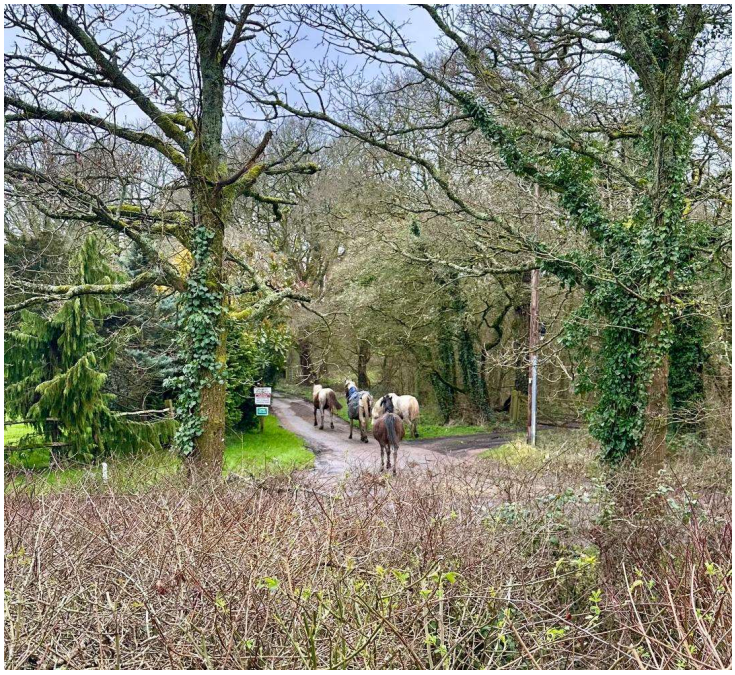
Meera Smethurst response to Written Representations and Local Impact Reports, Deadline 2

Kent Street:

The photograph below shows a group of horses turning off Kent Street onto a side lane. This demonstrates Kent Street's total unsuitability for any construction traffic. Most of the current traffic



is pedestrians, dogs and horses. How will Rampion manage them?

What is the weight bearing capacity of Kent Street and the culvert under the road before A-61? Has there been any assessment of whether the road can actually take this traffic? Without prejudice, the road must be repaired as necessary rather than at the end, but this will cause major disruption to both residents and site traffic as it will need to be done frequently in all probability. The northern end of Wineham Lane was strengthened and widened in the 1960s to take the main substation construction traffic. Description of Kent Street in the same terms as the A272 and A281 as a 'highway' may have led them to overlook this?

Also said without prejudice,

- if the proposals are consented, the commitment that no construction traffic will go further south along Kent Street than is agreed to access A-61, must be embedded in the final DCO.

- for Kent Street, has the possibility of using A-66/7 for the main construction access to the haul road between Kent Street and Wineham Lane been looked at, and downgrading the access at A-64 to 'light construction'? If not, what might the constraints be? This would reduce the traffic on Kent Street and move it to the much more suitable Wineham Lane.

Traffic modelling:

Regarding vehicle numbers for highways links and Kent Street, on what basis are the figures given? Given how little is yet set in concrete, and how much they are intending to fix only after the DCO is granted (if it is), what confidence can we have that these are accurate figures and not just fag packet guestimates bearing little relation to reality and which will be radically altered after the project is approved?

In any case the peak week scenarios don't necessarily show the worst week for a particular receptor, but appear to look at the impact across the section for one particular peak week.

Please can Rampion justify their conclusion that a holding bay will not be needed to control traffic flow, when it proved so important for the much smaller Rampion 1, especially given the significant increase in traffic numbers along the A272 in the years since Rampion 1.

Cowfold Parish Council have recently said that they are concerned because "WSCC's Road Traffic Monitor on the Bolney Road has identified **an increase in traffic levels passing through Cowfold of 6.5% in 2023 and a further 5.9% in the first two months of 2024** thus saturation capacity is already rapidly approaching."

The daily reality of the traffic on the A272, with which all residents of Cowfold live tells them that the proposed numbers of extra vehicles coming into the village will cause congestion and chaos on the road. And when even more are turning in and out of the two compounds and side Kent Street, all so close together and close to the congestion point, they *know* the chaos will be even worse and *there will be accidents.*

Yet Rampion's traffic modelling 'proves' this will not be the case! This is because it looks only at traffic numbers in the context of freely flowing traffic and does not consider the mini-roundabouts, which cause congestion and affect the capacity of the road. We all know the phrase 'garbage in, garbage out'. No matter how slickly presented or how scientific-looking a study is, no matter how well thought out the method or sound the calculations are, if there are errors in the fundamental premises underlying the study, the conclusions it draws will be **wrong.**

This flawed but convenient conclusion enables them to go on to 'prove' there will be no significant impact on air pollution and noise and allows them to totally ignore the possibility that there will be any effect on local businesses and the wider economy.

Rampion's conclusions on this are in keeping with their assessments of all impacts, as 'negligible'. This cannot be realistic across a project of this scale and leads one to question the premises on which other findings are based and whether the underlying assumptions are manipulated to provide results to suit the preferred options.

Ecology:

As HDC have also mentioned, I am very concerned that the noise and vibration at Oakendene from the substation operation will undo mitigations for nightingales and the other noise and vibration sensitive species. As HDC say:

Furthermore, with proposed mitigation, the difference in noise compared to background levels during the operational phase at the Oakendene substation at night-time (23:00 – 07:00) are +4 dB at two receptor sites, and +5 dB at one receptor site (Table 21-39. Chapter 21 APP-062). Given that the habitat creation on-site is proposed mitigation for hazel dormouse, commuting/foraging bats, and breeding birds, noise impacts on these species within the vicinity of the on-site habitats should be

considered. Bat and dormice foraging hours and the dawn chorus during the spring and summer months, with male nightingales singing during day and night from April to early June to defend their territories, overlap with the increase in noise during night-time hours. Therefore, any adverse noise impacts on these species' behaviours may affect the viability of the mitigation proposals and further measures may be required.

The assumption that planting a few bits of scrub around the substation can compensate is nonsense. Why should they want to use these plantings? The creatures chose to be where they *currently* are at Cratemans and the Cowfold Stream area, precisely **because it is quiet and away from traffic and noise.**

Every time that something significant is brought up, such as

- the destruction of nightingale habitats
- the destruction of hedgerows at Oakendene and whether it was considered in the comparison with Wineham Lane North,
- the noise and RVAA of properties along the cable route and at Oakendene being underplayed
- the damage to the SDNP

and so on, their fall-back argument is that it is "negligible when considered in the National Interest".

However, this argument will only be relevant for a maximum of around 5 years, **not** the lifetime of the substation and wind farm. This is because the ESO Beyond 2030 plans are to deliver a network, focussing largely off shore around the north and north east coasts of the country using windfarms *already under way.* This is thought to be more than enough to meet our needs, with far less habitat destruction and damage to communities. **How, therefore, can so much ecological devastation by Rampion, (marine and on shore), to the SDNP, to communities and the local economy be justified for just 5 years? Certainly not 'in the national interest'.**