

Cowfold Rampion Responses to Local Impact Reports Deadline 2

Comments on the LIRs do not represent the entirety of our support or objection for the LIRs; instead, specific points have been chosen for comment.

Comments on REP1-044 Horsham District Council Local Impact Reports:

4.7: *“Transport access and ease of movement is a key factor in the performance of the local economy, enabling residents to travel to their place of work, and allows the movement of goods and services. Cowfold Road (A272) is a key local distributor, taking traffic east west across the district and linking several other strategic road networks (A23 to the east and the A24 to the west) with quieter, rural lanes.”* This highlights the key importance of the need for traffic not to be disrupted on the A272

8.16-17: we share HDC’s concerns about the standing traffic on the A272 at Cowfold in peak periods of the day, and the fact that community concerns should be regarded, not dismissed

9.7: We welcome HDC’s clarification of its position on whether the Rampion ecology surveys are sufficient at Oakendene and the cable route, and thank them for and share their concerns of the limitations raised in 9.8 onwards.

9.17: We would like to reiterate their concern that at Oakendene, during operation, *“adverse noise impacts on these [many sensitive] species’ behaviours may affect the viability of the mitigation proposals”*

9.28: We endorse HDC comments about the swale and root protection zone. The applicant must show that this can be also compliant with the degree of flooding shown to be at the substation site.

9.30: Wilder Horsham. The imperative must surely be to protect an *already wild* and highly species rich habitat as in the northern cable route and Oakendene in the first place

9.33 3) The lack of ecological surveys at compounds also includes the small, highly biodiverse compound area at Crateman’s which is frequently omitted from any compound assessment.

10.22 We strongly agree with HDC’s objection to this blanket approach

10.27-28: We completely endorse these concerns and the objection to too much being left until after the conclusion of the Examination

10.33: *“there will be long-term changes to the structure of the landscape as no trees can be returned/replanted over the cable route.”* This has deeply concerning implications for the rich biodiversity and wildlife corridors at Cratemans and the Cowfold Stream area, meaning that effectively, much of it will be lost forever.

12.11 The duration of noise disturbance along the haul roads from Oakendene and the A281 will indeed be of considerable duration, as the disturbance of Kent Street is expected to last at least 38 weeks (REP1-006 and 009). This has significant implications for both residents and wildlife

13.8-11: we do not agree with HDC that the substation will ‘not cause substantial harm’ to the setting and heritage value of Oakendene Manor

Appendix B 11) *“The wide entrance to the site from the A272 and access road alone (much wider than the nearby Oakendene Industrial Estate) would introduce a high magnitude of change and*

would give rise to significant residual effects” The Cowfold community strongly supports this view and believes the impact of the substation are significantly downplayed by the applicant

We also completely support the views about Kent Street expressed in 12) and 13) and the request in 20) to include DC/24/0054 in assessments of LVIA and ES

21) We completely agree with this and feel it is an approach used throughout the DCO documents and calls into question the robustness of the whole submission, not just the LVIA

24-27): We wholeheartedly endorse the excellent points made in these sections about the urbanisation of Kent Street and the dramatic impact on its character. With regards to the need for both A59 and A60 however, it should be pointed out that A60 is actually Moatfield/Kings Lane and we are already concerned about the destruction of hedges on either side of this for the haul road, as they are of high quality, full of orchids and other species.

REP1-045 Horsham DC Written Representation:

3.1) CowfoldvRampion endorses Horsham DC’s concerns but would like to add that the sites chosen for meadowland survey also do not reflect the most valuable meadowlands. The newt ponds and survey dates are already available; they show a high proportion of ponds in this area were either not surveyed as they were ‘inaccessible’, or were surveyed outside prime months, or DNA was degraded.

REP1-054 WSCC LIR:

9.33-34: We agree with the views that the RVAA underestimates the impacts and that the results are not consistent with the findings identified

We endorse the concerns expressed in 9.51-59 and the comments made about the poor reinstatement of Rampion 1 and the likely overestimation therefore of the success of compensatory measures.

9.67: we share WSCC concerns regarding the impact on Oakendene Manor

10.4: we share WSCC concerns that that construction noise impacts may have been underestimated.

10.6: the impact of even low increases of noise would be very noticeable in this highly rural area

11.2: Vague and ambiguous wording is too great a feature in the whole DCO submission

11.6: we do not agree that woodland will be the only habitat which would not be reinstated within the cable easement. Huge areas of scrub and ancient hedges will be lost from the cable route and haul road from the A281 to Oakendene. This will be particularly severe due to the pattern of small fields across this area and the green lane. The hedges will not be reinstated as they do not allow planting over the cable and also will need to maintain operational access along the cable corridor. It is also inappropriate to aim to replant scrub adjacent to the noise and vibration from the substation as this is not a suitable nesting site for nightingales.

It should be noted that over half of the 1440m of the total hedgerow loss actually occurs in the small area between A281 and Oakendene, resulting in an irremediable destruction of habitat

12.30: we strongly agree with WSCC that the significant tree loss at Oakendene, and indeed hedge loss, do not appear to have been taken into account during the ecological comparison of the two sites

12.31: we share concerns that the need for routine maintenance will limit the size of trees close to the substation and therefore reduce their screening potential

13..2: There is little public transport here and the workers will be heavily reliant on private cars

13.7: Road safety considerations should also include any work pre-construction to create the access to the substation site and to re-route the UKPN underground cable.

15,3: We agree with WSCC that the substation will cause substantial harm to Oakendene Manor and that insufficient consideration has been afforded to the historic environment in consideration of substation location alternatives.

P218, from OCTMP APP 228, 4.9.1, Table 4-4. We completely agree with WSCC concerns that the HGV definition should be altered to include vehicles over 3.5 tons or more. We have been asking [REDACTED] to amend this since the DCO was first submitted. **Have HGV figures been based on 7.5T and does this mean that HGV numbers have been grossly underestimated?**

P223 Appendix B, Figure 7.6.4d, A62, A63 and Kent Street: We agree with these concerns. In addition, the proximity of these three points is of further concern. It should also be noted that the compounds will also serve as huge car parks for large numbers of passenger vehicles who will be crossing the A272 to enter them at peak times. Rampion are currently also expecting HGVs to be arriving at peak times as they talk about unloading occurring during the shoulder hours. Kent Street has soft unstable verges with deep ditches and is unsuitable for passing places.

It is not acceptable to allow traffic management to be left until the end of the examination