

Rampion 2

ExA deadline 1

Written representations of Nicola Hanley

Interested Party number 20045269

Site selection for the onshore substation

I write with reference to Action Point 4 arising from Issue Specific Hearing 1 and the Examining Authority's request that the Applicant provide additional evidence and justification to explain why the Wineham Lane North site was discounted for the onshore substation site with a focus on the engineering and environmental constraints of the site.

The Applicant conducted a non-statutory consultation in January and February 2021 on three possible onshore substation sites, and a statutory public consultation on the remaining two sites – Wineham Lane North ('WLN') and Oakendene - in July to September 2021. Parish Councils and residents were all invited to submit their comments and views on the alternative site options. The decision to select the Oakendene site was announced in July 2022.

The WLN site was considered as the alternative onshore substation site in the Rampion 1 project but was rejected because the site was found to have a high number of long-lived healthy trees, mature trees around its perimeter and its northern boundary abutted Ancient Woodland. One field within the site was also found to consist of species-rich unimproved grassland which represented the best example of the UKBAP Priority Habitat – Lowland Meadows in the Rampion 1 project onshore survey area. See Rampion 1 Environmental Statement Section 3 – Alternatives. A section of the site was also excavated as part of the Archaeological Survey by Archaeology South East commissioned for the Rampion 1 project. The excavation found a large quantity of pottery pieces (representing a third of all pottery pieces found along the entire length of the 26km cable corridor), a fire pit and hearth, flint work and a loom weight all dating to the late Iron Age/early Roman period around the mid 1st century AD.

As well as the ecological and archaeological constraints, the WLN site is crossed by two PRow's, two High Voltage underground cables, several pylons and overhead power lines. It is immediately adjacent to the Rampion 1 substation, and planning permission has already been granted by Mid Sussex District Council ('MSDC') for a 42 acre Solar Park on adjacent fields (DM/15/0644). There is currently a planning application with MSDC submitted by One Planet Development Ltd for a Battery Energy Storage System on part of the WLN site itself (DM/23/0769) and an EIA Screening Opinion application (DM/21/4285) made for a field that is another part of the WLN site by WP Grid Services Ltd, a subsidiary of Welsh Power, for a Grid Balancing project.

I live at [REDACTED], a Grade II listed building located approximately 300m to the north of the WLN site. [REDACTED] one of four listed buildings located within 400m of the WLN site. The WLN site once formed part of the [REDACTED] Estate and the site is the subject of an agreement pursuant to s34 of the Town and Country Planning Act 1932. The purpose of the agreement is to protect the countryside including the WLN site, and is consistent with paragraph 174 of the NPPF which seeks to protect the intrinsic character and beauty of the countryside and to protect agricultural land. Any industrial development on the site would therefore conflict with and fundamentally undermine the purpose of the s34 Agreement.

To support our objections to the Battery Energy Storage System currently being considered by MSDC (application DM/23/0769), my husband and I commissioned and submitted an independent Heritage Appraisal by HCUK Group dated May 2023 on the potential impact the BESS project might have on the setting of our listed property. The Heritage Appraisal concluded at paragraph 5.3:

"It is difficult to see how the proposed development can be described as anything other than harmful within the context of paragraph 202 of the NPPF – that is, less than substantial harm, to the significance of the grade II listed building".

The MSDC Conservation Officer concluded in her assessment (submitted on 7th August 2023 in planning application DM/23/0769) that the proposal will have a fundamental impact on the character of the (WLN) site which will result "in less than substantial harm to the special interest of [REDACTED]".

In summary, I would suggest that the WLN site is not a potential alternative site for the Rampion 2 substation. Whilst writing, I refer the Examining Authority to the judgment of the High Court of England and Wales given on 18th February 2021 in *Pearce v the Secretary of State for BEIS*, in the application for a judicial review to challenge the decision of the defendant not to take the cumulative impacts of two offshore wind projects into account but instead chose to assess the impact of one project in isolation. Given that the Rampion 1 substation is on a site immediately adjacent to the south of the WLN site I would suggest that pursuant to this High Court judgment, any decision to select the WLN site for the Rampion 2 substation must include an assessment of the cumulative landscape and visual impact that would occur if the Rampion 2 substation infrastructure were added to the Rampion 1 infrastructure and the consented 42 acre solar park.

Nicola Hanley

28th February 2024