

**From:** [Susan Davies](#)  
**To:** [Rampion2](#)  
**Cc:** [Robbins, Lily](#)  
**Subject:** Onshore- proposed substation sites  
**Date:** 08 February 2024 04:25:41

---

Dear Lily

It was lovely to meet you yesterday. Please could you send the attached to the Examiners.

Thank you for taking the time to listen to the concerns raised by local residents of Cowfold. I wondered if you could possibly review the following matters:

### 1 Alternative Sites

Evidence would suggest that there were very few surveys completed prior to selecting the "Oakdene" site. Rampion disclosed that the 'engineering and technical' considerations and constraints were "confined space". However please can you ask Rampion to clarify the size of the site at Wineham Lane, because in the past they had confirmed that the Wineham Lane North site was large enough, but the shape wasn't ideal.

Rampion stated that two land owners had submitted applications for battery storage facilities. According to HDC one has been withdrawn and the other has not been granted permission, as yet.

The reasons given for not choosing Wineham Lane included a listed building and also the proximity to ancient woodland and impact on 5 businesses. The Oakdene site also includes Taintfield ancient woodland and Oakdene Manor and 70 businesses directly on the site and a further 60 in the village.

### 2 Flood Risk.

Please can you find out if the analysis was based on desk top and historical records or whether they have completed soil samples, and geotechnical and topography surveys for both alternative sites. HDC's assessment (22.6.22) stated that their records showed no historical flooding, which is incorrect, perhaps they inadvertently looked at a different site. The Environmental Agency have designated several properties in the Oakdene post code, as at "high risk" of surface water flooding and several have actually flooded. Given the recent extensive flooding at Oakdene, we suspect that the EA flood maps may need updating. There is no such flooding at Wineham Lane North. We have photographic evidence showing extensive flooding at Oakdene, whilst water drained away very effectively at the Wineham Lane site.

According to 6.4.26.2, Section 5.3.10 Rampion state "The underlying topography used when modelling does not provide an up to date overview of surface water flood risks at the site".

5.3.15 On Oakdene "This could lead to increase in peak run-off and volumes as a consequence increase the flood risk for downstream receptors"

6.4.5 on p88, "the loss of flood plain storage will increase the levels elsewhere"

6.4.20 fig 26.2 5a-e "The regions of high risk include the compound at Washington and substation at Oakdene"

### 3 Traffic

We have raised concerns to WSCC about insufficient information and poor data relating to traffic at Oakdene, Kent St and Picts Lane. There have been no traffic surveys, no traffic modelling, no traffic management plan and no traffic impact assessment for these affected highways. We received the attached email from WSCC, stating that they were under resourced and unable to help in this matter.

There is no traffic impact assessment for either site and certainly no comparisons made. The substation located at Oakendene would cause substantial traffic congestion and chaos to the local road network, because the two accesses are located directly on this hazardous section of the A272, which is used by over 18,000 road users on a daily basis. The construction of Rampion 1, along Wineham Lane demonstrated that this did not cause congestion problems along the A272, but was very inconvenient and disruptive to the residents of Wineham Lane.

Thank you for considering these factors

Kind regards

Sue Davies

Email of 9.1.2024 @16.24

Hi Sue,

Many thanks for your email.

Unfortunately, given the pressure on staff resources dealing with Rampion 2 (and the Gatwick DCO) in addition to the business as usual, the County Council is not able to help with this matter or to enter in to dialogue about technical matters. However, any correspondence that you send to the project inbox ([rampion2@westsussex.gov.uk](mailto:rampion2@westsussex.gov.uk)) will continue to be taken into account, as necessary, in our dealings with the Applicant and in formal submissions as part of the DCO process going forward.

Best wishes

Amy

-----Original Message-----

From: Susan Davies [redacted]@googlemail.com>

Sent: Tuesday, January 9, 2024 11:19 AM

To: Amy Harrower [redacted]@alhcs.co.uk>

Cc: [redacted]@westsussex.gov.uk

Subject: Rampion 2- Traffic and Transport

Dear Ms Harrower

I hope that you don't mind me contacting you direct. I've just read your excellent Relevant Representations submitted to the Planning Inspectorate. Regarding the Traffic and Transport section, I see from previous documentation that there have been numerous extremely pertinent questions raised by National Highways (NH), WSCC and HDC regarding highways and that these have not been answered by Rampion.

Please find attached a document which demonstrates the very poor due diligence undertaken by Rampion, and shows contradictory or missing data that should have been disclosed. Neither have the alternative options available on Wineham Lane been thoroughly investigated.

I've written to Chris Tomlinson on numerous occasions asking for additional information regarding their proposed traffic control measures, but have not received a reply. Do you

think that it would be possible to ask Rampion for details of their proposed traffic control measures at the Oakendene/Kent St sites, and also for their analysis (with assumptions), of the implications on the existing road network and local community.

We have been advised that in situations such as these, a full traffic survey, traffic modelling and a Traffic Impact assessment should be completed for both options. Please could you find out if and when this is likely to be completed.

I look forward to hearing from you and thank you for your help in this matter.

Kind regards

Sue Davies

**From:** [Susan Davies](#)  
**To:** [Rampion2](#)  
**Subject:** Re: Rampion 2 Hearing Attendance  
**Date:** 07 February 2024 00:50:59  
**Attachments:** [Open Floor - discussions.docx](#)

---

Dear Lily

I'm so sorry, but I inadvertently sent you the old version which omitted the Economics section. Please could you replace it with this updated version. Apologies for the inconvenience caused.

Kind regards

Sue

Open Floor: Poor Due diligence on Traffic, Economic impact and Flooding at Oakendene

## TRAFFIC

It's important to understand the potential implications of locating the proposed sub- station at Oakendene in comparison to Wineham Lane.

At Oakendene/Kent St, during rush hours the traffic extends 1-1.5m outside of the village and there is usually slow moving or standing traffic by Kent Steet. This is due to the two mini roundabouts, pedestrian crossing and 2 junctions within the village. We understand that his proposal will require the installation of two visibility splays on the A272, and four new entrances along Kent St. The Visibillity splays will be 215m wide each and be within half a mile of each other located on this fast moving hazardous section of A272.

This will require some form of traffic management scheme, which has not been detailed, proposed or even mentioned by Rampion. The traffic management is required in order to allow the thousands of HGV's LGV's to cut across two lanes of fast moving traffic. They have promised that this information would be available in June 2022, but then said that it was a "highways problem".

They have completed ignored this aspect, which is critical for the operation of this proposal. Some 18,500 daily road users,(60-70mph) will be negatively affected, as will 70 businesses at Oakenene and 60 in Cowfold.

This compares with Wineham Lane, which already has a visibility splay, and is located 2.5 miles outside of Cowfold village. Traffic doesn't extend this far and there would be no need for traffic lights at this junction, as evident during Rampion 1.

RTA's

The section of A272 at Oakendene/Kent St experiences twice as many accidents as those at the Wineham Lane section. In the analysis, this point is not made. The A272 is assessed as a whole and the windy obscured , and more hazardous section near Oakendene is not assessed at all..

Alternatives not properly examined and mainly on desk top studies.

### Poor Due Diligence:

There was an underlying assumption that Wineham Lane would be used as the substation site up until mid July 2022. No traffic concerns were raised because Rampion 1 did not experience traffic issues. However the two locations are quite different, both in terms of traffic, ecology and soil composition.

APP 228 Outline Construction Man Plan – 0048666001-01 Ref 7.6 (Rev B). Demonstrates p11-16 that only in the third ETG meeting on 25.11.22, was " was also noted that the Oakendene substation site has now been selected by RED" – but no discussions or further comments were made about it.

There are over 24 inaccurate or misleading statements and incomplete/contradictory data made in the Traffic Sections, giving the impression that a full analysis has been completed.

However the following is missing or incomplete for the Oakendene/Kent St and Wineham Lane options:

There is no traffic modelling and it has not been updated (as aluded to)

No up to date construction management plan,

No detailed traffic calculations have been made and disclosed,

No traffic predictions or details of private vehicles which will be accessing Oakenedene

The RTA data has not been adequately assessed or compared.

On several occasions the reader is re directed to another chapter, volume, appendix to find this information, which doesn't appear to exist. Alternatively, it is in a percentage form with no underlying data and so is meaningless, or in diagrammatic form which is confusing and unhelpful.

The residents of Cowfold were advised that no HGV's would go through Cowfold village, unless absolutely necessary, but looking at the latest documents and mapping, it appears that it would be absolutely necessary , so we would like to know how many HGV's and LGV's will go through AQMA.

We've shared these findings and concerns with WSCC, but they responded by saying that their resources were stretched as they were also working on other applications such as Gatwick and so did not have the time to review this. They suggested that we send our concerns to the Planning Inspectorate.

A few examples of misleading or incomplete information:

We were told that 8040 HGV's will access the Oakendene site. We asked how many other vehicles would use the site but were never provided with this information. However it would appear that over 459,000 vehicles will use this site (no account has been taken for the hard core needed to prepare this flood plain site), so it's an under estimation.

There is no information that provides the number of private workers cars to the Oakendene site. We have extrapolated from Rampion 1 and calculate that there will be at additional 30%, as it's a third larger. Therefore about 356,000 private vehicles over 3.5yrs

On p44- HGV's 24,326 (no account for hard core for the floodplain)

On p51-52 LGV's 78,677. (App 228 OCMP – 0048666001 Rev B)

Total number min: 459,204 vehicles

- 1 In Document A228- 0048666001-01 point 6.2.23 Rampion state that the capacity of local roads has been assessed. However this is certainly not the case for the A272 besides Oakendene, nor Kent St, nor Dragons Lane, nor Picts Lane. P41 states that the Construction generation can be found in docu 6.2.23, but the info is not there. P59 "Other locations requiring traffic management" which would be essential for Oakenendene/kent St, is not included in the list
- 2 In Doc 7.6, p24 note 5.4.4 Rampion refer to traffic modelling that has taken place and can be found in 6.4.23.2. but it has not been completed.

- 3 In Document 7.6, p44, 6.5.2 Rampion state that detailed traffic calculations have been completed and can be found in 6.4.23.2, this is not correct as a great deal of relevant information is missing.
- 4 1 App 228. P59, 8.3.3 states that "Other locations requiring traffic management" but Oakendene/Kent Street has not been included or discussed.
- 5 Wineham Lane and Kent Str have been described in identical terms and yet they are very different. Wineham lane is a 2 lane road spanning 5.5m, built in the 1960's to accommodate HGV's for National Grid. Whilst Kent St is a single track lane with width restrictors, not suitable for HGV's or this proposal according to Woods Gp analysis.

### National Planning Policy Framework

National Planning Policy Framework NPPF paragraph 11: is mentioned in docu 6.4.23 on p11 "developments should only be prevented or refused on highways grounds if there would be an unacceptable impact on highways safety, or the residential cumulative impacts on the road network would be severe". Rampion refer the reader to 6.2.23, where there is no analysis on the impact on the local community, and no detailed analysis of the RTA's in the two alternative locations, no analysis on the cumulative impact on the road network or the congestion impact on the surrounding villages, /thre is nothing on the implications or consequences of traffic control measures at Oakendene or in fact what they will be. With two visibility splays of 215m each and access to Kent St., within 0.5m will there be 3 sets of traffic lights?

NPPF Paragraph 13: "all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed". This has not been produced. There is no traffic impact report.

### Misleading or incomplete Traffic. Information

- 6 In document 6.2.23 On p37, NH has requested "updated baseline traffic modelling". Rampion discuss data collection, but no such modelling has been provided for Oakendne/Kent St. On p38, in answer to NH request Rampion confirm the need to undertake refreshed surveys (updated baseline data from Sept 21) , but these have not been undertaken. NH also ask for inform on peak weeks. Rampion say its in 6.4.23.2, but the detailed infor has not been provided.
- 7 In document 7.6 on p5 Rampion states that modelling has been completed and can be found in 6.2.23 – but it is not there.

- 8 In Doc 7.6, p24 note 5.4.4 Rampion refer to traffic modelling that has taken place and can be found in 6.4.23.2. but it has not been completed.
- 9 In Document 7.6, p44, 6.5.2 Rampion state that detailed traffic calculations have been completed and can be found in 6.4.23.2, this is not correct as a great deal of relevant information is missing.
- 10 In Doc 7.6 p9, the document refers to the “need to provide detailed information on HGV’s and air quality at Cowfold”. The response is that this information “will be provided once the application has been approved”.
- 11 In Document 7.6 p16, point 2.4.4 states “ This CTMP shows that NH comments have been addressed”. This is a misleading statement because it only refers to new accesses and not the other points raised by NH.
- 12 In document 6.2.23 Chap 23 on p37 NH has requested an updated construction management plan”. Rampion refer to reader to 23.2 Traffic Generation Technical note, Vol 4, Doc ref 6.4.23.2 Ref 7.6 (dated 4.8.23). However there is no construction management plan for Oakendene/Kent st.
- 13 App228 Outline Constr Manag plan p 39, 5.4.4 c-201 The Construction management plans have not been completed, but “will be developed in consultation with WSCC or stages of the works”.
- 14 App 228 – p41 states that the construction generation can be found in document 6.2.23, but it is not there.
- 15 P41 point 6 “WSCC identified no need for detailed junction assessment or the provision of a Transport assessment for the DCO application”. This was based on traffic predictions in document 6.2.23, which did not include Oakenene. Therefore this should be assessed.
- 16 P42- states that traffic predictions can be found in document 6.2.23, but it is not found for Oakendene
- 17 No traffic surveys completed for Oakendene/Kent St
- 18 Info given on p40 Table 5-1 about Route 3 is different from the information given on p41 about the routes. This is leading to inaccuracies and confusion.
- 19 There is no information that provides the number of private workers cars to the Oakendene site. We have extrapolated from Rampion 1 and calculate that there will be about 356,000 private vehicles over 3.5yrs  
On p44- HGV’s 24,326 (no account for hard core for the floodplain)  
On p51-52 LGV’s 78,677  
Total number min: 459,204 vehicles
- 20 App 228. P59, 8.3.3 Other locations requiring traffic management- Oakendene/Kent Street has not been included or discussed.
- 21 APP 107 part 1 of 4 004884769-01 6.3.23. On p9 maps showing that HGV’s will go through the centre of Cowfold- AQMA area
- 22 APP 109 part 3 of 4, 004884769-01. 6.3.23, very confusing peak weeks table which doesn’t include Kent St and seems meaningless. However there appears to be an additional 459,000 vehicles making the journey to Oakendene over 3.5rs.
- 23 APP 110 part 4 of 4, 004884769-01 , 6.3.23, p11 this table should give peak weeks, but the diagram is confusing and difficult to interpret. Can this information be provided in tabular form? So that we know how many



vehicles during peak weeks, and how many peak weeks? And the category of vehicles.

- 24 Wineham Lane and Kent Str have been described in identical terms and yet they are very different
- 25 NH asked for info on “peak weeks” Rampion refer the reader to Appendix 23.2 Traffic Generation Technical note vol 4, 6.4.23.2- This information has not been found. In Doc 7.6 p19 the reader is referred to 6.2.23 to find the peak weeks, which cannot be found.
- 26 In doc 6.2.23 p 39- there was a question of “movements of personnel on internal trips”. Rampion refer the reader to Appendix 23.2 and to 6.4.23.2 The Table on p55 doesn’t reveal the number of workers arriving in their private cars. It only states peak weeks, but doesn’t disclose when those peak weeks will occur or how many of them there will be.
- 27 In Doc 7.6 p45, table 6-1 there is a table full of meaningless percentages, which doesn’t answer any questions because the underlying data has not be disclose.
- 28 On p40 NH have asked for more detail on the traffic flow diagrams, morning and evening network peaks , and the identified construction traffic peaks. Rampion refer to Figure 23.19, Volume 3 of the ES Document 6.2.23, which cannot be found.
- 29 P51 HDC requested “construction traffic trip generation data should be further updated in detail in the ES and associated traffic flows’>. Rampions anser : info on traffic has been provided in Appendix 23.2 Traffic Generation Technical Note 4, of the ES document 6.4.23.2. However, this infor is not there. There is nothing to cover the proposed change of route for Kent st or Dragons lane. Further more there is no impact analysis for traffic being diverted on to the surrounding single track lanes.
- 30 In Document A228- 0048666001-01 point 6.2.23 Rampion state that the capacity of local roads has been assessed. However this is certainly not the case for the A272 besides Oakendene, nor Kent st, nor Dragons Lane, nor Picts Lane. P41 states that the Constrcution generation can be found in docu 6.2.23, but the info is not there. P59 “Other locations requiring traffic management” which would be essential for Oakenendene/kent St, is not included.

RTA                    The RTA data is taken for the entire A272 from A23 to Cowfold, however the section by Oakendene has twice as many RTA’s as on Wineham Lane. Research would suggest that there is more likelihood of accidents as drivers get frustrated with sitting in queues.

## 2 ECONOMIC IMPACT Not assessed

Rampion mention two footpaths being closed. Nothing else is assessed.

In actual fact, there are over 70 active businesses on the Oakendene site, with a further 60 in Cowfold which will all be negatively affected by the traffic disruption and congestion. This compares to five at Wineham Lane. The main issues are that deliveries will be delayed, orders will be delayed, which will hit productivity and efficiency, customers may be put off from sitting in queues to reach these businesses. The local hospitality businesses are worried about staff retention and attracting staff who will then have to sit in queues to get to and from work, the local driving school fears for its survival if they have to sit in queues six times a day to get their students to Burgess Hill. For the 18,000 drivers who use this section of the A272 it is estimated to cost them £20m pa in lost productivity, also additional fuel costs for sitting in standing traffic. There is a further knock on effect for those drivers who will divert down Picts Lane and Bulls Lane. These lanes are single track lanes used by local residents, cyclists, horse riders and dog walkers. There are an estimated 70-100 cars each day. However on days where there are temporary traffic lights or an accident on the A272 this number rises to over 800 cars (as evidenced in October 2022). This volume of traffic causes chaos and will prevent the farms and shoots from operating on Picts Lane and surrounding areas.

The situation is somewhat different at Wineham Lane, as traffic doesn't back up to this junction and so there will be no need for traffic lights or any traffic management measures as demonstrated during the construction of Rampion 1.

## 3 FLOODING

1 In document 6.4.26.2, minutes of 1.4.22 show HDC were not included in any discussions regarding Oakendene, because it had not been considered at that time.

2 During a meeting on 22.6.22 where HDC were included for the first time.

During the meeting on 22.6.22 between WSCC, HDC, MSCC and Woods Gp, the following statement was made by MB (from HDC)

"MB advised that as long as the substation was positioned outside the 0.1% AEP surface water flood extent, he would not be concerned. MB advised that HDC records of historical flooding indicated that no flood incidents at Bolney Rd or Kent St had been recorded."

(According to neighbours, there have been a number of flood incidents for local residents and HDC is called out on a regular basis to deal with flooding issues).

Unfortunately both of these statements were incorrect.

According to EA flood mapping data, 6 properties in this post code are designated as "at high risk" and 6 at "medium risk" of surface water flooding and several have flooded over recent years. Please refer to maps on p 198 & p 199 in 6.4.26.2. Whilst Wineham Lane thankfully does not suffer such issues.

- 1 There appears to have been an underlying assumption that the substation would be located at Wineham Lane.
- 2 It was also noted that there were no flooding issues at Rampion 1 and so this shouldn't be an issue with Rampion 2  
"KM (from WSCC) noted that on Rampion 1 overall there were no flooding issues from a construction perspective that he was aware of, as temporary arrangements were dealt with by the contractor and that it didn't give West Sussex County Council major concerns."

3 In document 6.4.26.1 p62 the Cowfold stream has been "screened out", whereas it should be included in any such analysis on flooding.

4 In doc 6.4.31 on p131, item 9.1.36 there appears to have been a comparison with Wineham Lane North site and it was deemed only "marginally preferable". On p86, Rampion state that there is minimal risk of surface water flooding, which is not the case.

The above statements are inaccurate based on the following:

5 According to 6.4.26.2 Section 5.3.10 There is an area of isolated high risk 3.33%AEP. This area has only been assessed using historic aerial imagery and no soil analysis. Would it be possible to arrange a detailed site investigation during the winter months from November to April? Furthermore, Rampion state that "the underlying topography used within the RoFSW modelling pre-dates this development and does not provide an up to date overview of surface water flood risk at the site." Therefore, an up to date survey is requested.

6 According to 5.3.15 "the development have the potential to increase the overall extend of lower permeability surfaces within the proposed DCO Order Limits. These are associated with the development of permanent hardstanding at the onshore substation at Oakendene. This could lead to an increase in peak runoff rates (and volumes) and a consequence increase in flood risk for downstream receptors."

7 On p88, note 6.4.5 Loss of floodplain storage. Rampion state that "the creation of temporary raised structures in fluvial floodplain during construction works, such as raised stone haul roads and associated stockpiles of topsoil, could lead to a loss of floodplain storage and thus increase water levels elsewhere". Would this lead to flooding downstream? There were meetings held on 9.11.2020 & 22.3.22 (see 6.4.26.2, minutes in Annex A, agenda item 15 & 7) where these items were mentioned, however Oakendene was not discussed or evaluated with regard to flooding at that time or since.

8 According to 6.4.20 as shown in figure 26.2.5a-e, Annex B, "the mapping indicates that the north eastern section of the proposed DCO Order limits is traversed by a number of surface runoff pathways and minor watercourse draining into the River Arun and Cowfold stream. Regions of high risk are also mapped intersecting the construction compounds at Washington and the Oakendene substation". Please refer to the EA flood maps showing the surface water flooding at Oakendene and compare it against the negligible risk at Wineham Lane (found in document 6.4.26.2 pages 198 & 199).

9 On p 124 C-117 Rampion state "Works on areas identified as floodplain (Flood Zones 2 and 3) will be programmed to avoid the period between October and February inclusive to avoid

disturbance of waterbirds, and where possible, will be programmed to occur in late summer/ early autumn, to avoid interaction with PEIR Outline CoCP”

How likely is it that Rampion will avoid the winter months when building the substation?  
What effect will it have on the timing of the program?

10 6.4.26.2 Section 5.3.10 Rampion state “ The underlying topography used when modelling does not provide an up to date overview of surface water flood risk at this site”  
5.3.15 On Oakendene, “This could lead to increase in peak run-off and volumes as a consequence increase the flood risk for downstream receptors”  
6.4.5 p88 “loss of flood plain storage” will increase the levels elsewhere”  
6.4.20 fig 26.2 5a-e “Regions of high risk include the compound at Washington and substation at Oakendene”.

### Planning Guidelines:

1 The EN-1 planning guidelines encourage developers to avoid essential infrastructure from being built on vulnerable land, such as floodplains, just in case they suffer outages or loss of power due to frequent flooding. Such outages would affect wide areas of the South East, during the worst weather conditions. Why has Rampion chosen such a vulnerable site, when a perfectly good alternative site is available at Wineham Lane North?

2 According to 6.4.26.2 Chapter 26.7 Table 26-20 on p18 The NPS EN-1 have flood risk specific requirements. “Flood risk -the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere”. With this 6 HA development and deep pillings can this be confirmed?

3 Legislation and good practice

NPS EN1 Paragraph 5.7.5 identifies a minimum requirements”

NPS EN=1 paragraph 5.7.5 identifies a variety of minimum requirements for Flood Risk Assessments (FRA’s). These do not appear to have been completed for both sites. Paragraph 5.7.7 states that “Applicants for projects which may be affected by, or may add to, flood risk should arrange preapplication discussions with the EA, and, where relevant, other bodies such as Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRAs, and identify the information that will be required by the IPC (I [now the Planning Inspectorate] to reach a decision on the application when it is submitted.”

4 According to 6.2.26 Table 2-1 on p26

Legislation Relevance to protection of groundwater Overarching National Policy Statement (NPS) for Energy EN-1 Department of Energy and Climate Change (DECC) (2011) EN-1 states that “Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES or equivalent”.

No such studies appear to have been completed for the Oakendene or Wineham Lane sites. If they have been completed and comparisons made, please may we see copies of the results.

5 On p38 WSCC have stated “WSCC welcomes the embedded environmental measure C-75, which states that construction and permanent development in identified floodplains within the Scoping Boundary will be avoided where possible. WSCC expects any work where this cannot be avoided to be robustly justified through the site selection process, and any mitigation proposed to be compliant with all relevant policies, including the NPPF.” Rampion could avoid the flood plain, but using the Wineham Lane site.

6 The Exception Test, 2.2.14 NPS EN-1 (DESNZ 2023a). The test provides a method of allowing necessary developments to go ahead in situations where suitable sites at lower risk of flooding are not available” . However the alternative site at Wineham Lane North has no such flood risk and is available. Please refer to attached EA flood risk maps.

7 P13. NPS EN-5 restates the requirements of NPS EN-1 that due consideration and assessment is given to the effects of future climate change on flood risk to electricity transmission infrastructure (Section 2.4).

8 Paragraph 2.4.1 requires that “Applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it would be resilient to: flooding, particularly The FRA presented in Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2) has addressed the issue of climate change and flood vulnerability resilience.

9 Page 13 Policy description Relevance to assessment for substations that are vital for the electricity transmission and distribution network; effects of wind and storms on overhead lines; higher average temperatures leading to increased transmission losses; and earth movement or subsidence caused by flooding or drought (for underground cables).” on p17, Policy 38 HDC, 2015): Flooding Development sets out measures that proposals will follow with respect to flood risk management.

Rampion response:

The policy states that priority will be given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. This Statement from Rampion seems to contradict the decision for choosing Oakenene.

Information/Analysis required:

- 1 Full traffic surveys for Oakendene, Kent street, Picts Lane, Wineham Lane and Cowfold village
- 2 Traffic modelling for the above locations with assumptions made
- 3 Traffic management plan- traffic lights etc – how many? Where? and for how long? For both sites
- 4 Traffic Impact Assessment for both sites and affect on nearby villages?
- 5 Traffic predictions and delays envisaged?
- 6 Detailed analysis of RTA along the sections of Oakenene/Kent St in comparison to Wineham Lane
- 7 Details of “waiting area” for the HGV’s

- 8 Full details of the number of HGV's, LGV and private vehicles, and assume that the ground will need hard core to take account of the flood plaine
- 9 The number of peak weeks and what is the distribution of vehicles at that time?
- 10 Numbers of HGV's LGV, private vehicles – including more additional hard core for flood-plain.

#### Flooding

- 1 Soil analysis, hydrological, geotechnical, ground water, topographic surveys.
- 2 Detailed analysis of surrounding properties high risk of surface water flooding and the impact of the proposed development at both sites
- 3 Impact on increased surface water flooding on downstream communities
- 4 Pollution risk
- 5 Consequential risk of pilings, how deep? And their effect downstream
- 6 Impact of heave as trees and hedges are removed?
- 7 Consequences of construction locally and downstream.

#### Economic

1 Macro economic modelling consequences. Affects on local businesses, communities and residents businesses'. Bolney (5 businesses) and Cowfold (130 businesses). Also impact of traffic control measures and extended queuing and diversions impact on surrounding local villages and over 18000 commuters who use the A272 on a daily basis.

#### Surveys and analysis for:

- 1 Construction noise
- 2 Vibration impacts on wildlife and ecology