in the centre of the road.

Staff movements:

The outline CTMP (doc ref 7.6) p 45 Table 6-1 shows the staff movements to and from the compounds each day. Section 3 relates to the substation area and TCC 3. We have not been able to find actual numbers of staff anywhere, but in a project of this size there must be many thousands. You can see from table 6-1 that the vast majority of staff vehicles will come to Cowfold from the A23 and the A24, in roughly equal numbers. This is likely to equate to several hundred a day. The approximately half, from the table, who come from the A24 will have to travel through the AQMA twice daily at peak times. This will increase congestion and pollution at peak times.

Core working hours:

From the Outline Construction Traffic Management Plan (Doc Ref 7.6) p60 the core working hours are proposed as 7am -7pm M-F, 8am-1pm Sat and others as agreed necessary (By Rampion

presumably) including if there are delays. There are already twice daily delays on the A272, and the Rampion activities will create even more so this is effectively an open door to do as they please. In addition, they are asking for an hour either side for HGVs to return to the compounds 'because of the distances involved'. Then the staff vehicles will have to leave. There will be little time in the day when they will not be working. The noise and traffic implications of this are not acceptable. See also WSCC concerns about inadequacy of noise assessment.

Highways delay is NOT mentioned in the list of exceptions in 6.4.23.2 p39, 6.2.23 or 7.2, nor is the intention to allow an hour extra either side to get back from where they are working.

Light goods vehicles:

There appears to be lack of clarity about the definition of LGVs in the DCO documents. LGVs are referred to throughout as Light Goods Vehicles, and mention is made of private cars, minibuses and white vans. In 1992 the official definition of LGV changed to mean LARGE Goods Vehicle. It would seem from Table 4-4 in the Outline Construction Traffic Management Plan (Doc ref 7.6), that this may in fact be what was intended: the first item under HGVs refers to trucks >7.5T. Smaller trucks are not expressly listed on the table at all, and therefore, the implication of this is that trucks UNDER 7.5T are to be considered as LGVs. There is obviously quite a difference between minibuses and white vans, and huge lorries up to 7.5T.

An email from Chris Tomlinson on 24th September 2023 does not, unfortunately, help to clarify the uncertainty: *"The definition as set out in the Environmental Statement is applicable to all our assessments and tables; LGV refers to Light Goods Vehicles that are less than 3.5t. HGVs are goods vehicles heavier than 3.5t."* His response appears to contradict the DCO documents, and absolute clarification should be sought.

It also has huge implications, not just for the AQMA but also for the terrible burden that Rampion are expecting tiny Kent Street Lane and those living in the vicinity of the haul road across to the A281 to bear.

With regards to the circular route, this appears to be contradicted by the LGV route map, 7.6.13c from document 7.6. This shows a route from Wineham Lane to an isolated spot in the south part of Kent Street, not apparently connected to the cable route and no obvious through route down Kent Street is shown at all from the North. **Nor is it clear from this map how HGVs will access Kent Street and the haul road.**

Traffic Flow:

In The Outline CTMP Table 5-2, HGV access strategy, issue 6 discusses the need for an assessment of the construction traffic impacts on **capacity at junctions** and traffic links. Rampion say, *"The traffic predictions in **Chapter 23: Transport, Volume 2** of the ES (Document Reference: 6.2.23) indicated low daily traffic flows across a majority of the links assessed and discussions with WSCC and NH identified no need for detailed junction assessment or the provision of a Transport Assessment for the DCO Application."* **This assessment of linear traffic flow along the A272 highways link only looks at percentage changes in numbers of vehicles along the whole highways link (link 27) and does NOT make any assessment of the capacity at the mini-roundabout junction in Cowfold.**

Horsham District Council say that the additional traffic is a concern to locals (Table 23-5, p45). Rampion's response is that *"local access routes have been developed based on considerations including areas prone to congestion and are available in 7.6"*. **There is nothing in 7.6 which suggests they have considered the congestion in Cowfold; indeed, they continue only to assess it as highways link 27 as a whole.**

An email received from Mike Elkington at WSCC on 7/11/23 states that *"Whilst capacity modelling may not be required, the Applicant will still have to be mindful of existing traffic conditions. This may mean that any traffic management is not permitted during network peak times, although such matters have not been discussed or agreed with WSCC at present. Such measures can be included in the Outline Construction Traffic Management Plan, the content of which will be subject to further changes though discussion between WSCC and the Applicant."* As yet there has been no sign of any such intentions and nothing is included in the Outline CTMP, indeed the reverse, as the applicant requests core hours from 7am to 7pm. This shows no understanding of the traffic flows at this section of the A272.

The email goes on to say *"There are existing highway capacity issues through Cowfold. Traffic management associated with the Project will have to take account of these issues and where possible alternate routes for HGVs should be used. It may, however, be unavoidable for some HGVs to travel through Cowfold, particularly those associated with the cable route to the south of the village. There should be no reason for HGVs associated with the substation construction to arrive or depart via Cowfold, unless materials are being brought in from local sources. WSCC are pushing for a stronger commitment to avoid Cowfold wherever possible, and provide mitigation measures for those that are required to travel on this route."* Whilst we agree with these aims, none of this had been thought through by Rampion during the consultation and has not yet appeared as a plan. The impact on the AQMA would be largely removed if Wineham Lane was used as the substation site.

Updated accident data:

Data provided by David Newman of Highways, Transport and Planning at WSCC show the updated accident figures for the 10-year period, 1 Oct 2013 to 30 Sep 2023. Clusters at the intended western compound area by the industrial estate, the new Oakendene access point, Kent Street and to the east of Kent Street where a dip in the road affects visibility, remain high.

He also provides the information that nationally *"there are an estimated 1 reported injury collision for every 3.34 unreported injury collisions and there are an estimated 1 reported injury collision for every 15.36 unreported injury and damage only collisions."* So real figures are likely to be much higher. Indeed, the holes in the hedges would tend to support this. Whilst accident rates are not insignificant near the turn off to Wineham Lane either, the turn there would be straightforward and not involve the complicated, and dangerous 'dance' of vehicles coming in and out of several close together points as is proposed for the compounds, construction site and Kent Street at the Cowfold location, which will result in far more accidents, particularly when the congestion and queuing is taken into account.

We feel this lack of reporting must be taken into account when considering impacts on Kent Street and Picts Lane, where, as residents, we know that accidents frequently take place when people who

are not used to the small lanes use them, but they do not appear in statistics as they are not reported. Instead, farmers regularly pull them out of ditches or mud on the side of the lanes without the assistance of the emergency services. The increased traffic which will result on these side roads will rapidly result in gridlock and an increase in accidents, along with misery for the residents who will not easily or safely be able to gain access to their homes.

In the Transport Chapter, para 23.6.73, the accident rate along the whole A272 from Cowfold to the A23 is assessed as evenly distributed along the road. This is simply incorrect. There are clear clusters at the very turning points they wish to use to access Oakendene, Kent Street and the temporary compounds. Table 23-20 does not give a true picture of the dangers at Oakendene as Access 62 and 63 are very close together on this extremely busy road, and Kent Street, a few hundred yards away from Access 63 is not listed at all although it is a frequent accident location.

In Table 23-5 WSCC ask that feasibility checks should be conducted for access locations. Rampion reply that *"Visibility splays have been reviewed for all accesses along the route."* **There is no evidence that they have taken into account the close proximity of the Kent Street and junction and the Oakendene access A63.**

Similarly, in Table 23-5 (p49) WSCC comment that there are a number of accesses indicated in the table where a visibility splay is not required (e.g. AA-22, 23, 24, 26). *Whilst these accesses may be existing, the proposals will intensify the use. Some of these accesses are also onto high-speed roads and have potentially substandard visibility for emerging vehicles at present.* A full review of the appropriateness of these accesses to accommodate the intended use should be undertaken. Rampion's response is *"Visibility splays have been reviewed prior to DCO submission based on maximum road design speed and are available in the [Outline CTMP](#) (Document Reference: 7.6)."* **Agan, there is nothing in this to indicate that an assessment of the Kent Street junction has been carried out based on the intensified use, its suitability for slow moving access onto and off this high-speed road, or the consequences of its extreme proximity to access point A63.**

Kent Street:

There are references in the various DCO documents (e.g. Outline CTMP Doc ref 7.6 table 5-2) to 'single track lanes such as Wineham Lane and Kent Street'. Whilst technically, it might be true to call Wineham Lane a single-track lane as it has no white line down the centre along the whole length, it is in fact of similar width to the A272, a major road, and does not require passing places for the traffic to pass in both directions. Kent Street, however, is truly a narrow single-track lane, quite unsuitable for HGV use. We feel it is misleading to equate the two. Indeed, the OCTMP (doc ref 7.6) lists the widths of Kent Street as 3m, and Wineham Lane as 5.5m, almost the same as the A281 at 6.3m. This does not take into account the firm verges along Wineham Lane compared to the boggy ones and deep, often overflowing ditches along Kent Street

National Highways request updated traffic modelling based on post covid patterns. (p37 doc ref 6.2.23). The only assessment which has been done (see table 23-15) is in March 2023 where a visit to study area 1 was undertaken to *"assess all roads, and junctions, all proposed access sites and the*

PRoWs affected by the onshore elements and confirmation of the suitability of roads for HGV traffic”
Yet there is no documentation of the findings of this study. And no mention of whether Kent Street was assessed for ‘suitability for HGVs’.

Highways England also ask for the numbers of trips to be expected during peak time hours. **The Outline CTMP reference does not give this information.**

The Transport Chapter (6.2.23) contains the statement “*The **Outline CTMP** (Document Reference: 7.6) sets out the principles of which routes have been selected for use by HGVs.*” **There is nothing in this document which comes to the conclusion that Kent Street is a suitable road for HGVs,** indeed, from 6.2.23 para 23.3.46 “*temporary construction access to the onshore substation site at Oakendene: Kent Street was not considered appropriate as a main construction access to the onshore substation site by some consultees, and instead an access directly off the A272 was proposed.*”? **If the HGV traffic through the AQMA is recognised to be a significant enough risk that there is a need to avoid it, how can tiny Kent Street be suitable for such a significant number of HGVs?**

The Draft HDC district local plan 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*”. The A272 at Cowfold clearly does not have the capacity to support this development, and the only mitigation they have put forward simply puts the problem onto tiny side roads such as Kent Street which are somehow to be considered a suitable 3-6 year alternative to the use of the A272. If the HGVs are recognised to be so significant in number and consequences, that they must avoid the centre of Cowfold, how **Can** it be considered acceptable to send them through Kent Street and the ecologically sensitive area by the Cowfold Stream?

In July 2021, James d’Alessandro wrote to a resident who was concerned about the use of Kent Street by construction traffic: “*In January 2021, the Council responded to the Rampion 2 informal consultation process to the effect that Kent Street is not deemed appropriate for temporary construction access and an access directly off the A272 is acceptable in principle.*”

It should also be noted that at both ends of Kent Street are signs reminding drivers there is a width restriction of 6’6” on this road, except for access. This was surely only ever meant to mean access for the current residential and agricultural purposes and highlights its total unsuitability for the use in these proposals. It certainly indicates that it was never the intention to use this lane for large vehicles in any number. This was indeed the opinion of Horsham District council some years ago when an application for a Wedding Venue was made at a property on Kent Street. (see Application number DC/06/1049 on the Horsham Planning Portal). A study by WSCC commissioned by Horsham DC (the WSCC Transport Planning Services Consultation document in DC/06/1049) deemed the access to be so unsuitable that the application was turned down. Up to 40 cars 1-3 times a month was likely to push the level of use up by around 29%, well beyond the 10% increase viewed as significant by the Institute of Highway and Transportation. The *daily* number of much larger *goods vehicles* approximately 6 days a week for four years for Rampion is considerably in excess of this. The survey also concluded that a further reason for refusal was that Kent Street was “**a road of insufficient width to allow two vehicles to pass safely to the detriment of road safety**”. The truth of this was demonstrated very alarmingly when, between 20th and 22nd October 2023, an accident on A272 to the east of Kent Street closed the road. There was chaos on both Kent Street and Picts

Lane as vehicles tried to bypass the area, making it almost impossible for residents to enter or leave their homes. There were angry altercations as drivers met the oncoming traffic, vehicles in ditches and lorries stuck in narrow bends (see photos attached to Relevant Representation: RR168.)

In addition, the poor access via Kent Street being blocked by excessively large vehicles would be an issue to emergency service vehicles and the aging demographic on Kent Street and Kings Lane/Moatfield has a greater need for ambulances and as indeed has happened in recent weeks, and for some, over the years of planned construction, daily access for carers and even palliative specialist care.

A Traffic Impact Assessment for Kent Street has not been done, although they have done one for Wineham Lane. (See large tables at the end of Appendix 23.2 (doc ref 6.4.23.2) This is unacceptable, especially as traffic impacts on Wineham Lane were a consideration in the choice of substation site. This is a desktop assessment of the percentage increase in traffic there will be on various roads. I suspect this failure is because there is no baseline data for Kent Street as it is too small for the council to have collected any data. However, it is misleading simply to ignore its impact, which will indeed be terrible.

A recent assessment of traffic numbers has in fact been carried out by Enso Energy, Macquarie's shell company, for the battery storage farm application. (See Horsham Planning portal: DC/24/0054) However, it should be noted that three of the days it was in place coincided with the A272 road closure and ensuing chaos mentioned above.

The graphs in Appendix B of the Enso Construction Management Plan show an average of 486 two-way movements a day during the week of Wed 18th October to Tuesday 24th.

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 around 75-90, less than a tenth of Wineham Lane, (948 vehicles/day) and, looking at the vehicle classification graphs in Enso's CTMP, 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.** (compared to 17 for Wineham Lane)

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.

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.

It is also noted that access points A59, A61 and A64 off Kent Street are all listed for operational access. As no roads currently exist at these points, it is not clear whether there will be, not only visibility splays, but actual roads created, thus having a permanent effect on this tiny road. This is additionally unclear as A59 and A61 in the OCTMP (doc ref 7.6) are listed as 'construction and operational access' but at the same time 'temporary bellmouth construction'.

In addition, it is not stated in the DCO what exactly is the nature of the 'roadworks' planned for Kent Street and the A272 and why the intention differs between BI to BJ on sheet 33 from the rest of Kent Street, which will also be used for HGV and LGV access and at some locations will also need access points constructing to the cable route. No consultation has taken place about this.

Dragons Lane:

Similarly, they now realise that there will need to be long term access to the cable route. Dragons Lane, a narrow, unmade up private lane which is the only access to several homes, is to be used as operational access. Residents tell me that "We have had repeated assurances that the Lane will not be used operationally". However, whilst this is reason enough for concern, the report by the Examining Authority, following a site visit to the entrance to Dragons Lane, states that the lane will be used for *construction* as well as operation. This was denied at ISH 1

Kings Lane/Moatfield Lane:

Although this was not a part of the consultation in any way, Rampion have now decided they need to close Kings Lane/Moatfield Lane for several days in order to create two open cut trenches across it. A resident of the lane received the following from Chris Tomlinson:

*"The proposed cable route for Rampion 2 crosses many roads, rights of way and private means of access. Where this is by means of open cut trenching, there is likely to be disruption to usual traffic. We have proposed temporary diversions in many locations, but this is not always available. We will need to develop bespoke proposals for managing traffic along private means of access. These could include set closure hours, advanced notice of closure, and provision for emergency access. In all cases, Rampion 2 will seek to reduce the duration of any disruption, **likely to just a few days.**"*

It is also listed in the Draft Development DCO (doc ref3.1) as 'Bridleway 1730-scheduled for temporary closure'.

Until relatively recently Rampion were under the impression that this tiny lane had an exit to the south as well as its usual access from Kent Street. This was because they had only considered google maps etc and not listened to residents saying that in fact this is a historic second

route only and has not existed for many years. Even now, it is shown on their maps as a bridleway only. **The reality is that the access from Kent Street is the only access to their homes, farms and businesses.** The residents will therefore be completely cut off for 'just a few days'. There are in fact quite a number of people who live on this lane. Many will need to go to work or school. We have already raised concern about the disruption on the lane given the elderly demographic there and the need to access emergency visits or urgent visits from GPs, district nurses etc as has been needed several times in recent weeks. There is also a continual need for access to move livestock. This also needs to be looked at in the context of their **disingenuous claim that this lane will be used only for operational purposes.** If it needs to be closed, and also somehow the vehicles to do this work will need to access it, then clearly access is needed during construction as well as operation. It will also be repeatedly crossed by vehicles using the haul road.

Either they are deliberately attempting to mislead, or they just have not thought it through properly. Either way, it is a reflection of how little they have engaged with this community when it mattered.

In their Relevant Representation Bolney Parish Council asks that 'under no circumstances' should the use of narrow rural minor roads be permitted, and that traffic should be restricted to the A23, A272 and Wineham Lane. We support this view and cannot understand why the use of Kent Street, Dragons Lane and Moatfield Lane should therefore be deemed acceptable either. We also welcome their recognition that Wineham Lane is a much wider, and therefore more suitable lane for construction access than Kent Street.

We note the Examining Authority site visit on 16th November to the entrance to Dragons Lane, and to Kent Street. However, we are disappointed that the visit did not include a journey along Dragons Lane, as they would have seen that it became increasingly narrow, tortuous and poorly made up, as well as appreciating the proximity of several of the residential properties to the narrow road. Also, no visit was made to Moatfield/Kings Lane off Kent Street, which similarly narrows, with frequent bends and constraints. Both provide the only access to the homes on these lanes. Rampion have listed Moatfield/Kings Lane as a bridleway, which is only partially correct as it is a private road.

Between these small lanes is the proposed haul road across the Cowfold stream area. We share WSCC's concerns about the commitment C-19 to construct the cable route in sections. (WSCC Relevant Representation para 3.4.ii) However, even if this were possible, the haul road running alongside it will cause unacceptable disruption to residents, farmers, and other businesses along the route.

We believe there would be a case to argue that they have so materially changed these plans as to require another consultation. They cannot possibly have understood the implications for Kent Street, the lack of farm tracks and the impact on the AQMA when they looked at the 'evidence' and decided Oakendene was the most suitable choice. Nor had they realised the need to use Dragons Lane and Moatfield Lane in this way.

We disagree with the statement from Doc 7.6: *"1.1.8 This Outline CTMP has evolved throughout the DCO pre-application process as the onshore elements of the Proposed Development have been further defined through the design process and following feedback from stakeholders. Consultation*

has been undertaken with West Sussex County Council (WSCC), National Highways (NH)1 and The South Downs National Park Authority (SDNPA) to develop an agreed management and mitigation strategy for heavy goods vehicles (HGVs) and light goods vehicles (LGVs) during the construction of the Proposed Development.” The dramatic increase in HGV numbers and the extensive use of Kent Street for HGVs and LGVs, plus WSCC and HDC concerns over these issues shows how little engagement there has been with either the public or statutory consultees in this area.

Misleading statements regarding traffic

The ‘design and evolution mitigations ‘diagram shown at the Cowfold Information Event carries the statements ‘There will be no use of Kent Street for Substation Construction Traffic’

This is misleading, we believe deliberately so, as it is consistent with the deceptive language used regarding other details:

- ‘There will be no use of Kent Street for Substation Construction Traffic.’
Take home message: *no construction vehicles will go down Kent Street*
Actual meaning: *an awful lot of construction vehicles will use Kent Street to access other sites.*
- ‘There will be no single lane traffic lights on A272’.
Take home message: *no traffic lights on A272.*
Actual meaning: *There will almost certainly be traffic lights, just not single file.*
- ‘No substation HGVs will enter the AQMA in Cowfold.’
Take home message: *There will be no construction vehicles through the village.*
Actual meaning: *HGVs will use the village to access other sites. An awful lot of other vehicles will come and go through the village increasing congestion and impacting on the AQMA.*
- ‘Moatfield Lane will be used for operational access only’
Take home message: *Moatfield Lane will not be affected by construction traffic.*
Actual meaning: *Moatfield Lane will be **closed** for several days at a time, preventing access to houses and livestock. It will also be repeatedly crossed by haul road traffic.*

Section 11: Historic Environment

Oakendene:

The land on which Rampion propose to site the substation is not simply in fields near a grade two listed manor house. This land is in the historic parkland surrounding the house, and as such is essentially a part of the property itself. See photo at Appendix 1. WSCC response to the 2021 consultation, section 4.4.27 notes the importance of taking this 'historic parkscape' into account

The house is designed to look out over the landscape and to the beautiful lake beyond, and without the parkland is diminished considerably. The effect on the house will be utterly devastating. Far from taking the park into account, it seems such a brutal choice; one which could only have been made by someone from afar, with no understanding of the reality, and picking the site from a map. Lack of consultation prevented this from coming to light until far too far down the line. The appalling impact is far beyond any damage which may be done to nearby grade 2 listed properties at the alternative Wineham sites. The building itself is the listed part, but the context is meaningless without the landscape in which it sits.

The National Policy Statement EN-1 states that: "5.9.26 The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, **or from development within its setting**) **should require clear and convincing justification.**

5.9.27 **Substantial harm to or loss of significance of a grade II Listed Building** or a grade II Registered Park or Garden **should be exceptional.** "We would argue that the harm would be substantial, its significance would be adversely affected and that there is no clear or convincing justification for this in terms of public benefit as reasonable alternative sites exist at Wineham Lane.

The decision to refuse the Navitus Bay project, by the then Secretary of State, was made partially on the basis that "the substantial harm to or loss of a Grade 2 listed building should be exceptional and that impact on World Heritage sites should be wholly exceptional" (Page 5, paragraph 23). And that the setting of such assets was to be considered relevant (Page 7 paragraphs 33 and 34). Arundel Castle is a World Heritage Site. To retain its character and setting, the view of the coast it defended should remain as knights saw it in days gone by. Oakendene's setting, also, would be completely destroyed.

The view of and from Oakendene is in fact not just for the private enjoyment of the owners, but is open to the many local people who take delight in walking in these beautiful, tranquil surroundings. Worse still is the loss of the intended additional amenity and heritage gain for future generations from the further enhancement of the area in the owners previously intended plans (See Enterprise Park PDF)

A map from 1885 (Appendix 2) clearly shows the parkland area to the south and the ancient hedging and trees which are still there on the land to the east, and many of which face removal for the access road, visibility splay and compound.

Rampion's own assessment of the impact of the finished substation on Oakendene was 'major', compared to 'moderate' for the worst affected Grade 2 listed building at Wineham Lane North (PEIR chapter 26, pp 148-50), simply based on proximity.

Before choosing the final site the WSCC report, section 26.9.35, asked for detailed assessments of both substation sites options because of the impact on the surviving historic parkland, for archival research for heritage assets in the grounds of Oakendene Manor, and for site walkovers and assessment of the views from and of the manor house.

In PEIR Ch26 Historic Environment p30 Rampion have chosen to interpret this as 'should the site be chosen' not 'before'. And Rampion's assessment of the impact of the construction on Oakendene manor is, quite extraordinarily, 'minor adverse'! (p 234).

The same chapter refers to the Mid Sussex district Plan with regard to historic environment and heritage assets, parkland etc. **Oakendene is in fact in Horsham District**, not Mid Sussex. There is no corresponding assessment of Horsham's local plan for the Oakendene site. In fact, Horsham's plan includes the statement 'Proposals which would cause substantial harm to, or loss of a heritage asset will not be supported unless it can be demonstrated that the substantial public benefits gained would outweigh the loss of the asset and that any replacement scheme makes an equal contribution to local character and distinctiveness. 'The local population does not directly benefit, this proposal cannot be said to make an equal contribution by any reasonable means, and there *is* a suitable alternative, if it has to be built at all, which is to build at Wineham.

The Chapter also gives Wineham lane north mediaeval sites a 'high/medium' rating yet similar sites related to Oakendene are rated 'low or medium'. For example:

- "Landscaped grounds of Oakendene Manor (MWS96, HWS2285). The surviving manor house is grade II listed (1027074). Former extent on historic OS mapping. The ANA relating to Oakendene Medieval Manor Farmstead (ANA Horsham 139) also lies adjacent to Bolney Road / Kent Street search area. Medieval and post medieval Low"
- "Remains associated with Parkminster Medieval Farm (MWS13258), Little Parkminster 17th Century Historic Farmstead (MWS12020, farmhouse grade II listed 1286321) and St Hugh's Carthusian Monastery (grade II* listed 1027084, MWS90; and grade II listed lodge 1193051) (ANA Horsham 146). The ANA lies adjacent to onshore part of PEIR Assessment Boundary. Medieval to post medieval Low"
- "Wineham Lane North Remains of medieval field systems Low-level of medieval activity consisting of ditches/gullies along with pottery sherds have been recorded (MWS12642) within onshore part of PEIR Assessment Boundary. Medieval Known/ Medium to High"

At what time of year were any 'walk over' studies carried out? The 2km scoping boundary is arbitrary; it does not take into account the effect of winter, when the largely deciduous trees are bare, and the fact that many mature oaks and ancient hedges will have been removed from the northern end, facing directly towards the AONB, historic Wallhurst Manor and Oakendene Manor itself. 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.

Even within the 2km boundary, there are numerous grade 2 listed buildings including those within the conservation area of Cowfold. The beautiful Grade 1 listed Church of St Peter stands in the centre. A favourite attraction on special occasions is to climb the tower and enjoy the spectacular views. Those views are entirely rural. Where are the graphics to show how that would change? Similarly, the iconic tower of St Hugh's monastery with its unusual, 62m high spire, stands within the 2km boundary and looks out across the affected landscape to the south downs. The substation will be clearly visible from this tower.

Many listed buildings are in the immediate vicinity of the site, such as Oakendene, Allfreys, Kings, Bankfield, Kings Barn, and Eastlands. The contextual change for these buildings will be huge. Indeed, Chapter 26 p134, assessed the impact on Allfreys as 'moderately adverse', yet the owners of Allfreys received no communication at all from Rampion at any stage of the consultation to invite them to comment.

Historic landscape

It is not just the built heritage which is important when considering the historic environment. There will be a huge perceptual change in the character of the historic landscape, including from the PRow's around the lake and woods which are currently enjoyed by many.

Similarly, the impact on ancient, quiet Kent Street, even with screening will be enormous and impossible to mitigate appropriately given the height and footprint of the proposed substation. Rampion say "*where practical* there will be protection of the landscape character and replanting to screen." (Chapter 19; 19.7 substation planting). This is a meaningless statement; they know that given the size and scale, in this location it is simply not possible. The photomontage they showed at the Cowfold Information event was a totally inadequate picture showing Kent Street with a small green box in the background; a completely unrealistic representation.

The layout of the grade 2 listed farms on the cable route and the historic assart field and settlement patterns of the area from Cratemans to Kent Street reflect its mediaeval structure which persists to this day. Manors such as Ewhurst and indeed Oakendene itself also reflect this history. Land usage remains, in essence, in its ancient form.

Rampion's archaeological surveys in this area appear to have been desk top in nature, despite requests from WSCC to extend them at an early stage of the consultation. In a recent newspaper interview, in 2023, Chris Tomlinson of Rampion said "We know that prehistoric artefacts have been found on the South Downs before, so we will work with Historic England and local authorities to devise a system of archaeological investigation, as this could provide a rare and significant opportunity to find out more about how the South Downs were used in the past." ' This does not suggest any serious exploration of the proposed route has been so far carried out with geophysical and LiDAR studies in order to inform the choice of route. It also suggests there has been little attention paid to the low weald area of the cable route in archaeological terms.

Unfortunately, the potential impacts of this approach extend not just over the south downs national park, but all the way to the planned 12-acre substation site at Cowfold. The cable route to the south of the substation site covers an area between the A281 and A272 which is farmland, unploughed since at least the war because it floods, being on the flood plain of Cowfold stream, a tributary of the Adur. Like the biodiversity (extensive nightingale breeding sites, turtle doves, adders) there has been no disturbance of the land and therefore no reason or opportunity to record what might lie beneath the surface.

There is a green lane, (See Section 9: Ecology; Appendix 1, photo of badger path and hand drawn map of wildlife sites. Also, Appendix 3 in this Section) identified in our badger survey (separate communication to follow from Janine Creaye), located between Wilcocks and Moatfield Farm which has potentially 25 veteran field maple and oak trees that would be lost (as implied by CT response to JC May 2023). All trees are twisted, with cracks and hollows that are so good for wildlife, there are oaks that measured to be between 150 and 200 years old. There is a bank to one side and an animal path in the middle of this which dates back at least to 1870s, coming off a track which dates at least from 1649 (Buckhatch Lane) and heads towards the stream. There are numerous other similar hollow lanes to the north of Oakendene, suggesting ancient interconnectivity of settlements.

Green lanes have been thought to have been routes for cattle movements in the Sussex weald, or may date back as far as the iron age in some instances.

Dr Roger Smith, archaeologist from CPRE, informs me that the evidence is that, in ancient times, settlements were often found just above the margins of flooding along rivers. The Cowfold stream and floodplain may indeed have attracted such settlements. The recent finding of Henry VII coins in this area would support this: an amateur detectorist has found several collections of King Henry VII coins in the Cratemans and Cowfold stream area. These obviously date from between 1457 and 1509, the dates of his reign. With the permission of the landowner, he is extending his search into the Green Lane on the other side of Moatfield Lane.

The parkland of Oakendene Manor itself is the site of the proposed substation, and also may have a rich history beneath.

The absence of records does not in itself mean there is nothing to find. It may in fact mean that, if present, the buried history may be all the better preserved. Thorough assessments of this nature, which so far have been in short supply, are surely needed in order to make an accurate and informed decision regarding the correct location **before** any decision is made.

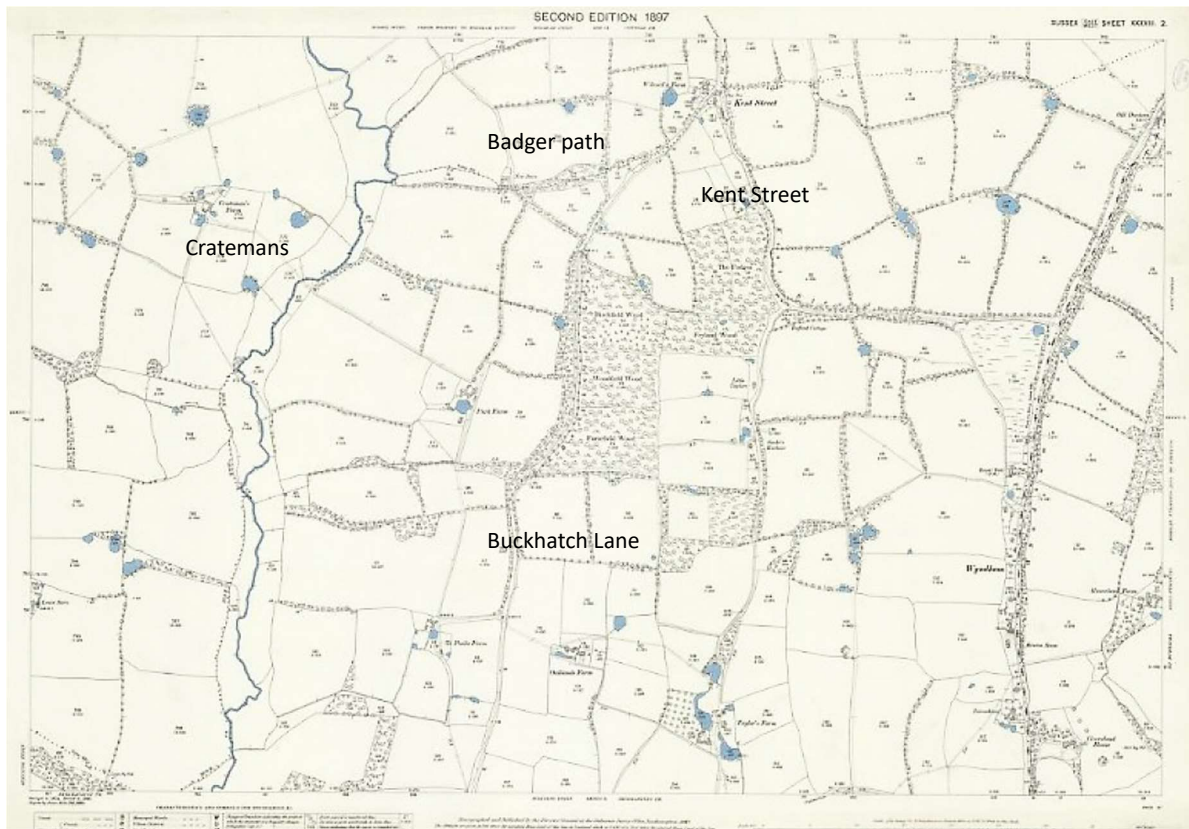
Appendix 1 – Oakendene Manor from Substation Site.



Appendix 2 – Oakendene Map 1885



Appendix 3 – Map Showing Badger Route / Green Lane 1897



Addendum to Historic Environment following the DCO Submission

Introduction and summary:

Additional impact data is now available from the recently added document on the PINs website regarding Oakendene and PRowS (See 5.8 design and access updated version.) Neither were done at the time of comparing alternatives and therefore were not considered when choosing the site. We argue that the heritage impact on Oakendene Manor and its parkland have been downplayed and that the effect will be brutal, both in terms of the impact from the Manor house and on looking at it from the surrounding area. Furthermore, it is unjustified as alternative, less damaging sites exist.

The tree loss at Oakendene is significant and will be detrimental to the historic parkland and cannot be compensated for in the lifetime of the substation.

Oakendene Parkland:

Despite WSCC requesting in 2021 that an assessment of the historic parkland was carried out and used to help inform the choice of substation site, a WSCC archaeologist is asking for details as late as October 2022, (The Oakendene Parkland historic Landscape assessment, Doc Ref 6.4.25.5 paragraph 1.1.14) and the report was first issued to West Sussex County Council (WSCC) on 21 April 2023(paragraph 1.1.1). **This cannot possibly therefore have been used in the evidence considered in deciding which site to choose, nor in a proper comparison of the Alternatives.**

The archaeologist asks them to *“Determine the historic extent of the estate using relevant documentary sources such as earlier estate mapping, tithe apportionments etc., where available;”* And to *“include an assessment of the relationship between the listed house, Oakendene Manor (NHLE 10270742), and the parkland how each might contribute to the significance of the other;”* None of this could have been used in a comparison of the alternatives, The Oakendene Parkland historic Landscape assessment (Doc Ref 6.4.25.5)

2.1.6:” *The available evidence for planting regimes as described, suggests that long views into or out of the parkland formed part of its design.”*

2.1.11: downplays the significance of the parkland by emphasising the Industrial Estate.

Similarly, 6.1.3 *“The presence of the industrial estate has an urbanising effect on the setting of the parkland. “We strongly disagree with this. This is NOT the sense you get from being there and is the view of someone who in the main has done a desktop study. The site was philanthropically given for the benefit of the community. It is surely WRONG that such an act should be used as a justification to destroy the rest.*

We would also refer you to the comments made about the setting of the industrial estate in RR - 161 in the Relevant Representations Examination Library, by someone who has a close association with the Industrial estate.

2.1.10 *“Later in the 20th century, many of the newly established field boundaries were subsequently removed, resulting in the creation of a large irregular shaped field.”*

Given the time at which this took place, it seems likely that this expansion of farmland may have been part of the wartime effort and therefore a further philanthropic action, neither of which they should be penalised for now.

Even so Rampion themselves accept that *“Overall, the setting of the parkland is considered to make a moderate contribution to its heritage significance.”* (para 6.1.3). We argue that the setting is far more significantly defined by its RURAL location. Even Rampion admit *“Whilst the parkland use and character has changed, it provides a rural agrarian setting to Oakendene Manor”*. The substation will transform that negatively both in and out looking far more drastically than the industrial estate could. It is disingenuous to give the impression that the context is diminished as the parkland has reduced. The main context of BOTH is in an extremely rural and ancient setting. The surrounding fields give the house its context even if no longer entirely formal parkland. The substation would transform that context extremely negatively.

3.4.2 *“Approaching the former parkland from the south, along the public right of way (PRoW 1786) which leaves Taintfield Wood (Plate 11), the elevation of the hill permits distant views of the house across the agricultural fields within the former parkland. However, moving downhill, closer to the southern boundary of the historic parkland, the high tree belt screens views northwards towards the house.*

3.4.3 *The higher elevation occupied by the house and the northern part of the former parkland, affords longer views south across the former parkland toward the hill and Taintfield Wood. However, views southeast and eastwards from the house are limited by the treelines and individual trees within the former parkland and within the immediate grounds of the house itself.”*

This gives a misleading idea of the impact on views both to and from the house, as the sense of openness is far greater than this would suggest. The footpath PRoW 1786 is enjoyed by local residents. Indeed, this view from the wood looking across to the lake and Manor house and the High Weald AONB beyond, with no other structures visible, is a principal reason for walkers to enjoy this route. It will be destroyed forever as the pathway looks down on to the substation from the wood and is directly next to it to the north of the lake. The DCO pictures of the Viewpoints from Taintfield show more accurately the terrible impact from the Taintfield footpath (DR 6.3.18: 2of6). However, even they do not give a true idea of the impact. If instead, one looks at the view from SA3 in the Cowfold Information event, it shows the whole panorama, which is decidedly industrial where currently the only built structure visible is the Manor house itself, with a splendid view of the High weald AONB beyond. Rampion’s statement also completely ignores the fact that the PRoW actually passes directly through the parkland and adjacent to the substation. How can this not brutally impact on the appearance of the manor and parkland from the footpath?

6.2.2: *“The local topography and the relatively open nature of the former parkland and the presence of the large lake to the south of the house allow for long views to and from the wider rural wooded landscape. This visual connectivity reflects the historical connection between Oakendene Manor, the former parkland and land to the south (including Taintfield Wood), which were all under the same ownership at the time the tithe map was drawn up. However, it is still unclear if these long views south from the house were intentionally part of the original design of the informal parkland. The planting scheme detailed on the 1875 OS, looks to create a setting for the*

house with a relatively enclosed character but with possible narrow framed views south though the trees.”

The whole property is **still** under the same family ownership it has been for many years and it is misleading to imply that it is now broken up thus somehow diminishing the importance of its setting and context.

From Historic England’s Advice note 10, ‘Listed Buildings and Curtilage’, the curtilage of a building is not always a small area, nor is it always easy to define. It should be based on the previous and current uses and the nature of the landscape, which is currently, and was historically, parkland and not used as agricultural. Indeed, the current owner of the house, who has lived there for over 80 years, very much views the whole area as parkland for walking in and the vista over the lake and surrounding landscape has been part of the curtilage of the home in which she has lived. The vista down to the lake and the view to the east are an essential part of its setting. Of course, the owners at the time would have had the intention of enjoying that view. What landscape designer worth their salt would NOT make use of that view!

The document concludes:

7.1.1 “Rampion 2 has the potential to introduce the following impacts, which could affect the heritage interests of the parkland and the setting of Oakendene Manor:

- Removal of surviving relic parkland boundary.
- Removal of surviving parkland trees.
- Impact potential archaeological remains associated with the former parkland, anticipated to be of low heritage significance.
- Erode the rural character of the setting of Oakendene Manor.
- Change long views to and from Oakendene Manor; and
- Introduce urban elements into the setting of Oakendene Manor.”

7.1.2 *“As referred to in **Section 1**, the results of this assessment have been incorporated into the indicative landscape planting proposals and will inform detailed design post-consent.”*

We conclude that these impacts will be impossible to mitigate and that the impact on this Grade 2 listed building and its historic parkland will be severe. When viewed from the other side of the lake, **the current impression is of a manor house within its own grounds, not a large house with a small garden in the middle of fields.** This proposal is against the National Policy Statement requirement that damage to a listed building should be exceptional and require clear and convincing justification. Rampion have failed to provide this justification as an alternative site exists.

Oakendene Manor:

WSCC’s PADs statement number 43 states that **“it is unlikely that it will be possible to avoid substantial harm to Grade 2 listed Oakendene Manor”**

From the Onshore Baseline Heritage Asset Baseline Report, Doc Ref 6.4.25.8:

2.11 .1 *“Grade II Listed Oakendene Manor (NHLE 1027074) is a two-storey grade II listed 17th century or earlier house associated with post medieval parkland (MWS96) **Oakendene Manor is of high heritage significance for architectural and historic interests.** “*

2.11.2 *“The manor is situated immediately within a surrounding garden. Its wider setting is characterised by fields to the south and east, dense groupings of planted trees.”*

2.11.4 *The asset’s historic interest primarily comprises its association with historic parkland Appendix 25.5 Oakendene parkland: historic landscape assessment, Volume 4 of the ES (Document Reference: 6.4.25.5) and the insight the asset provides into developments in the area from the early 18th century. “*

2.11.5 *“In the early 19th century land at Oakendene Manor included a “park” containing a large reverse L-shaped area of pasture immediately southwest of the manor, as well as plantations. Before the end of the 19th century, the parkland appears to have reduced in size, coinciding with the appearance of a new lake and boathouse and formal gardens, including the erection of new buildings Appendix 25.5 Oakendene parkland: historic landscape assessment, Volume 4 of the ES (Document Reference: 6.4.25.5).*

2.11.6 *“OS mapping dating to the late 19th and early 20th centuries shows that Oakendene’s surrounding land exists in much the same form, except for some encroachment into former parkland by the industrial estate and some smaller developments at its southwestern extent.”*

2.11.7 *“Visual relationships between the manor and aspects of its setting enhance its historic and architectural interests.....The rural parkland character of the asset’s wider setting contribute to its historic and architectural interest, where longer filtered views south from the asset are permitted across pasture fields toward the lake Viewpoint (VP) HE01, Figures 25.5h and 25.7, Volume 3 of the ES (Document Reference: 6.3.25), and glimpsed views of the asset from the south can be appreciated (LVIA VP SA3, Figure 18.12, Volume 3 of the ES (Document Reference: 6.3.18).”* Whilst we agree that the visual relationship between manor and setting enhance its interests, the views are not simply ‘filtered’ or ‘glimpsed’ as the house and its setting are clearly visible from both the raised ground to the south of the lake and the PRow which passes to the north of the lake, through the grounds of the house themselves.

2.11.8 *“Elements of the asset’s setting which negatively contribute towards its heritage significance, include the proximity of Oakendene industrial estate, which illustrates the alterations and loss to the historic parkland....”.* However, it should be remembered that the development of the industrial estate was essentially philanthropic in nature and therefore consistent with the historic relationship between the manor house and the village, which it has always tended to support and indeed continues to do so.

The settings assessment scoping report, Doc Ref 6.4.25.7 contains some remarkable statements:

Table 5-1: Setting of the asset is defined by the surrounding garden and associated with former historic parkland. Proximity to Proposed Development **could result in visual and audible change to setting** during construction of onshore cable corridor, including changes to former historic parkland.

Table 5-2: Setting of the asset is defined by the surrounding garden and associated with former historic parkland. Proximity to Proposed Development **could result in visual and audible change to setting** during construction and operation of onshore substation. Proposed onshore substation is located within historic parkland associated with the asset.

These statements are a most extraordinary understatement, and a reflection of the dismissive way Rampion have addressed the consultation and the impacts on local communities.

Kings Barn (known as Kings):

From Rampion 2 ES Appendix 25.8 Onshore heritage asset baseline report (Doc ref 6.4.25.8)

2.12 Grade II Listed King's Barn (NHLE 1027089)

2.12.1 *King's Barn (NHLE 1027089) is a two-storey grade II listed 15th century timber framed house, that has since been restored and enlarged. It is located approximately 2km southeast of Cowfold and 1.5km northwest of Twineham Green. King's Barn is of high heritage significance for architectural and historic interests.*

2.12.2 *The house is set within sculpted gardens and trees and hedgerows surround much of the boundary of the curtilage of the property. The wider setting contains short and longer vista views of surrounding, open, rural land. Kent Road, a small one lane Road, is located immediately adjacent and the western elevation of the house glimpses it through a gap in the hedge incorporating a fence.*

2.12.3 *King's Barn's architectural interest is derived from the quality of its features, design, materials, **and its relationship with its setting**. The first floor is close studded with curved braces and plaster infilling. The ground floor is rebuilt in red brick and contains south front tile-hung, a Horsham slab roof and casement windows. The modern wing possesses imitation timbering added to the north and is at an L-shaped angle.*

2.12.4 *Close visual links with the surrounding garden, including the pond to the southwest, contribute to the aesthetic value and enhance the historic rural context of the house. A sense of enclosure and isolation is created by the surrounding trees and hedges, **and the lack of other built forms in views from the house, again enhances its rural context**. Kings is very close to the substation and its 'historic rural context' will be utterly changed as will the relationship with its setting.*

Due to Kent Road's small size, it is unlikely to contribute much traffic pollution to the setting of King's Barn, including little in the way of noise. At present. The proposals for HGVs and other vehicles to use Kent Street and the nearby haul road will change this for the duration of the project, i.e. many years.

NB Kings has been correctly identified here by its NHLE number, but the British Listed Buildings' website uses the name Kings *Barn*, even though it is clearly shown on their map as Kings. This appears to have led, in almost all other documents, to Rampion then incorrectly assuming the reference is to Kings Barn FARM which is much further away and not in fact listed. **This means that in all their sensitivity and impact assessments, including RVAA, noise and traffic, they have failed to correctly assess the true impacts on Kings**, which is in fact right on the edge of Kent Street, close to the entry and exit cable routes and in sight of the substation, which is just a short distance away, and directly adjacent to the Kent Street route to the haul roads.

Cratemans Farm:

2.84 Grade II Listed Crateman's Farmhouse (NHLE 1354155)

2.84.1 *"Crateman's Farmhouse is a grade II listed two-storey house of 17th century date. The listing entry notes three casement windows, the ground floor fronted with red brick and grey headers with the upper floor tile-hung in addition to a tiled roof."*

2.84.2 *"The asset is located within the extent of Crateman's Farm Historic Farmstead (MWS9939), characterised by the Historic Farms and Landscape Character in West Sussex Project (Forum Heritage 2000) as a 17th century three-sided L-Plan loose courtyard farmstead with additional detached elements to the main plan, and has suffered loss. The asset sits at the northern extent of the farmstead, detached from most of the farm outbuildings and set back in a plot of land north of Dragon Lane. Mature trees are present to the northeast and west, flanking the lane in this direction but views are largely open to the arable fields beyond in every direction. **The setting of the asset is chiefly associated with its farm location and rural surroundings.**"*

2.84.3 *"The building's architectural interest comprises the quality of its built features, design and materials as articulated above **in addition to its relationship with its setting.** The building's visible "set apart" status in relation to the farm outbuildings and clear domestic function place an emphasis on its architectural qualities through contrast to the rest of the farm and **its isolated location.**"*

2.84.4 *"The asset's historic interests comprise its associations with the past, its illustration of historical developments in the area and through contributions made by its setting. OS mapping dated to the late 19th century shows farm buildings to the southeast and southwest of the asset in place with their layout continuing in the present day, in addition to a pond on the south side of Dragon Lane from the asset. **The setting contributes to the historic interest of the asset through illustrative qualities relating to its place within the associated farmstead.**"*

The term Farmstead includes both the building and the grounds and means that the context and land are extremely important for its Grade 2 listing. In this case, this includes the ancient wildflower meadowland around it, the rarity of which, in these biodiversity depleted times, deserves to be preserved, especially when considered as part of a general picture in association with the Farm; the effect is synergistic and the overall picture illustrative of a significant historic interest. It is therefore inevitable that the scale of work proposed all around Cratemans (cable route, haul route, temporary compound and access to it which by necessity need to be along Dragons Lane) will destroy the Historic Farmstead and its setting. The construction may be temporary (albeit significant, being over several years), but the impacts on the setting of this farmstead will be permanent by expansion of the access road and the destruction of the meadowlands and red list species breeding sites (such as nightingales and reptiles) surrounding the farm, which are now a rarity but were common in the times when this farm began its existence and now provide the important context of this unique site.

Historic Landscape:

The heritage importance of this area with its mediaeval layout has been discussed in depth in the main Historic Environment section. In the last few months an amateur detectorist has found several collections of King Henry VII coins in the Cratemans and Cowfold stream area. These obviously date from between 1457 and 1509, the dates of his reign. With the permission of the landowner, he is extending his search into the Green Lane on the other side of Moatfield Lane.

Section 12: Water Environment

There are two main concerns regarding water environment at this site. The first is the flood risk. The second is the impact on the water of the streams and lake which flow into the River Adur.

Flood risk EN-1: 5.8

5.8.6 The applicant must consider flooding risk local to the site.

Impact on nearby roads and properties:

The proposed substation site at Oakendene lies to the south of the A272 at a point where regular surface water flooding occurs on the north side of the road. At times this can affect the access road to the properties to the west of Picts Lane. As can be seen from the attached gov.uk flood map (See Appendix 1), surface water accumulates here and a culvert carries the water under the road and into a ditch running north-south in the Oakendene field. Climate change means these risks will increase over time. Residents are concerned that the 6-hectare raft of concrete under the substation will increase the flood risk to the north, made worse by the proposed road into the site which risks disrupting the ditches along which the culverts drain, and the proposed bunds and landscaping.

The elderly residents of South Lodge to the west (see marker on flood map) are particularly worried as their home has already been subject to severe surface water flooding. Again, their culverts pass under the road and into Oakendene. WSCC have been involved in flood management at that property several times.

Not only HGVs but hundreds of cars will be parked on the site, churning mud, and bringing it on to the busy road. If the substantial parking area is covered in tarmac or concrete to prevent this, it will increase the flood risk to the A272, and also to the substation site itself.

The Oakendene Industrial Estate also contains properties at risk of flooding.

Land drainage must be adequately ensured in the proposals. Rampion must show how they are going to achieve this with a full Flood Risk Assessment given the size of the site area (EN-1;5.8.13-14) and show how they have applied the Sequential Test in their choice of site as the surface water flooding risk is higher than at the other two originally proposed sites.

The substation site:

The proposed site is not known to be at risk from surface water flooding according to the current government surface water flood maps. However, being in private ownership it is likely that public records may not be accurate or up to date. In fact, the stream running along the southern boundary of the site floods over the south bank, and the field on which the substation is to be built is boggy until early summer, from the stream to the hedge which runs east to west 200m from the A272. PEIR Ch27 p143 recognises that the drainage from the impermeable onshore substation footprint and the presence of a below ground grid have the potential to disrupt infiltration and displace shallow groundwater. This risks both passing on the flood risk to surrounding roads and properties, and causing flooding at the substation site itself.

PEIR Ch 4 5.3.11 recognises that there is risk of flooding at this site and that it is less than the flood risk at Wineham: “The Bolney Road / Kent Street onshore substation search area shows greatest interaction with RoFSW flood extents, with approximately 3.5% of the onshore substation search area at high risk of surface water flooding. The onshore substation search area is intersected by two main surface water flowpaths evident in the 3.33% AEP extents, that drain south across the search area and into an Ordinary Watercourse (a small unnamed tributary of the Cowfold Stream) running along the southern boundary of the search area. In events of 1% AEP and greater, the southern boundary of the onshore substation search area is anticipated to be impacted by flooding from this unnamed tributary.

5.3.12 The Wineham Lane North onshore substation search area’s interaction with RoFSW extents can be mainly attributed to ordinary watercourse flooding associated with an unnamed tributary of the River Adur that drains eastwards along the northern search area boundary. Surface water flow paths across the onshore substation search area are only anticipated in the 0.1% AEP event, flowing north-eastwards across the western and central portions of the search area.”

The Historic Parkscape walkover report, form October 2021 also notes how boggy Oakendene was.

Bolney parish council in their scoping response in 2020 report flooding around the Rampion1 site where no flooding previously occurred. How much more of a concern would it surely be here, where flooding is already a problem.

Impact on stream and lake to south:

The precious ecosystem balance in this area has already been outlined. This could further be put at risk from alterations in the flood risk from the concrete raft, especially given the comments by Bolney parish council above. They also tell us that during the construction of Rampion 1 there was no filtering of water before it went into the ditches, and that during construction there was a film of oil on the ditch water. The streams here are tributaries of the Adur, so this would obviously be a matter of great concern. They also support a range of birds, reptiles and animals which would be put at risk from potential contamination and also from the changes to the water balance as a result of eutrophication during the construction phase (see Section 9: Ecology).

Another significant concern regarding contamination is that the substation site will be treated with herbicides. These will also be at risk of entering the stream and lake affecting their habitat.

PEIR. Volume 4 Appendix 27.3: Preliminary WFD Assessment screens out lakes for assessment and anticipates that” lake WFD water bodies will remain screened out from the assessment at the ES stage as well.” What is the justification for this when a lake is so close to the onshore substation site?

Impact on Cowfold Stream and River Adur:

The above lake and stream flow into the Cowfold Stream, which is a tributary of the Adur, so anything which affects them affects the Adur also. The cable route runs through flood meadows (See photos at Appendix 3). Here the water table is at ground level or more throughout the winter. Any cable digging risks altering the ecosystem balance of these meadows, and risks contaminating

the water as diesel and other pollutants spread in. Practically, the cable route will also be under water for a considerable period of each year during construction and the haul road impassable.

Rampion have assessed the ecological status of the Cowfold Stream as poor due to the supposed contamination from rural areas (PEIR vol 4, App 17.1). As we have previously explained, the area around the Cowfold Stream is not intensively farmed, if at all and very few fertilisers and other chemicals contaminate the water. The area is host to a finely balanced ecosystem and has a very low level of pollution currently. That may be put at risk from the construction of the haul road across the flood meadow however. There is also a risk, as the cable trenches are to be left open for a number of years, that the cable channels will divert water from the Cowfold Stream, especially at flood times, and therefore from the Adur also. It may also result in the flooding of the foundations of the mediaeval homes nearby and impact the water supply downstream in the Adur. Flood patterns will be changed, possibly putting the A281 at Mockbridge at further risk from flooding.

Conclusion:

There is significant risk of impacting water courses both at the substation site and attendant cable route. There is also risk from flooding to the nearby roads, properties and habitats. These risks are less at the Wineham Lane site as is clear from the PEIR Chapter 27 map below (Appendix 2).

Appendix 1 – Flood Risk Map South Lodge A272

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Flood risk summary for the area around:

SOUTH LODGE, BOLNEY ROAD, COWFOLD, HORSHAM, RH13 8AZ

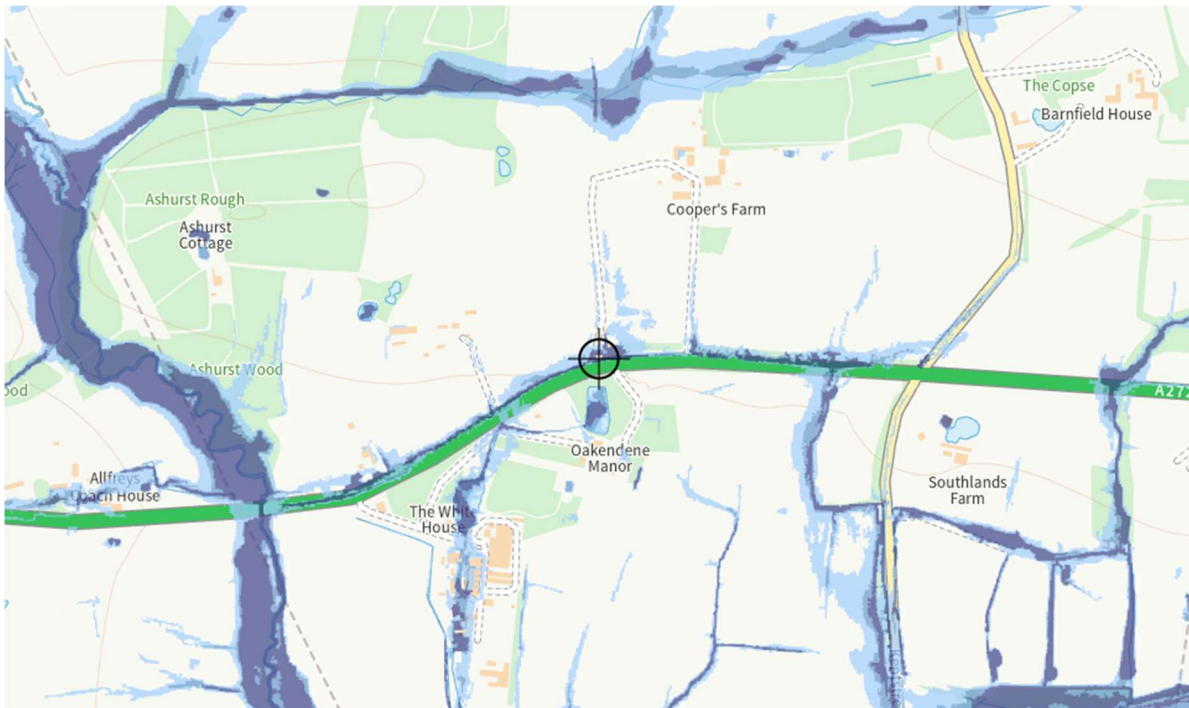
Surface water

High risk

[More information about your level of flood risk from surface water](#)

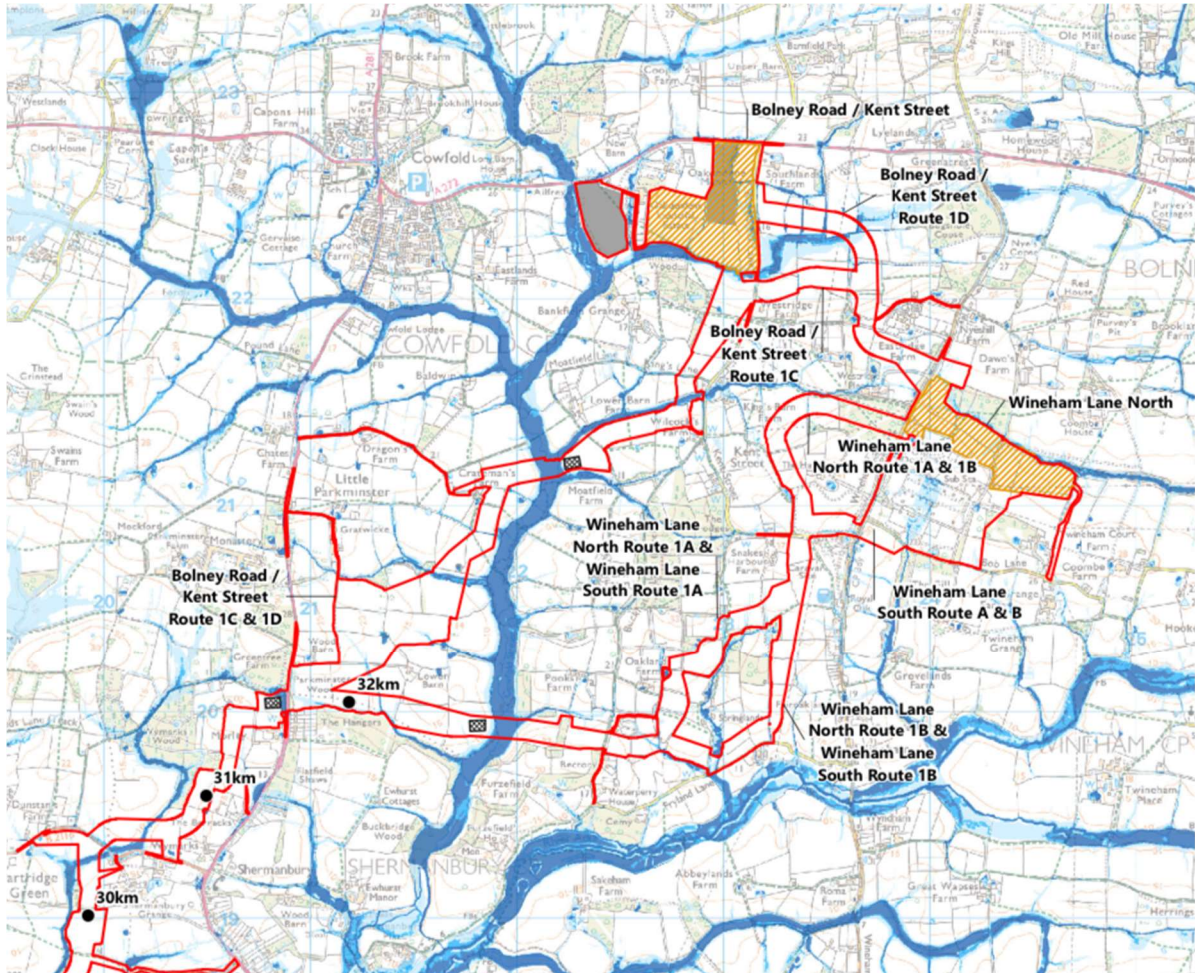
Surface water flooding happens when rainwater cannot drain away through the normal drainage systems. Instead, it lies on or flows over the ground.

English (United Kingdom)
United Kingdom keyboard



Appendix 2 – Flood Map of Oakendene and Wineham Lane Sites

From PEIR Chapter 27 – Water Environment



Appendix 3 – Flood Meadow along Cable Route to Oakendene.



Field floods, catchment of river Adur near Cowfold Stream, at Gratwicke stud farm in cable route



Field floods at Cratemans farm in the cable construction route, near Cowfold stream, January 2021



Cowfold Stream in flood, cable route at Moatfield farm, January 2014



Cowfold Stream in flood, cable route, Moatfield farm November 2022

Addendum to Water Environment following DCO Submission.

Oakendene:

Unfortunately, the true level of flooding at Oakendene is not mirrored in the current surface water flood mapping. The responses of WSCC, Horsham District Council and that of residents highlight the significant flooding issues of this site and that the design proposals do not truly reflect the winter flooding that occurs at this location. Photographic evidence (Appendix 2 below) clearly shows how the Oakendene area and Cowfold stream are prone to flooding, unlike the Wineham Lane area. The NPPF does not allow flooding to be made worse elsewhere due to new development and therefore, the Applicant will need to show they have taken account of the local conditions in their modelling, Flood Risk Assessment (FRA), and proposed mitigation measures. Our evidence will show that they have not:

The diagram of the substation landscape plan shown at the Cowfold Information Event in June 2023 ('design evolution and mitigation'), differs significantly from that in the Design and Access Statement DR 5.8 in that it is clear that even as late as June 2023 they had not recognised the full extent of the flooding on this site. There are no basins or swale, and it is therefore not possible that this could have formed part of their 'engineering constraints' assessment when choosing the substation site.

There is also a drain under the road which takes the water from the higher ground in the AONB north of A272. This goes all the way to the first attenuation basin (see map Appendix 1 below). It is barely adequate to deal with current needs and indeed the property on the north side of the A272 has flooded as described in the main Water Environment section of our document. A high voltage cable runs under the site also. There appears to be no assessment as to how constraints around this might affect drainage plans, particularly the design and location of the basins.

Substantial basins and planting will be needed to prevent flooding of the site. There is also foul drainage to consider for rest room facilities. They will all impact on the flow of water into the Cowfold stream and the Adur, and the flood plains of both. They will also affect the downstream residences and wildlife habitats of both, which are already prone to significant flooding. We cannot be certain that will be no impact and therefore this ill-thought plan should be rejected. With increasing flood risk as climate change accelerates, the use of this site is of obvious concern.

From the Operational Drainage Plan (doc Ref 7.1)

It is clear that no soil infiltration testing has been undertaken at the onshore substation site to date, but the British Geological Survey (BGS) mapping (BGS 2023) indicates that the onshore substation is underlain by Weald Clay formation. Nor do they have any properly thought-out plans to deal with the surface water.

They are offering to do soakage testing AFTER the granting of consent (para 2.2.16)-that is too late. Their proposal is, if the ground is unsuitable for infiltration, then discharge to the stream to the south would be suitable: *"Discharge to an open surface water body 2.2.17: An unnamed Ordinary Watercourse (a tributary of the Cowfold Stream) flows east to west along the southern boundary of the onshore substation site (into which the former ditch flows into). This open watercourse provides*

*a suitable location for discharge of surface water from the onshore substation site. "This is not going to be possible for much of the year, as our photographs show, even early on in the winter when the earlier dry conditions still have not fully recovered. When the ground is properly saturated, the situation is even worse. Also, this is not a **former** ditch; it still has an important function to drain water away from the A272 and the properties on the north side of the road.*

Also, no provision appears to have been thought through for the years of construction, with HGVs compacting the ground and the additional hardstanding they will need to avoid being bogged in; their calculations, which in any case are only desk-top, are based purely on the final 1.7 ha of hardstanding and 4.3ha of granular material and stone chipping of the substation itself. This does not take into account the daily washing of HGV wheels and the welfare facilities for many hundreds of workers. Nor for the foul drainage associated with welfare facilities of this size. Indeed, the need for wheel washing will be greatest precisely at the wettest, muddiest times, when the ground is water logged and the stream is overflowing and simply cannot take the extra water. **In addition, it does not take into account the worsened flood risk from the removal of so many hedges and trees.**

From Flood Risk Screening Assessment (doc ref 6.4.26.2), and the commitments register C-75, *"Construction and permanent developments in flood planes will be avoided where ever possible"*. It is avoidable in this instance, as the substation could be located in Wineham Lane, near Rampion 1, which is not an official flood risk area and photographic evidence would support this.

Table 8-1 Embedded environmental measures relating to flood risk management, no 36: *"Works on areas identified as floodplain, will be programmed to avoid the period between October and February inclusive"*. How would this be possible at Oakendene without extending the build for another few years, or in the case of the Cowfold Stream, accommodating the breeding birds season?

Doc Ref 6.4.26.2 also quotes from the ETG discussion reports that there is no record of flooding on Bolney Rd (pA24 and again pA29). This is incorrect as South Lodge was severely flooded a number of years ago, and WSCC have had to come out several times to deal with culverts to prevent further flooding. The access road to Coopers Farm and Applecross is almost covered in severe rain. It is the only access to these properties. Our photographic evidence (see Appendix 2) clearly shows the assumptions made about the tributary of Cowfold Stream are also incorrect!

According to paragraph 5.3.5 *"The mapping (Figure 26.2.5a-e, Annex B indicates regions at high risk in the northeast portion of the proposed DCO Order Limits, where the underlying geology is dominated by the Weald Clay (from chainage 24km onwards, as discussed in Section 3.6). The majority of surface water flood risk intersecting the proposed DCO Order Limits is associated with crossings of minor watercourses and tributaries of the River Adur and Cowfold Stream. Away from these watercourses, the risk is generally low."* **Yet Fig 26.2.5e (see Appendix 1 below) clearly shows that not only the main substation site, but also the Oakendene west compound and much of the cable route from A281 to Oakendene actually lie alongside the Cowfold Stream or its tributaries and are therefore liable to flooding throughout much of the winter.**

Photographic evidence:

Photographs were taken on 3/11/23 of the proposed Oakendene substation site immediately to the north of the tributary of the Cowfold Stream where it feeds into the Lake at Oakendene. (See

appendix 2.) This clay-based field is already heavily waterlogged and would not take construction traffic. The water on the southern part is clear, but the whole field is boggy and waterlogged underfoot. This is the proposed location of the onshore substation itself.

Videos of the same field will be sent in by a member (#20045103). These fields will be waterlogged now until April at least.

The picture with the gate in is of the PRoW 1786 which runs close to the site on the south west. The ones showing a bridge with the far end submerged in water are of the west end of the lake. There is also a photo showing swales already near the top of bridges on Kent Street, even without any construction run off. When these photos were taken, in early winter, the ground was not yet saturated. The expectation is therefore that the situation will worsen with further rainfall during the winter months. Indeed, this is confirmed by further photographs from December and January, also in Appendix 2.

Based on the experience of residents in the immediately surrounding area, the fields are likely to be around 10cm of grass and silt over 3.5m of Weald Clay formation. Soakaways are not possible in this clay as it is not permeable. Ground water seepages can be encountered as groundwater can be expected at 1.5-2m; probably significantly closer to the surface in this location by the stream in fact. They would need an extensive water drainage strategy as local brooks cannot take this much water from the hard-standing run-off. The Oakendene flood map 2 in Appendix 1 also shows just how much the site is currently at risk, although the photographs demonstrate that in fact the reality is even worse. The maps demonstrate a clear difference at Wineham Lane.

These photographs show how the water does not drain away and that the ditches do not easily drain the central part of the field as it is heavy clay, therefore it is not enough to just put swales AROUND the site. In addition, at meetings in Ashurst and Cowfold towards the end of the consultation, we were told it was likely that they would be able to lower ground height to reduce the visual impact. **Now it seems much more likely that they will have to RAISE it instead. The baseline ground height should be clearly stated when any consideration of the height of the substation structures is being discussed.**

Within a few hours of these photographs and videos being taken a visit was also made to the alternative Wineham Lane North site. To our astonishment, it was clearly a lot less wet than Oakendene. Indeed, the ground, including the ditches, was completely dry (see Appendix 2, Wineham Lane). This includes a picture of Rampion 1 substation drainage pipe above a ditch and the Wineham Lane North site. There is no water in either. Another photograph shows the Main Substation at Wineham is BELOW ground level and was completely dry even at a time when there have been severe floods extensively in the county.

Further photographs have been taken in December, January and February, showing that this flooding is not an isolated one-off incident but a consistent feature during the winter months; a completely different situation compared to Wineham.

The following would appear to explain why there is such a difference:

- Topographical mapping shows the Wineham Lane North site is 21-25m above sea level, Rampion1 is about 27m and the main substation about 31m. By contrast, at Oakendene, the north end by the A272 is 22m above sea level, midway down is 18m and the actual Substation site to the south is 17m, the lake just 14m.
- In addition, DEFRA surface water flood maps show that water drains TO Oakendene from the, higher, AONB in the north and even from the northern part of Wineham Lane in the east, but water flows FROM the Wineham Lane North site area and from the AONB above Bolney to the east to join the Adur further south. (See maps Appendix 1)
- These maps also show how, in addition, the Oakendene west compound and much of the cable route from A281 to Oakendene actually lie alongside the Cowfold Stream or its tributaries and are therefore liable to similar flooding throughout much of the winter and indeed periodically in the summer being in flood zone 3. They also show the extent of the propensity of Kent Street to flooding.

From Rampion 1 soil and agriculture documents; 20.4.13 *“The proposed substation site is located within slowly permeable, seasonally wet, slightly acidic but base rich loamy and clayey soils.”* 2b.7.5” *Ground levels vary from approximately +30m Above Ordnance Datum (AOD) at the western end to +18m AOD at the north-eastern tip. This deviation in elevation may require a significant amount of earthworks to provide a flat substation site”*. In fact, it did not, and the site is tiered down into the ground. **This would be quite impossible at Oakendene**

Water Neutrality:

“If a planning application cannot demonstrate that water neutrality is achievable, it will be refused.” Rampion have not provided this evidence.

Water neutrality is very difficult to prove as there can be no increase in water usage from the baseline. In this case, the baseline usage is zero. They plan to install mains water. During construction which will last at least 3.5 years, and decommissioning, they will need to use copious water for cleaning tyres before exiting the site, rest rooms etc. Water will be needed in large quantities for concrete mixing, and cooling activities. During operation, various facilities will use water.

In all three phases; construction, operation and decommissioning, there is also a risk of contamination of water.

Drainage Strategy:

There is no mains drainage here so, without appropriate action, it will all be going into the water courses. Discharging into the water courses would clearly not be acceptable, particularly given the evidence shown above. From the design and access statement (doc ref 5.8) it does appear that some sort of SuDS is proposed in order to prevent water run-off, although clearly, they have as yet, no actual plan. For a project of this size, and given the height of the water table for at least the winter months, it is difficult to see how this could work or how the site can accommodate sufficient SuDS systems without eating into the area earmarked for biodiversity net gain creation. The creation of SuDS will require deep holes in the ground. Experience locally is that, when digging deep, fissures in the clay frequently allow water to rise UP from underground, which would actually make it worse.

Future resilience:

The amount of flooding in this area has become worse over time, as is generally witnessed in the country as a whole; we are undoubtedly experiencing heavier, more frequent rain and we can expect this to get worse as time goes on. Rampion have not provided a credible argument to show that the site is resilient to the effects of climate change. Instead, this is further evidence that this proposal is not in the right place. The site was chosen for the wrong reasons.

It is also important to consider the fact that all the water from the higher AONB from the north feeds into the Cowfold stream in the west by the western compound, but also via channels under the A272, directly from Longhouse Lane, Bulls Lane, and Picts Lane, through the fields to the north of the proposed Oakendene substation site, **across the site** and into the tributaries south of the site. This is in striking contrast to the Wineham Lane North area, from where the water drains **away** (map 1, Appendix 1).

Cowfold stream area:

The cable route would go through small fields which regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more obvious flood meadow (see photos Appendix 2). These are used by herons and grey lag geese and many wild meadow plants and reeds grow across the wetter areas. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can still use it. This was clearly explained in a first round consultation response from JHC (See Section 13: Assessment of Consultation Reports) but was ignored. Photographs of the flooding around the Cowfold Stream over the course of a decade were also submitted with this in 2021(see Appendices 1 and 2 in the Consultation section) and shown in our Consultation Report to have been made available to Rampion in 2021.

There are two High Speed Direct Drilling sites close together at Cratemans by the Cowfold Stream. This risks contamination of the rivers.

On floodplains, flood risk mitigation measures include the avoidance of work from October to February. Add to this the commitment to avoid bird breeding sites in early summer and the fact that frog and toad breeding can start in February, meadows seed into the soil (which they save) late in August, so construction timing is totally impossible in terms of the use of this area as a busy haul road.

Flooding at Mockbridge on the A281 (see photos Appendix 2 below) cuts off Henfield from Cowfold quite often, and this has got worse year on year - construction work in this area will inevitably have a further impact on that especially if the drilling pours further water into the Cowfold Stream.

Appendix 1- Risk of Flooding from Surface Water

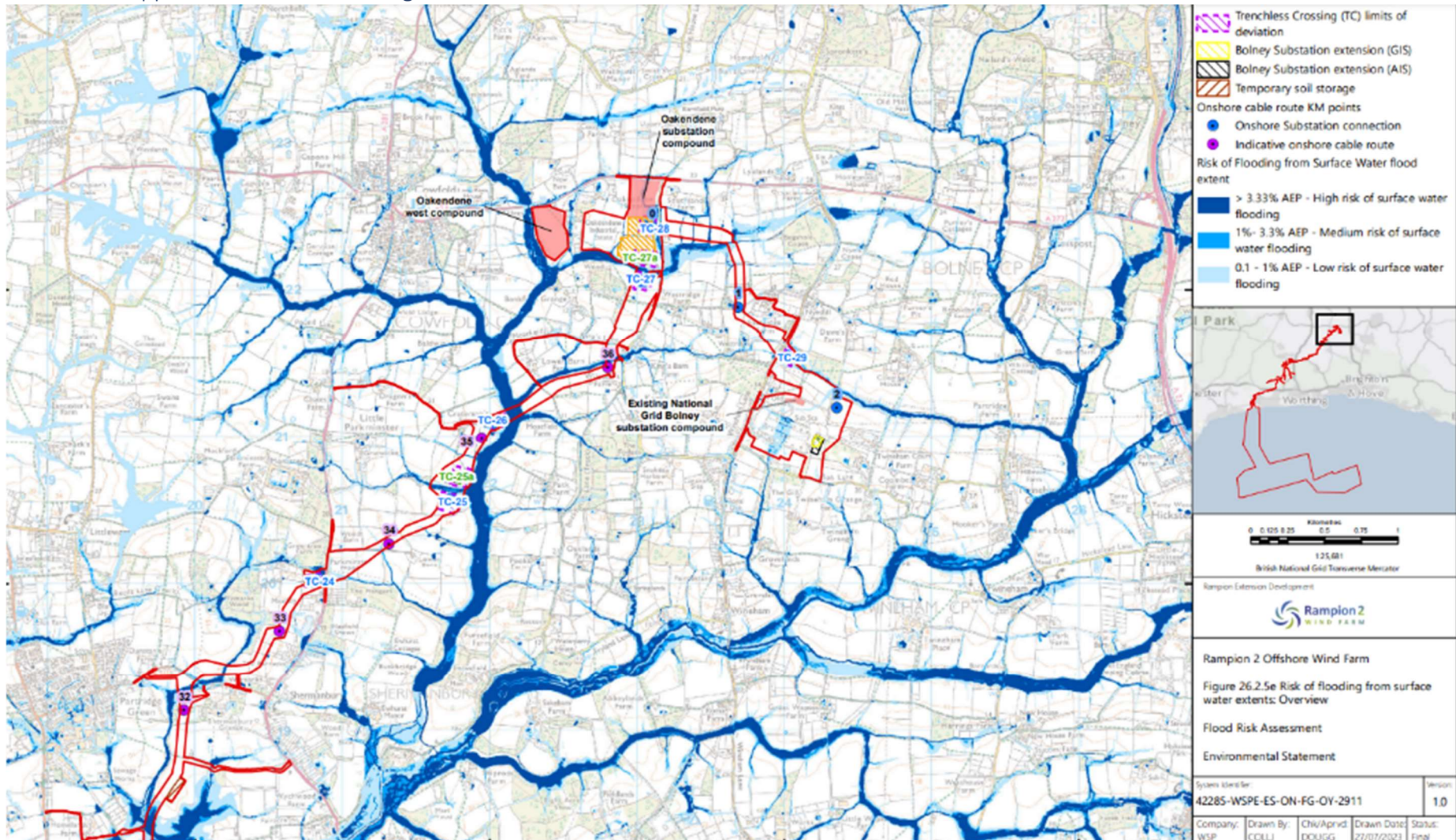
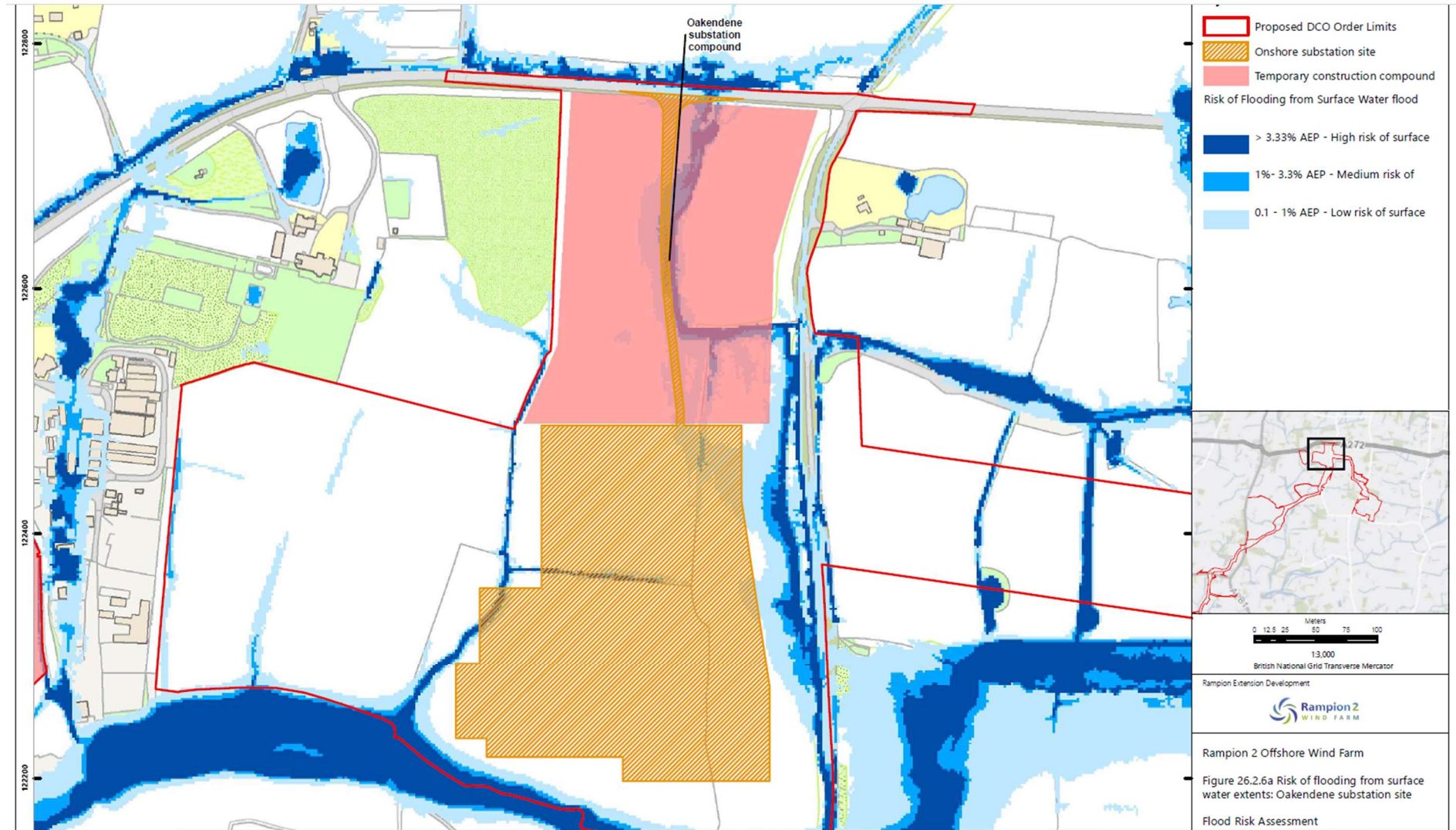


Figure 26.2.5e

Figure 26.2.5a



Appendix 2 – Oakendene Flooding

3rd November 2023



Western end of Oakendene Lake



Footbridge to west of Oakendene Lake



Oakendene Lake



Southern end of Proposed Substation Site from the south



Tributary under Kent Street



Proposed Substation Site



Public Right of Way #1786

Proposed Wineham Lane Site and National Grid Substation 3rd November 2023



Rampion 1 Substation, dry ditch



Wineham Lane North site and ditch, both dry



Wineham Lane South



National Grid Substation, below ground level





Cratemans

November 2023



Cowfold Stream Floods in normal pattern 5th January 2024



Highest point mid photo is the footbridge across the Cowfold Stream, lower two thirds is all field



Stream flowing through field, facing site where trenchless crossing emerges in Moatfield Farm



Cowfold stream is to extreme left, view north across field



Cratemans Farm lower field completely flooded next to trenchless crossing compound



Cratemans Farm lower field, looking through by site of trenchless crossing compound

Mock Bridge A281 - January 2024



Around Oakendene February 2024



Tributary under Kent Street 8 Feb



Southern end of Substation site 8 Feb



Kent Street 8 Feb



Southern end of Substation site 8 Feb



Proposed Substation site 8 Feb



Proposed Substation site 9 Feb

Section 13: Assessment of Consultation Reports, Comments following DCO Submission

This section should be read in conjunction with the Cowfold v Rampion Adequacy of Consultation Document previously submitted.

From the Consultation Report in the DCO submission it is now clear that Rampion did not properly consult with Cowfold Residents, nor did they take into account the responses they **did** receive. Instead, they have been highly selective in their consideration of the responses, as we will show:

Rampion's consideration of the responses received:

5.1.1 consultation report Annexe 1 (first consultation) deadline 7th Dec 2021

ONLY THREE responses from Cowfold area: 2 objecting to the proposals and highlighting the impact on Moatfield Lane (GEN-01), GEN 2 comments on unsuitability of Kent Street and the access from A272. One, ONS-104, comments on the need to avoid the Cowfold AQMA. This does not appear to have been written by a member of the public There are NO objections mentioned around traffic on the A272, AQMA, businesses at Oakendene, or the ecology at Oakendene. ONS -62 mentions lack of assessment of nightingale and turtle dove populations, but again, this is more likely to have been written by a wildlife trust as it also mentions SDNP. Approximately 12 separate topics are listed concerning the Wineham substation area and the implication from the report is that multiple comments were received about many of these issues. The population of Wineham is far smaller than that in Cowfold. There is a duty to consider all responses, this must include a *lack* of response. Due diligence in a properly conducted survey should have triggered an investigation into the lack of response from the Cowfold area and would have revealed the failure to send appropriate leaflets and section 42 letters. We asked Rampion for the postcodes and numbers of responses received from the two areas. This has not been forthcoming although we were assured this information would be available when the DCO was submitted.

Compare this to the very many responses received from Cowfold in the second consultation. I have written evidence from residents that they wrote far more than the above would suggest in the first consultation (see below). Therefore, Rampion have been highly selective about which comments they included - numerous comments regarding objections to the Wineham Lane choice and pushing for Oakendene as preferred choice are mentioned. There is quite a lot of trivia, including a comment about someone's caravan getting dirty, so it cannot be argued that the comments received from Cowfold were not of sufficient merit.

On the contrary, the comment on Moatfield Lane is from a highly detailed letter, sent to the first consultation: submitted 16/8/2021 reference #00001916. (See Appendix 1). As you can see there is extensive evidence regarding the wildlife in this location, flooding and much more. Photographs of the flooding at the Cowfold Stream area were also submitted (see Appendix 3 to Section 12: Water Environment). There is a paragraph on flooding, a topic which seems only now to be entering the consciousness of the RWE team:

"Flood plain

The cable route would go through small fields that regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more obvious flood meadow. These are used by herons and grey lag geese and many wild meadow plants and reeds grow across the wetter areas. I have even found a fish (perch) in a field where the Cowfold Stream has flooded and then retreated. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can still use it." There is no mention of this when they are showing how they have used the consultation responses to inform their choice of substation site.

A letter sent to Carter Jonas in August 2021 shows (See Appendix 2) that a memory stick of photographs and sound recordings of the wildlife were also sent.

Similarly, she records in detail the profusion of reptile species at Cratemans. This is not featured in the Consultation Reports.

After repeated emails to Chris Tomlinson asking whether her data has been taken into account, she finally received a response from Chris Tomlinson on 26th May 2023 to say it would appear in Appendix 22.2. This would appear to be the case, after a fashion. This is a document, written in August 2023, on the **Desk Top** Study of Terrestrial Ecology and two comments are bolted on to the end of a table and inserted into a section about the Sussex Ornithological Society data:

Page 11, Paragraph 3.1.2 *"In addition, a local resident provided field observations for the Cowfold Stream and surrounding area when within and close to the proposed DCO Order Limits."*

Page 42 paragraph 4.5.6 *"A local resident living in the vicinity of the Cowfold Stream provided records of breeding nightingale in areas of scrub adjacent to the watercourse and within the wider flood zone."* There is no reference to whether or *how* they took this information into account, nor does it appear in the Consultation Report at all, where they would have had to explain how they considered it, or in the Assessment of Alternatives. The conclusion we must come to, therefore, is that its insertion into Appendix 22.2 is a cynical tick box exercise.

In Annexe 2 (Doc Ref 5.1.2) the second consultation is considered. This time they are more forthcoming about the responses received, but by and large choose to ignore them. It is difficult to be sure exactly which comments from Area 6 (section 6.8.6 of Doc Ref 5.1.2) relate to the northern end from the A281 to Kings Lane. We discuss some of the comments from area 6 and area 7 to illustrate the lack of consideration Rampion have taken of these points when it suits their agenda:

5.1.2 Consultation Report Annexe 2: Deadline 29th November 2022

39 comments are listed for area 6 (Wiston to Kings Lane). It is very difficult to work out whether or not they relate to A281 to Kings Lane area, but many of them do appear to be. (A6-01 to A6-39) (p390-413).

Area 7: a large number of concerns are raised about ecology, impacts on properties and small roads -at least three quarters of the 38 responses relate to Oakendene itself even though this consultation was technically only about the cable route, suggesting that people in Cowfold were not aware of the first consultation (A7-01 to A7-38) (p414-440).

Substation: again, the majority relate to objections/concerns about Oakendene (SUB-1 to 30) (pages 740-approx to 749) and in Other; OTH-4 to OTH -16. Pp798-806

Many of these concerns are in fact raised in the letter from JC referenced above. Why, therefore were they not considered in the first consultation? Our view is that they had so few comments from Cowfold that they took the path of least resistance. The comments they then received in round two did not suit the plans they had already made so were ignored.

The responses Rampion make to the comments are inadequate. For example, the responses to the ecology comments say these issues are addressed in Doc Ref 6.2.22, "*which identifies the significant environmental effects, including consideration of the impacts on wildlife habitats and nature reserves*". In fact, this Document demonstrates an overreliance on desk top studies and the use of **known** wildlife habitats and nature reserves to inform the study areas, meaning that a number of key studies relating to these comments were **not** carried out here.

Traffic impacts:(A6-14, A7-07): the Rampion responses ignore the impact on Kent Street and in fact their choices make the Kent Street situation worse. . A6-20 traffic management: the outline CTMP does **not** in fact deal with this concern, even though the Rampion responses say it does.

A6-16 concerns the Jubilee Wood. The concern is effectively dismissed. A6-17 raises issues regarding the Cowfold Stream; again dismissed.

The high voltage cable running under Oakendene was mentioned by several residents in the 2022 consultation. There is no mention of it in the DCO documents. This is a potentially serious example of how responses have not been taken into account where not convenient.

Project refresh consultation April 2023; to consult those people with an interest in the land *not previously identified*. This included Kings Lane/Moatfield lane. There is no excuse for not identifying them if they had genuinely listened to the response from JC in 2021, which clearly identifies Moatfield as an issue. Nothing had changed. It is a box ticking exercise to say that they were then 'consulted' when nothing they could say could now impact on the key thing which results in them being affected i.e. the substation location. They make reference to the fact that the land registry refreshes only every 2 years (p17 of Doc Ref 5.1). However, most of these people have lived in this lane for decades. It is a reflection of the chaotic and cavalier way this consultation has been carried out. We dispute the claim that the changes were minor. The need was there from the outset, but not recognised by Rampion due to lack of engagement.

How Rampion have interacted with this community:

Rampion's response to Section 51 advice from the Planning Inspectorate (doc ref 5.1, table 2.5):

The Inspectorate informed the Applicant of an increase in emails raising concerns over the Applicant's consultation process, with reference to the residents of Cowfold and West Sussex County Council, which is the proposed location for the onshore substation. The Applicant informed the Inspectorate that in addition to four in-person events held for the cable route modification consultation, the Applicant went to a public meeting at Cowfold Village Hall and gave a

As set out in in Section 3.4. in addition to attending the event hosted by Cowfold Parish Council, the Applicant held a dedicated public event on 21 June 2023 for the Cowfold community, close to the proposed Oakendene Onshore Substation site for the Project. This event was attended by 140 people and responded to concerns about the level of engagement. The Cowfold Information Event was advertised on posters locally, on community

presentation and answered public questions on the scheme at the invitation of the Parish Council. **The Inspectorate advised** that the Applicant's Consultation Report recognises the event and clearly demonstrates how concerns about the adequacy of the consultation have been addressed and considered.

Facebook pages and through a targeted maildrop to everyone within 1km of the proposed Oakendene substation site and the main Cowfold conurbation. The Parish Council also helped promote the event and attended in person.

We utterly dispute how this can be relevant. Our argument remains that these retrospective meetings cannot be considered adequate as **the decision to use the Oakendene site had already been made, as indeed it was before the very first engagement with the village in the second consultation. It can only therefore amount to a box-ticking exercise.**

3.6.14. Focused engagement in Cowfold

This again deals with the same two meetings, in November 2022 and June 2023-again TOO LATE to be meaningful and did not deal adequately with our concerns. Please refer to the original Adequacy of Consultation report submitted by CowfoldvRampion.

Section 42 letters first consultation

5.3.13. *"The identification of potential PWILs was an **iterative process**. Due to changes in the Project proposals as well as the land referencing process, new interests have been identified throughout the pre-application process. All PWILs identified in the Book of Reference (application reference 4.3) have been consulted under section 42 of the Act at least once with an opportunity to comment on the project as a whole although not all PWILs will have been identified at each stage of consultation. Where PWILs have been identified later in the process, and so were not consulted under section 42 at the time of the project wide statutory consultation, each subsequently identified PWIL has been given the opportunity to make representations about the project as a whole, has been directed to all consultation material previously made available, and has also been offered an opportunity to meet with members of the project team to find out more about the project and any potential impacts on their land interest. "*

However, this fails to recognise that the situation with Cowfold is unique in that the failure to engage in the first round had major implications. Also, no explanation is given for their failure to engage with any of us in the first round. The scope area round the substation site had not changed from the outset of even the informal consultation, most properties are very easy to identify, most resident have lived in our homes for many years and a simple google search of postcode brings up comprehensive list of properties including all the businesses in the Oakendene Industrial Estate. The section 42 letters were simply not sent out in the first consultation.

Second consultation:

6.3.2. *"The list of PWILs was also updated to include those newly identified and newly affected. Newly identified PWILs had not previously been consulted for a number of reasons, primarily due to the land not being newly included in the project boundary and refreshes of land registry searches since initial referencing in mid-2021". **The consultation boundary here had NOT changed, and we are easy to identify as above. Those who received section 42 letters in 2022 should have received them in the first consultation. They have reference numbers; it would be an easy matter to demonstrate whether these numbers had been included in the first round.***

6.3.3. *“New parties both with freehold interest in land and with rights over land, for example tenants or people with rights of access were identified. It was also brought to RED’s attention that **not all of the tenants at Oakendene Industrial Estate had been consulted.** Addresses for Oakendene Industrial tenants were not available via Royal Mail”* Possibly true, but all are available very easily as above via Google. This means that a number of businesses did not receive a letter in the second round, but from Rampion’s own explanation it must also mean therefore that they did not receive them in the first round either and that **Oakendene businesses did not receive their Statutory Section 42 letters at the crucial time when they could have raised concerns about their businesses.** In fact, business owners would dispute whether *any* of them had received them in the first round (see testimony of the estate manager in our Adequacy of Consultation report) Why therefore did this not result in the reopening of the consultation as had happened in Middleton on Sea when letters were not received? The principle is exactly the same. The only difference is that Rampion had by this stage invested a great deal in the project and were not willing to rewind. This should not be considered a factor, only whether they have complied with the regulations; they clearly have not.

6.3.4. *“Further to these discussions, consultation packs were sent to the Oakendene Industrial Estate office on Friday 28th October 2022, which were delivered on the morning of Tuesday 1st November 2022. As discussed, and agreed with the landowner, Carter Jonas visited the industrial estate on 1st November between 11:45 and 15:00 to issue packs, attempting to hand deliver the packs to occupiers. If the occupier was not on site these packs were placed in their designated post tray. If they did not have a designated post tray, the pack was left in the industrial estate office. While on site there were 11 units identified which had not been included in the initial batch of consultation packs. Carter Jonas returned to the industrial estate on 7th November between 14:00 and 14:45 to issue these additional packs, which included a covering letter confirming they had an extended deadline of 6th December to respond. 9 unaddressed packs were also left in the estate office in case any occupiers had misplaced their packs.”* **This is not the experience of the people on the estate, see written statements in our AoC document.**

Summary:

Planning Act 2008 section 47, Duty to Consult: Para 5:

*“In preparing the statement, the applicant must have regard to **any response** to consultation under subsection (2) that is received by the applicant before the deadline imposed by subsection (3).”*

Rampion have failed in their obligation to show how they have taken the comments received during the consultation in to account and even in some instances the DCO show they have NOT done so.

Rampion 2 Bolney Road/Kent Street substation cable route option

This option of Rampion cable route is devastating for many reasons. The main reason is destruction of habitat, wildlife and biodiversity and the continuity that supports the survival of a number of endangered species (that are not mentioned anywhere in the PEIR report that we can see). The second is issues with road access on the A272, to and from Kent Street, and on our private road, which would be crossed twice. The third is disruption to access for local people for wellbeing, exercise, including noise disturbance to people working in the area.

We do not believe existing wildlife surveys have covered this area, to some extent because much of it is private land, and it has not had cause to come to the attention of campaign groups who may have already commissioned such studies. So 'desk study' mentioned in the PEIR report is not going to give much accurate information. The people undertaking the surveys have only visited the sites a very few times and have not asked landowners or local people to share their knowledge. So, we question how any understanding for example of adder, nightingale, cuckoo or turtle dove presence and behaviour can be put forward.

Habitat and wildlife loss

I believe that the location of this cable route is an invaluable habitat of undisturbed hedgerow, blackthorn scrub, lichen and interconnected flood meadow. All along the Cowfold Stream on its way to the river Adur, including the tributaries that join into it across Moatfield Road, is such a special habitat for wildlife, which spreads far beyond the immediate borders of these water courses. This pocket of land shares many elements with Knepp Castle's 'Wilding' project, yet it has not been a monitored process, but has just been left for flood meadow, grazed or cut for hay for decades. It has not needed rewilding. The undisturbed nature of the soil, trees and hedgerows is a benefit for carbon storage that will also be lost with this process. There are so many endangered species that are still in this habitat which will vanish with ongoing disruption of 50m wide swath of cable-laying construction over years (as it has taken for Rampion 1). There are nightingales (red list 91% decline in 40 years), cuckoos (65% decline since 1980's), sky larks, great crested newts, turtle doves, purple hairstreak butterflies, adders and grass snakes, wild service trees and much more, but all in this little area that Rampion would destroy to get cables to the new substation if was sited at Oakendene.

Nightingales

We are in hotspot for nightingales all along and even across this proposed cable route option. Yet they are not even mentioned in the PEIR report. They compete in song every year (including this year) from April through to mid-July, in the same sites, where other sites across Sussex have gone silent. Last year there was a great loss of valuable blackthorn scrub (around 5m depth and 3m high and hung through with moss and

lichens) all along the Gratwicke side of the Cowfold stream because the newest owners did not consider wildlife. In the last 10 years all through Taintfield Wood the ground level scrub was taken out (possibly for duck shooting) which completely stopped the nightingales which had converged to breed in that wood over many previous years. They need dense low-level scrubland to continue breeding as they create nests only just off the ground. This has compressed their range into a smaller space around us to the end of our garden and around the hedgerows of the fields opposite – just where this Rampion option would disrupt for years and in parts destroy these last quiet areas of habitat. They eat insects, and the destruction of the adjacent meadows even in the short term could take their food supply away and would mean that they do not breed as well and so fewer return the next year. I have over 20 short sound recordings of nightingales from different years and many from earlier this year made at the end of our garden in Moatfield Lane, along Crateman's field edges and all along the Cowfold stream in the blackthorn at the edges. I have marked a map with the distribution, and I have a photo of a nightingale near the Cowfold Stream just by where the route is proposed to go. Photos are only possible where there is enough competition to breed that the males sing high up in the bushes to make sure they can attract a mate and claim the best territory possible. They will struggle to be heard over construction machinery.

Turtle doves can be heard by the Cowfold stream, and along the flood area at the end of our garden well into the summer. This little area also was host to only **cuckoo** that arrived this year after previous years of there being so many. These will decline further if the habitat continuity is lost by taking out all these metres of complex hedgerow pattern around the large width of cable construction. If they each fail to breed, they decline further in numbers and are unlikely to return. Even if hedgerow is finally replaced it would take many years to get it to the density which is needed for this breeding habitat.

What would be the loss of **oak trees** in this process? So many grow within the hedgerows they would not all be avoided in the construction process and yet each is an irreplaceable ecosystem. They grow in symbiosis with fungi, insects and caterpillars, which then support bird breeding etc. We have **purple hairstreak** butterflies in one of our oaks each year – there must also be others in the cable route as it runs adjacent to our property. On the cable route, the boundary of Wilcox Farm and the Taintfield polo field is entirely made up of a double row of oak trees with a drainage ditch between. If these are not moled underneath for cable laying they will be lost and cannot be replaced in our lifetime, even with the stated intentions of putting habitat back or better. Would drilling under disturb the tap roots and the trees die anyway? This is just not the route to choose.

This is also a hotspot for **crested newts**. These have been in our pond, under our suspended floor, on our doorstep and come to us across the flood area between our garden and the field where these cables are proposed to come through. These are endangered and protected by law.

Toads migrate to a breeding site in the property 'Kings' every March and are already seen crushed on their journey as far away as Park Farm on Moatfield Lane and beyond Wilcox Farm on Kent Street. The cable route goes right across this toad superhighway. I have some photos of this event. With years of

construction going across Kings Lane and Moatfield Lane and an increased number of vehicles on Kent Street this population will be devastated.

There are **Badger setts** in the strips of woodland just near here. We see badgers cross the lane at times and they have visited the end of our garden. As their setts are in the woods opposite Moatfield Farm and this is across the cable site from here, it will disrupt the established pathways that they use. It is easy to find the active setts but they are on private land so unlikely to be found in these brief surveys unless arranged in advance, which has not happened to my knowledge.

I have seen **weasels** all around this area and have a photo of one found on my property that my cat brought to me.

Grass snakes commonly bask at the sides of Crateman's farm fields where the cable is proposed to go, and the field across the bridlepath nearby. There are also **adders** at times. I have photos of a dead adder which was on the footpath behind the pond at Crateman's Farm, and a grass snake caught by my cat a while ago (it was released again unharmed). I have also got photos of a **slow worm** found on my property. My neighbour's cat has caught a grass snake this year. These creatures are sensitive to vibration and so are unlikely to remain here because of the sheer scale of this construction and prolonged work.

Wild service trees are all round this small area including on Dragons Lane near Crateman's farm and on the bridlepath that goes up from Wilcox Farm where the cable is planned to go. As this is an indicator of ancient woodland along with wood anemones. Strips of woods like this are all around this location and digging for the cables would destroy the meadow corridors the wildlife uses to get between them.

Every year we count the **Glow worms** which shine out to attract a mate all along Moatfield Lane between June and the end of August. I have photos. There can be as many as 14 in one grass verge area. They are always along by Moatfield Farm and across the field edges between there and our house. This year there was one right in the middle of the proposed cable route.

Woodpeckers

We have greater spotted woodpeckers on our feeders every day which often come across from the Badger wood the other side of the cable route. We also have many green woodpeckers come down on the lawn to dig out crane fly larvae. This search for food sources would be disturbed by prolonged construction work in the polo field between here and their nest sites.

Owls

Little owls hunt on the polo field that would become the cable route behind our property in this proposal. I have a photo as one stayed so long there. Little owls are also often seen on Kent Street where they hunt

very low to the ground and have even become a hazard to traffic in past years. These will be under threat with construction, a change in traffic and noise disturbance.

Barn owls very prominently hunt across Crateman's farm fields where the cable is to go and are seen many times in the trees that hang over Moatfield/Kings Lane. They have been known to nest in Lower Barn Farm sand school next to the cable site, the shelter adjacent to the cable route in the field on the other side, and the barns at Crateman's Farm. They are also often seen on Kent Street.

We hear and see **Tawny owls** very often anywhere along the lane and around our property. **Buzzards** and **red kites** are also a common site over our garden and the surrounding fields where the cable is proposed to go. Therefore, there must be a good rodent population to supply this amount of hunting (cats catch voles and field mice daily). With the loss of so much hedgerow and undisturbed field here how can the continuity of this hunting be maintained throughout the construction phase?

Bats

The wildflowers of the meadows and field edges bring many insects. The meadows particularly at Crateman's Farm are a constant buzz of insect life until the hay is cut, which means that there are bats skimming around the area for many months of the year. The Oakendene lake in the site of the proposed substation is also a key location for bats and the loss of meadow along the cable route along with light pollution at the substation would be devastating for the bat population through here.

Flood plain

The cable route would go through small fields that regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more obvious flood meadow. These are used by herons and grey lag geese and many wild meadow plants and reeds grow across the wetter areas. I have even found a fish (perch) in a field where the Cowfold Stream has flooded and then retreated. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can still use it.

Two of the landowners have told me that their fields have not been ploughed for decades but are only grazed or used for hay. There must be many meadow **plant species** that are particular to the lack of disturbance. I have many photos over the years. This cannot be put back after the years of construction phase. You cannot restore time.

Road access and road damage

I am very concerned with this cable route option's effect on access to and from the A272 for both people who live down Kent Street as well as for users of the already very congested main road. This is likely to be very disrupted for years during construction and maintenance after. Already we can be stuck for 20 minutes just trying to get to Cowfold village at rush hour or when there are issues on the A23 that have diverted traffic. The knock-on effect could also be more traffic all around these small single carriage lanes.

Kent Street is a fragile, single carriageway road and extra traffic would cause further structural damage and extensive disruption to local traffic. Already this year the edges have caused a horse lorry full of horses to fall into the ditch as the hidden edge crumbled when passing another vehicle.

Our very small private Lane (Kings/Moatfield Lane) would be disproportionately affected by being crossed twice under this proposal at 50m wide at a time. It is unadopted and used by 9 properties and 11 families as well as necessary access for farm traffic (sometimes 7 or 8 times in a day with haybales and livestock delivery). This will massively be disrupted during construction however it is managed, yet nobody thought to contact any of the non-landowners of the cable route until now. The residents finance all repairs, so are very concerned about both access of construction vehicles and structural damage to the road.

Psychological wellbeing and exercise

Disruption to the complex network of footpaths that many people from Cowfold village and beyond have been reliant on (especially since Covid lockdown) for recreation and exercise would be a huge problem as there are no alternative routes for these. A well-used route goes around Crateman's Farm and onto Kings Lane, leading through to Frylands lane. I walk a circuit most days through here to photograph wildlife, see the changes in the season and think through my work schedule for the day. The Cowfold Stream regularly floods right across the field below our property and Crateman's and Park Farm are the routes where the bridges may still be passable even when the field opposite is under flood water. If these paths are out of action for many months, I cannot think how myself and others in the area with continue to function and make productive work.

Noise disturbance

I work as a visual artist on public art projects which are large scale wood carvings. Not only do I rely on studying the wildlife I carve which lives around this property, I also complete the work outside the studio at the bottom of my garden and rely on the quiet and natural environment for concentration. Prolonged construction work just next to me creating devastating noise and dust would be terrible for me and I would even consider moving if this proposed route goes ahead. This would have a huge economic effect on my business. There are many people who choose to be outside in these locations because of the natural environment and peace and this needs to be considered. It is a web of small properties and landowners. I am very aware of how extensive the construction phase turned out to be for Rampion 1 and know that it is a long period before anything gets restored, if indeed it can be. This is not endurable as a working environment.

Appendix 2 – JHC letter to Carter Jonas

Jack Furness
Land Referencing Manager
Rampion 2 Project Team
Carter Jonas
2 Snow Hill
BIRMINGHAM
B4 6GA

22nd August 2021

Dear Jack Furness

RAMPION EXPANSION – PUBLIC CONSULTATION

Further my email dated 27th July please find enclosed a memory stick of images, sound recordings and information to add to the biodiversity studies concerning the Kent Street/Bolney Road cable route option. Please pass this on to the team who are undertaking the environmental surveys for the Rampion 2 Project who have been visiting under your company name. As no meeting seems to be forthcoming this can add evidence to the 'desk study' for the ecology survey work. We are not assured that enough material will be gathered in any other way. I will also send this to RWE, Sussex Wildlife Trust, and other relevant conservation organisations so that these records are more widely available.

I am disappointed that although the website for the consultation says 'if you have any questions ... please contact RED's appointed land agents', and that 'the red team is on hand to help with queries', yet we get no responses to our phone calls or emails from either. These proposals would have such a devastating effect on the lives of people who live directly within the construction sites for Rampion cabling especially when it is such a quiet area, with only private and narrow roads as access. We should have had face to face discussion and answers to our questions both about the wildlife present here and about the logistics of how the construction phase (if this option went ahead here) could be carried out to allow us to go about our daily lives, but we get no interactive response at all. This leads to great upset and frustration and spurs people on to start public campaigns when they would not have been motivated otherwise. Not a good strategy.

Yours sincerely

Janine Creaye

Encs

cc. Rampion Extension Development Ltd

Section 14: Soils and Agriculture

Comments following DCO Submission

Introduction:

There is no main section on this topic, only an addendum, as up to the submission of the DCO documents, there has been remarkably little detail about the soil and agricultural impacts at all.

Overall, only 40% of the total land under the DCO proposal has actually been surveyed (Soils and Agriculture, Doc Ref 6.2.20, para 20.5.3). This is apparently mostly due to the UXBs on the SDNP. It does not explain why the Oakendene west compound or sections of the northern cable route have not been surveyed.

Oakendene:

Para 20.3.7, tells us that Horsham DC were omitted from the soil and agriculture ETG until 2022, as was the case for the Noise and Vibration ETG also. This was a key time when choice of substation site was under consideration. During the 2021 meetings, Mid Sussex DC said *'the loss of any agricultural land will be restricted to grade3 land at the substation site and so it is not a reason to refuse'*.

However, Doc Ref 6.2.20 tells us that a quarter of the land at Oakendene is ALC Grade 3a or grade 2. The Wineham substation area is of a lower grade overall.

Table 20-10 tells us that Rampion have scoped out the loss of agricultural land during the operational phase. We absolutely disagree with this statement as **all** the Oakendene land within the DCO will be used, if not for the substation footprint itself, then for access or for landscaping and biodiversity restoration and net gain. It cannot therefore be used for agriculture without undoing the habitat creation work. It is therefore irrelevant where exactly on the site the Grade 2 and 3a land is.

Use of this grade of land is outside local planning policy and is unnecessary as the land at Wineham Lane is already degraded as explained in the DCO chapter, Doc Ref 6.4.20.1

In any case, the whole area will be severely compacted and made poor, as will also be the case for the western compound, which has not been surveyed at all to date.

The document does recognise that Oakendene is at significant risk of both compaction and soil erosion (para 20.9.7), but it then assesses the overall risk as 'not significant'. This is clearly nonsense and fails to take into consideration the additional flood risk to increase the potential for eutrophication.

Cable route A281 to Oakendene:

Table 20-15 lists the compounds across the project and the 'likely' impacts. There is no mention of the compound at Cratemans, which will be directly on a field we have highlighted to Rampion as full of wildlife and in particular reptiles.

Risks and Mitigations:

It is not acceptable that a full survey will not be carried out until construction; what difference can that then make to the outcome? There is far too much use of vague or unfounded terms such as 'probably will', 'it is likely that' with no evidence to back it up.

Nor is the suggestion that the areas of UXBs can account for the fact that only 40% of the DCO land having been surveyed.

Para 20.9.2 lists the sites at risk of compaction, and 20.9.7 lists those at risk of soil erosion (and therefore eutrophication). Essentially, they are the same:

- ***“The onshore substation, onshore substation permanent access and onshore substation temporary compound.***
- *the existing National Grid Bolney substation extension works and temporary construction access.*
- *the onshore **cable corridor** (including joint bay locations), temporary construction accesses (**where not already an established road or track**);*
- *the landfall temporary construction compound, trenchless crossing compounds, other temporary construction compounds; and*
- ***the onshore substation landscaping and drainage area at Oakendene.”***

In other words, **all** the Oakendene substation and compound land and the entire length of the cable route from A281 to Oakendene and across to Wineham Lane as there are **no roads or tracks and in addition, the land around the Cowfold stream and Oakendene floods.**

We disagree with the estimated likelihood that any of the land can be restored to its previous state of health by the suggested means, especially the endangered meadows around Cratemans which are the result of many years of natural process. Compaction affects soil health by reducing aeration and affecting water retention. Any farmer will tell you that when the soil is lifted or turned the heavy clay will come to the surface, and increase compaction, resulting in poor quality waterlogged or dried out land according to the seasons.

The wildflower meadows at Cratemans are the result of hard work by nature over decades with a complex raft of roots and mycelium. Simply scraping the soil away and replacing it cannot easily restore if at all, this landscape (see report by ecologist Perry Hockin submitted by Janine Creaye)

The haul road cannot be restored as it will be covered over with Type 2 coverage or similar and then compacted.

Section 15: Onshore Substation Design and Access

Comments following DCO submission.

Introduction:

There is no main section on this topic, only an addendum, as up to the submission of the DCO documents there has been remarkably little detail on what and where they were proposing to build on this site. Instead, the substation issues have been subsumed into the relevant sections such as traffic or ecology. Almost the only substance until after the end of the consultation was that they proposed a 12-acre substation somewhere on the Oakendene estate with access from an as yet undecided point. Almost no discussion took place with residents until after the end of the consultation. As a result, the most unsuitable site has been chosen for the substation, a location far more damaging ecologically, economically and socially than the Wineham Lane locations.

The decision to choose this site on such a congested and dangerous section of road affecting so many people and having so many environmental consequences might have seemed like a good idea from a desk top map survey in lock down, but failure to consult with the local community has meant they have only understood the impacts retrospectively and have had to retrofit their reasons for 'choosing' it and alter proposals as each issue was brought to their attention.

For more detail on each of the following, please see the relevant Sections and Addenda.

Site Access:

From the Outline Construction Traffic Management Plan (DR 7.6), pA61, Access A63 from A272 is described as 'constructional and operational' yet the bell mouth construction is described as 'a new **temporary** construction bellmouth is required'. The section on visibility splays describes it as permanent and it is clearly Rampion's intention to use this as the permanent access to the site. What then is meant by 'temporary 'bellmouth? Is it to be reduced in size once construction is complete, or is this another example of lack of attention to detail?

Whatever its size, it should be remembered that this access point is at a dangerous location on the A272, and the site of many traffic accidents, further complicated by its proximity to Kent Street, and close to the old entrance to Oakendene Manor which was moved some decades ago as access was so dangerous.

Similarly, A61 on Kent Street is described as a 'temporary construction bellmouth' yet is listed as needed for both construction and operation. And what is the justification for requiring a second operational access to the site from Kent Street in addition to the main access from A272, and does this mean that the intention is to put in a permanent road? Could it perhaps be that it is part of a longer-term agenda to facilitate the battery storage farm on that site? (see below).

High Voltage Cable:

There is a 132kV cable which goes under the northern half of the site, from north west to south east, under the access road and construction compound and almost certainly under the proposed attenuation basin and swale and probably under the northern part of the permanent substation location. It is also crossed at least twice by the proposed cable route from Oakendene to Wineham. Nowhere in the DCO documents is there a discussion about it, nor is it mentioned in the Relevant Representation from the National Grid (RR-032). Perhaps, as it is an export cable, it is the property of UKPN instead?

Yet such a cable was one of the reasons for discounting a potential site for Rampion 1. (see the now archived DCO documents: Alternatives; Onshore Site Selection Process 3.8.6). There is nothing in the current Design and Access Statement (Doc Ref 5.8) about how it will be managed, or indeed moved, or any reference to a discussion with UKPN or National Grid that they are happy with the proposals to create hardstanding over the top and have portacabins and 100s of vehicles parked on it, concrete chutes and even drainage ditches. Access to this cable is needed at all times and it cannot be built over.

Have they confirmed with UKPN the exact location and that any proposals for roads, hardstanding, planting, bunding, excavation etc are acceptable to them? Surely it will restrict the ability to landscape and thus increase the visibility of the substation from the road?

This cable *has* leaked in the past causing oil spillage into the lake. If the project goes ahead, there will be the potential for three cables to leak into the water courses.

Flooding and drainage:

Rampion underestimate the flood risks on this site and overestimate the potential to drain water away into the saturated water courses. We provide extensive evidence of the significant degree of winter flooding on this site in the Water Environment Addendum. 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 affects downstream on the Adur valley. There is also the risk of flooding vulnerable properties on the north side of the A272.

Not only is there the water pollution risk from the three cables, but during construction also, as happened during the construction of the Rampion 1 substation, where the water courses are far less significant.

Landscape and visual:

Any assessment of the visual impact must take into account the final ground height, which is likely to be raised from the present level to manage flood risk.

There is significant downplaying of the impacts visually from the roads, country lanes, PRoWs and the High Weald AONB. Also, on the detrimental effects on the Grade 2 listed manor house and parkland.

The visual assessments which have been done do not take into account the extensive hedge and tree removal, or the visual effect of the bare trees in winter, or the surrounding high ground which looks down into the site. In the winter months the shrubs along the tributary into the lake are in full view from the A272 and the whole substation will be clearly visible for decades to come. i.e. the lifetime of the substation. Rampion1 planting success 12 years on emphasises the likelihood of this being the case even if screening were relatively easy to achieve. (See Addendum to Landscape and Visual; Appendix 1 Viewpoint Analysis.)

The supposed 'industrialising' effect of the small industrial estate is designed to denigrate the local landscape whereas in fact the Industrial estate is one of the reasons the wildlife and habitats flourish here as they do. Workers on the estate enjoy the wildlife and ensure its wellbeing.

None of the DCO documents include the 20m high concrete chutes, the lightning mast or the highly visible perimeter fence with signs on when assessing visual impacts-a further example of downplaying the detrimental effects.

Although the design and access statement states that there will be no lighting other than emergency lighting, on the substation, it does not make clear what lighting will be on the perimeter fencing, lightning mast etc, or the infrared and CCTV impacts on wildlife. Also, confusingly, C-105 from the Commitments Register (Doc Ref 7.22) mentions that the only permanent lighting will be at the onshore substation. This would appear to be at odds with 'no lighting'.

Ecology:

Hedge and tree removal will be extensive as a result of the location of the substation on this site, in order to place the substation, create access and to have a vast construction compound.

The ecological surveys were in the main not done before the site was chosen, and when they have been done, there has been an overreliance on desk top studies and the use of designated sites to inform where surveys were undertaken. This has meant that not all studies were attempted on this site. Even when they were, there were incomplete surveys due to equipment failure, or the carrying out of surveys outside of correct seasons. Even more incomprehensible is the claim that they were incomplete due to 'lack of access'. Yet despite all this, this so called undesignated 'industrialised' location and the northern end of the cable route contain such a high proportion of all positive findings-great crested newts, important hedges and veteran trees, water voles, dormice, otter, badgers and nightingales. It is far more biodiverse than the alternative locations at Wineham, sadly already depleted by the earlier substations and the more open nature of the field systems.

The Oakdene estate has a high amenity value for many local residents and from far further afield, from wildlife to walking, running, dog walking and horse riding. In addition, there is the loss to the community of the owner's original plans to improve the employment opportunities at the industrial estate, and nature conservation and accessibility to local people.

Mitigations: there is no clarity as to what is an attempt to make up for what has been destroyed (even if it were possible to restore things such as the nightingale habitats) and what contributes towards Biodiversity Net Gain.

Soils and Agriculture:

Soils and Agriculture, Doc Ref 6.2.20, para 20.3.7, tells us that Horsham DC were omitted from the soil and agriculture ETG until 2022, as was the case for the Noise and Vibration ETG also. This was a key time when

choice of substation site was under consideration. During the 2021 meetings, Mid Sussex DC said *'the loss of any agricultural land will be restricted to grade3 land at the substation site and so it is not a reason to refuse'*.

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The document does recognise that Oakendene is at significant risk of both compaction and soil erosion (para 20.9.7), but it then assesses the overall risk as 'not significant'. This is clearly nonsense and fails to take into consideration the additional flood risk to increase the potential for eutrophication.

Heritage impacts:

The impacts on the Grade 2 listed Oakendene Manor, its parkland nearby Listed homes, and the ancient landscape to the south have been significantly downplayed in the DCO. These issues are dealt with in detail in our Historic Environment and Landscape and Visual Sections and Addenda

Noise and vibration:

The noise and vibration effects of both construction and operation are not properly assessed in the DCO and are too often dismissed as 'likely not significant' or scoped out without reasoned justification for doing so. There is no assessment of the ecological impacts of these pollutants on the sensitive ecology. No consideration is given to the noise or vibration effects of HGVs and other vehicles turning in and out of the Oakendene and Kent Street sites or waiting on the road to do so, nor indeed of the Air Quality effects of this.

Battery storage farm:

A planning application has also been made to Horsham District Council for a battery storage farm next to the substation site at Oakendene. (Planning Ref EIA/23/0006) Although any involvement by Rampion is denied by Vicki Portwain and Lucy Tebbutt, (email to MES 5/10/23) there **MUST** at least be collaboration between them as the location lies over the top of the cable route.

"The Site, excluding the underground cable route to the Point of Connection, comprises land totalling approximately three hectares (see Location Plan at Appendix 1) set within well-established hedgerow and tree planting. The Site will be connected via an underground cable route to the Point of Connection at Bolney National Grid Substation, located approximately 1km to the south-east of the Site."

Although alone, a battery storage farm application would normally be a matter for local planning, the cumulative impact on landscape, ecology, water and drainage etc must be considered and the plan should therefore be seen as part of the DCO application, and as it does NOT currently form part of it, the DCO application must be re-submitted, particularly as the applicant appears to be a subsidiary company of Macquarie, a main player in RED. Furthermore, there are 4 further battery storage farm applications close by and a 180-acre solar farm. The cumulative impacts on communities and ecology must be taken into account.

Constraints:

Having initially no doubt been pleased to find, what on a map looked like a large convenient plot, close to a main road, due to lack of early engagement they have increasingly found themselves constrained to the far south east corner of the plot. This is partly in order to reduce the impacts on the grade 2 listed Manor house and the businesses on the Industrial Estate, both of which they have tried to downplay or ignore during the consultation. The realisation, once away from their desktops, that Kent Street was far too small to be used for construction access, then meant that access had to be from A272 either directly or via the Oakendene Industrial Estate. This will cause huge disruption to many thousands of road users, again because they have failed to understand the behaviour of traffic on this congested road.

In order to limit the visibility from the A272 they now find themselves pushed into the part of the site which is the most affected by flooding and will most destroy the beauty and rural tranquillity of Kent Street and the stunning landscape to the south. However, to build further north would be unacceptably visible from the main road and would lie over the high voltage cable. This location also has the highest impact on habitats and wildlife being adjacent to a lake and requiring the permanent removal of large sections of ancient hedgerows and trees. It also irretrievably disrupts the ecosystems and corridors from A281 to A272 which we believe to be of major importance in this nature depleted world.

The sites at Wineham Lane do not flood, do not cause so much disruption to so many road users or businesses and it is clear from the ecological studies Rampion *have* done that it is far less environmentally sensitive. Add to this the admission that in fact there was little to choose between them, ("***On balance, there is a marginal preference for the Oakendene site.***"), even before they understood these additional issues, there really is no justification for the choice, other than they thought nobody had noticed and they believed they would not face protests. This is not a sound basis on which to try to justify so much destruction and disturbance.