

Discussion at Planning Inspectorate hearing

1 Alternative substation sites at Wineham Lane

It is evident from the absence of topographic, hydrological, geotechnical, groundwater assessment, traffic and ecological data that comprehensive comparative study has not been conducted for the alternative substation sites. It's difficult to understand why the battery facility application along Wineham Lane (DM/24/0136) has not been included in the DCO Application, considering it is owned by the Rampion joint venture, the ownership of which should have been disclosed.

It is entirely understandable that our neighbours near Wineham Lane objected to the proposed Rampion substation 2 being built on Wineham Lane. When they pass by Rampion 1, they are reminded of broken promises, poor replanting, and the massive scars left on their beautiful countryside. They endured several years of neglect from Rampion, with unanswered emails, unreturned calls, numerous concerns ignored and summer weekends ruined by noisy construction.

If Rampion substation 2 is constructed on Wineham Lane, our neighbours should be compensated for the duration of the project. Rampion 1 was initially estimated to take 17 months, but ended up taking 72 months, over 3 times longer than expected. Serious consideration should be given to liquidated damages to be paid to the neighbours who will be affected by this significant disruption.

2 Traffic and Highways - the proposed substation at Oakendene/Kent Street.

In relation to the proposed substation at Oakendene/Kent street, the Traffic and Highways section extensively references NPPF, National Highways guidelines and policies from relevant councils. However, Rampion have failed to adhere to several guidelines and only superficially acknowledged local policies. A closer examination of the documents reveals inadequate due diligence, missing data and insufficient information and a lack of comparisons between the two proposed sites. The reader is frequently directed to specific chapters or appendices, only to discover the absence of relevant information and data. References are made to traffic modelling at Oakendene which has not been completed. Please refer to document attached, Highways and Traffic, which provides several examples, though it is not an exhaustive list.

A crucial point that appears to have been downplayed is that the Oakendene site is accessible only directly off the fast-moving, busy and hazardous A272. This implies that tens of thousands of construction vehicles will have to significantly reduce speed to enter the site safely. In contrast, the entrance to the Wineham Lane site is much safer, as it is a 5m wide, relatively quiet lane.

Considering that this section of the A272 is a perilous road affecting thousands of road users daily, it seems prudent to conduct a comprehensive traffic survey, traffic modelling and a Traffic Impact Assessment for both options to make an informed decision.

i) Local residents have expressed concerns that the village is already at capacity, with consistent and regular traffic queues of 1-1.5 miles, often extending to Kent St and beyond during rush hours. They have faced utter chaos and significant disruption when there are temporary traffic lights operating on the A272 approaching Cowfold village. During such instances, drivers divert from the A272 and A281 to surrounding lanes to avoid congestion. These concerns have been raised at parish council meetings and covered in the local press.

According to a traffic survey conducted in October 2023 on Wineham Lane for a battery facility application, on a typical day, approximately 80-90 cars use Wineham Lane. However, during a road-disrupting accident on the A272 which lasted a couple of days, over 800 vehicles diverting down this narrow lane. Notably, an accident involving a horse-box overturning along this lane, was not included in any official Road Traffic Accident data.

ii) Rampion has not disclosed the numbers of HGV, LGV and workers' vehicles making two-way journeys to the substation site. Initially advised that there would be 8040 HGV's, the number now appears to be at least three times that, exceeding 20,000, but no details of workers' vehicles. This data is crucial for assessing the impact on the existing road network. It is essential to know the numbers during peak weeks, the duration of these peak weeks, and whether they plan to avoid rush hours, as recommended by National Highways.

iii) The A272 is a lengthy road with some sections being more hazardous than others. Rampion has not assessed the number and severity of RTA's on the A272 at the two alternative locations. Oakendene experiences twice as many RTA's compared to Wineham Lane.

iv) There is no assessment of the impact on the surrounding lanes, which will be used as cut-throughs, nor on the surrounding villages, through which traffic will divert.

v) Rampion refers to traffic modelling for the two sites, but it has not been located within their documents.

vi) Crucially, Rampion has not disclosed their proposed "temporary traffic control measures" for Oakendene and Kent St. Many residents voiced concerns during the Cowfold meetings, but no answers were provided. Worries centre around the safety aspect of this hazardous stretch of road and how thousands of HGV's and other construction vehicles will safely exit this site, cutting across two lanes of fast moving A272 traffic. Furthermore, there are concerns that the existing traffic congestion and pollution will worsen, creating chaos for the 18,000 daily road users and the local community. These traffic control measures were not necessary at Wineham Lane, as demonstrated during the construction of Rampion 1.

vii) There has been no comparative Road Traffic Impact report for the two alternative locations, nor any completed Traffic Modelling, despite Rampion's reference to it in their application. There are also no details of the holding area, where HGV's will park, while waiting to enter the site.

viii) To reduce speed along the A272 and safely direct thousands of commercial vehicles off this hazardous stretch of road, into the proposed Oakendene site, visibility splays will be needed. However, insufficient details have been provided regarding the distance between them and the safety aspect has not been examined. This would not be necessary at Wineham Lane, as it already has a wide visibility splay and the site entrance is not off the main road, making it significantly safer.

ix) The Wineham Lane site is 2.5 miles away from the village of Cowfold and

does not experience daily congested traffic. When Rampion 1 was constructed, there was no need to introduce traffic control measures along the A272. Wineham Lane is a significantly quieter road with fewer vehicles using it.

x) Rampion has given the impression that Kent St and Wineham Lane are comparable. On the contrary, Wineham Lane is a 5m wide 2-lane road, suitable for HGV's built in the 1960's to accommodate the construction of the National Grid substation, but it has low traffic numbers. Kent St. in contrast, is a 3m wide single lane, with narrow grass verges, not suitable for HGV's or heavy traffic. It has width restriction notices at either end and a narrow bridge.

xi) During the first meeting at Cowfold in November 2022, Rampion did not realise that Kent St was a minor single track lane, and locals pointed out that the Woods report deemed it "unsuitable" for the proposal. However, looking at the application, Rampion have now decided to use both Kent St and Dragons Lane (another unsuitable lane) for construction traffic, as they have realised that Cowfold is an AQMA and has to be avoided if possible.

3 Economic and financial impact on businesses on Oakendene estate and Cowfold businesses

i) There are over 70 businesses on or around the Oakendene site, with an additional 60 in the village. Originally the Oakendene site was established to enable local people to start their own businesses and then it grew enabling a wider range of businesses to flourish. These are mainly artisan businesses either sole traders or partnerships, ranging from carpenters and engineers to gardening businesses. Many rely on 'just in time' deliveries, which could be disrupted as a result of the traffic congestion and the extra time delays.

ii) Other local businesses in Cowfold will suffer. The pub and cafe mentioned difficulties in attracting and retaining staff, especially if the commute is even more problematic. The local driving instructor is fearful for his business's survival, if he has to endure long traffic queues with his students to get to [REDACTED] for training.

4 Flooding and pollution of Oakendene and downstream communities

It's not entirely surprising that Rampion proposed Oakendene as a substation site. As a floodplain, the land is considerably cheaper, saving them money, and it's relatively flat, making it easier to build upon. However it is surprising that they selected this site prior to completing comparable hydrological and geotechnical research. This is a critical decision for the Planning Inspectorate and Secretary of State, whether to run the risk of choosing a floodplain, when a safer alternative site is available.

The significant drawback is the increased risk of flooding for neighbouring homes and businesses, as well as potential flooding downstream. Flooding can lead to equipment damage, power outages and increased maintenance and higher insurance costs due to elevated risks. Power outages, would affect thousands of homes, businesses and other facilities disrupting essential services such as lighting, heating and cooling and electronic communication. Health and safety concerns may arise, affecting medical equipment, security systems and other critical devices.

Communication issues may also arise with disruptions to telecommunications and internet services during power outages. Considering climate change and

increasingly severe weather conditions, heavy rain can damage power lines, transformers and other electrical equipment, exacerbating problems.

Despite the government and Rampion's declared support for environmental issues and bio diversity, building on a floodplain would have negative environmental consequences, given the ecological importance of these natural habitats.

The cables are surrounded by oil, to keep them cool and these have been known to leak, necessitating their inclusion in the pollution risk assessment. Rampion 1 also suffered a diesel spillage, addressed only after the Environmental Agency was alerted by local residents. In the event of such an incident at Oakendene, the consequences would likely be more severe, considering the numerous water courses and proximity to lakes and the Cowfold Stream.

During the first meeting in Cowfold in October 2021, Rampion confirmed that they would consider lowering the structure, to make it less visible from the road. However, upon discovering that it was a floodplain, nothing further was said. It is likely, though, that they may need to elevate the structure to avoid flooding, making it even more visible and pronounced.