

Rampion 2

Development Consent Order

Summary Written Representations Submitted by Knight Frank LLP on behalf of

Richard John Goring

Richard Harry Goring

P Goring

Wiston Estate Partnership

Wiston Estate

Rock Common Limited

1. Introduction

- 1.1. Wiston Estate extends to over 2,420ha centred on Wiston House and Park, which has been owned by the Goring family since 1743. The estate comprises, 1,765ha of farmland, 495ha woodland, 100ha parkland, 70ha of quarries and 24ha of ponds and wetland. There are 106 in-hand and let residential properties, 11 in-hand and let farms, and 22 commercial units.
- 1.2. Wiston Estate Winery and the Chalk Farm Restaurant sit to the south of the estate and are managed directly by the estate. There are 12ha of vineyards and the estate produces award winning wines, winning the Wine GB "Winery of the Year" twice. Wiston Estate directly employ 80 number of people and support over 20 number of businesses operated by others.
- 1.3. The proposed Rampion Scheme bisects the property from east to west and runs for more than 5km representing over 15% of the onshore cable route. The impact both on the overall estate and estate tenants and their associated business will be severe and will restrict the economic development of the estate in perpetuity.
- 1.4. This is a Summary of the full Written Representations submitted on behalf of Wiston Estate.

2. The Route

- 2.1. The route is damaging to the estate, their farm tenants, the South Downs National Park, the visual landscape, and the wider environment. We have extracted the relevant parcels of land and provided additional commentary on both the construction and long-term impacts within the Written Representation.

3. Failure to Engage and Consult Sufficiently

- 3.1. The level of response by Rampion to the Wiston estate's attempts to engage has been disappointing and below the standard to be expected for a project of this scale. There has been change of personnel both within the Rampion project team and their agents Cater Jonas.
- 3.2. Summary and brief Heads of Terms for an option and easement agreement were not provided until Spring 2023, however, there has been no meaningful discussion about these terms and their suitability for the Wiston Estate until more recently. A group of agents representing a large proportion of affected landowners attempted to engage as a group and received very perfunctory responses. There was a refusal from Rampion and their agents to meet with the agent group to discuss the key terms.
- 3.3. The draft easement and option documents were not provided until late October 2023. There was insufficient time for Wiston Estate to review these and take professional advice, prior to the DCO process (the DCO application was submitted in August 2023).

- 3.4. Due to lack of proper engagement and consultation the rights being sought by Rampion are too wide. We are aware that Rampion 1 proposed an easement width of 15m, subject to maximum of 30 m2 for physical obstacles. No acceptable justification has been provided by Rampion to substantiate why they require such wide and far-reaching rights over and above what was agreed in Rampion 1.
- 3.5. Notwithstanding the above, we acknowledge that several meetings have been held with Rampion and their agents in the past month, where some more meaningful progress has been made. It is disappointing that this has taken so long and as a result Wiston Estate has incurred unnecessary professional costs in engaging in the DCO process.

4. Failure to properly consider major and minor variations to the route

4.1 Major Route Variations

- 4.1.1. The Washington Parish Council submitted a major alternative route proposal in their paper dated 11th February 2021 – the 'Blue Route'. This is identified below in blue.
- 4.1.2. At a meeting on the 1st September 2021 Rampion suggested that this proposed route would pass through an area of Ancient Woodland on the north scarp of the downs south-east of Washington Village. Had they inspected the woodland they would have known that it is predominantly a single species woodland suffering from acute ash-die back disease. It is therefore due for an imminent clear fell under Forestry Commission guidelines. In addition only a small part of this area of woodland is designated an Ancient Woodland. We are aware that Rampion are Directional Drilling underneath woods, such as Calcott Wood (which is also an Ancient Wood in part) as detailed above. Could this not have been considered for the proposed "Blue Route".

4.2 Minor Route Variations

- 4.2.1 Minor route variations have also been proposed, which have not been properly considered by Rampion. There is a strip of land between the Rock Common sand pit 54metres wide that sits to the north of the Pike (A283). This represents a better location for the cable than the route to the south of the Pike which crosses the entrance to a highly bio-security sensitive rare breed sheep farm to the south, referred to above.
- 4.2.2 Generally, a route which follows the southern edge of the road boundary (from Rock Common sandpit eastwards) will see less injurious affection of the farms to the south. It minimises the loss of long-term excavatable sand reserves and future vineyards sites, which are detailed below.
- 4.2.3 This route was proposed at a meeting with Rampion on the 1st of September 2021. Following that meeting Rampion stated they would investigate the feasibility of this route and acknowledged the benefits as it avoided the severance of various accesses and driveways. No detailed response was received from Rampion following this meeting and suggestion.

5. Failure to provide sufficient information.

- 5.1. Information has been requested and not been provided in its entirety, or insufficient information has been provided by Rampion and their agents. For example, plans showing the operational and construction accesses were requested in the Summer of 2023 so the impact of the project could be fully understood. This detailed information was only provided more recently. Without this information it is difficult to understand the long-term impact of the proposals.

6. Impact of the Route on potential Vineyard Land

- 6.1. Wiston Estate has a successful vineyard and winery business. This is an important and expanding part of the estate and significant investments have been made over the recent years, including the opening of Chalk Restaurant. Fields suitable for vines will be dissected by the cable. Plans of the affected fields were provided to Rampion at an early stage and has not been fully considered by the project.

7. Impact of the Route on Mineral Potential

- 7.1. Wiston Estate owns Rock Common, a working quarry, which adjoins the route. Neighbouring Wiston land impacted by the proposals has the geological benefit of sitting upon significant reserves of building sand. Therefore, the proposed underground cable, which requires a 20-metre width corridor together with the potential severance, will sterilise in-situ sand in perpetuity.

8. Impact on Farm Tenants and in-hand farming operations

- 8.1. The position of the route takes a significant amount of land out of agricultural use during construction. It also severs fields making large areas unusable. Some of the affected land is farmed by farm tenants, and the proposals will severely impact their livelihoods. We detailed some of the practical issues in the Written Representation.
- 8.2. The separation of the buildings from the main area of the holdings will have a detrimental effect on the ability to run the agricultural enterprises.

9. Wet Pools Compound (Work No.10)

- 9.1. Further information on the proposed Wet Pools Compound has been requested (shown on the plan as Work No.10). It is understood that this is a major compound. The estate has serious concerns over access, Highway safety and the impact on the local road network as the current access is poor.
- 9.2. The estate has previously put forward alternative sites for a compound, which have not been considered properly.

10. Manhole Covers

- 10.1. It is understood that Manhole covers will be erected at 1km intervals on the route and access to these will be retained in perpetuity. We understand from Rampion that location of these will not be provided until the construction period, and they will be limited to where they can go due to the cable being in set lengths. If they are located inappropriately, such in the middle of the field, this will have significant implications both operationally, such as arable farming, and for future uses, such as vineyards.

11. Failure to cover professional costs

- 11.1. Throughout the consultation and survey period, there has been a failure to cover the affected parties' professional costs. Much wasted professional time has been spent following up their chaotic approach to matters. This is unequitable when Wiston Estate have only incurred these costs due to the proposed project.

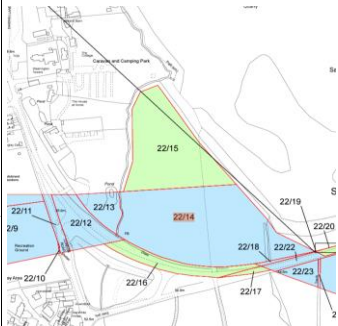
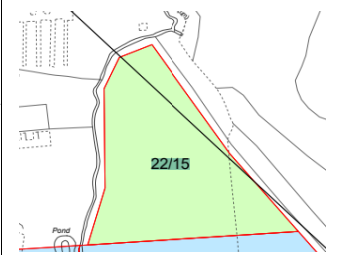
12. Compensation arrangements

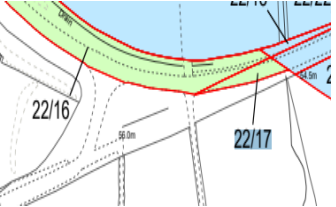
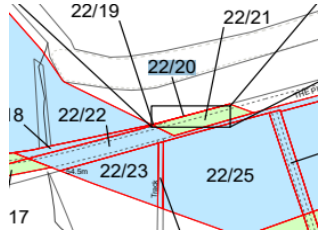
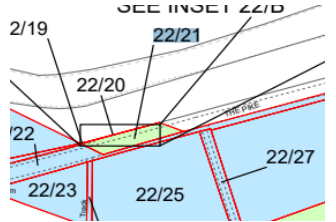
- 12.1. Without prejudice to the objections above the parties are seeking to agree a position relating to several points above as well as an option and easement agreement and a compensation agreement.

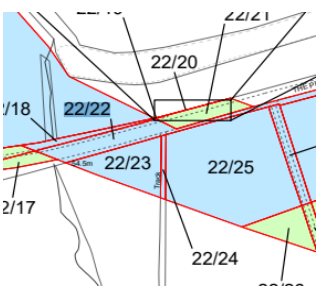
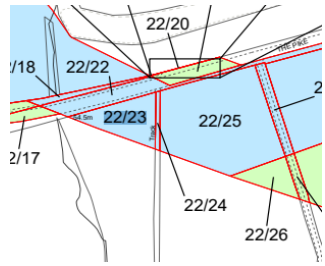
13. Reservations

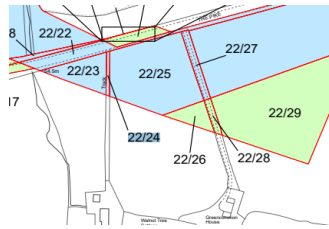
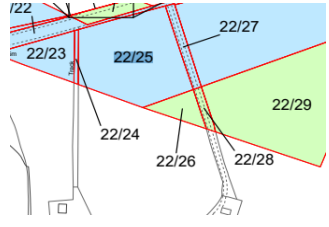
- 13.1. Wiston Estate reserves the position to submit further information, issues, and objections as part of the DCO process.

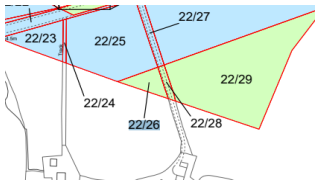
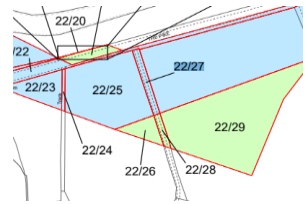
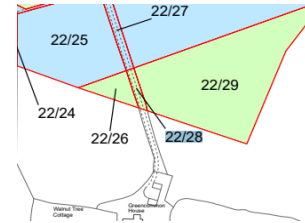
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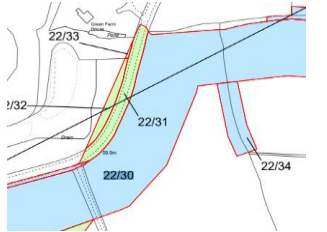
Number on Plan (1)	Description of Land (2)	Category 1			Plan (7)	Draft Development Consent Order (8)
		Owners or Reputed Owners (3)	Lessees or Tenants or Reputed Lessees or Tenants (4)	Occupiers or Reputed Occupiers (5)		
22/14	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 24344 square metres of land being agricultural land, public footpath (WAS/2701/2) and overhead electricity lines, lying south west of Green Barn Farm and north of Tilleys Farm in the parish of Washington CP. Freehold – WSX307196	Penelope Ann Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD Richard Harry Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD	Caroline Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA Christopher J Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA	Caroline Hodgkins Greencomon House The Pike, Washington, Pulborough, RH20 4AA Christopher J Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA Andrew James Hodgkins Locks Farm The Pike Washington Pulborough RH20 4AA Laura Hodgkins Locks Farm The Pike Washington Pulborough RH20 4AA UK Power Networks (Operations) Limited Newington House 237 Southwark Bridge Road London SE1 6NP.(Co. Reg.03870728) (in respect of overhead electricity lines) Southern Water Services Limited Southern House Yeoman Road Worthing BN13 3NX (Co. Reg. 02366670) (in respect of underground water main)		Cable Rights. Cable Restrictive Covenant
22/15	Temporary Possession and Use of approximately 14447 square metres of land being agricultural land, public footpath (WAS/2701/2) and overhead electricity lines, lying south west of Green Barn Farm and north of Tilleys Farm in the parish of Washington CP.	Penelope Ann Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD Richard Harry Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD	Caroline Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA Christopher J Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA	Caroline Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA Christopher J Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA Andrew James Hodgkins Locks Farm The Pike Washington Pulborough RH20 4AA Laura Hodgkins Locks Farm The Pike Washington Pulborough RH20 4AA UK Power Networks (Operations) Limited Newington House 237 Southwark Bridge Road London SE1 6NP (Co. Reg. 03870728) (in respect of overhead electricity lines)		Land to be used Temporarily- construction compound


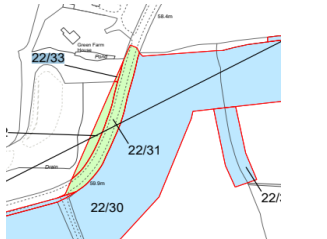
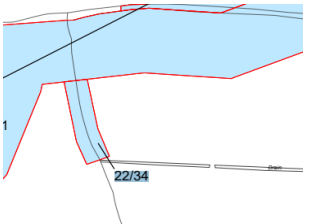
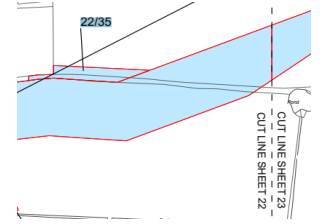
<p>22/17</p>	<p>Temporary Possession and Use of approximately 380 square metres of land being adopted highway and verge (The Pike, A283) lying south west of Green Barn Farm and north of Tilleys Farm in the parish of Washington CP. Unregistered</p>	<p>Unknown West Sussex County Council County Hall Chichester West Sussex PO19 1RQ (in respect of adopted highway) Penelope Ann Goring (in respect of presumed ownership of subsoil (part width of highway)) Richard Harry Goring (in respect of presumed ownership of subsoil (part width of highway))</p>	<p>None</p>	<p>Southern Water Services Limited Southern House Yeoman Road Worthing BN13 3NX (Co. Reg 02366670) (in respect of underground water main)</p>		<p>Land to be used Temporarily- Access</p>
<p>22/20</p>	<p>Temporary Possession and Use of approximately 5 square metres of land being hedgerow lying to north of Walnut Tree Cottage and south west of Green Farm House in the parish of Washington CP. Freehold – WSX348682</p>	<p>Rock Common Limited Wiston Estate Office Wiston Park Steyning Road Wiston Steyning BN44 3DD (Co. Reg. 13328664)</p>	<p>None</p>	<p>None</p>		<p>Land to be used Temporarily- Access</p>
<p>22/21</p>	<p>Temporary Possession and Use of approximately 540 square metres of land being adopted highway and verge (The Pike, A283), lying north of Walnut Tree Cottage and south west of Green Farm House in the parish of Washington CP. Unregistered</p>	<p>Unknown West Sussex County Council County Hall Chichester West Sussex PO19 1RQ (in respect of adopted highway) Penelope Ann Goring (in respect of presumed ownership of subsoil (part width of highway)) Richard Harry Goring (in respect of presumed ownership of subsoil (part width of highway)) Rock Common Limited (Co. Reg. 13328664) (in respect of presumed ownership of subsoil (part width of highway))</p>	<p>None</p>	<p>Southern Water Services Limited (Co. Reg. 02366670) (in respect of underground water main)</p>		<p>Land to be used Temporarily- Access</p>

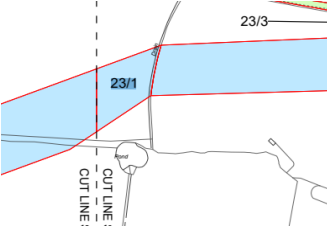
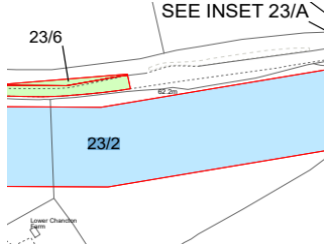
22/22	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 1883 square metres of land being adopted highway and verge (The Pike, A283), public bridleway (WAS/2703/1) and overhead electricity lines, lying south west of Green Barn Farm and north of Tilleys Farm in the parish of Washington CP. Unregistered	<p>Unknown</p> <p>West Sussex County Council County Hall Chichester West Sussex PO19 1RQ (in respect of presumed ownership of subsoil (part width of highway))</p> <p>Penelope Ann Goring (in respect of presumed ownership of subsoil (part width of highway))</p> <p>Richard Harry Goring (in respect of presumed ownership of subsoil (part width of highway))</p>	None	<p>Southern Water Services Limited Southern House Yeoman Road Worthing BN13 3NX (Co. Reg. 02366670) (in respect of underground water main) UK Power Networks (Operations) Limited Newington Water 237 Southwark Bridge Road London SE1 6NP (Co. Reg. 03870728) (in respect of overhead electricity lines)</p>		Cable Rights. Cable Restrictive Covenant
22/23	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 1344 square metres of land being agricultural land and hedgerow lying to north of Walnut Tree Cottage and south west of Green Farm House in the parish of Washington CP. Freehold - W5X307196	<p>Penelope Ann Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD</p> <p>Richard Harry Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD</p>	<p>Caroline Hodgkins Greencommon House The Pike Washington Pulborough RH20 4AA</p> <p>Christopher J Hodgkins Greencommon House The Pike Washington Pulborough RH20 4AA</p>	<p>Caroline Hodgkins Greencommon House The Pike Washington Pulborough RH20 4AA</p> <p>Christopher J Hodgkins Greencommon House The Pike Washington Pulborough RH20 4AA</p> <p>Andrew James Hodgkins Locks Farm The Pike Washington Pulborough RH20 4AA</p>		Cable Rights. Cable Restrictive Covenant
Continued	N/A	N/A	N/A	<p>Laura Hodgkins Locks Farm The Pike Washington Pulborough RH20 4AA</p> <p>Openreach Limited Kelvin House 123 Judd Street London WC1H 9NP (Co. Reg. 10690039) (in respect of underground telecommunication lines)</p> <p>Southern Water Services Limited Southern House Yeoman Road Worthing BN13 3NX (Co. Reg. 02366670) (in respect of underground water main)</p>	N/A	N/A

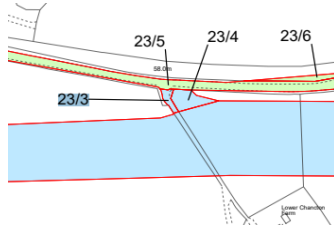
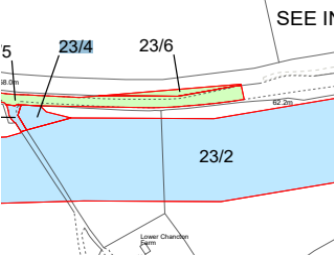
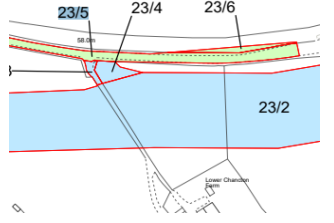
22/24	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 141 square metres of land being track lying south west of Green Barn Farm and north of Tilleys Farm in the parish of Washington CP. Freehold - WSK120476	Richard Anthony Hewson Walnut Tree Cottage The Pike Washington Pulborough RH20 4A	None	Openreach Limited Southern Water Services Limited (Co. Reg. 02366670) (in respect of underground water main)		Cable Rights. Cable Restrictive Covenant
22/25	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 5247 square metres of land being agricultural land lying south west of Green Barn Farm and north east of Tilleys Farm in the parish of Washington CP. Freehold - WSK307196	Penelope Ann Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD Richard Harry Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3D	Caroline Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA Christopher J Hodgkins Greencomon House The Pike Washington Pulborough RH20 4AA	Caroline Hodgkins Christopher J Hodgkins Andrew James Hodgkins Laura Hodgkins Openreach Limited (in respect of underground telecommunication lines) Southern Water Services Limited (in respect of underground water main)		Cable Rights. Cable Restrictive Covenant

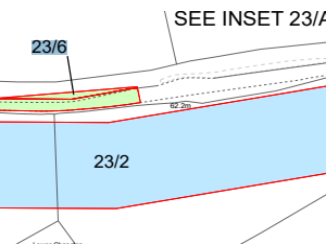
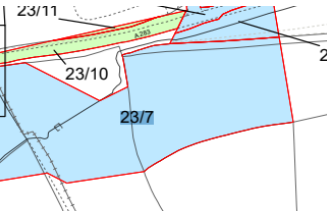
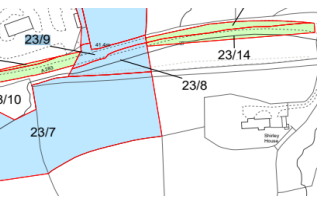
22/26	<p>Temporary Possession and Use of approximately 703 square metres of land being agricultural land and overhead electricity lines, lying south west of Green Barn Farm and north east of Tilleys Farm in the parish of Washington CP. Freehold – WSX307196</p>	<p>Penelope Ann Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD</p> <p>Richard Harry Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD</p>	<p>Caroline Hodgkins Greencommon House The Pike Washington Pulborough RH20 4AA</p> <p>Christopher J Hodgkins Greencommon House The Pike Washington Pulborough RH20 4AA</p>	<p>Caroline Hodgkins Greencommon House The Pike Washington Pulborough RH20 4AA</p> <p>Christopher J Hodgkins Greencommon House The Pike Washington Pulborough RH20 4AA Andrew James Hodgkins Locks Farm The Pike Washington Pulborough RH20 4AA</p> <p>Laura Hodgkins Locks Farm The Pike Washington Pulborough RH20 4AA</p> <p>UK Power Networks (Operations) Limited</p>		Temporary possession of land and overhead cables
22/27	<p>Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 504 square metres of land being track and overhead electricity lines, lying south west of Green Barn Farm and north east of Tilleys Farm in the parish of Washington CP. Freehold – WSX250829</p>	<p>Andrew James Hodgkins</p> <p>Caroline Janet Hodgkins</p> <p>Christopher John Hodgkins</p> <p>Emily Victoria Hodgkins</p>	None	<p>Andrew James Hodgkins</p> <p>Caroline Janet Hodgkins</p> <p>Christopher John Hodgkins</p> <p>Emily Victoria Hodgkins</p> <p>Openreach Limited</p> <p>UK Power Networks(Operations) Limited</p> <p>Southern Water Services Limited</p>		Cable Rights. Cable Restrictive Covenant
22/28	<p>Temporary Possession and Use of approximately 239 square metres of land being track and overhead electricity lines, lying south west of Green Barn Farm and north east of Tilleys Farm in the parish of Washington CP. Freehold – WSX250829</p>	<p>Andrew James Hodgkins</p> <p>Caroline Janet Hodgkins</p> <p>Christopher John Hodgkins</p> <p>Emily Victoria Hodgkins</p>	None	<p>Openreach Limited</p> <p>UK Power Networks (Operations) Limited</p>		Temporary possession of land and overhead cables - Cable duct stringing.

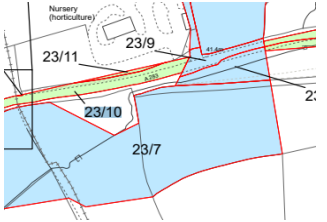
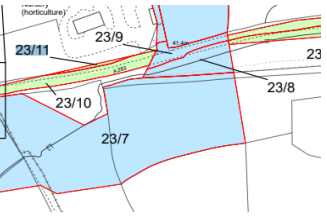
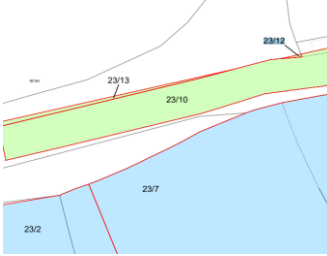
22/29	Temporary Possession and Use of approximately 8585 square metres of land being agricultural land lying south west of Green Barn Farm and north east of Tilleys Farm in the parish of Washington CP. Freehold – W SX307196	Penelope Ann Goring Richard Harry Goring	Caroline Hodgkins Christopher J Hodgkins	Caroline Hodgkins Christopher J Hodgkins Andrew James Hodgkins Laura Hodgkins Openreach Limited		Temporary possession of land
22/30	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 41794 square metres of land being agricultural land, public bridleway (WAS/2703/1) and overhead telecommunication lines, lying south east of Green Barn Farm and north east of Tilleys Farm in the parish of Washington CP.	Penelope Ann Goring Richard Harry Goring	Caroline Hodgkins Christopher J Hodgkins	Caroline Hodgkins Christopher J Hodgkins Andrew James Hodgkins Laura Hodgkins Openreach Limited Southern Water Services Limited		Cable Rights. Cable Restrictive Covenant
22/31	Temporary Possession and Use of approximately 1956 square metres of land being adopted highway and verge (The Pike, A283), public bridleway (WAS/2703/1) and overhead telecommunication lines, lying south of Green Barn Farm and north east of Tilleys Farm in the parish of Washington CP. Unregistered	Unknown West Sussex County Council Penelope Ann Goring Richard Harry Goring Rock Common Limited (Co. Reg. 13328664) (in respect of presumed ownership of subsoil (part width of highway))	None	Openreach Limited Southern Water Services Limited		Temporary possession of Land and overhead cables

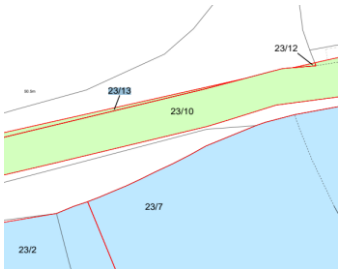
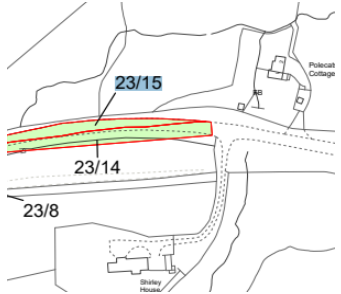

22/32	Temporary Possession and Use of approximately 684 square metres of land being scrubland lying south of Green Barn Farm and north east of Tilley's Farm in the parish of Washington CP. Freehold – WSX348682	Rock Common Limited	None	Rock Common Limited Southern Water Services Limited		Temporary possession of Land
22/33	Temporary Possession and Use of approximately 33 square metres of land being scrubland lying south of Green Barn Farm and north east of Tilley's Farm in the parish of Washington CP. Freehold – WSX166796	Richard Harry Goring The Wiston Estate Office Wiston Park Wiston Steyning West Sussex BN44 3DD	None	Richard Harry Goring Southern Water Services Limited (Co. Reg. 02366670) (in respect of underground water main)		Temporary possession of Land
22/34	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 1631 square metres of land being agricultural land and hedgerow lying north of Poplars Cottage and south east of Green Farm House in the Parish of Washington CP. Freehold - WSX307196	Penelope Ann Goring Richard Harry Goring	Caroline Hodgkins Christopher J Hodgkins	Caroline Hodgkins Christopher J Hodgkins Andrew James Hodgkins Laura Hodgkins Southern Water Services Limited (in respect of underground water main)		Operational Access Rights
22/35	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 1221 square metres of land being agricultural land and hedgerow lying east of Green Farm House and north of Lock's Farm in the Parish of Washington CP. Freehold - WSX307196	Penelope Ann Goring Richard Harry Goring	Caroline Hodgkins Christopher J Hodgkins	Caroline Hodgkins Christopher J Hodgkins Andrew James Hodgkins Laura Hodgkins		Operational Access Rights

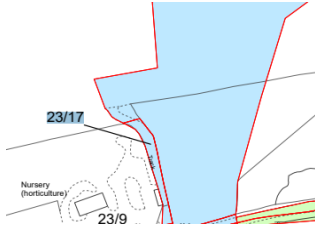
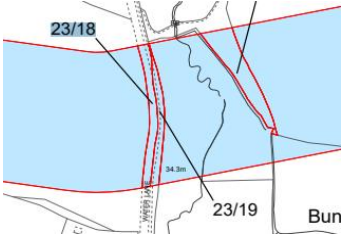
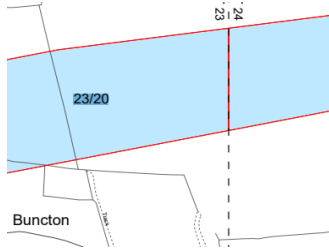
<p>23/1/</p>	<p>Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 2512 square metres of land being agricultural land and drain, lying north west of Lower Chancton Farm and south of The Pike in the parish of Washington CP Freehold – WSX307196</p>	<p>Penelope Ann Goring Richard Harry Goring</p>	<p>Caroline Hodgkins Christopher J Hodgkins</p>	<p>Caroline Hodgkins Christopher J Hodgkins Andrew James Hodgkins Laura Hodgkins</p>		<p>Cable Restrictive covenanat. Cable Rights.</p>
<p>23/2/</p>	<p>Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 31961 square metres of land being agricultural land, hedgerow, overhead electricity lines and track lying north of Lower Chancton Farm and south of The Pike in the parish of Washington CP. Freehold – WSX372649</p>	<p>Richard John Goring</p>	<p>Charles John Wreford How 2 Model Cottages Steyning Road West Sussex BN44 3DD (in respect of part of plot)</p>	<p>Richard John Goring Charles John Wreford How 2 Model Cottages Steyning Road West Sussex BN44 3DD (in respect of part of plot) Openreach Limited (in respect of underground and overhead telecommunication lines)</p>		<p>Cable Rights. Cable Restrictive Covenant</p>

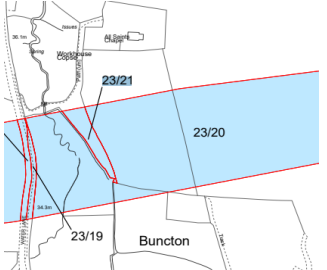
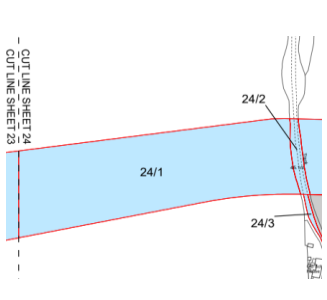
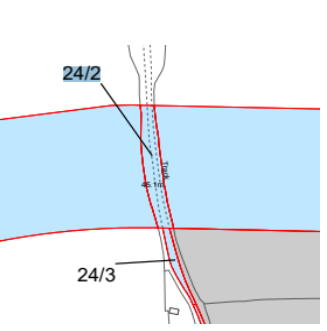
23/3/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 118 square metres of land being agricultural land lying north of Lower Chancton Farm and south of The Pike in the parish of Washington CP. Freehold – WSX372649	Richard John Goring	None	Richard John Goring Openreach Limited		Restrictive Covenants
23/4/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 357 square metres of land being agricultural land lying north of Lower Chancton Farm and south of The Pike in the parish of Washington CP. Freehold – WSX372649	Richard John Goring	None	Richard John Goring Openreach Limited (in respect of underground telecommunication lines)		Restrictive Covenants
23/5/	Temporary Possession and Use of approximately 2409 square metres of land being adopted highway and verge (The Pike, A283), lying north of Lower Chancton Farm and south of The Pike in the parish of Washington CP. Unregistered	<p>Unknown</p> <p>West Sussex County Council</p> <p>Penelope Ann Goring (in respect of presumed ownership of subsoil (part width of highway))</p> <p>Richard Harry Goring</p> <p>Rock Common Limited</p>	None	Openreach Limited Southern Water Services Limited		Temporary possession of the land- Access



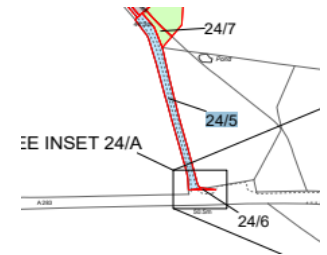
23/6/	Temporary Possession and Use of approximately 259 square metres of land being verge, lying in The Pike and north of Lower Chancton Farm and south of The Pike in the parish of Washington CP. Freehold – WSX348682	Rock Common Limited	None	Southern Water Services Limited		Temporary possession of the land- Access
23/7/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 18257 square metres of land being agricultural land, access track and hedgerow, lying south of The Pike and north east of Lower Chancton Farm in the parishes of Washington CP and Wiston CP. Freehold – WSX372649	Richard John Goring	Lord Francis Maude Shirley House Field Wiston Estate Chanctonbury Ring Road Steyning West Sussex BN44 3EA (in respect of part of plot) Charles John Wreford How	Lord Francis Maude Shirley House Field Wiston Estate Chanctonbury Ring Road Steyning West Sussex BN44 3EA (in respect of part of plot) Christina Maude Shirley House Field Wiston Estate Chanctonbury Ring Road Steyning West Sussex BN44 3EA (in respect of part of plot) Charles John Wreford How		Cable Rights. Cable Restrictive Covenant
23/9/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 691 square metres of land being adopted highway and verge (The Pike, A283) and track, lying in and north of The Pike and north east of Lower Chancton Farm in the parish of Wiston CP. Unregistered	Unknown West Sussex County (in respect of adopted highway) Richard Harry Goring (in respect of presumed ownership of subsoil (part width of highway))	None	Southern Water Services Limited (in respect of underground water main)		Cable Rights. Cable Restrictive Covenant

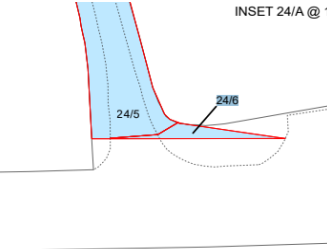


23/10/	Temporary Possession and Use of approximately 1899 square metres of land being adopted highway and verge (The Pike, A283) in and north of The Pike and north east of Lower Chancton Farm in the parish of Wiston CP. Unregistered	<p>Unknown</p> <p>West Sussex County (in respect of adopted highway)</p> <p>Richard Harry Goring (in respect of presumed ownership of subsoil (part width of highway))</p> <p>Rock Common Limited (in respect of presumed ownership of subsoil (part width of highway))</p>	None	<p>Southern Water Services Limited (in respect of underground water main)</p> <p>Openreach Limited (in respect of underground telecommunication lines)</p>		Tempory possession of Land- Access
23/11/	Temporary Possession and Use of approximately 130 square metres of land being wooded area north of The Pike and north east of Lower Chancton Farm in the parish of Wiston CP. Freehold – WSX305235	Richard Harry Goring	None	Richard Harry Goring		Tempory possession of Land- Access
23/12/	Temporary Possession and Use of approximately 1 square metre of woodland lying north west of Shirley House and south west of Polecats Cottage in the Parish of Wiston CP. Freehold - WSX305235	Richard Harry Goring	None	Richard Harry Goring		Tempory possession of Land- Access

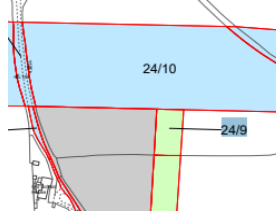
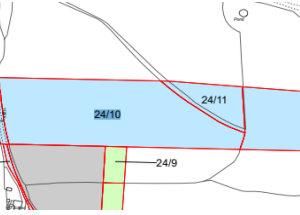
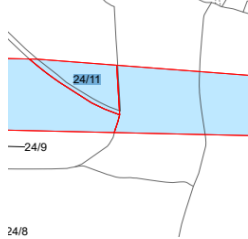
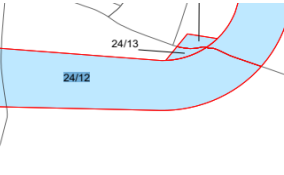
23/13/	Temporary Possession and Use of approximately 30 square metres of land being scrubland north of The Pike and north east of Lower Chancton Farm in the parish of Wiston CP. Freehold – WSX348682	Rock Common Limited	None	Southern Water Services Limited		Temporary possession of Land- Access
23/15	Temporary Possession and Use of approximately 860 square metres of land being adopted highway and verge (The Pike, A283), lying in and north of The Pike, north of Shirley House in the parish of Wiston CP. Unregistered	Unknown West Sussex County Council Richard Harry Goring	None	Southern Water Services Limited		Temporary possession of Land- Access
23/16	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 51947 square metres of land being agricultural land and hedgerow north of The Pike and north of Shirley House in the parish of Wiston CP. Freehold – WSX372649	Richard John Goring Guesses Farm Spithandle Lane Wiston Steyning BN44 3DY	None	Richard John Goring Southern Water Services Limited		Cable Restrictive Covenants. Cable Rights

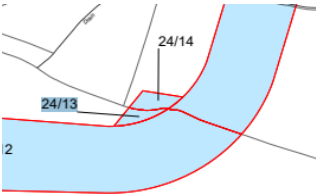
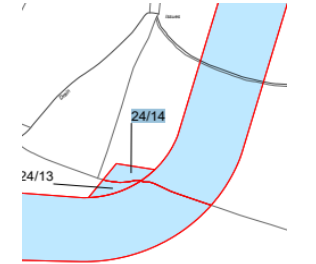
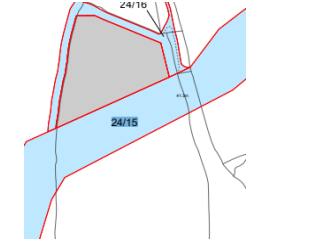
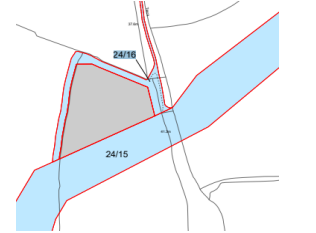
23/17	<p>Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 697 square metres of land being track, north of The Pike and north west of Shirley House in the parish of Wiston CP.</p> <p>Freehold – WSX305235</p>	<p>Richard Harry Goring</p>	None	None		Cable Restrictive Covenants. Cable Rights
23/18	<p>Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 594 square metres of land being adopted highway and verge (Water Lane), north west of Buncton Manor Farm in the parish of Wiston CP. Unregistered</p>	<p>Unknown West Sussex County Council</p> <p>Richard Harry Goring (in respect of presumed ownership of subsoil (part width of highway))</p>	None	<p>Southern Water Services Limited (in respect of underground water main)</p>		Cable Restrictive Covenants. Cable Rights
23/20	<p>Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 27689 square metres of land being agricultural land, public footpath (WIS/2710/2) and wooded area, lying east of Water Lane and north west of Buncton Manor Farm in the parish of Wiston CP. Freehold – WSX372649</p>	<p>Richard John Goring Guesses Farm Spithandle Lane Wiston Steyning BN44 3DY</p>	None	<p>Richard John Goring Guesses Farm Spithandle Lane Wiston Steyning BN44 3DY</p>		Cable Restrictive Covenants. Cable Rights

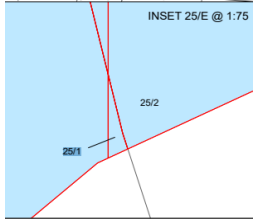
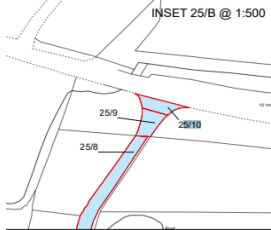
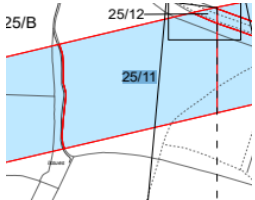
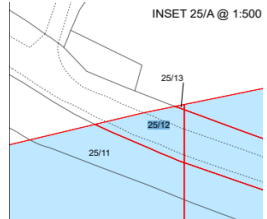
23/21	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 983 square metres of land being wooded area lying east of Water Lane and north west of Buncton Manor Farm in the parish of Wiston CP. Freehold – WSX305185	Richard Harry Goring	None	Richard Harry Goring		Cable Restrictive Covenants. Cable Rights
24/1/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 23230 square metres of land being agricultural land, lying north east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP. Freehold – WSX372649	Richard Harry Goring	None	Richard Harry Goring		Cable Restrictive Covenants. Cable Rights. Operational Access Rights
24/2/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 851 square metres of land being track and public bridleway (WIS/2711/1) and overhead electricity lines, lying north east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP. Freehold – WSX277906	John James Goring Fairoak Farm Wiston Steyning BN44 3DS	None	UK Power Networks (Operations) Limited Newington House 237 Southwark Bridge Road London SE1 6NP (Co. Reg. 03870728) (in respect of overhead electricity lines) Southern Water Services Limited (in respect of underground water main)		Cable Restrictive Covenants. Cable Rights

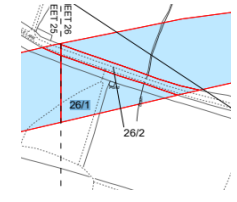
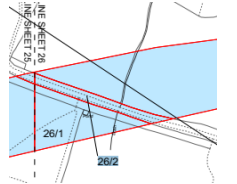
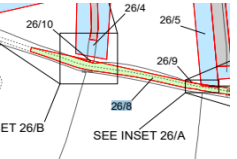
24/3/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 210 square metres of land being track and public bridleway (WIS/2711/1) and overhead electricity lines, lying north east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP. Freehold – WSX277906	John James Goring	None	UK Power Networks (Operations) Limited Southern Water Services Limited		Operational Access Rights
24/4/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 377 square metres of land being track and public bridleway (WIS/2711/1) and overhead telecommunication lines, lying east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP	Richard Harry Goring	None	UK Power Networks (Operations) Limited Southern Gas Networks plc		Operational Access Rights
24/5/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 961 square metres of land being track and public bridleway (WIS/2711/1) and overhead telecommunication lines, lying east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP.	Richard Harry Goring	None	Openreach Limited (in respect of underground and overhead telecommunication lines) Southern Water Services Limited (in respect of underground water main)		Construction and Operational Access Rights

24/6/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 14 square metres of land being adopted verge (Washington Road), and overhead telecommunication lines, lying east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP. Unregistered	Unknown West Sussex County Council Richard Harry Goring	None	Openreach Limited (in respect of underground and overhead telecommunication lines)		Construction and Operational Access Rights
24/7/	Temporary Possession and Use of approximately 172 square metres of land being agricultural land, lying east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP. Freehold – WSX305185	Richard Harry Goring	None	Richard Harry Goring Southern Water Services Limited		Temporary possession of Land- Access
24/8/	Temporary Possession and Use of approximately 3395 square metres of land being agricultural land, lying east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP. Freehold – WSX372649	Richard John Goring	None	Richard John Goring		Temporary possession of Land- Access

24/9/	Temporary Possession and Use of approximately 1078 square metres of land being agricultural land, lying east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP. Freehold – WSX298888	<p>Charles Arbutnot Upper Buncton House Spithandle Lane Wiston Steyning BN44 3DS</p> <p>Jennifer Rosemary Arbutnot Upper Buncton House Spithandle Lane Wiston Steyning BN44 3DS</p>	None	<p>Charles Arbutnot Upper Buncton House Spithandle Lane Wiston Steyning BN44 3DS</p> <p>Jennifer Rosemary Arbutnot Upper Buncton House Spithandle Lane Wiston Steyning BN44 3DS</p>		Tempory possession of Land- Access
24/10/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 18991 square metres of land being agricultural land lying north east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP Freehold – WSX298888	<p>Charles Arbutnot</p> <p>Jennifer Rosemary Arbutnot</p>	None	<p>Charles Arbutnot</p> <p>Jennifer Rosemary Arbutnot</p> <p>Southern Gas Networks plc</p>		Cable Restrictive Covenants. Cable Rights
24/11/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 3017 square metres of land being agricultural land, lying north east of Buncton Manor Farm and north of Steyning Road, A283, in the parish of Wiston CP. Freehold – WSX304491	<p>Charles Arbutnot</p> <p>Jennifer Rosemary Arbutnot</p>	None	<p>Charles Arbutnot</p> <p>Jennifer Rosemary Arbutnot</p>		Cable Restrictive Covenants. Cable Rights
24/12/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 24070 square metres of land being agricultural land and overhead electricity lines, south east of Upper Buncton Farm and north west of Lower Barn, in the Parish of Wiston CP. Freehold – WSX277907	John James Goring	None	<p>John James Goring</p> <p>UK Power Networks (Operations) Limited</p>		Cable rights. Cable restrictive Covenant

24/13	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 372 square metres of land being agricultural land, south east of Upper Buncton Farm and north west of Lower Barn, in the Parish of Wiston CP. Freehold – WSX277907	John James Goring	None	John James Goring		Operational Access Rights
24/14	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 519 square metres of land being agricultural land, south west of Guessgate Farm and north west of Lower Barn, in the Parish of Wiston CP. Freehold – WSX305185	Richard Harry Goring	Simon Kilham Calcott Farmhouse Horsham Steyning BN44 3AA	Simon Kilham Calcott Farmhouse Horsham Steyning BN44 3AA		Operational Access Rights
24/15	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 39466 square metres of land being agricultural land, public footpath (WIS/2514/3), hedgerow and track, south of Guessgate Farm and north of Lower Barn, in the Parish of Wiston CP. Freehold – WSX305185	Richard Harry Goring	Simon Kilham	Simon Kilham		Cable Restrictive Covenants. Cable Rights
24/16	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 4785 square metres of land being agricultural land, public footpath (WIS/2514/3), hedgerow and track, lying south and east of Guessgate Farm and north of Lower Barn, in the Parishes of Wiston CP and Ashurst CP. Freehold – WSX305185	Richard Harry Goring	Simon Kilham	Simon Kilham		Operational Access Rights

25/1/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 1 square metre of land being agricultural land, west of College Wood Farm and south west of Doves Farm, in the parish of Wiston CP. Freehold – WSX305185	Richard Harry Goring	None	Richard Harry Goring		Cable Restrictive Covenants. Cable Rights
25/10/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 25 square metres of land being adopted highway verge (Spithandle Lane) and public bridleway (AST/2589_1/1) lying north east of Doves Farm and south of Spithandle Lane, in the parish of Ashurst CP	<p>Unknown</p> <p>West Sussex County Council</p> <p>Richard Harry Goring</p>	None	Southern Water Services Limited		Construction and Operational Access Rights
25/11/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 12420 square metres of land being wooded area and overhead telecommunication lines, lying north east of Doves Farm and south of Spithandle Lane, in the parish of Ashurst CP. Freehold – WSX305185	Richard Harry Goring	Adrian Weller Wiston Estate Chanctonbury Ring Road Steyning West Sussex BN44 3EA	Adrian Weller Wiston Estate Chanctonbury Ring Road Steyning West Sussex BN44 3EA Openreach Limited		Cable Restrictive Covenants. Cable Rights.
25/12/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 158 square metres of land being adopted highway and verge (Spithandle Lane) lying south east of Beggars Bush and north east of Doves Farm in the parish of Ashurst CP. Unregistered	<p>Unknown</p> <p>West Sussex County Council</p> <p>Richard Harry Goring</p> <p>Susie Clare Fischel Sweet Hill Farm School Lane Ashurst Steyning BN44 3AY (in respect of presumed ownership of subsoil (part width of highway))</p>	None	Openreach Limited Southern Water Services Limited		Cable Restrictive Covenants. Cable Rights.

26/1/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 5371 square metres of land being wooded area, pond, drain and overhead telecommunication lines, south of Spithandle Lane and west of New Wharf Farm in the parish of Ashurst CP Freehold – WSX305185	Richard Harry Goring	Adrian Weller	Adrian Weller Openreach Limited		Cable Restrictive Covenants. Cable Rights.
26/2/	Acquisition of Rights by the Creation of New Rights or the Imposition of Restrictive Covenants over approximately 1840 square metres of land being adopted highway and verge (Spithandle Lane), west of New Wharf Farm in the parish of Ashurst CP. Unregistered	Unknown West Sussex County Council Susie Clare Fischel Richard Harry Goring	None	Openreach Limited		Restrictive Covenants, Cable Rights
26/8/	Temporary Possession and Use of approximately 3174 square metres of land being adopted highway and verge (Spithandle Lane) and overhead electricity lines, lying in Spithandle Lane and west of New Wharf Farm in the parish of Ashurst CP. Unregistered	Unknown West Sussex County Council Susie Clare Fischel Richard Harry Goring Unknown (in respect of presumed ownership of subsoil (part width of highway))	None	Openreach Limited UK Power Networks (Operations) Limited Southern Water Services Limited		Tempory possession of Land- Access

Rampion 2

Development Consent Order

Written Representations Submitted by Knight Frank LLP on behalf of

Richard John Goring

Richard Harry Goring

P Goring

Wiston Estate Partnership

Wiston Estate

Rock Common Limited

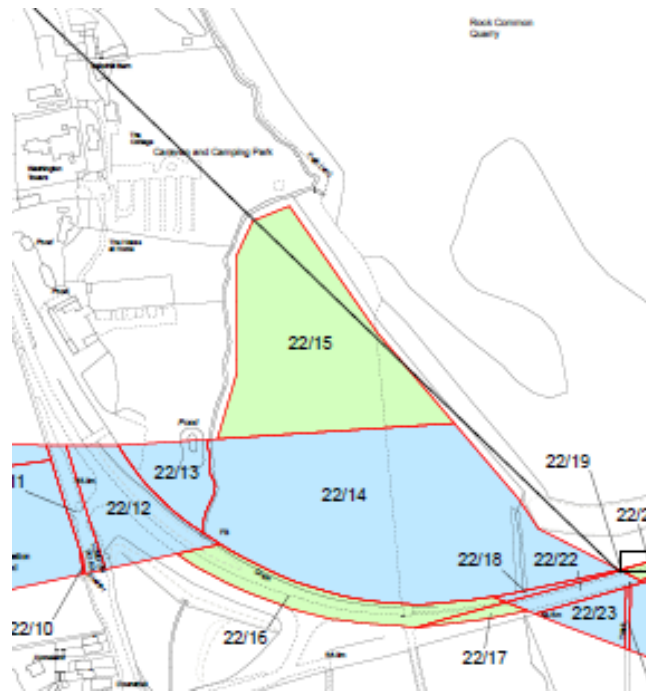
1. Introduction

- 1.1. Wiston Estate extends to over 2,420ha centred on Wiston House and Park, which has been owned by the Goring family since 1743. The estate comprises, 1,765ha of farmland, 495ha woodland, 100ha parkland, 70ha of quarries and 24ha of ponds and wetland. There are 106 in-hand and let residential properties, 11 in-hand and let farms, and 22 commercial units.
- 1.2. Wiston Estate Winery and the Chalk Farm Restaurant sit to the south of the estate and are managed directly by the estate. There are 12ha of vineyards and the estate produces award winning wines, winning the Wine GB "Winery of the Year" twice. Wiston Estate directly employ 80 number of people and support over 20 number of businesses operated by others.
- 1.3. The proposed Rampion Scheme bisects the property from east to west and runs for more than 5km representing over 15% of the onshore cable route. The impact both on the overall estate and estate tenants and their associated business will be severe and will restrict the economic development of the estate in perpetuity.
- 1.4. We attach a schedule summarising the Land Parcel references owned by Wiston Estate which will be affected by the Rampion Project. The scale and impact of the Rampion project on the Wiston Estate is severe.

2. The Route

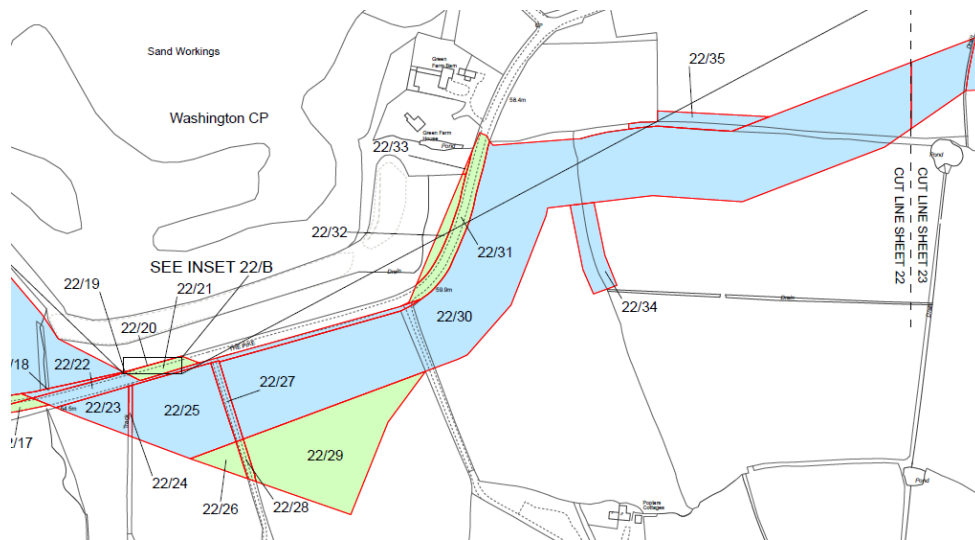
- 2.1. The route is damaging to the estate, their farm tenants, the South Downs National Park, the visual landscape, and the wider environment. We have extracted the relevant parcels of land and provided additional commentary on both the construction and long-term impacts below.

2.2. Wet Pools Compound – Land Parcel Reference – 22/15, 22/14



- 2.2.1. This parcel of Grade 2 land extends to 10.03 acres and is let on an Agricultural Holdings Act Tenancy for agricultural use. Rampion have requested permanent rights for the land shaded blue (22/14) and temporary rights for the land shaded green (22/15). This land will be used for a major compound for the works to underground the Rampion cable under Washington and will be used for the duration of the project. This will reduce the land available to the tenants' farming business and impact on their operations.
- 2.2.2. This land is bordered by the Rock Common quarry to the east, a Caravan and Camping Park to the north and an equestrian property to the west. Although this parcel of land is used for agricultural purposes it clearly has potential for alternative uses by virtue of its location on the edge of Washington.
- 2.2.3. The width of the permanent rights being sought within 22/14 is approximately 122m from the highway boundary and is over half of the field. This will permanently restrict what can be carried out in the field. The permanent rights being requested both here and elsewhere on the route should be restricted to the 20m width of the cable where possible. The request for compulsory powers over a width of 122m is excessive.

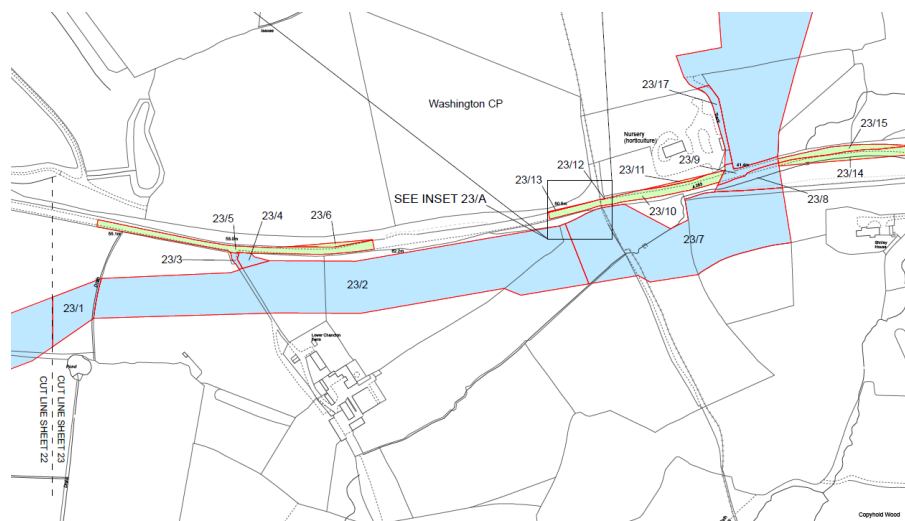
2.3. Locks & Tilley's Farm – Land Parcel Reference – 22/23, 22/25, 22/26, 22/29, 22/30, 22/34, 22/35, 23/1



2.3.1. Locks and Tilley's Farm extends to approximately 180 acres. It is let on an Agricultural Holdings Act Tenancy and is used as a specialist sheep farm, breeding high value New Zealand Romney Sheep. The fields are used intensively due to the specialist nature of this farming operation.

2.3.2. During the construction period the usable acreage of the farm will be reduced by approximately 50%. This will cause significant disruption and losses to the farming business, impacting on that business viability during the construction period. The Rampion Cable route will dissect the main farm drive, causing significant disturbance to the users of that access.

2.4. Lower Chancton Farm & land adjacent to Shirley House – Land Parcel Reference – 23/2, 23/3, 23/4, 23/7, 23/11, 23/12, 23/15

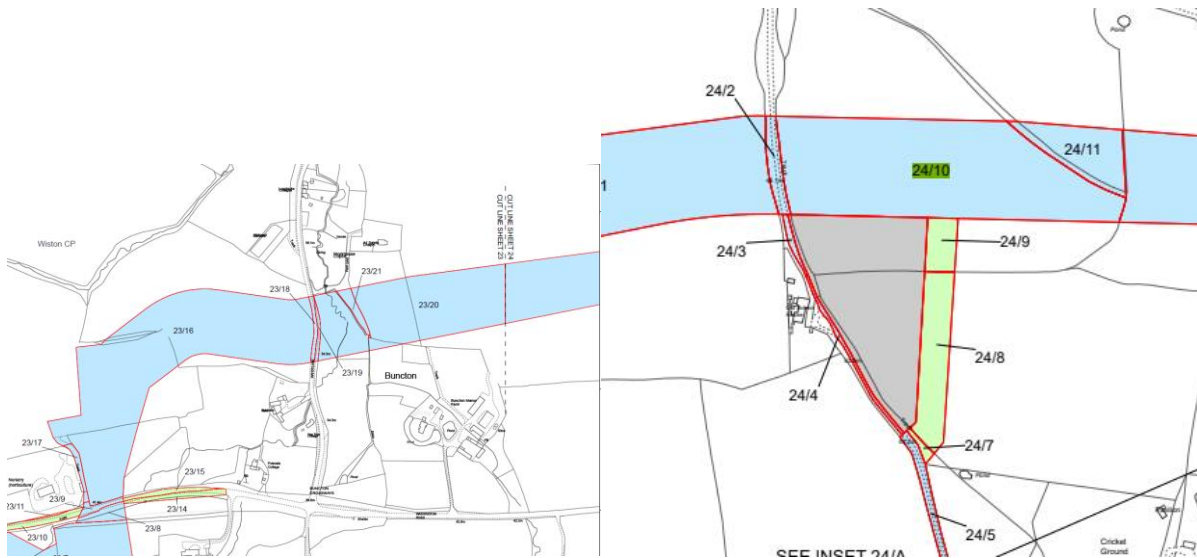


2.4.1. This part of the route passes through Lower Chancton Farm, which is a working livestock and arable farm let on an Agricultural Holdings Act Tenancy and land adjacent to Shirley House which is a residential property let on an AST tenancy agreement.

2.4.2. The cable route will dissect the access track to Lower Chancton Farm. This is a busy access servicing a residential property, a working farm, and a business unit. We understand the proposal is to dig an open trench. This will cause significant disruption to these tenants and businesses.

2.4.3. There are two residential properties here which are affected by the Rampion project, Lower Chancton Farmhouse and Shirley Farmhouse. We understand that there will be a Directional Drill (HDD) compound adjacent to Shirley House. This will cause noise & dust disturbance to this property during construction. We request that accommodation works are agreed to minimise any impact to these residential properties.

2.5. Buncton Manor Farm – Land Parcel Reference – 23/16, 23/17, 23/20, 23/21, 24/1, 24/4, 24/5, 24/6, 24/7, 24/8,



2.5.1. Once the route has crossed the A283, it passes up a track very close to the east of Sussex Wood Yard, who are a tenant of Wiston Estate. This is a busy timber yard which processes timber and is open to the public for direct sales. There are heavy vehicle movements in and out of this access.

2.5.2. The route will cause disruption to this business, and we request that the access to the wood yard is not disturbed or impacted. The track to the east of the wood yard is very narrow, we understand this track is proposed to be used for construction traffic. Directly abutting the track is a timber framed building which is used by the wood yard business as an office and a shop. This building will need to be protected to ensure that no damage is done due to the proximity of heavy machinery passing.

2.5.3. The route then passes through Buncton Manor Farm, this is farmed in hand by the Wiston Estate and is used for arable cropping. The cable route will cause significant disruption to the farming operations, fields will be severed and become unusable during the construction period. The losses suffered by the farming business will be more significant than just the cable route. Corners of fields will be severed and will be unusable during the construction period due to their size and the size of modern farming equipment.

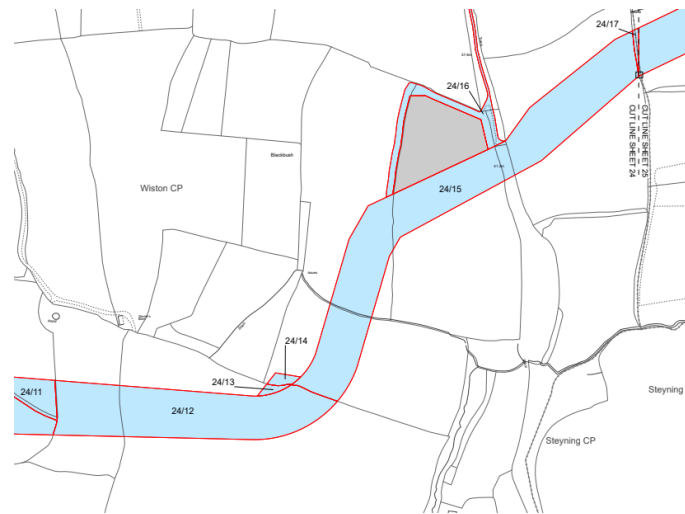
2.5.4. An operational and construction access is being proposed (24/8). This runs straight through the middle of the arable field and will cause disruption to the farming operations on the land shaded grey.

2.5.5. More importantly this access and the cable route is adjacent to the Old School House. This is a Grade II Listed former School House. This property has now come back to Wiston Estate following being in the same tenanted occupation for a long period of time.

2.5.6. The property requires a significant repair and improvement to bring it up to modern day standards. To fund the cost of the work Wiston Estate propose to convert this property into a Holiday Let within the next 12 months, as they have done so with other properties they own. However, the disruption of the proposed Rampion works is going to cause significant issues to the financial feasibility of this project. Typical holiday cottage customers who come to Wiston for a holiday are looking for a rural tranquil and quiet setting, with beautiful views.

2.5.7. We request that Rampion enter discussions around accommodation works to be considered to this cottage to protect it from the impact of the project.

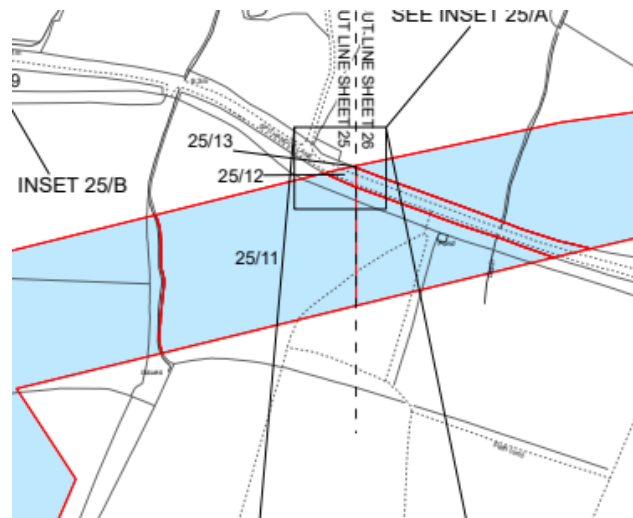
2.6. Guesses and Guess Gate Farms



2.6.1. Guess and Guessgate Farms are arable and livestock farms let on a Farm Business Tenancy. The proposed route goes directly through the centre of the farms and severs many of the fields. This will cause significant disruption to the ability to farm these fields during the construction period. The majority of the fields are used to grow grass to feed the livestock.

2.6.2. An alternative more direct route was proposed which avoided various tree lines and would have caused less disruption to the farming operations by the tenant farmer.

2.7. Calcott Wood (25/11)



2.7.1. Calcott Wood forms part of Wiston Estate Forestry enterprise. We understand it is proposed to Directional Drill under this area of woodland. We have asked for clarification on the impact of the cable on the operation of this area of woodland. For example, if timber was extracted from this area of woodland in the future it is important for Wiston Estate to be able to replant this area.

3. Failure to Engage and Consult Sufficiently

3.1. The level of response by Rampion to the Wiston estate's attempts to engage has been disappointing and below the standard to be expected for a project of this scale. There has been change of personnel both within the Rampion project team and their agents Cater Jonas.

3.2. Meetings have been postponed or rearranged at short notice, for example a meeting was arranged with the estate and their tenants on Tuesday 24th August 2021. This was cancelled by email with less than 24 hours' notice by [REDACTED] Carter Jonas. Bearing in mind the number of parties involved this was not helpful.

- 3.3. Actions have not been recorded or followed up sufficiently. For example, queries around the proposed compound (traffic information and size of the compound) were requested by Richard Goring by email to [REDACTED] (Rampion) on the 5th September 2021. No answer was received. Wiston Estate requested this information so they could suggest alternative sites further to the east to minimise the disruption that this compound will have to the local Highway and the estate.
- 3.4. Minutes from meetings were received late. Minutes from a meeting held between Wiston Estate, Rampion and Carter Jonas on the 23/07/2021 was not received until the 16th September 2021, the date of the end of the consultation period. With a note which stated, *"If you were awaiting these minutes before making your written representation (as part of the statutory consultation) I can inform you that Rampion will accept late submissions (emailed to Rampion2@rwe.com) up until 30th September 2021"*. This was hours before the end of the consultation period and Wiston had already submitted their response. This was emblematic of the entire consultation period.
- 3.5. On the 24th March 2021 [REDACTED] Rampion stated in an email *"As mentioned we are just in the process of seeking approval from our Board for a comprehensive package which we expect to be able to send to you fairly soon, with proposed commercial terms (including support for advisors fees), which we then look forward to discussing in more detail with you."* No proposal was received until the standard Heads of Terms were provided in 2023, as detailed below. When the Heads of Terms were received they were not customised for Wiston specific issues.
- 3.6. Summary and brief Heads of Terms for an option and easement agreement were not provided until Spring 2023, however, there has been no meaningful discussion about these terms and their suitability for the Wiston Estate until more recently. A group of agents representing a large proportion of affected landowners attempted to engage as a group and received very perfunctory responses. There was a refusal from Rampion and their agents to meet with the agent group to discuss the key terms.
- 3.7. We were informed that draft legal documentation was only to be provided to parties who were willing to engage. This was an unhelpful position as it is not possible to assess the terms offered until full legal documentation was provided. An incentive payment was applied to the Heads of Terms should they be signed within 6 weeks; this was entirely unreasonable considering the complex nature of the scheme and the lack of detail in the documents.
- 3.8. The draft easement and option documents were not provided until late October 2023. There was insufficient time for Wiston Estate to review these and take professional advice, prior to the DCO process (the DCO application was submitted in August 2023). There are additional rights and restrictions contained within these drafts which are important for Wiston to understand and make representations on. For example, the draft legal documents included the provision for Rampion to use additional land areas subject to predetermined payment rates and to plant trees anywhere within the Grantors Title. Clearly these will be unacceptable to a complex business such as the Wiston Estate.
- 3.9. Wiston Estate was informed that further Heads of Terms are to be issued for the Wet Pools compound by the 20th October 2023. These were not provided until February 2024.
- 3.10. Rampion stated that they would prefer to secure the agreement by private treaty but until more recently we have noted very little evidence of any meaningful negotiations. For example, Rampion only confirmed in late November 2023 that rights will be partly limited by reference to the DCO plan, this is after the DCO application has been submitted. We await explanations of key definitions within the draft documents and plans showing the areas where these key definitions apply to.
- 3.11. Due to lack of proper engagement and consultation the rights being sought by Rampion are too wide. We are aware that Rampion 1 proposed an easement width of 15m, subject to maximum of 30 m2 for physical obstacles. No acceptable justification has been provided by Rampion to substantiate why they require such wide and far-reaching rights over and above what was agreed in Rampion 1.
- 3.12. Notwithstanding the above, we acknowledge that several meetings have been held with Rampion and their agents in the past month, where some more meaningful progress has been made. It is disappointing that this has taken so long and as a result Wiston Estate has incurred unnecessary professional costs in engaging in the DCO process.
- 3.13. We note that in the Land Rights Tracker submitted by Rampion (PEPD-016), two sets of Heads of Terms have been agreed and no land agreements have been completed as of January 2024. This is out of the 85 entries. This is symbolic of the consultation and engagement process.
- 3.14. Although the Estate acknowledges that there has been some engagement with Rampion since 2021, as noted above, the Estate's view is that this has been disappointing and below the standard to be expected

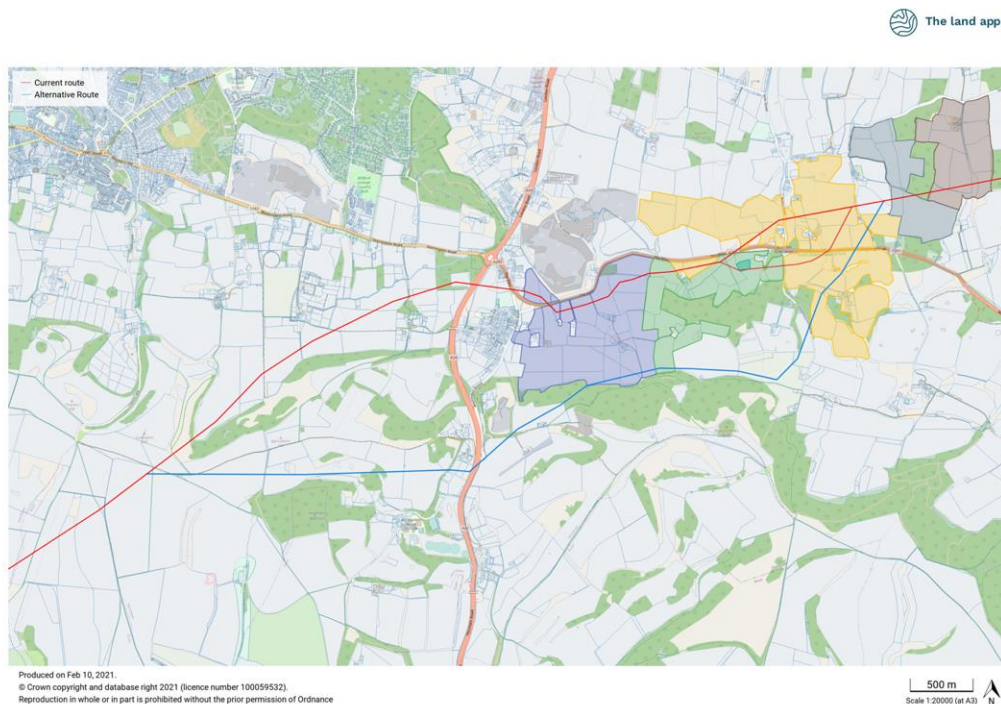
for a project of this scale. The guidance on compulsory acquisition for DCO projects¹ states at paragraph 24 that “*Early consultation with people who could be affected by the compulsory acquisition can help build up a good working relationship with those whose interests are affected, by showing that the applicant is willing to be open and to treat their concerns with respect. It may also help to save time during the examination process by addressing and resolving issues before an application is submitted, and reducing any potential mistrust or fear that can arise in these circumstances.*” It is the Estate’s view that Rampion’s approach to engagement has at times fallen short of the standard expected by this guidance, with the consequence that it was not possible to address and resolve all of the issues raised by the Estate before the DCO application was submitted.

3.15. Paragraph 25 of the guidance states: “*Applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail.*” As indicated in this written representation, the Estate is willing in principle to enter into agreements with Rampion to enable Rampion to acquire the interests it needs for the scheme. However, the Estate’s interests must be properly protected and the impacts on it must be minimised. It is the Estate’s view that Rampion’s attempts to acquire the interests it needs by agreement have not failed, and that it would therefore be premature for compulsory acquisition powers to be granted in respect of the Estate’s interests.

4. Failure to properly consider major and minor variations to the route

4.1 Major Route Variations

4.1.1. The Washington Parish Council submitted a major alternative route proposal in their paper dated 11th February 2021 – the ‘Blue Route’. This is identified below in blue.



Blue – Proposed Alternative Route
Red - Approx Rampion Proposal

4.1.2. At a meeting on the 1st September 2021 Rampion suggested that this proposed route would pass through an area of Ancient Woodland on the north scarp of the downs south-east of Washington Village. Had they inspected the woodland they would have known that it is predominantly a single species woodland suffering from acute ash-die back disease. It is therefore due for an imminent clear fell under Forestry Commission guidelines. In addition only a small part of this area of woodland is designated an Ancient Woodland. We are aware that Rampion are Directional Drilling underneath woods, such as Calcott Wood (which is also a Ancient Wood in part) as detailed above. Could this not have been considered for the proposed “Blue Route”.

¹ Planning Act 2008: guidance related to procedures for the compulsory acquisition of land (MHCLG, September 2013)

4.1.3. This route passes far fewer dwellings and interrupts far fewer businesses. It is a superior route that has not been properly evaluated. The Blue Route also avoids the estate's sand reserves which are shown coloured pink on the plan under section 7.

4.1.4. We note Rampion state in the Land Rights Tracker that the *“rationale and decision-making process for not progressing with the route to consultation was communicated verbally by the Applicant at a site meeting in April 2022.”* Although a brief explanation was given at this meeting, no detail on this decision was provided and no further written clarification was received. There has been no further engagement from Rampion on this alternative proposal.

4.2 Minor Route Variations



Yellow – Proposed Variation
Red – Approx Rampion Proposal

4.2.1 Minor route variations have also been proposed, which have not been properly considered by Rampion. There is a strip of land between the Rock Common sand pit 54metres wide that sits to the north of the Pike (A283). This represents a better location for the cable than the route to the south of the Pike which crosses the entrance to a highly bio-security sensitive rare breed sheep farm to the south, referred to above.

4.2.2 Generally, a route which follows the southern edge of the road boundary (from Rock Common sandpit eastwards) will see less injurious affection of the farms to the south. It minimises the loss of long-term excavatable sand reserves and future vineyards sites, which are detailed below.

4.2.3 This route was proposed at a meeting with Rampion on the 1st of September 2021. Following that meeting Rampion stated they would investigate the feasibility of this route and acknowledged the benefits as it avoided the severance of various accesses and driveways. No detailed response was received from Rampion following this meeting and suggestion.

5. Failure to provide sufficient information.

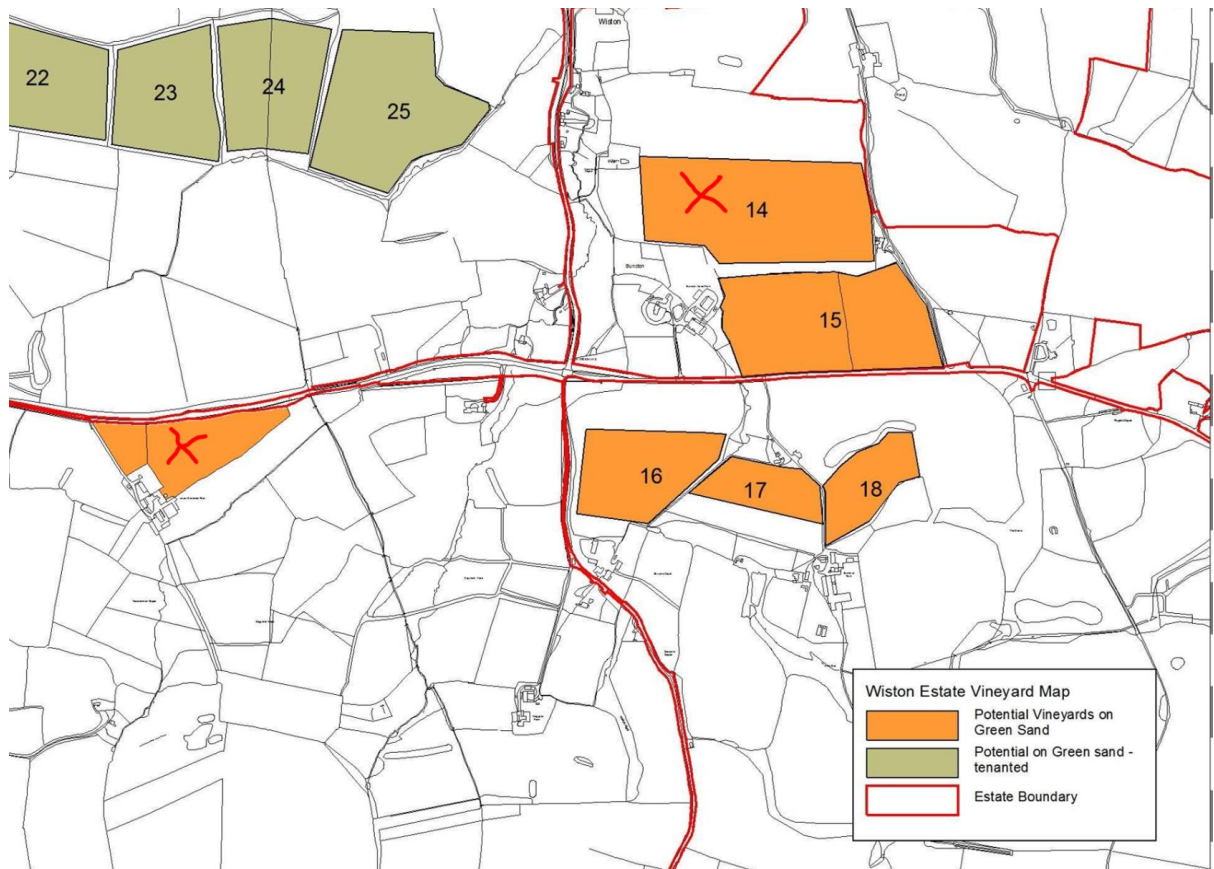
5.1. Information has been requested and not been provided in its entirety, or insufficient information has been provided by Rampion and their agents. For example, plans showing the operational and construction accesses were requested in the Summer of 2023 so the impact of the project could be fully understood. This detailed information was only provided more recently. Without this information it is difficult to understand the long-term impact of the proposals.

6. Impact of the Route on potential Vineyard Land

6.1. Wiston Estate has a successful vineyard and winery business. This is an important and expanding part of the estate and significant investments have been made over the recent years, including the opening of Chalk Restaurant. The enclosed plan below showing the fields suitable for vines was provided to Rampion at an early stage and has not been fully considered by the project.

6.2. This land has been identified as being suitable for vines due to its soil type and geology and has been assessed by the estate vineyard consultants, Vinescapes. These fields are on greensand, they are south facing and free draining making them ideal for planting vines. The vineyard fields affected by the Rampion

project are identified with a red cross below and extend to 27.82 acres. The proposed Rampion Route dissects both fields.



6.3. Most of the other fields identified as being suitable, are tenanted within secure Agricultural Holdings Act Tenancies and are not available for the estate to use in-hand. These makes the unavailability of these two fields even more challenging when Wiston is considering expanding their wine business.

6.4. We have received mixed messages from Rampion as to whether Vines will be permitted to be planted under the terms of the easement. However, even if they are it will be a significant financial risk to plant vines on land which could be disturbed in the future. Notwithstanding the damage to the soil structure and geology during construction meaning that they will never be suitable for planting vines in the future. The proposals severely limit the future expansion of the estate winery business on the available fields which would be suitable for vines.

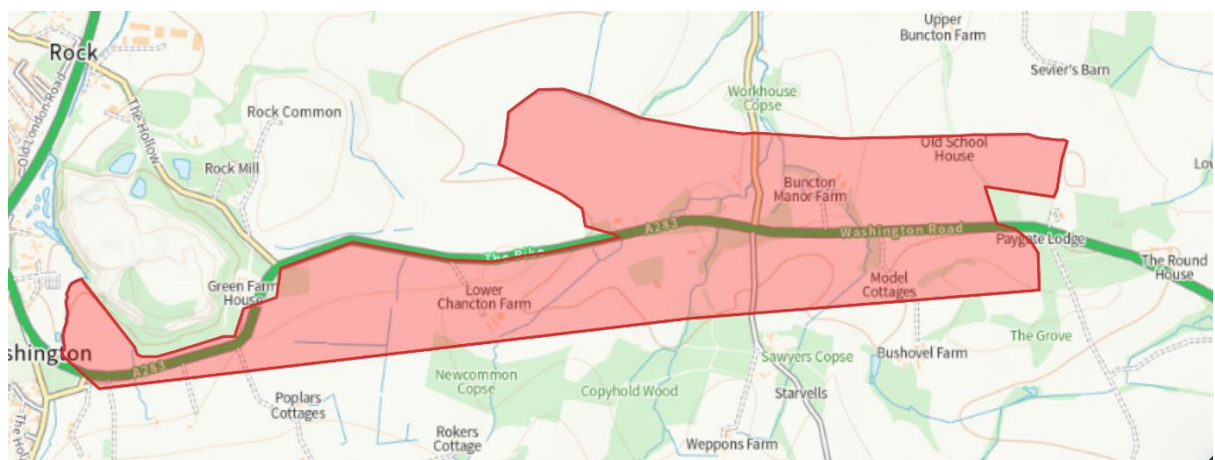
7. Impact of the Route on Mineral Potential

7.1. Wiston Estate owns Rock Common, a working quarry, which adjoins the route. Neighbouring Wiston land impacted by the proposals has the geological benefit of sitting upon significant reserves of building sand. Therefore, the proposed underground cable, which requires a 20-metre width corridor together with the potential severance, will sterilise in-situ sand in perpetuity.

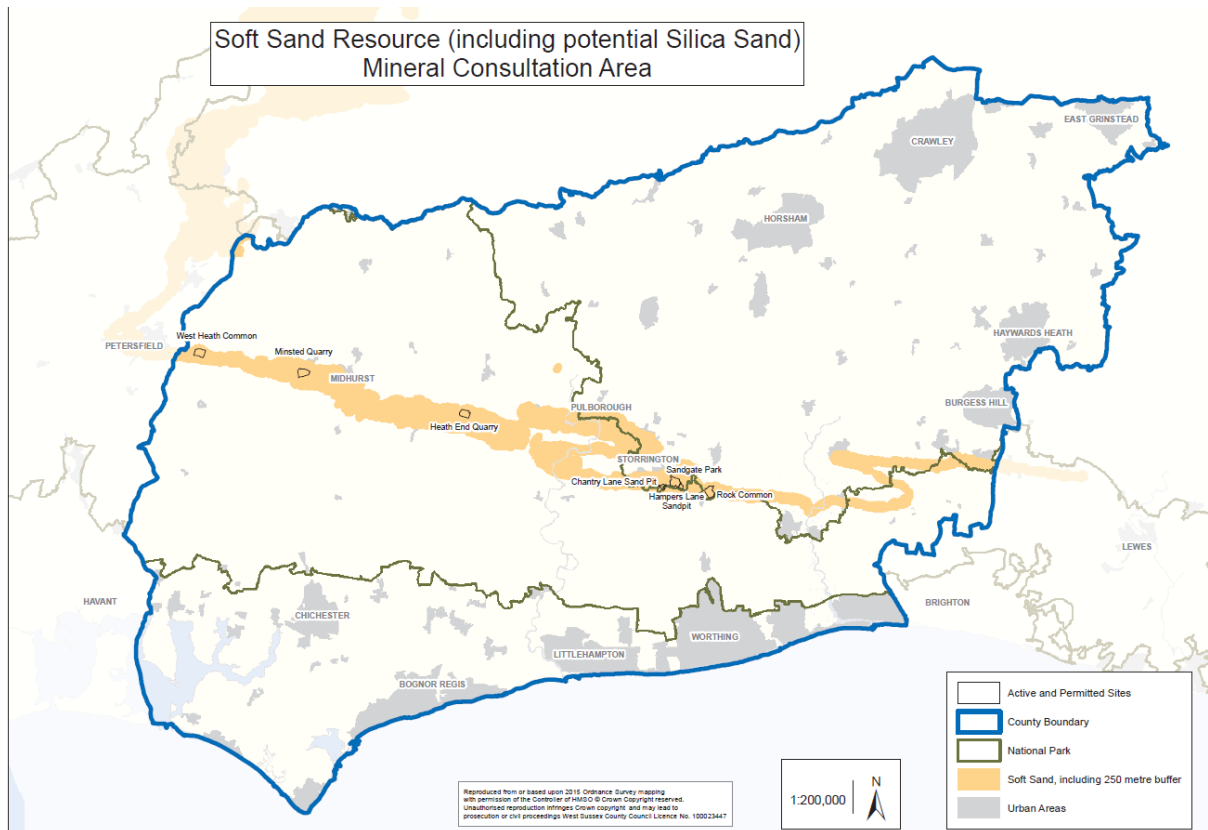
7.2. At a meeting on the 23/07/2021 between Richard Goring (Wiston Estate), [REDACTED] (Rampion) and [REDACTED] (Carter Jonas) various issues relating to Wiston Estate was discussed. One of the issues was the sand reserves at Wiston Estate. In the meeting notes provided by Carter Jonas it states, "JDA confirmed the Deed of Grant would provide a Diversion Clause in the event the landowner achieved planning permission for certain development activities including housing and working of minerals".

7.3. It was therefore a surprise that when the Key Terms were issued in Spring 2023, there was no Diversion Clause proposed. During discussion with Carter Jonas the only response provided was "This is Rampion 2 not Rampion 1. There will be no lift and shift clause."

- 7.4. Rock Common Quarry is an operational facility operated by Dudman Ltd. We understand the estimated in-situ sand reserves is in the order of 100,000 tonnes with an estimated operational life in the order of 2 years, therefore demand for sand is strong.
- 7.5. The land to the north of Rock Common Quarry has planning permission for a ready-mixed concrete batching plant and for the importation of materials for blending, thus providing added value products. We would anticipate that Dudman Ltd would wish to continue these service lines subject to virgin sand being available. In addition, this land provides the associated sand processing plant. Clearly these are established operations and would support an application to quarry in land owned by Wiston shaded pink on the plan below. Going forward there is potential for development of the sand associated with land to the north of the A283, which could be easily linked by conveyor to the existing Dudman Ltd processing and concrete batching site.
- 7.6. A mineral specialist has applied a high-level assessment of the mineral reserves, assuming a depth of 5 metres with ratio of 1 cubic metre to 1.5 tonnes. This high-level approach provides in the order of 5.2 million tonnes for the cable corridor and for the assumed severed land east and west of the cable corridor.



- 7.7. We enclose a WSCC plan showing the sand deposits in the county. You will note the band of sand which runs west to east through the county. Rock Common is identified on the plan. The Rampion proposal runs straight through these sand deposits.
- 7.8. WSCC had previously requested Wiston Estate consider putting this land into the Local Waste Plan due to the quality of the sand in this area. For strategic reasons Wiston Estate did not take this forward, as they have a live planning application for the restoration of Rock Common Quarry currently being considered. This application has been submitted to seek permission for the restoration of the quarry once extraction activities have ceased.
- 7.9. However, the sand potential should be considered in light of Wiston Estate ownership structure, the estate is a multi-generational estate held by the same family since 1743. Therefore, they take a long-term view and if the Rampion project goes ahead this sand potential will be sterilised for the next generation.



8. Impact on Farm Tenants and in-hand farming operations

- 8.1. The position of the route takes a significant amount of land out of agricultural use during construction. It also severs fields making large areas unusable. Some of the affected land is farmed by farm tenants, and the proposals will severely impact their livelihoods. We detailed some of the practical issues above.
- 8.2. The separation of the buildings from the main area of the holdings will have a detrimental effect on the ability to run the agricultural enterprises. Some of the farm tenants have had a poor experience with the project, having correspondence ignored and surveys being carried out without consent, which has resulted in concerns that farm tenants will not be treated fairly.
- 8.3. Some examples of this include: -
 - On the 19th May and the 20th May 2021 ecology surveys took place on Guess Gate Farm in advance of the environmental survey licence being agreed and signed. At this point the tenant had not even been provided with a copy of the licence to be signed. This raised significant health & safety and biosecurity concerns of unauthorised third party access onto a working livestock farm.
 - On the 21st September 2021 surveyors turned up unannounced to Guess Gate Farm, despite terms being agreed in the access licence which stated that the estate and their tenants would be notified of proposed surveys and the surveyors would sign into farm log books where required.

9. Wet Pools Compound (Work No.10)

- 9.1. Further information on the proposed Wet Pools Compound has been requested (shown on the plan as Work No.10). It is understood that this is a major compound. The estate has serious concerns over access, Highway safety and the impact on the local road network as the current access is poor.
- 9.2. No detailed plans for the compound have been provided, including details of use such as working hours and access arrangements. Head of Terms for use of this compound were only received on the 2nd February 2024.

- 9.3. We note in Rampion's submitted outline Code of Construction Practice they intend to operate with the following core working hours: 07:00 to 19:00 hours Monday to Friday and 08:00 to 13:00 hours on Saturday. This would result in significant traffic and disturbance on this compound during the rush hours.
- 9.4. The estate has previously put forward alternative sites for a compound, which have not been considered properly.

10. Manhole Covers

- 10.1. It is understood that Manhole covers will be erected at 1km intervals on the route and access to these will be retained in perpetuity. We understand from Rampion that location of these will not be provided until the construction period, and they will be limited to where they can go due to the cable being in set lengths. If they are located inappropriately, such in the middle of the field, this will have significant implications both operationally, such as arable farming, and for future uses, such a vineyards.

11. Failure to cover professional costs

- 11.1. Throughout the consultation and survey period, there has been a failure to cover the affected parties' professional costs. Much wasted professional time has been spent following up their chaotic approach to matters. This is unequitable when Wiston Estate have only incurred these costs due to the proposed project.
- 11.2. Rampion refused to pay professional costs during the initial consultation period. This fundamentally undermines the engagement process, especially given professional costs were reimbursed during the development of Rampion 1.
- 11.3. We do acknowledge that Rampion have confirmed they will meet professional costs during the Heads of Terms negotiations.

12. Biodiversity Net Gain

- 12.1. We note in Rampion submissions – Appendix 22.15: Biodiversity Net Gain Information (Document reference: 6.4.22.15) it is stated that "Three Landowners with interests over large land holdings have expressed interest to RED for the delivery of biodiversity units".
- 12.2. Biodiversity Net Gain was discussed with Rampion in 2021 when they engaged with the Weald and Waver Project. Wiston Estate is partner in this project. Since 2021 despite attempts to engage no further responses have been received from Rampion with respect to BNG.

13. Compensation arrangements

- 13.1. Without prejudice to the objections above the parties are seeking to agree a position relating to several points above as well as an option and easement agreement and a compensation agreement.

14. Reservations

- 14.1. Wiston Estate reserves the position to submit further information, issues, and objections as part of the DCO process.