

Rampion 2 Wind Farm Category 8: Examination Documents Applicant's Response to Parish Councils and MP's Written Representations

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Executive Summary

At Deadline 1 of the Examination for Rampion 2 Offshore Wind Farm Project, Interested Parties were invited to submit Written Representations and Post-hearing submissions following Issue Specific Hearing 1 (held 07 to 08 February 2024) into the examination. A total of five Written Representations were received from Parish Councils, and a Post-hearing submission from a Member of Parliament.

Rampion Extension Development Limited (the 'Applicant') has taken the opportunity to review each of the Written Representations and the Post-hearing submission received from Parish Councils and the Member of Parliament, this document provides the Applicant's responses and has been submitted for Examination Deadline 2.

1. Introduction

1.1 Project Overview

- 1.1.1 Rampion Extension Development Limited (hereafter referred to as 'RED') (the 'Applicant') is developing the Rampion 2 Offshore Wind Farm Project ('Rampion 2') located adjacent to the existing Rampion Offshore Wind Farm Project ('Rampion 1') in the English Channel.
- 1.1.2 Rampion 2 will be located between 13km and 26km from the Sussex Coast in the English Channel and the offshore array area will occupy an area of approximately 160km². A detailed description of the Proposed Development is set out in **Chapter 4: The Proposed Development, Volume 2** of the Environmental Statement (ES) [APP-045], submitted with the Development Consent Order (DCO) Application.

1.2 Purpose of this document

- 1.2.1 Interested Parties were invited to submit Local Impact Reports, Written Representations, and Post-hearing submissions at Deadline 1 (28 February 2024) following Issue Specific Hearing 1 (held 07 to 08 February 2024) to provide further information and to expand on views provided in Relevant Representations previously submitted in accordance with the Examination timetable in the Rule 8 letter [PD-007]. Please see below for a summary of the submissions received at Deadline 2, as categorised by the Planning Inspectorate:
- 6 submissions from Local Planning Authorities;
 - 5 submissions from parish and towns councils and Members of Parliament;
 - 6 representations from prescribed consultees;
 - 28 representations from and on behalf of Affected Parties;
 - 44 representations from members of the public or businesses; and
 - 8 representations from non-prescribed organisations.
- 1.2.2 The Applicant has taken the opportunity to review each of the Local Impact Reports, Written Representations, and Post-hearing submissions received. This document provides the Applicant's responses to Parish Councils and the Member of Parliament and has been submitted for Examination Deadline 2.

1.3 Structure of the Applicant's Responses

- 1.3.1 For ease of referencing and to facilitate future cross-referencing, the Applicant has included references for the Applicant's responses to the Local Impact Reports, Written Representations, and Post-hearing submissions received from other Interested Parties, as follows:
- Local Authorities (including both host and neighbouring authorities):

- ▶ Arun District Council (**Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.44)**);
 - ▶ Brighton and Hove City Council (**Applicant's Responses to Brighton and Hove City Council Deadline 1 Submissions (Document Reference: 8.48)**);
 - ▶ Horsham District Council (**Applicant's Responses to Horsham District Council Deadline 1 Submissions (Document Reference: 8.45)**);
 - ▶ Mid Sussex District Council (**Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.46)**);
 - ▶ South Downs National Park Authority (**Applicant's Responses to South Downs National Park Authority Deadline 1 Submissions (Document Reference: 8.47)**); and
 - ▶ West Sussex County Council (**Applicant's Responses to West Sussex County Council Deadline 1 Submissions (Document Reference: 8.43)**).
- Parish Councils and Members of Parliament (this document: **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)**);
 - Prescribed Consultees (as set out in Schedule 1 of the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2010, noting that Parish Councils are also Prescribed Consultees) (**Applicant's Responses to Prescribed Consultee's Written Representations (Document Reference: 8.49)**);
 - Affected Parties (Category 1, 2, and 3 Land Interests as identified in the **Book of Reference [PEPD-014]**) (**Applicant's Responses to Affected Parties' Written Representations (Document Reference: 8.51)**);
 - Members of the Public and Businesses (**Applicant's Responses to Members of the Public and Businesses' Written Representations (Document Reference: 8.52)**); and
 - Non-Prescribed Consultees (**Applicant's Responses to Non-Prescribed Consultee's Written Representations (Document Reference: 8.53)**).

1.3.2 Each section below includes responses to the submissions received from Parish Councils and the Member of Parliament. Each response is identified in the relevant table:

- Andrew Griffith MP: **Table 2-1**;
- Ashurst Parish Council: **Table 2-2**;
- Bolney Parish Council: **Table 2-3**;
- Clymping Parish Council: **Table 2-4**; and
- Cowfold Parish Council: **Table 2-5**.

2. Applicant's Response to Parish Councils and Members of Parliament

Table 2-1 Applicant's Response to Andrew Griffith's post-hearing submission response [REP1-067]

| Ref | Post-Hearing Submission Comment | Applicant's Response |
|-------|---|---|
| 2.1.1 | <p>As requested by in the Open Floor Hearing this week asking for evidence to my reference about the visible scarification of the South Downs from Rampion 1, please refer to Page 8 of the Written Representation made by South Downs National Park Authority. Page 8 includes images as evidence of scarification from Rampion 1, and Appendix B provides further details. Further to this, Shermanbury Parish Council have also made written representation to you which references how Rampion 1 construction has left severely damaged road surfaces and verges. I hope this is sufficient information and prompts a site visit as part of this examination process.</p> | <p>With respect to visible scarification from Rampion 1 the Applicant has provided a response to South Downs National Park Authority Written Representation, please refer to the Applicant's response to Cowfold Parish Council in Applicant's Responses to South Downs National Park Authority Deadline 1 Submissions (Document Reference: 8.47).</p> <p>The Applicant cannot comment on the reinstatement of land following the Rampion 1 works as this is not a matter for this DCO Application.</p> <p>The methodologies that will be used for the Proposed Development to ensure construction (including restoration) is undertaken in a sensitive and appropriate way can be found in the Outline Construction Method Statement [APP-255], the Outline Code of Construction Practice [PEPD-033], and the Outline Landscape and Ecology Management Plan (LEMP) [APP232]. These documents are secured under Requirements 12, 22 and 23 respectively of the Draft Development Consent Order [PEPD-009] which has been updated at Deadline 2.</p> |

Table 2-2 Applicant's Response to Ashurst Parish Council's Written Representation [REP1-072]

| Ref | Written Representation Comment | Applicant's Response |
|-----|---|--|
| 1.1 | Major land owners and farmers in Ashurst Parish feel aggrieved that their views have not been properly taken into account by RWE in planning the route for the Rampion 2 proposed onshore cable corridor. As a result the majority are left with no choice but to object to the scheme as it's currently planned. | <p>As the Parish Council has not identified on whose behalf the Written Representation is made, the Applicant cannot comment on any points relating to impacts on particular land holdings. The Applicant has agreed key terms with a Land Interest in this area and is in detailed discussions with other Land Interests where they have indicated a willingness in principle to enter into voluntary agreements.</p> <p>The project has been subject of multiple rounds of iterative consultation with local people and environmental authorities (through statutory and non-statutory consultation as detailed in Section 5.9 of Chapter 5: Approach to the EIA, Volume 2 of the ES [APP-046]). This process, and evidence of regard had to consultation responses, is set out in the Consultation Report [APP-027].</p> <p>During each consultation, the Applicant's consultation materials included a combination of both simplified plans to enable consultees to review draft proposals in relation to their geographical area of interest, while also providing more technical and detailed Onshore Work Plans [PEPD-005].</p> |
| 1.2 | Land owners and farmers in the village believe that RWE is making minimal effort to listen to sensible and well thought out suggestions for alternative routes for the corridor, presumably in anticipation of being granted the necessary compulsory powers which will allow the company to dictate terms. | <p>As the Parish Council has not identified those Land Interests this Written Representation relates to the Applicant cannot comment on these points or on alternative routes. The onshore cable route alternatives considered by the Applicant have been described in the Chapter 3: Alternatives of the Environmental Statement (ES) [APP-044]. As detailed in Table 3-7 of the Chapter 3: Alternatives [APP-044], a number of onshore cable route options were considered by the Applicant following first Statutory Consultation exercise and feedback from landowners and wider stakeholders, such as the Ashurst Parish Council.</p> <p>Alternatives relevant to the Ashurst area include Alternative Cable Route (ACR) ACR-06, which was introduced at second Statutory Consultation exercise (RED, 2022) and was located south of Ashurst, to avoid impacts on a private nature conservation scheme and engineering constraints. No new or different significant residual effects were identified which alter the assessment outcomes and conclusions from the first Statutory Consultation exercise presented in the PEIR (RED, 2021). ACR-06 and associated trenchless crossings were preferred over the PEIR Assessment Boundary (RED, 2021) and are included in the proposed DCO Order Limits.</p> <p>ACR-07 was introduced at second Statutory Consultation exercise (RED, 2022) and was located east of Bines Green to avoid new infrastructure with planning permission and in response to further engineering considerations. No new or different significant residual effects were identified which alter the assessment outcomes and conclusions presented in the PEIR (RED, 2021). ACR-07 and associated trenchless crossings were preferred over the PEIR Assessment Boundary (RED, 2021) and are included in the proposed DCO Order Limits.</p> <p>Modified Route (MR) MR-09 was also introduced at second Statutory Consultation exercise (RED, 2022) and located approximately 150m east of Ashurst. The area was added to extend the original PEIR Assessment Boundary to the west to minimise the severance of agricultural fields. Following this consultation exercise, MR-09 was accepted and included in the proposed DCO Order Limits.</p> |
| 1.3 | The proposed route does not fully take into account the environmental impact along the cable route to the south of the B2135 and further north close to the Adur River Restoration project, | <p>The Applicant has undertaken an Environmental Impact Assessment (EIA) of the Proposed Development which assesses the likely significant effects of the Proposed Development. Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] to Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] of the Environmental Statement (ES) reports the findings of the assessment of effects for</p> |

| Ref | Written Representation Comment | Applicant's Response |
|-----|---|---|
| | | <p>the onshore element of the Proposed Development which include the onshore cable route. At Deadline 3 the Outline Code of Construction Practice [PEPD-033] and Outline Landscape and Ecological Management Plan [APP-232] will be updated with regards habitat loss. This will include a review of what is proposed in the area south of the B2135. The Arun River Restoration Project area within this area is crossed by trenchless crossing method and therefore, no direct effects on the river or its flood plain habitats is expected.</p> |
| 1.4 | <p>Also, it does not allow farmers to have full access for livestock movements, milk collection, the transporting of feed and forage, veterinary emergencies and staff access. The restriction on movement will have a detrimental effect on their businesses and finances. They also need reassurance that farm tracks damaged by the project construction will be fully repaired on completion.</p> | <p>The Written Representation states that the Proposed Development will not allow farmers to have access for various farming activities and therefore have a resulting detrimental effect on their businesses and finances. As the Parish Council has not identified those Land Interests this Written Representation relates to the Applicant cannot comment on these points in detail, however in principle where the cable route dissects fields, the Applicant will seek to agree crossing points with Land Interests to facilitate ongoing farm activities wherever possible. Voluntary land agreements provide for a record of condition to be taken prior to the start of construction and any damage resulting from the Proposed Development will be made good where reasonably necessary.</p> |
| 1.5 | <p>Overall, it seems that RWE has not listened sufficiently to the concerns of property owners and farmers in the village and made steps to incorporate them into their plan for the route of the cable corridor.</p> | <p>The Written Representation states that the Applicant has not listened sufficiently to the concerns of property owners and farms in the village. A number of modifications to the proposed cable route put forward by Land Interests in and around Ashurst were considered at the Second Statutory consultation in October 2022. Modification MR09 proposed extending the cable to the west to reduce the severance of agricultural fields and maximise their use during construction. Trenchless Crossing 15 was introduced to go under a farm access track and mature treeline. Such as Alternative Cable Route (ACR) ACR-06 to avoid impacts on a private nature conversation scheme and engineering constraints and ACR-07 avoided new farming infrastructure under construction. The alternatives and refinements considered between Scoping and Statutory Consultation are summarised in Table 3-7 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044] and the alternatives and refinements considered following the Statutory Consultation exercises are summarised in Table 3-8 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044]. These changes were incorporated into the final cable route and therefore the Applicant does not accept that it has not listened sufficiently to the concerns raised.</p> |

Table 2-3 Applicant's Response to Bolney Parish Council's Written Representation [REP1-074]

| Ref | Written Representation Comment | Applicant's Response |
|---|---|--|
| APP – 224 Outline Code of Construction Practice (Document Reference 7.2) | | |
| 1.1 | Bolney Parish Council objects to the applicant's proposed core working hours in paragraph 4.4.1: <ul style="list-style-type: none"> • 07.00 to 19.00 hours Monday to Friday; and • 08.00 to 13.00 hours on Saturday. | Working hours are stated in Section 4 of Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045] and are outlined in Section 4.4 of the Outline Code of Construction Practice [PEPD-033] . Following receipt of Relevant Representations and information shared at Issue Specific Hearing 1, commitment C-22 within the Commitments Register [REP1-015] has been updated at the Deadline 1 submission to the following: |
| 1.2 | In the Rampion 1 project, the planning permission to extend the Bolney National Grid substation to accommodate Rampion 1 was granted by Mid Sussex District Council (MSDC) on 22nd August 2013 with reference 13/02342/FUL. The hours granted for construction including the use of plant and machinery were limited to: <ul style="list-style-type: none"> • 08.00 to 18.00 hours Monday to Friday; and • 09.00 to 13.00 hours on Saturday. The reason given by MSDC for the construction hours was 'to safeguard the amenities of nearby residents and to accord with Policy B3 of the Mid Sussex Local Plan'. | <i>'Core working hours for construction of the onshore components will be 08:00 to 18:00 Monday to Friday, and 08:00 to 13:00 on Saturdays, apart from specific circumstances that are set out in the Outline COCP, where extended and continuous periods of construction are required.</i> <i>Prior to and following the core working hours Monday to Friday, a 'shoulder hour' for mobilisation and shut down will be applied (07:00 to 08:00 and 18:00 to 19:00). The activities permitted during the shoulder hours include staff arrivals and departures, briefings and toolbox talks, deliveries to site and unloading, and activities including site and safety inspections and plant maintenance. Such activities shall not include use of heavy plant or activity resulting in impacts, ground breaking or earthworks.'</i> |
| 1.3 | In its Principal Area of Disagreement Summary Statement submitted in this Examination on 9 th November 2023, MSDC expressed its concern about the applicant's proposed core working hours and 'the impact on the residential amenity of neighbouring residents who live close to the construction areas' and suggested the hours be amended 'to more closely reflect the working hours applied to all development by MSDC'. | This has been updated in the Outline Construction Traffic Management Plan [REP1-010] secured via Requirement 24 within the Draft Development Consent Order [PEPD-009] and will be updated in the Outline Code of Construction Practice [PEPD-033] secured via Requirement 22 within the Draft Development Consent Order [PEPD-009] for the next submission of this document. |
| 1.4 | Bolney Parish Council would ask that the consented hours for all construction and related works in Works No. 13, 17, 19 and 20 all within the District of Mid Sussex therefore be limited to: <ul style="list-style-type: none"> • 08.00 to 18.00 hours Monday to Friday; and • 09.00 to 13.00 hours on Saturday. | As outlined in the Outline Code of Construction Practice [PEPD-033] , no activity outside these hours (including Sundays, public holidays, or bank holidays) will take place apart from under the following circumstances: <ul style="list-style-type: none"> • Where continuous periods (up to 24 hours, 7 days per week) of construction work are required for horizontal directional drilling (HDD) (as HDD is a continuous activity that cannot be paused once started); • for other works requiring extended working hours such as concrete pouring which will require the relevant planning authority to be notified at least 72 hours in advance; • or the delivery of abnormal loads to the connection works, which may cause congestion on the local road network, and will require the relevant highway authority to be notified at least 72 hours in advance; • or as otherwise agreed in writing with the relevant planning authority. |
| 1.5 | If the Examining Authority is not persuaded to limit the construction hours for Works Nos. 13, 17, 19 and 20 to reflect those implemented previously by MSDC, then Bolney Parish Council would ask that the core working hours granted for these four Works Numbers should follow the precedent set in the Rampion 1 project when 'quiet' shoulder hours were incorporated into the core working hours. The shoulder hours were: <ul style="list-style-type: none"> • 07.00 to 08.00 hours and 18.00 to 19.00 hours Monday to Friday <p>During these 'shoulder hours' only quiet setting up and closing down of the construction sites was permitted and no loading or unloading of HGVs or other deliveries. The reason for the quiet hours was to protect the amenity of local residents.</p> | |
| 1.6 | Bolney Parish Council would ask that within Works Nos 13, 17, 19 and 20 the use of generators be limited to consented construction hours and that all vehicles working on or visiting a site must avoid reversing where practicable and be fitted with low noise or white noise reversing beepers for the amenity of local residents. | Section 5.4.8 of the Outline Code of Construction Practice [PEPD-033] details the best practice measures that will be implemented to manage the impact of noise generated during construction. This includes ensuring plant and machinery is turned off when not use and applies to generators. Generators will be low-noise models with manufacturers' acoustic packs and silencers fitted, and located in a position that they are screened by site buildings and/or temporary acoustic screening. |

| Ref | Written Representation Comment | Applicant's Response |
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| | | <p>Section 5.4.8 of the Outline Code of Construction Practice [PEPD-033] details the practical measures that will be implanted to manage the impact of noise generated during construction. This includes the avoidance of reversing, where practicable and the fitting of low noise reversing warnings to pertinent vehicles. Procedures and measures stated in the Outline Code of Construction Practice [PEPD-033] are secured through Requirement 22 of the Draft Development Consent Order (DCO) [PEPD-009].</p> |
| APP – 228 Outline Construction Traffic Management Plan (Document Reference 7.6) | | |
| 1.7 | <p>Bolney Parish Council objects again to the proposed core working hours for the construction work and any construction-related traffic movements to or from onshore elements of the proposed development set out in paragraph 3.6.4 as:</p> <ul style="list-style-type: none"> • 07.00 to 19.00 hours Monday to Friday; and • 08.00 to 13.00 hours on Saturday <p>Instead the Parish Council would ask that the hours be restricted as set out above.</p> | Please see the Applicant's response above in references 1.1 to 1.5 . |
| 1.8 | <p>The Parish Council would ask that Figure 7.6.8 drawn 01/08/2023 showing the Exit Points from the Transport Study Area should be amended to reflect the acknowledgement by the Rampion team at the Issue Specific Hearing that the proposed exit point off the northbound A23 carriageway will be at the junction with the A272 and not as currently shown on Figure 7.6.8.</p> | <p>The Applicant has provided an update to the Outline Construction Traffic Management Plan [REP1-010] at the Deadline 1 submission on 28 February 2024 including amendment to Figure 7.6.8 to show the strategic road network route along the A23 extending to the north. The Applicant would like to clarify that the exit point triangle as labelled on Figure 7.6.8 within the Outline Construction Traffic Management Plan [REP1-010] represents the start and end point of the Construction Traffic Management Plan Study Area. It is not showing the exit point from the A23 with traffic needing to follow the routing as outlined in Figure 7.6.6c within the Outline Construction Traffic Management Plan [REP1-010].</p> |
| 1.9 | <p>Likewise, the Parish Council would ask that Figure 7.6.9c drawn 12/01/2024 showing Routes from Compounds to Sites be amended to reflect the acknowledgement that Kent Street and Bob Lane off Wineham Lane will not be used as proposed routes for HGVs and LGVs.</p> | <p>The Applicant has provided an update to the Outline Construction Traffic Management Plan [REP1-010] at the Deadline 1 submission on 28 February 2024 including amendment to Figure 7.6.9c to reflect that Kent Street and Bob Lane off Wineham Lane will not be used as proposed routes for Heavy Goods Vehicles (HGVs) and Light Goods Vehicles (LGVs).</p> |
| 1.10 | <p>Bolney Parish Council disagrees with paragraph 6.5.6 that no routing restrictions should be applied to LGV construction staff traffic travelling to and from construction compounds and the onshore substation sites. In the Rampion 1 project, the Construction Traffic Management Plan ('CTMP') for LGVs specifically included construction workers and workers could not use the rural back roads or the prohibited routes close to the A272 and Wineham Lane (see next paragraph).</p> | <p>The Outline Construction Traffic Management Plan [REP1-010] provides details of construction traffic routes for the Proposed Development. The strategy for HGV traffic includes the use of strategic elements of the highway network (A27 and A23) as far as possible before routing onto the local highway network. Construction traffic routes that form part of the local highway network also use West Sussex County Council's prescribed Lorry Route Network wherever possible.</p> |
| 1.11 | <p>Bolney Parish Council would ask that the CTPM be amended to reflect the wording of the Rampion 1 CTMP that specifically prohibited the use of several rural roads in the Parish of Bolney by construction traffic. The Parish Council would ask that the following roads in the Parish be prohibited from use in the Rampion 2 project by any vehicle associated with or part of the construction project whether private car, construction worker, LGV or HGV:</p> <ul style="list-style-type: none"> • The Street, Bolney • London Road north of the exit roundabout from the northbound A23 • Bolney Chapel Road • Foxhole Lane • Spronketts Lane | <p>The Applicant notes Bolney Parish Councils concerns with respect to the use of 'rural back roads' in the Parish and is considering the request to update the Outline Construction Traffic Management Plan [REP1-010] wording to prohibit use of rural roads by all construction traffic (including HGVs and LGVs) as outlined in Bolney Parish Councils Written Representation.</p> |

| Ref | Written Representation Comment | Applicant's Response |
|---|---|--|
| | <p>The Parish Council is concerned that without prohibiting the use of the rural back roads in the Parish, vehicles related to the Rampion 2 project could use alternative junctions from the A23 to avoid queues of traffic at the junction of the A23 and A272 or in the event of an obstruction on the A272.</p> | |
| 1.12 | <p>The Parish Council would ask that paragraph 8.4.13 proposing that HGVs be permitted to arrive at construction sites one hour before or one hour after the agreed construction working hours be removed from the Outline Construction Management Plan. As explained at the Hearing on 7th February, Rampion made multiple applications during the construction of the Rampion 1 project to extend the consented working hours to enable work at weekends including over several Bank Holidays. For example, during 2017 weekend working took place almost every weekend between the middle of January and the end of November between 0.800 and 18.00 hours every Saturday, Sunday and Bank Holiday. During that 10 month period, Rampion also obtained permission to work further extended hours on the cable route close to the new Rampion 1 substation in Twineham from 07.00 to 21.20 hours for six weeks in May and June 2017 and for 10 days at the new substation between 0.700 and 22.00 hours also in May and June 2017. If HGVs were permitted to arrive one hour before and after these extended hours then residents living near construction sites would potentially have to put up with HGVs arriving from dawn till dusk. The Parish Council does not believe this is acceptable.</p> | <p>Please see the Applicant's response above in references 1.1 to 1.5 with respect to working hours.</p> <p>The use of shoulder hours as currently proposed obviates the need for an additional delivery hour, so this provision has been removed from the Outline Construction Traffic Management Plan [REP1-010].</p> |
| 1.13 | <p>Bolney Parish Council is concerned about uncertainty in paragraph 8.4.1 and the possible use of multiple traffic lights on the A272 for access to Kent Street for access A-64, for access A-63 to the Oakendene site and access A-62 to the construction compound adjacent the Oakendene Industrial Estate. Any temporary traffic lights on the A272 result in queues of traffic along the road which according to the last traffic count by the Department for Transport in 2022, has a daily traffic flow of 18,546. Even without the use of traffic lights, queuing traffic can sometimes back up from Cowfold to the junction with Wineham Lane in the Parish of Bolney. The resultant effect is that drivers use the unsuitable narrow rural back roads to avoid the queues which impacts on residents and local road users. This is another reason why the Parish Council would ask that the five roads in the Parish identified above are prohibited from use by any vehicle associated with the construction project in the Construction Traffic Management Plan.</p> | <p>At peak construction activity, access A-62 (Oakendene Compound) will cater for 326 HGV two-way movements and 456 LGV two-way movements across a one-week period. This is the equivalent of 156 construction traffic two-way movements per day or 12-13 per hour (approximately 6 entering and 6 exiting the compound). At peak construction activity, access A-63 (Oakendene Substation) will cater for 326 HGV two-way movements and 564 LGV two-way movements across a one-week period. This is the equivalent of 178 construction traffic two-way movements per day or 14-15 per hour (approximately 7 entering and 7 exiting the access junction). On the basis of these peak construction traffic flows is not anticipated that traffic signals will be required at access A-63.</p> <p>Whilst it is also not anticipated that traffic signals will be required at the A272 / Kent Street junction, any traffic measures will need to be agreed with West Sussex County Council as part of the detailed design stage. Should traffic signals be required (or any other form of traffic management) these will be applied in accordance with guidance and procedures contained in Section 14 of the Road Traffic Regulation Act 1984.</p> <p>The Applicant notes Bolney Parish Councils concerns with respect to the use of 'rural back roads' in the Parish and is considering the request to update the Outline Construction Traffic Management Plan [REP1-010] wording to prohibit use of rural roads as outlined in Bolney Parish Councils Written Representation.</p> |
| <p>APP – 064 Volume 2, Chapter 23: Transport (Document Reference 6.2.23)</p> | | |
| 1.14 | <p><u>Re-assessment of Highways Link 26 Wineham Lane</u> Bolney Parish Council asks that the environmental effects of transport on Highways Link 26, Wineham Lane, South of the A272 be re-assessed. Based on Table 23-41, paragraph 23.9.26 states that 'the overall significant of residual effects on Highways</p> | <p>An assessment of Wineham Lane has been completed in Chapter 23: Transport, [APP-064] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006]. This assessment has predicted that the Proposed Development will lead to an increase in total traffic of 7.3% (69 vehicles per day) and an increase of 233.8% in Heavy Goods Vehicles (HGVs) (41 HGVs per day). Whilst it is acknowledged that</p> |

| Ref | Written Representation Comment | Applicant's Response |
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| | <p>Link 26 and associated receptors' is Not Significant in EIA terms. But Table 23-41 fails to acknowledge that there are 25 residential properties and 5 Public Rights of Way which enter Wineham Lane between the A272 and the entrance to the Bolney National Grid substation and Access A- 69. Table 23-37 shows the percentage increase for Wineham Lane in the peak week of construction as being 237.8%. This cannot be 'Not Significant' for the residents and ProW users of Wineham Lane.</p> | <p>the Proposed Development will result in a large percentage increase in HGVs this should be considered against the very low baseline flow of 18 HGVs per day and peak construction traffic flow of 3-4 HGVs per hour, equivalent to one vehicle every 15-20 minutes. This peak also only lasts for approximately two weeks, after which HGV construction traffic flows will reduce to 1-2 vehicles per hour. Taking this into account in combination with the limited pedestrian demand and desire lines on Wineham Lane, the Applicant considers that the Proposed Development will not generate a significant effect. However, given the comments received from Bolney Parish Council, the Applicant will review these assessments during the Examination period and update them if appropriate.</p> |
| 1.15 | <p><u>Signalisation of the A23 northbound exit and A272 T junction</u> Bolney Parish Council would also ask that any future transport assessments on the impact of construction traffic take into account the signalisation of the junction of the northbound exit slip road from the A23 with the A272. This is part of the Northern Arc project at Burgess Hill - see the MSDC Decision Notice dated 6th October 2019 in planning application DM/18/5114.</p> | <p>The Applicant has reviewed the proposals associated with the consented planning application (DM/18/5114) and assumes the reference to signalisation of the northbound exit slip road of the A23 refers to Cowfold Road junction improvements shown on SK-0015 (Appendix M of the Transport Assessment Addendum submitted as part of the planning application). This proposal, if implemented prior to the construction phase of the Proposed Development, will provide capacity and road safety enhancements over the existing junction arrangement and therefore a worst-case assessment has already been completed as part of Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006].</p> |
| 1.16 | <p><u>Implementation of an HGV Holding Area in the CTMP</u> Bolney Parish Council asks that the applicant consider the implementation of a Holding Area for HGVs as it did for the Rampion 1 project. In the Rampion 1 project, the Holding Area was to proactively control the flow of construction traffic along the A272 and Wineham Lane. The Holding Area was sited adjacent to the northbound exit from the A23 at the junction with the A272. All HGVs were required to report to the Holding Area before continuing along the A272 towards Wineham Lane. The Holding Area was open and manned during construction hours and was large enough to allow several HGVs to be held at any one time as well as provide off-site parking for construction staff and the storage of non-valuable material. The purpose of the Holding Area was to:</p> <ul style="list-style-type: none"> • Log registration and drivers name for all HGVs • Track daily HGV numbers (which were then included in the weekly Construction Update sent to all Parish Council's impacted by the construction project) • Provide verbal briefings to drivers on the route, speed limits and prohibited routes • Hold individual HGVs in order to prevent HGVs travelling to construction sites in convoy. <p>The applicant predicts in excess of ten thousand of HGVs required for the construction of:</p> <ul style="list-style-type: none"> • the new substation at Oakendene; • The Cowfold sections of the connecting cable route from Climping to Oakendene; • the connecting cable route from Oakendene to the Bolney National Grid substation; and the extension of the National Grid substation. <p>All these HGVs will be required to use the A23/A272 exit from the northbound A23 and travel along the A272 to Accesses A-62, A-63, A-64, A-66, A67, A-68 and A-69. Bolney Parish Council would suggest that a Holding Area is imperative for the safety of other road users along the HGV route from the A23 along the A272 and Wineham Lane.</p> | <p>The Applicant understands that an HGV holding area was required for the Rampion 1 project given the need for all construction vehicles to access the substation and compound on Wineham Lane. As the Proposed Development includes the Oakendene substation and compound that can be accessed directly from the A272, (which forms part of West Sussex County Councils' (WSCC's) lorry route network) it is not considered necessary to implement an HGV holding area.</p> |

APP - 44 Environmental Statement Volume 3 Chapter 3 Alternatives (Document Reference 6.3.3)

| Ref | Written Representation Comment | Applicant's Response |
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| 1.17 | <p>If the Examining Authority is minded to re-open the decision to select the site at Oakendene for the new onshore substation instead of the alternative site at Wineham Lane North, then Bolney Parish Council would ask to be involved in any discussion or reassessment and be invited to comment again on the two alternative site options. The Wineham Lane North site lies partially within the Parish of Bolney.</p> | <p>The onshore substation site selection process considered a number of onshore substation options. Following the first Statutory Consultation exercise in 2021, the onshore substation location was confirmed as Bolney Road/Kent Street (now referred to as 'Oakendene'). Paragraphs 3.6.18 to 3.6.26 of Chapter 3 Alternatives, Volume 2 of the ES [APP-044] provides further detail regarding this onshore substation site selection process and outcomes. The Oakendene onshore substation option was taken forward and presented at the second Statutory Consultation exercise in 2022.</p> |

Table 2-4 Applicant's Response to Clymping Parish Council' Written Representation [REP1-079]

| Ref | Written Representation Comment | Applicant's Response |
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| 1.1 | <p>1. Clymping is a small rural parish of 690 hectares on the south coast to the west of Littlehampton. It is bisected roughly east to west by the A259 Littlehampton to Bognor Road. The other through routes in the parish are the B2233 leading from the Oystercatcher Junction with the A259 north-west to Yapton and Church Lane that runs northward to Ford and Arundel respectively. The village faces numerous issues including coastal erosion threatening homes and livelihoods, housing development that will double the size of the village and traffic issues that lie behind a major upgrade proposed for the A259 through the village. Rampion 2 will only exacerbate all these pressures as we worry timings could coincide. This would considerably affect residents' lives and the applicant's ability to access and work in the operational areas proposed to the north and south of A259 in the village.</p> | <p>Disruption has been minimised through the production of the Outline Construction Traffic Management Plan (CTMP) [REP1-010] which has been updated at the Deadline 1 submission. Stage specific CTMPs (including a stage specific CTMP for the works at Climping Beach) are required to be submitted in accordance with Requirement 24 of the Draft Development Consent Order [PEPD-009] and will be produced by the appointed Contractor(s) following the grant of the Development Consent Order (DCO) and prior to the relevant stage of construction. This will be produced in accordance with the Outline CTMP [REP1-010] for approval of the relevant highway authority, prior to the commencement of that stage of works.</p> <p>The likely significant transport effects of the construction phase of the Proposed Development including temporary construction compounds and trenchless crossing compounds have been assessed within Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] and Chapter 32: ES Addendum of the ES [REP1-006] submitted at the Deadline 1 submission. With the implementation of embedded environmental measures (as described in the Outline CTMP [REP1-010]), no significant transport effects have been identified in relation to identified sensitive receptors within Climping.</p> |
| 1.2 | <p>2. Clymping Parish Council has engaged in the consultation process for the proposed Rampion 2 Offshore Windfarm.</p> <p>Through the process the Parish Council, using our local knowledge and experience, has registered the following principal concerns of Council, residents, and local businesses:</p> <ul style="list-style-type: none"> • Once Operational: <ul style="list-style-type: none"> o The visual impact of the turbines that will dominate the horizon viewed from Clymping beach, a popular community and visitor amenity. o The landscape that will be left, post construction, in the Littlehampton to Middleton gap that is a protected open, rural landscape within the Arun Local Plan. o During Construction: <ul style="list-style-type: none"> • A single landfall site on Climping beach connecting offshore and onshore cables using Horizontal Directional Drilling (HDD) installation techniques. • Offshore impacts of marine trenching in an area currently the focus of rewilding as part of the Weald to Waves project and work to restore the kelp forest. • Onshore construction disruption to village life and amenities through additional traffic on the local roads and the operational activities that will impact the village daily for several years. • Onshore construction/operational impacts on the local environment in the countryside. • The final details on the precise line of cable routing, where the cable is trenched and the areas to be drilled horizontally. • The Transport Assessment including the additional HGV and LGV traffic movements, their routing and access points to the work areas. | <p>The visual impacts of the wind turbines during the operation and maintenance phase, are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. The Design principles are described in Section 15.7 within Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] which sets out how the design of the Proposed Development provides embedded environmental measures addressing visual effects, in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, its spread and quantity of wind turbine generators (WTGs) within it. Opportunities to reduce effects through WTG height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The Applicant has produced and submitted a SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037] at Deadline 1, which provided further commentary on these SLVIA specific design principles.</p> <p>Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] assesses landscape and visual effects of the onshore elements of the Proposed Development. The landscape assessment is provided in Table 2-1 of Appendix 18.3: Landscape assessment, Volume 4 of the ES [APP-169], and reports on the effect of the onshore elements of the proposed development on the local landscape character and landscape elements or features.</p> <p>Horizontal Directional Drill (HDD) at the landfall site has been proposed to minimise risk to the integrity of the embankment as noted in embedded environmental measure C-43 in the Commitments Register [REP1-015] (updated at Deadline 1) secured via Draft Development Consent Order [PEPD-009], Schedule 12, Part 2, Condition 2 (8) which states '<i>The cables comprising Work Nos. 5 are to emerge in HDD exit pits and be laid on or beneath the seabed or in ducts laid on or beneath the seabed</i>'. The outcome of the ground investigation as outlined in commitment C-247 (Commitments Register [REP1-015]) will inform the exact siting and detailed design of the drilling works. Environmental measure C-17 in the Commitments Register [REP1-015] is also included to ensure adherence to the permitting regime which will cover any temporary construction activities in close proximity to the Environment Agency flood defence. The permits will be obtained in accordance with The Environmental Permitting (England and Wales) Regulations 2016.</p> <p>With respect to transport please see the Applicant's response above reference 1.1 and below references 1.3 and 1.4.</p> |

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| 1.3 | <p>3. The Parish noted that during the Inspectorate's hearings held on February 7th , 2024, that Traffic Assessment details are still awaited by National Highways and West Sussex County Council to enable them to comment. The Parish Council is in the same position.</p> <p>That said, the Parish object strongly to any use of Crookthorn Lane, Brookpit Lane and Byway 197, Bread Lane as access to the work areas south of A259. The lanes are narrow with blind corners and they are simply not suitable for additional works traffic and heavy vehicles. The grass edges that are easily damaged and prone to flooding. They provide the primary driven and walking access to the primary school. There are no pavements. The limitations of the lanes are such that at busy times the school operates a voluntary one system for parents driving their children to and from school.</p> <p>Bread Lane passes directly past the school entrance and the byway is the community's primary walking route to the beach and open countryside of the Littlehampton to Middleton gap in this area. Although unrestricted it is not suitable for use by heavy vehicles.</p> <p>The Parish is pressing for an alternative dedicated route south from Ferry Road as this would be far more suitable and less disruptive.</p> <p>The Parish is also keen to see works traffic banned from other local roads including Horesemere Green Lane and Climping Street.</p> | <p>Additional transport information and assessment was provided at Deadline 1 on 28 February 2024 and should be read in conjunction with Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064]. The documents include:</p> <ul style="list-style-type: none"> • Section 2 of Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006]; and • Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES [REP1-008]. <p>The assessments included within Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] concluded that the Proposed Development will not generate any transport related significant effects within Climping.</p> <p>Access A-04 (Bread Lane) is served by Crookthorn Lane directly from the A259 and is for operational purposes only as shown on the Onshore Works Plans Sheet 1 [PEDP-005].</p> <p>Access A-04 (Bread Lane) is associated with scheduled and unscheduled maintenance with Byway 197 used to access the onshore cable route from the public highway. Paragraphs 23.4.21 and 23.4.22 within Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] describe the expected operation and maintenance phase activities which includes periodic testing of the cable through attendance by up to three light vehicles such as vans in a day at any one location. Unscheduled maintenance or emergency repair visits for the onshore cable will typically involve a very small number of vehicles, typically light vans. Infrequently, equipment may be required to be replaced, then the use of an occasional heavy goods vehicle (HGV) may be utilised, depending on the nature of the repair.</p> |
| 1.4 | <p>4. It was also of note during the hearing on 7th February that no specific issues were raised about the A259 as it runs through Clymping. The road is already under significant traffic pressure and project proposals are in an advanced stage of development for a significant upgrade of this section of road. There will be new or significantly modified junctions at Littlehampton (Tesco roundabout), Ferry Road, Church Lane, the Oystercatcher and Comet Corner. If the timings of these works and the applicant's project works coincide, they will not only limit both access to the operational areas and but disrupt residents' lives and local business activities severely.</p> | <p>The likely significant transport effects of the construction phase of the Proposed Development has been assessed in Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064], Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] and in Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES [REP1-008]. Based upon the peak week sensitivity test included in the Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006], receptor 5 (the A259 west of Wick) will experience the following traffic flow increases as a result of the Proposed Development:</p> <ul style="list-style-type: none"> • A 5.3% increase in heavy goods vehicles (HGVs) during the peak HGV week across the construction programme (week 83), which is an increase of 50 HGVs and 57 Light Goods Vehicles (LGVs) per day; and • A 4.5% increase in total traffic flow during the overall peak construction traffic week (week 72), which is an increase of 45 HGVs and 76 LGVs per day. <p>Noting that construction traffic movements will occur between 07:00-19:00 each day (see paragraph 8.4.14 of the Outline Construction Traffic Management Plan (CTMP) [REP1-010]), this is the equivalent of approximately 3-4 HGVs and 6-7 LGVs per hour in each of the peak scenarios. It is therefore not anticipated that this construction traffic will have a material impact on traffic conditions during construction of the strategic housing development or associated highway works.</p> <p>All estimates of future baseline traffic flows used within Chapter 23: Transport, Volume 2 of the ES [APP-064] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] were based on TEMPro forecasts, which is a program developed by the Department for Transport providing traffic growth projections. These projections take account of national and local predicted growth in population, employment, housing (including sites allocated in the Local Plan) and is the industry standard approach to assessing future baseline traffic. Use of this methodology was also agreed</p> |

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| 1.5 | <p>5. In addition, the Inspectorate should note that a major strategic housing development is planned to the west of Church Lane with its primary access opposite and near the applicants proposed access to Work Areas on the same stretch of Church Lane. The development was approved on appeal in 2018 (CM/1/17/OUT) and Reserved Matters (CM/48/21/RES) approved by Arun District Council in December 2023. Significant disruption in Church Lane is anticipated, entirely irrespective of the Rampion project.</p> <p>The proposed sustainable drainage scheme (SUDS) for the site has yet to be finalised with Arun District Council but will inevitably need to drain through Work Areas 9,10, 11,13,14,15 towards the river Arun. It will be important for the applicant to show that its work activities will not disrupt this drainage to avoid flooding in the village.</p> | <p>with West Sussex County Council (WSSCC) and National Highways during consultation. Following the implementation of embedded environmental measures (such as the Outline CTMP [REP1-010] which is secured through Requirement 24 of the Draft Development Consent Order [PEPD-009]), no significant transport effects have been identified in relation to transport receptors in Climping.</p> <p>To ensure safe access is achieved to / from the Church Lane compound the access junction will be designed in accordance with Design Manual for Roads and Bridges visibility splay requirements and subject to an independent Road Safety Audit. It is also the intention of the Applicant to reach agreement with West Sussex County Council on the design of the proposed access before the end of the DCO Examination period.</p> <p>The 300 house development project referenced was included as part of the cumulative effects assessment within the ES where relevant (Chapter 6: Coastal processes, Volume 2 [APP-047] to Chapter 29: Climate change, Volume 2 of the ES [APP-070]), this development is referred to as ID13 (CM/48/21/RES).</p> <p>Regarding the concerns around drainage: As outlined in paragraph 5.10.9 of the Outline Code of Construction Practice (CoCP) [PEPD-033], a Construction Phase Drainage Plan will be developed by the contractor(s) to determine potential location specific risks in relation to the water environment and identify appropriate measures to avoid or reduce risk. The Construction Phase Drainage Plan is secured via Requirement 22 of the Draft Development Consent Order [PEPD-009]. In addition, the following embedded environmental measures (as outlined in Table 5-9 of the Outline CoCP [PEPD-033]) are of relevance to ensure that the existing functionality and conveyance capacity of the drainage ditch is not compromised. The following commitments are included within the Outline CoCP [APP-033] secured via Requirement 22 of the Draft Development Consent Order [PEPD-009]:</p> <ul style="list-style-type: none"> • C-28 (existing land drainage regime); • C-30 (erosion and sediment control); • C-73 (drainage design for surface water); • C-119 & C-175 (temporary construction areas and flood conveyance); • C-126 (temporary watercourse crossings); • C-130 (soil stockpile standoff distances); • C-179 (soil stockpiling and management of surface water); • C-181 (access roads and management of surface water); and • C-182 (watercourse consents). <p>The Applicant notes that drainage from the proposed Climping strategic housing site (Application Reference CM/48/21/RES) will discharge via an existing culvert beneath Church Lane and to a drainage ditch that runs west to east between the temporary construction compound (to the south) and access track A-06 (to the north). A Cumulative Effects Assessment (CEA) was carried out as reported in Table 26-32 and Table 26-34 of Chapter 26: Water environment, Volume 2 of the Environmental Statement (ES) [APP-067] for relevant developments within a delineated hydrological Zone of Influence (ZOI). The CEA concluded that there would be no likely significant cumulative effects arising from the strategic housing site (CM/48/21/RES), in combination with Rampion 2. This is based on the implementation of good industry practice measures and other measures as outlined in the accompanying Flood Risk Assessment and Drainage Strategy Report (Bright Plan Civils, 2021) being implemented on the housing site. This is in combination with the implementation of embedded environmental measures as part of the Proposed Development which would mitigate any likely significant effects.</p> |

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| 1.6 | <p>6. Clymping Parish Council endorses the Local Impact Assessment undertaken by Arun District Council and approved by Arun Planning Committee on 17 January 2024. We are concerned about the activities within the work areas in the village to the north and south of A259. More detail is required on the precise scope of these operations, their visual impact in the open countryside, excess noise over ambient levels (+ 45 dBA -rural background 45dBA. Rampion have confirmed drilling will be continuous at 90 dBA) vibration, dust generation, and night-time lighting in dark skies areas. Above all, clarity is required with regards the timing of daily operations and works traffic (daily start and finish times), the extent of 24-hour drilling operations and the overall timescales envisaged for what is referred to as a “temporary’ construction phase. All these factors could impact the daily lives of residents and negatively impact to local natural environment. We have yet to see a detailed construction management plan. We have also yet to see the steps the applicant plans to take to mitigate the impacts on the community and local environment.</p> <p>The Parish Council have concerns that at least two residential areas could be subject to statutory nuisance, Climping Park residential caravan site and Norden House, a recently completed purpose – built 64 bed dementia care home located at the junction of Clymping street and the A259. Loud and persistent noise may be particularly over stimulating and disturbing for someone living with dementia which can trigger experiences of ill being. We are naturally concerned that the noise of drilling operations particularly at nighttime will have a negative effect on individuals living at the home.</p> <p>The owner of Clymping Mill Cottage on the seafront maintains grave concerns his property will be adversely affected by the Proposed Development in terms of visual amenity during construction, operation and maintenance, or decommissioning phases.</p> | <p>The implementation of the embedded environmental measures as outlined above in combination with those proposed on the third party housing site are envisaged to avoid any significant cumulative effects (on the shared drainage regime).</p> <p>The Applicant has provided a response to Arun District Council’s Written Representation and Local Impact Report in at Deadline 2 (Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.44)).</p> <p>The Applicant has undertaken an Environmental Impact Assessment (EIA) which considers and assesses the likely significant effects of the Proposed Development. The Volume 2 of the Environmental Statement (ES) [APP-042 to APP-072], and Volume 4 of the ES [APP-120 to APP-222], reports the findings of the EIA. The ES also provides information about the Proposed Development including its context, a full description of the Proposed Development and its construction, the main alternatives considered, the consultation process that was part of the EIA, and any relevant technical information that has been used to assess the likely significant effects of the Proposed Development. The ES and includes a series of chapters that consider and assess the likely significant effects of the Proposed Development in relation to each relevant environmental aspect. These include the following aspect chapters:</p> <ul style="list-style-type: none"> • Chapter 17: Socio-economics, Volume 2 of the ES [APP-058]; • Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059]; • Chapter 19: Air quality, Volume 2 of the ES [APP-060]; • Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018]; • Chapter 23: Transport, Volume 2 of the ES [APP-064]; • Chapter 28: Population and human health, Volume 2 of the ES [APP-069] (including effects from exposure to electromagnetic fields). <p>There have been opportunities for the development of environmental measures which have been adopted to reduce the potential for environmental impacts and effects. These were included directly into the design of The Proposed Development as embedded environmental measures and are detailed in the Commitments Register [REP1-015] (which has been updated at Deadline 1). The Commitments Register was initially presented in the Scoping Report and subsequently updated throughout the Statutory Consultation exercises and in the Environmental Statement to reflect design evolution and consultation feedback. Further to this, a number of management plans have been included in the DCO Application such as Outline Code of Construction Practice (CoCP) [PEPD-033] which provide the details of the proposed embedded environmental measures to manage effects during the construction phase and is secured by requirement 22 of the Draft DCO [PEPD-009].</p> <p>Section 5.4 of the Outline Code of Construction Practice (CoCP) [PEPD-033] describes the practical measures and monitoring to be implemented to reduce the impact of onshore noise and vibration during the construction phase. Commitment C-263 (Commitments Register [REP1-015]) includes the production of a Noise and Vibration Monitoring Plan (NVMP) during detailed design based on the principles in the Outline CoCP [PEPD-033], which is secured by Requirement 22 of the Draft Development Consent Order [PEPD-009] and includes best practicable means the Contractor(s) will adopt to minimise noise during construction in all areas. Construction plant will be carefully procured to ensure compliance with noise limits quoted in European Commission Directive 2000/14/EC, United Kingdom Statutory Instruments (SI) 2001/1701. Localised screening and temporary barriers will also be installed in proximity to sensitive receptors. As stated in Table 21-29, Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018], estimated drilling duration is provided for each horizontal directional drill (HDD) location, typically trenchless crossings are short term construction activities. For trenchless crossings (such as HDD), drills will be housed within acoustic cladding and associated acoustic louvres. Mud pumps will be housed in temporary</p> |

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| | | <p>acoustic shrouds. Noise monitoring will be agreed with the relevant planning authority, through Section 61 of the <i>Control of Pollution Act 1974</i> consent, where applicable.</p> <p>Volume 2 of the ES [APP-042–APP-072] has assessed the effects of the Climping compound during the construction phase. Though impacts will arise, there are no significant effects arising from noise, dust, ecology, settlement/residential areas, Public Rights of Way access and traffic impacts when considering the embedded environmental measures secured in the Outline Code of Construction Practice (CoCP) [PEPD-033], the Outline Construction Traffic Management Plan (CTMP) [REP1-010] and Outline Public Rights of Way Management Plan (PRoWMP) [APP-230]. The Applicant acknowledges that there will be significant landscape and visual effects associated with the presence of the Climping compound on the local landscape character including views from the Climping Caravan Site. These will be temporary and limited by retention of the perimeter vegetation along the A259. Where removal is required (as per the Vegetation Retention Plan–Appendix B of the Outline CoCP [PEPD-033]), this will be temporary as per the commitment to reinstatement in the Outline Landscape and Ecology Management Plan (LEMP) [APP-232] is considered. Each of the above plans will be subject to submission of stage specific details for approval (including the stage specific CoCP and stage specific LEMP to Arun District Council who will also be consulted on the stage specific CTMP and stage specific PRoWMP (for approval by West Sussex County Council)). This is as per the Draft Development Consent Order (DCO) [PEPD-009] Requirements 22, 12, 24 and 20 respectively.</p> <p>The noise assessment utilised a study area of 300m to sufficiently consider any effects that might be possible from the worst-case noise emissions from the Proposed Development at the most sensitive times (for instance HDD at night) (Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018]). Norden House is located outside of this study area (>500m) and there are a number of receptors between the DCO Order Limits and Norden House including the Church of England Primary School (Brookpit Lane, Littlehampton, BN17 5QU) and a residential receptor (5 Crophorne Drive, BN17 5GG). As presented in Table 21-27 (Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018]). The worst-case noise levels at the receptors between the DCO Order Limits and Norden House would not give rise to significant effects see Table 21-27 (Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018]), therefore it is not considered that significant noise effects are likely to occur at receptors at a greater distance from the DCO Order Limits including Norden House.</p> <p>While the EqIA utilised a study area of 500m, Norden House was not identified as a receptor, possibly because of its location being only partially within the study area or because the dataset had not yet included the address for this due to its recent completion. Despite this, from a health and wellbeing perspective, the same logic applies. As stated above, Norden House is in a location which would not give rise to significant changes in noise exposure; on this basis, and taking into consideration the highly sensitive nature of residents of Norden House, the potential for any health and/or wellbeing effects is limited.</p> <p>Similar concerns were raised regarding Eastridge Manor dementia care home which is located adjacent to trenchless crossing activities (much closer than Norden House). Despite the proximity of Eastridge Manor to the construction works, unmitigated noise levels during the daytime would remain below the threshold noise level which is set to be protective of the environment and health. During the night time, unmitigated noise levels would marginally exceed the threshold noise level by just 1 dB which due to the short term and transient nature of trenchless crossing activities would not result in any material health or wellbeing impact.</p> |
| 1.7 | 7. The hearing on February 7th highlighted the risks association with coastal erosion at Clymping where the applicant plans to bring the offshore cable onshore. The coast has been subject to significant erosion and its defences breached in early 2020 extensively flooding | The Applicant has sited the landfall options in accordance with the advice received from the Environment Agency during pre-DCO Application consultation. The work is not dependent on the Environment Agency maintaining the bund sea defences. |

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| | <p>Work Areas 7, 8, and 9 south of the A259. Recent flooding in October and November 2023 is a reminder of the fragility of the remaining shingle bunds maintained by the Environment Agency. These are the only remaining coastal defence, with shingle replenishment funded increasingly by the landowner and local threatened homeowners with some support from the Parish Council.</p> | <p>In relation to concerns about flood risk from the sea during construction, the Applicant is confident that the sequential approach to careful siting of the landfall, the implementation of horizontal directional drilling (HDD) works and emergency flood response planning will ensure that there is no increase in flood risk in the area from the Proposed Development and that the construction personnel, and equipment will all be adequately safe during the works.</p> <p>Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216] and its associated 'Annex A: Meeting minutes cover the Environment Agency's 'do minimum' strategy for the management of the Climping shingle defences as set out in the Arun to Pagham Flood and Coastal Erosion Risk Management Strategy' held with the Environment Agency (in November 2020 and March 2022) to understand the baseline and future flood risk at these locations and within the Arun Valley within the context of recent storms (Annex A Meeting minutes of Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216]). The Environment Agency stated their preferred approach for the long-term management of this defence is to allow the shingle embankment to naturally realign to a more naturally sustainable position. Whilst there is noted uncertainty with regards to the anticipated future coastlines presented, a sequential approach has been considered to locate the transitional joint bay on the landward side of the most extreme of these estimates. The landfall options were also located as part of a sequential approach at the most optimal locations in relation to the peak sea levels sourced from the Environment Agency's Coastal Design Sea Levels Database and Lower Arun tidal modelling results. The landfall locations TC-01 and TC-01a were sited on higher land in Flood Zone 1 (low flood risk) with the lowest hazard ratings for both the present day and future (2070) 0.5% Annual Exceedance Event (AEP) Probability events as illustrated on Figure 26.2.3a and 26.2.3b in Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216]. Drone footage also illustrates the typical flowpaths from sea flooding in the event of overtopping in Feb 2020 (Storm Ciara) where floods were channelled along the lower lying land and circumnavigated around the landfall sites. This provided evidence that the landfall areas were not inundated, consistent with the assessment of flood risk in the Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216].</p> <p>As noted in paragraph 10.2.3 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216] there is a suite of suitable embedded environmental measures in Table 8-1 of Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES [APP-216] which have been put in place to minimise any potential residual risk from tidal flooding to and from the proposed works. Further ground investigation will be carried out at the landfall location post-DCO award as outlined in C-247 (Commitments Register [REP1-015]) which will inform the exact siting and detailed design, as well as the need for any further adaptation measures to help minimise the vulnerability of assets. The investigations will be carried out pursuant to article 18, to inform the coastal erosion and future beach profile estimate assessment and implementation of mitigation secured via the Draft Development Consent Order [PEPD-009], Schedule 1, Part 3, Requirement 26 Coastal erosion (1), (2). Requirement 26 (Draft Development Consent Order [PEPD-009]) states that: "No works comprising Work Nos. 6 or 7 are to commence until a coastal erosion and future beach profile estimation assessment has been carried out and a scheme identifying any mitigation or adaptive management measures required to help minimise the vulnerability of this part of the Order land from future coastal erosion and tidal flooding (if required) has been submitted to and approved in writing by the Environment Agency".</p> <p>With these commitments in place there will be no impact on the sea defence from construction itself. Chapter 6: Coastal processes, Volume 2 of the ES [APP-047] concludes that construction (and operation and maintenance activities) will not significantly impact coastal morphology and offshore sediment transport and therefore the development will not increase the risk of coastal flooding and erosion.</p> <p>An Emergency Response Plan for Flood Events (C-118, Commitments Register [REP1-015]) included within the Outline Code of Construction Practice (CoCP) [PEPD-033] secured via Requirement 22 within the Draft Development Consent Order [PEPD-009] will also be prepared to address the flood risk to construction activities</p> |

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| | | <p>and personnel. This will help effectively protect site personnel and equipment from any risk of flooding from the sea during construction.</p> <p>On this basis the construction site will be safe from flooding even in the event of sea flooding therefore the proposals are not critically dependant on the maintenance of the sea defence as suggested within the relevant representation comment. Longer term during the operational and maintenance phase, the landfall will be buried and resilient to flooding.</p> |
| 1.8 | <p>8. The Inspectorate should note the threat that the Environment Agency will withdraw further work if they judge further maintenance uneconomic. The current plans are to allow the coastline to retreat but the extent of this retreat remains a matter of conjecture and the ongoing threat of storm damage is real. However, this does raise the question whether or not the choice of Climping as the landfall location, bearing in mind the 30year life of the Rampion project, is now a viable option. The risk to plans for works south A259 are therefore material, and we want to understand the threat to the integrity of the cable and the applicant's contingency plans.</p> | <p>Please see the Applicant's response above in reference 1.7.</p> |
| 1.9 | <p>In conclusion, homeowners in especially close proximity with the proposed works and work site are deeply concerned, as is this Parish Council, to the protracted upheaval and harm that will doubtless be caused to them should the project go ahead.</p> | <p>Please refer to the Applicant's responses above in reference 1.1 to 1.8.</p> |

Table 2-5 Applicant's Response to Cowfold Parish Council [REP1-085]

| Ref | Written Representation Comment | Applicant's Response |
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| 1.1 | <p>1. Cowfold Parish Council fully upholds renewable energy projects in principle and recognises their importance to our environment. However, this support is predicated on the fact that any such projects are sited in an appropriate location and include suitable mitigations so as to minimise any impact during the construction, operational and reinstatement phases</p> | <p>The Proposed Development will help meet the urgent need for new renewable energy infrastructure in the UK and supporting the achievement of the UK Government's climate change commitments and carbon reduction objectives. The Proposed Development type is recognised as being a critical national priority in the revised National Policy Statement (NPS) EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023a) and NPS EN-3 (DESNZ, 2023b), which came into force in January 2024 and are considered to be relevant to the determination of the DCO Application.</p> <p>This additional generating capacity will contribute towards meeting the urgent need for new energy infrastructure in the UK, provide enhanced energy security, support the economic priorities of the UK Government and, critically, make an important contribution to decarbonisation of the UK economy.</p> <p>The Proposed Development will contribute materially towards meeting the urgent national need for renewable electricity, significantly reducing carbon emissions from energy. The assessment set out in Chapter 29: Climate change, Volume 2 of the Environmental Statement (ES) [APP-070] concludes the Proposed Development has a lifetime greenhouse gas (GHG) emissions saving of 35,901ktCO_{2e}. The Proposed Development will continue to offset GHG emissions until 2050, and therefore make a positive contribution the UK Government target to reach net zero emissions in 2050.</p> <p>Section 104 of the Planning Act 2008 outlines that the DCO Application must be decided in accordance with the relevant NPS (in this case: NPS EN-1 Department of Energy and Climate Change (DECC), 2011a), NPS EN-3 (DECC, 2011b) and NPS EN-5 (DECC, 2011c) with NPS EN-1 (DESNZ, 2023a), NPS EN-3 (DESNZ, 2023b) and NPS EN-5 (DESNZ, 2023c), that came into force in 2024, relevant considerations in the decision-making process) unless (inter alia) the adverse impacts of a proposal would outweigh its benefits. Section 5.4 of the Planning Statement [APP-036] summarises the potential environmental, social and economic benefits and the adverse impacts of the Proposed Development drawing on relevant information in line with NPS EN-1 (DECC, 2011a and DESNZ, 2023a). Section 5.5 of the Planning Statement [APP-036] sets out the planning balance where the potential benefits and impacts of the Proposed Development are weighed up. Although, inevitably, there are adverse impacts associated with the scale and type of infrastructure that forms the Proposed Development, the Applicant considers that the planning balance is firmly in favour of the Proposed Development and the benefits outweigh the adverse impacts.</p> |
| 1.2 | <p>2. Further to the initial Letter of Representation (20045197) made by Cowfold Parish Council to the Planning Inspectorate's Examining Authority and having acted as an Observer during the Open Forum (6-8 February 2024) there are a number of points which the Parish Council believes need to be given particular emphasis on behalf of residents within the parish. These highlight the shortcomings of the management and process delivery of this Project which leads the Parish Council to object to the Planning Application</p> <p>3. Many of these have been identified and vocalised by residents in manuscript form, at the Open Forum and subsequently identified in the Examining Authority's Action Points Arising in which the Applicant has been tasked to clarify/resolve by Deadline 2 (20 March 2024).</p> | <p>The Applicant has no further comments on this matter at this time.</p> |

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| 1.4 | <p>4. However, the Parish Council feels that they need to publicly iterate a number of the specific concerns which they believe will have a direct impact on the lives and livelihoods of those residents and businesses situated in this primarily rural parish for not only the immediate (construction phase) time frame but potentially decades ahead. Also the loss of species rich habitat, historic woodland and listed buildings, most of which have been extant since the seventeenth and eighteenth centuries and earlier. An example is the proposed use of a number of nominated haul and (future) operational routes by the Applicant, crossing historic access ways such as Dragons Lane (identified as a point of concern by the Examining Authority at Serial 19 of the Action Points Arising). This will have a profound impact on long established domestic residences ('Dragons' and 'Cratemans' first being noted in Parish Records in 1632), Public Footpaths and associated agricultural land. Cowfold remains proud of its cultural ecology and the community has evolved in a manner in which the social, environmental and biological aspects of the parish have achieved an established equilibrium with the landscape, species and associated habitats. These features provide the defining characteristics of the area as both a place(s) of multi-generational residence and employment.</p> | <p>Dragons Lane is not proposed for use as a construction access or haul road. For the details of the Applicant's response on Dragon's Lane please refer to reference 18 and 19 of the Applicant's Response to Action Points Arising from Issue Specific Hearing 1 [REP1-018]. For further information regarding the livelihoods of residents and businesses see the Applicant's response to Cowfold Parish Council's Relevant Representation reference 2.17.4 and reference 2.17.5 regarding landscape/ecological views in Applicant's Response to Relevant Representations [REP1-017] submitted at Deadline 1.</p> |
| 1.5 | <p>5. The Parish Council does not believe that Rampion 2 has fully upheld or demonstrated the ethos encapsulated in the governance of the Institute of Environmental Management and Assessment (IEMA), the Competent body in the UK for eco-management, of integrity, transparency, inclusivity and stewardship. Or, as outlined in Historic England's guidance produced in 2022 'Strategically Assessing the Historic Landscape's Sensitivity and Capacity in Relation to Change: a discussion document to inform preparation of advice' (author Peter Herring), where it is stated that "<i>it is important to consider collective, public and personal perceptions of landscape alongside more expert views</i>" (p.20). This study requires consideration of four crucial aspects:</p> <ul style="list-style-type: none"> * Critical Consideration of the Change Scenario – its range of predictable effects and impacts, positive as well as negative. * Assessment of the Vulnerabilities and Potentialities – in relation to the scenario and its impacts and effects, to develop an understanding or measure of sensitivity to the change scenario. * Assessment of the significance of that sensitivity – to society by the consideration of heritage values and attributes in relation to the effects of the change scenario. Developing an understanding of the capacity of the historic landscape character type or place to accommodate the change. * Drawing together the three assessments of Impact, Vulnerability and Significance alongside present sensitivity and capacity presented in the form of maps and associated commentary, including recommendations. | <p>The document referred to by the Parish Council, <i>Strategically Assessing the Historic Landscape's Sensitivity and Capacity in Relation to Change: A Discussion Document to Inform Preparation of Advice</i> (Herring 2022), is a research report prepared for Historic England exploring the different approaches to modelling the sensitivity to or capacity for change of the historic landscape and seascape for a wide-range of project types. It is a discussion document to inform Historic England in the preparation of advice. Whilst the subject matter is broadly relevant to any project type which has the potential for historic landscape character change, it does not constitute a Historic England guidance note pertaining to relevant planning policy. The Applicant refers the Parish Council to page 2 of the document (Herring 2022), which states "...<i>Many of the Research Reports are of an interim nature and serve to make available the results of specialist investigations in advance of full publication.... Opinions expressed in Research Reports are those of the author(s) and are not necessarily those of Historic England.</i>" Page 3 of the document (Herring 2022), also states, "<i>The project aims to help HE develop advice for a reasonable and deliverable scenario-led approach...</i>".</p> <p>The historic environment was a consideration, balanced against other criteria, in the site selection and design process for the Proposed Development (see Chapter 3: Alternatives, Volume 2 of the ES [APP-044], and also the Applicant's Post Hearing Submission – Issue Specific Hearing 1 – Appendix 2 – Further Information for Action Point 4 – Wineham Lane North [REP1-021]). Historic landscape character was identified as a potential receptor at the scoping stage, which together with other historic environment receptors, informed the need and scope of a range of embedded environmental measures to mitigate potential effects (Commitments Register [REP1-015]), which were refined and updated throughout the consultation and design process.</p> |
| | <p>The importance of recognising these criteria are clearly illustrated in the Cowfold Residents' Impact Statement on Rampion 2 provided by CowfoldvRampion which has been submitted to the Examining Authority.</p> | <p>Taking a landscape approach and considering all available desk-based and geophysical survey data, Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], together with associated appendices [APP-199 to APP-202, APP-211 to APP-214, PEPD-031, and PEPD-113 to PEPD-119], identifies those historic environment receptors which might be affected by the Proposed Development, including historic landscape character.</p> |

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| 1.6 | <p>6. The Historic England report, see p.3, “underscores the need for change, including the need for new development (renewable energy is cited at p.6), to make a positive contribution to local distinctiveness, and through that increase senses of personal and community identity, sense of place, and wellbeing, and thus deliver substantial public benefit” The Applicant will cite the benefits of additional green energy contributions to the National Grid. However, the Parish Council has neither seen or received any evidence that the Project will deliver enhanced visual “local distinctiveness” or “substantial public benefit” to the local community.</p> | <p>The assessment was undertaken in line with relevant policy and guidance, as listed in Section 26.2 of Chapter 25: Historic environment, Volume 2 the ES [PEPD-020]. The methodology for baseline data gathering is described in Section 25.5 and the assessment methodology is described in Section 25.8 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p> <p>Community benefits are not a legal or DCO requirement and are quite distinct from the consenting process, a point reiterated in the UK Government (Department for Energy Security and Net Zero) response to the consultation on Community Benefits for Electricity Transmission Network Infrastructure (December 2023), which stated:</p> <p><i>“The proposals on community benefits for electricity transmission network infrastructure discussed within this document will remain separate to the planning process. It will not be a material consideration in planning decisions, and not secured through those decisions.”</i></p> <p>That said, Rampion 2 will be a permanent neighbour in the Sussex community and the Applicant intends to develop and implement a community benefits package of proposals. In the second half of 2024, the Applicant will therefore be consulting key stakeholders and local communities on how a community benefit package could best support Sussex communities. The final package may include a range of initiatives to benefit business, education, and residential communities.</p> |
| 1.7 | <p>7. In addition to the overarching cultural ecology of the wider parish, the proposed Oakendene site and associated areas, the Parish Council wishes to reiterate and expand upon concerns identified in the initial Letter of Representation. Focussing on the paucity of detailed material in respect of:</p> | <p>Please see the Applicant's response to references 1.8 and 1.9 below.</p> |
| 1.8 | <p>7.a. Inadequate biodiversity studies; in particular lack of field work during each representative breeding seasons and failure to communicate with and include local knowledge of the affected areas. A detailed, illustrated study of the 'Biodiversity Threat', including the presence of Red Listed species, has been submitted to the Examining Authority by local resident Janine Creaye (20045132). The content of which is supported and upheld by the Parish Council.</p> | <p>The Applicant is satisfied that the level of terrestrial ecology field survey undertaken is proportionate to the type of activity proposed and allows a robust ecological impact assessment to be carried out in line with appropriate guidance as quoted in Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063]. The surveys undertaken in the Cowfold area are:</p> <ul style="list-style-type: none"> • Extended Phase 1 Habitat Survey (Appendix 22.3: Extended Phase 1 Habitat Survey, Volume 4 of the ES [APP-181]); • National Vegetation Classification Survey (Appendix 22.4: National Vegetation Classification survey report 2021-2022 [APP-182]); • Hedgerow Survey (Appendix 22.5 Hedgerow Survey Report Volume 4 of the ES [APP-183]); • Fisheries habitat survey (Appendix 22.6: Fisheries habitat survey report Volume 4 of the ES [APP-184]); • Great crested newt environmental DNA survey (Appendix 22.7: Great crested newt environmental DNA survey report Volume 4 of the ES [APP-185]); • Bat surveys (Appendix 22.8: Passive and active bat activity report Volume 4 of the ES [APP-186]); |

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| | | <ul style="list-style-type: none"> • Hazel dormouse survey (Appendix 22.9: Hazel dormouse report 2020-2022 Volume 4 of the ES [APP-187]); • Badger, otter, and water vole survey (Appendix 22.11: Badger, otter and water vole survey report Volume 4 of the ES [APP-189]); • Breeding bird surveys (Appendix 22.13: Breeding bird survey Volume 4 of the ES [APP-191]); and • Arboricultural survey (Appendix 22.16: Arboricultural Impact Assessment Volume 4 of the ES [APP-194]). <p>The Applicant notes that Natural England have not highlighted a lack of survey information as a concern in terms of reaching conclusions within the Ecological Impact Assessment (see Deadline 1 Submission – Natural England’s Risk and Issues Log [REP1-059a]. It is also noted that the approach to baseline data collection and the interim results of the surveys were shared on a number of occasions with the Expert Topic Group (see Section 22.3 of Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement (ES) [APP-063]).</p> <p>Data provided by Janine Creaye is referenced within Appendix 22.2: Terrestrial ecology desk study of the ES [APP-180] at paragraphs 3.1.2 and 4.5.6.</p> |
| 1.8 | <p>7.b. A perceived disregard of aspects of the visual and heritage features of extant ancient landscapes, woodlands, trees and hedgerows. From 12 February 2024 a 10% Biodiversity net gain (BNG) has become mandatory. Given the concerns cited here the Parish Council would wish to see the Applicant provide a detailed, updated schedule of how this might be effectively and sustainably delivered across the whole of the proposed site(s) within the parish. Also addressing the evolving landscape challenges as flooding becomes an annual, as opposed to occasional, condition of the site(s).</p> | <p>Mandatory biodiversity net gain (BNG) for Nationally Significant Infrastructure Projects (NSIPs) consented under the Planning Act 2008 is not required until April 2025. However, the Applicant has committed to delivering at least 10% BNG as part of the Proposed Development as part of a positive legacy. All BNG will be secured, managed, and monitored in line with the current mandatory system as detailed and managed by the Department for Environment, food and Rural Affairs (Defra) and Natural England as set out in Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193] secured via Requirement 14 of the Draft Development Consent Order [PEPD-009].</p> |
| 1.10 | <p>7.c. Parish residents have significant concerns over of all types of increased vehicular traffic, both proximate & adjacent to the site. Access/egress concerns have also been highlighted by Horsham District Council. These include questions about the suitability and safety of the nominated routes, i.e. works traffic access via single lane narrow country roads with no defined passing places and the physical means by which the site can be accessed. Fears voiced by residents about enhanced traffic volume along the already heavily used A272 with associated air quality and road safety impacts on Cowfold village have been identified in the Examining Authority’s Action Plan for the Applicant. Cowfold Parish Council wishes to reiterate the need for representative, accurate and transparent information which it believes, to date, has not been fully documented. The potential for diminished quality of life for those living in the parish is of significant concern to residents particularly in respect of Air Quality Management, traffic congestion and road safety as illustrated by these photographs.</p> <p>As a result of these extant road safety considerations the Parish Council is currently in discussion with West Sussex County Council Highways in regard to the installation of a traffic crossing point on the Bolney Road within the village (the Mercers Mead/Huntscroft Gardens aspect, What3Words location - ///prevents.afflicted.deflated). The addition of significant further levels of traffic, including supplementary Heavy Goods Vehicles, can only be detrimental.</p> | <p>The likely significant transport effects associated with the construction phase of the Proposed Development have been assessed in Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064], Chapter 32: ES Addendum, Volume 2 [REP1-006] (submitted at Deadline 1) and Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES [REP1-008]. At peak construction, taking account of the construction traffic routing contained within the Outline Construction Traffic Management Plan (CTMP) [REP1-010], the following effects have been identified for Cowfold:</p> <ul style="list-style-type: none"> • At A281 south of Cowfold (Receptor 23): <ul style="list-style-type: none"> ▶ A heavy goods vehicle (HGV) peak week increase of 12 HGVs per day, equivalent to an increase of 7.5% and approximately one HGV per hour; and ▶ A total construction traffic peak week increase of one HGV per day and 71 light goods vehicles (LGVs) per day (5-6 per hour), equivalent to a 1.1% increase in total traffic flow. • The A281 / A272 in the centre of Cowfold (Receptor 24): |

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| | | <ul style="list-style-type: none"> ▶ An HGV peak week increase of 39 HGVs, equivalent to an increase of 3.5% and 3-4 HGVs per hour; and ▶ A total construction traffic peak week increase of 19 HGVs and 154 LGVs (12-13 per hour), equivalent to a 0.7% increase in total traffic flow. • The A272 Station Road west of Cowfold Village centre (Receptor 25): <ul style="list-style-type: none"> ▶ An HGV peak week increase of 39 HGVs, equivalent to an increase of 4.6% and 3-4 HGVs per hour; and ▶ A total construction traffic peak week increase of 19 HGVs and 154 LGVs (12-13 per hour), equivalent to a 0.9% increase in total traffic flow. • The A272 Bolney Road east of Cowfold Village centre (Receptor E): <ul style="list-style-type: none"> ▶ An HGV peak week increase of 39 HGVs, equivalent to an increase of 5.5% and 3-4 HGVs per hour; and ▶ A total construction traffic peak week increase of 19 HGVs and 147 LGVs (12-13 per hour), equivalent to a 0.8% increase in total traffic flow. <p>As noted within Institute of Environmental Management and Assessment (IEMA) 1993 publication <i>Guidelines for the Environment Assessment of Road Traffic</i> (IEMA, 1993), an increase of less than 10% is not discernible environmental effect as is within day-to-day fluctuations in traffic flow. Therefore, no significant effects are predicted to occur within Cowfold.</p> <p>Chapter 19: Air quality, Volume 2 of the ES [APP-060] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] (submitted at Deadline 1) present an assessment of air quality impacts from construction traffic. The assessment concludes that the Proposed Development will not result in significant effects on air quality, as a result of increased traffic on the local road network. An air dispersion traffic modelling study of the potential impacts on the Cowfold Air Quality Management Area (AQMA) is presented in Section 1.4 within Appendix 19.1: Full results of construction road traffic modelling, Volume 4 of the ES [APP-174] with the assessment in Chapter 19: Air quality, Volume 2 of the ES [APP-060] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] (submitted at Deadline 1) concluding that there are no significant effects.</p> <p>For further information please refer to the Applicant's response to Cowfold Parish Council's Relevant Representation in reference 2.17.3 in Applicant's Response to Relevant Representations [REP1-017] submitted at Deadline 1.</p> |
| 1.11 | <p>7.d. Road traffic data from the A272 Bolney Road Speed Sign (What3Words location - ///vessel.campers.hoaxes) incoming from the direction of Bolney, collected and held by the Parish Council between August 2023 – February 2024 shows that 4.38% of vehicles passing along this route currently exceed the 30 mph speed limit (metric used, vehicles in excess of 36mph, i.e. the threshold speed for police road safety cautions). This represents 41,343 detected motor vehicles thus enhancing the likelihood and foreseeability of a significant accident or incident. Considerable additional road traffic usage can only compound an already over-burdened highway.</p> | <p>The impact of the Proposed Development of road safety has been assessed in Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] and Chapter 32: ES Addendum, Volume 2 [REP1-006]. These assessments conclude that the Proposed Development will not generate any significant transport effects within Cowfold Village centre.</p> |

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| 1.12 | <p>8. Using the University of Oxford's definition of accessible communication (that which is clear, direct, easy to understand and can be made available in multiple formats so that all users have equal access) the Parish Council believes that the Applicant has demonstrated considerable failings in their communication strategy and engagement practices. In parallel to residents frequently voiced misgivings the Parish Council wishes to restate the ongoing, significant lack of clarity of information provided. For example, Cowfold Parish Council has previously asked the Applicant to provide more digestible information packs which can be circulated to those within parish who, whilst seemingly not directly affected, will be exposed to the wider impacts of the Project. Low engagement levels by the Applicant have fostered the view that relative geographical distance from the proposed sites will mean little or no direct impact, thus minimising the likelihood that residents would take the time to peruse and digest the voluminous, complex data displayed online and make their feelings known at local, District and County levels.</p> | <p>The Applicant has previously provided detailed and extensive information pre-DCO Application submission to support consultations, including a Preliminary Environmental Information Reports (published 2021, 2022, and 2023), draft Works Plans and a draft Development Consent Order (submitted as part of the DCO Application, August 2023), which go far beyond the standards required by legislation and guidance. These have been supplemented by public facing consultation brochures and websites to summarise this information and signpost further detail. Throughout the consultations, the project team responded to queries by phone, email, online presentations, and (after COVID-19 pandemic restrictions were lifted) in-person information events (see Consultation Report [APP-027 to APP-030]).</p> |
| 1.13 | <p>9. In January 2018 the Government published 'A Green Future: Our 25 Year Plan to Improve the Environment' in which ten environmental goals were laid out.</p> <ul style="list-style-type: none"> • Goal 1: Thriving plants and wildlife • Goal 2: Clean air • Goal 3: Clean and plentiful water • Goal 4: Managing exposure to chemicals and pesticides • Goal 5: Maximise our resources, minimise our waste • Goal 6: Using resources from nature sustainably • Goal 7: Mitigating and adapting to climate change • Goal 8: Reduced risk of harm from environmental hazards • Goal 9: Enhancing biosecurity • Goal 10: Enhanced beauty, heritage, and engagement with the natural environment. <p>As stipulated in the original Plan every five years it is to be refreshed, a commitment set into law in the Environment Act 2021. The initial refresh to the Plan took place in 2023. Currently, the infrastructure within Cowfold Parish is failing to comprehensively meet the first four goals. Excessive renewable development, albeit projected as being for the greater good, is likely to see our Parish also failing to meet goals 6, 9 and 10 in the future.</p> | <p>The Applicant has no further comments on this matter at this time.</p> |
| 1.14 | <p>9. Cowfold Parish Council appreciates, acknowledges and upholds the vital place that green energy has in providing sustainable solutions for the future. The overarching question which the Parish Council presents to the Examining Authority at this stage of the evaluation process is the suitability of this Project in the proposed setting? Should the Sub Station and associated aspects go ahead, there will be lasting and potentially irreparable damage to both the community and the landscape in which it has co-existed for hundreds of years</p> | <p>Please see above responses in references 1.1 to 1.13.</p> |
| 1.15 | <p>1. Cowfold Parish Council fully upholds renewable energy projects in principle and recognises their importance to our environment. However, this support is predicated on the fact that any such projects are sited in an appropriate location and include suitable mitigations so as to minimise any impact during the construction, operational and reinstatement phases</p> | <p>The Proposed Development will help meet the urgent need for new renewable energy infrastructure in the UK and supporting the achievement of the UK Government's climate change commitments and carbon reduction objectives. The Proposed Development type is recognised as being a critical national priority in the revised National Policy Statement (NPS) EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023a) and NPS EN-3 (DESNZ, 2023b), which came into force in January 2024 and are considered to be relevant to the determination of the DCO Application.</p> |

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This additional generating capacity will contribute towards meeting the urgent need for new energy infrastructure in the UK, provide enhanced energy security, support the economic priorities of the UK Government and, critically, make an important contribution to decarbonisation of the UK economy.

The Proposed Development will contribute materially towards meeting the urgent national need for renewable electricity, significantly reducing carbon emissions from energy. The assessment set out in **Chapter 29: Climate change, Volume 2** of the Environmental Statement (ES) **[APP-070]** concludes the Proposed Development has a lifetime greenhouse gas (GHG) emissions saving of 35,901ktCO_{2e}. The Proposed Development will continue to offset GHG emissions until 2050, and therefore make a positive contribution the UK Government target to reach net zero emissions in 2050.

Section 104 of the Planning Act 2008 outlines that the DCO Application must be decided in accordance with the relevant NPS (in this case: NPS EN-1 Department of Energy and Climate Change (DECC), 2011a), NPS EN-3 (DECC, 2011b) and NPS EN-5 (DECC, 2011c) with NPS EN-1 (DESNZ, 2023a), NPS EN-3 (DESNZ, 2023b) and NPS EN-5 (DESNZ, 2023c), that came into force in 2024, relevant considerations in the decision-making process) unless (inter alia) the adverse impacts of a proposal would outweigh its benefits. Section 5.4 of the **Planning Statement [APP-036]** summarises the potential environmental, social and economic benefits and the adverse impacts of the Proposed Development drawing on relevant information in line with NPS EN-1 (DECC, 2011a and DESNZ, 2023a). Section 5.5 of the **Planning Statement [APP-036]** sets out the planning balance where the potential benefits and impacts of the Proposed Development are weighed up. Although, inevitably, there are adverse impacts associated with the scale and type of infrastructure that forms the Proposed Development, the Applicant considers that the planning balance is firmly in favour of the Proposed Development and the benefits outweigh the adverse impacts.

3. References

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