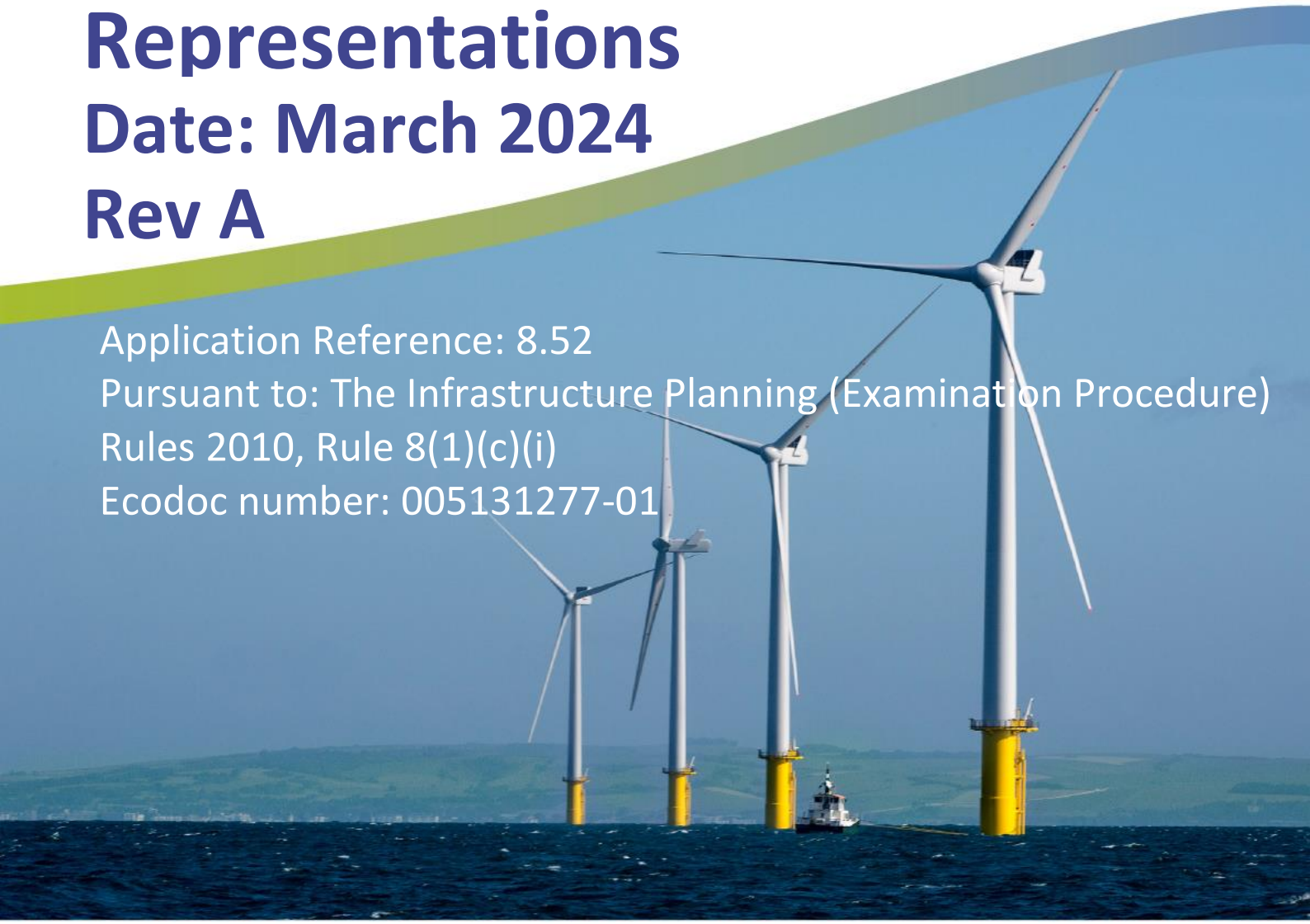
Rampion 2 Wind Farm

Category 8: Examination Documents

Applicant's Responses to Members of the Public and Businesses' Written Representations

Date: March 2024

Rev A



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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 44 Written Representations were received from Members of the Public and Businesses.

Rampion Extension Development Limited (the 'Applicant') has taken the opportunity to review each of the Written Representations received from Members of the Public and Businesses, 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 160km^2. 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 provided 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 Members of the Public and Businesses 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 (**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 (this document: **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 Members of the Public and Businesses. Each response is identified in the relevant table:

- Andrew Jeremy Maris: **Table 2-1**;
- Andrew Morrison: **Table 2-2**;
- Annie Lewis: **Table 2-3**;
- Atspeed Distributors Ltd: **Table 2-4**;
- Bill Brock: **Table 2-5**;
- Brian Conrad Whiting: **Table 2-6**;

- Christopher Nigel Guy: **Table 2-7**;
- Clare Woolcock: **Table 2-8**;
- Connie Davies: **Table 2-9**;
- David Jenkins: **Table 2-10**;
- Diane Mary Playford: **Table 2-11**;
- Elizabeth Leanne Marogna: **Table 2-12**;
- Ellen Jane Finely: **Table 2-13**;
- Jane Lamb: **Table 2-14**;
- Janine Creaye: **Table 2-15**;
- John Anthony Lucas: **Table 2-16**;
- John Hughes: **Table 2-17**;
- Jonathan Dittmer: **Table 2-18**;
- Lawrence Haas and Faye Christensen: **Table 2-19**;
- Luke Davies: **Table 2-20**;
- Margaret Marcelle Madron: **Table 2-21**;
- Maria Tozzi: **Table 2-22**;
- Martin Buglar: **Table 2-23**;
- Matthew Davies: **Table 2-24**;
- Maurice and Geraldine Huggett: **Table 2-25**;
- Michael Naish: **Table 2-26**;
- Mrs Lorraine Powell: **Table 2-27**;
- Mrs Valerie Ann Swaffer: **Table 2-28**;
- Natalie Dittmer: **Table 2-29**;
- Nicola Jane Hanley: **Table 2-30**;
- Nicole Edwards: **Table 2-31**;
- Mr Norman Swaffer: **Table 2-32**;
- Paulette Jane Northam: **Table 2-33**;
- Peter Fairhall and Patricia Fairhall: **Table 2-34**;
- Robert Finely: **Table 2-35**;
- Ruth Aldred: **Table 2-36**;
- Shane Colvin: **Table 2-37**;
- Shuna Le Moine: **Table 2-38**;

- Spencer Shire: **Table 2-39**;
- Susan Davies: **Table 2-40**;
- Susan J Bell: **Table 2-41**;
- William Davies: **Table 2-42**;
- Diana Allam: **Table 2-43**; and
- Steve Mansell: **Table 2-44**.

2. Applicant's Response to Members of the Public and Businesses' Written Representations

Table 2-1 Applicant's Response to Andrew Jeremy Maris's Written Representations [REP1-172]

Ref	Written Representation comment	Applicant's response
2.1.1 to 2.1.5	I have previously been in touch with Rampion about the RF interference generated by their site at the Bolney, where the AC feed from Rampion is connected to the National Grid. I am a Radio Amateur who experiences significant interference at the University Amateur station G4AQG at Falmer, some 16km to the SE of the Rampion at Bolney. The current Rampion wind farm causes significant interference on the 160m amateur band, with strong wideband noise from about 1.4 MHz to 2.1MHz that impacts on weak signal reception. I believe that this comes from the STATCOM equipment for power factor correction, and have confirmed the source by radio direction finding. The interference is in the form of a broad band hash with 300Hz modulation with a peak at around 1.5MHz and again at around 2MHz. The interference wipes out weak long distance signals on the amateur band 1.81 - >2.0MHz who arrive on the same bearing as Rampion at Falmer	The Applicant acknowledges the concerns raised. The Applicant would be happy to engage further with Mr Maris to further understand the point raised about amateur radio band interference, which is suggested to be associated with existing high-voltage electrical infrastructure at Bolney Substation. There is helpful guidance from Ofcom (n.d.) and from the Radio Society of Great Britain (n.d.) (such as leaflet EMC 04) relating to managing interference in this radio band.
2.1.6	Despite commenting on the initial planning application in 2021 and conversations with Rampion staff, and being on their mailing list, I have had NO notification of the examination process and was not informed of the meeting in Brighton until the day afterwards	In terms of communications around the examination, all the relevant Notices were published in accordance with Section 56 of the Planning Act 2008 and the Applicant also went further by emailing key stakeholder organisations, local authorities, parish councils and MPs, setting out how the community can register their opinions with the Planning Inspectorate. There were also notices on some Parish Council notice boards along the cable route and news coverage in the local media and notice of hearings published in accordance with Rule 13(6) Infrastructure Planning (Examination Procedure) Rule 2010.

Table 2-2 Applicant's Response to Andrew Morrison's Written Representations [REP1-068]

Ref	Written Representation comment	Applicant's response
2.2.1	I would just like to say that I support the excellent submission from our representative Cowfold v Rampion.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-3 Applicant's Response to Annie Lewis's Written Representations [REP1-070]

Ref	Written Representation comment	Applicant's response
2.3.1	I have already submitted a response but want to re-iterate my support and contribution to the cowfoldvrampion impact statement. This represents my views that the substation proposal is completely in the wrong location and will effect the lives of myself, my family, my neighbours and my business and the safety of my animals and children for many years to come. Please understand the location of the Cowfold site is wholly inappropriate and will have a huge impact on all surrounding nature and wild animals. Rampion 1 did not make good their damage after all these years - as promised. rampion 2 has been completely underhand and intentionally misleading in their initial consultation and had they been transparent at the beginning I feel that Cowfold locals would be more understanding of the impact, still, many many of them don't know about this - and that is Rampion 2's responsibility	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-4 Applicant's Response to Atspeed Distributors Ltd's Written Representations [REP1-073]

Ref	Written Representation comment	Applicant's response
2.4.1	If this development goes ahead then our business is very likely to suffer huge if not catastrophic consequences. Due to the major congestion on the roads leading in our estate (Oakendene Industrial Estae, Cowfold) that will occur for a long period of time our staff will not be willing to continue working for us, our suppliers (5 artics of goods 3 days a week) will not be prepared to deliver to us due to the hold ups, our own vehicles will be unable to fit their runs into the hours drivers are allowed to drive under their tacho rules as they will have to allow a much longer time to get both out of and back into the estate each day. Our customers will not be prepared to get caught up in the congestion of getting in and out of our estate and will invariably look to go to a competitor as they cannot afford the delay that will occur. The amount of traffic congestion and upheavel this will cause is extremely worrying. We have been trading for 35 years on this estate and employ 20 people who have to travel by car to get here as there are no pathways from any village to enable them to park up somewhere and walk in. The A272 is not a safe road to walk on. We would be devastated should this order be granted and it would ruin a lot of people's livelihood. The A272 and village of Cowfold cannot cope with the level of traffic congestion this will cause. It will be carnage. It's bad enough if one delivery driver pulls up on the side of the Road opposite the field to do a delivery as the backlog of traffic can be 20 minutes plus then. It really would be the worst possible thing that could happen to this community and certainly this Industrial Estate that has a number of businesses within it.	As part of the DCO process, a thorough assessment of the likely impact of traffic upon the strategic and local road network and highway assets during the construction phase of works has been completed (see **Chapter 23: Transport, Volume 2** of the ES **[APP-064]**). Traffic volumes on the Oakendene Industrial Estate and A272 have been observed and presented in **Chapter 23: Transport, Volume 2** of the ES **[APP-064]** and **Chapter 32: ES Addendum, Volume 2** of the ES **[REP1-006]** (submitted at Examination Deadline 1). Access to the construction compound site via the Industrial Estate entrance from the A272 and access management measures will be designed taking into account the existing use of the road. Continued access use by Industrial Estate tenants will be facilitated. The proposed routing strategy is further detailed in the **Outline Construction Traffic Management Plan (CTMP) [REP1-010]**. The CTMP would be secured by Requirement 24 of the **draft Development Consent Order (DCO) [PEPD-009]**. Environmental measures will be implemented to manage the potential effects from construction traffic. These are detailed in the **Commitments Register [REP1-015]** and are secured through the **Outline Construction Traffic Management Plan** (CTMP) **[REP1-010]**, **Outline Construction Workforce Travel Plan [APP-229]**, **Outline Public Rights of Way Management Plan [APP-230]** secured through requirements 24 and 20 of the **draft DCO [PEPD-009]**. The **Outline CTMP [REP1-010]**, which has been updated at the Deadline 1 submission includes: • *Commitment C-157: The proposed heavy goods vehicle (HGV) routing during the construction period to individual accesses will be developed to avoid major settlements of Storrington, Cowfold, Steyning, Wineham, Henfield, Woodmancote and other smaller settlements where possible; and* • *Commitment C-158: The proposed heavy goods vehicle (HGV) routing during the construction period to individual accesses will avoid the Air Quality Management Area (AQMA) in Cowfold where possible.* These commitments are also reflected in Table 5-1 of the **Outline CTMP [REP1-010]** which were updated at Deadline 1 and confirms prescribed local Heavy Goods Vehicle (HGV) access routes for all sections of the onshore cable corridor and Table 5-2 which details specific local constraints and proposed management of construction traffic routes. These commitments ensure that HGV construction traffic will route along the A27 and A23 to gain access to the A272 east of Cowfold wherever possible, thereby avoiding the village centre. Therefore, only accesses A-52, A-56 and A-57 will require construction traffic to route through Cowfold Village centre. As calculated by using data included in Table 5-3 of the **Outline CTMP [REP1-010]**, the impact of this commitment is the removal of up to 22,000 two-way HGV trips (11,000 HGVs) from Cowfold Village centre over the construction phase. 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** of the ES **[REP1-006]** and **Appendix 23.2: Traffic Generation Technical Note, Volume 4** of the ES **[REP1-008]** which were updated at the Deadline 1. At peak construction, taking account of the construction traffic routing contained within the **Outline CTMP [REP1-010]** which has been updated at the Examination Deadline 1 submission, the impacts listed below have been identified for Cowfold. • At A281 south of Cowfold (Receptor 23):

Ref	Written Representation comment	Applicant's response
		▸ An 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): ▸ 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): ▸ 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): ▸ 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. As noted within Institute of Environmental Management and Assessment (IEMA) 1993 publication *Guidelines for the Environment Assessment of Road Traffic* (IEMA, 1993) and 2023 publication *Environmental Assessment of Traffic and Movement* (IEMA, 2023) 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. Based on the proposed location of the onshore substation and routing of the onshore cable corridor, plus the incorporation of appropriate embedded environmental measures, no significant effects have been identified in relation to transport receptors from Rampion 2 construction, operation and maintenance, and decommissioning. For further information, please see the Applicant's response to Relevant Representations regarding Oakendene Industrial Estate (Table LI3, **Applicant's Response to Relevant Representations** **[REP1-017]**.

Table 2-5 Applicant's Response to Bill Brock's Written Representations [REP1-174]

Ref	Written Representation comment	Applicant's response
2.5.1	As a significant operator in the commercial fishing sector in Sussex, we have only very recently become aware that there is a ISH1 meeting to discuss the Rampion 2 proposal to develop another wind farm in the Sussex Bay sea area, tomorrow. We would like to make it clear to the planning inspectorate that there has been little to no meaningful engagement or discussion between the local fishing industry and Rampion on the subject of how this project will further effect the local fisheries and fishermen, and that the wording in the Environmental Statement (ES), that alludes to there having been such is not entirely accurate. Please see emails below that show an on-going lack of communication and discussion on the part of Rampion and our request that the inclusion of our company names are removed from the ES as we do not feel that this represents reality and may give a false impression to the inspectorate. <u>Email 1: From Bill Brook to Brown and May, 07 February 2024</u> Nearly 5 months have passed since I sent the email below to Rampion Wind farm and their appointed agents. The email highlighted the lack of meaningful engagement by Rampion with the local Sussex based fishing industry and the contempt and disrespect they continue to show us despite the fact that this potential development will be displacing yet further the local fishermen who have worked this area for generations. By way of proof that this Corporation (Rampion), is ignoring our industry and pushing ahead regardless at the detriment of our industry and fish/shellfish stocks, my email remains to this day unanswered. No reply, no meeting organised, no request for fishing information. Nothing! Yet despite this, it is noted that Rampion have cited ourselves as having been "engaged" for their Impact assessment. Something that is a stretch of the truth and something that I will not allow to influence the current planning process. To Rampion. I require you with immediate effect to take out of your impact assessment any mention of Brighton & Newhaven Fish Sales or Leach Fishing and to confirm in writing that this has been done. I further require that the planning authorities are informed that the impact assessment will require updating in order to remove our company names that have been used in an attempt to justify or otherwise imply that local fisheries engagement has occurred when the reality is that this has been close to non-existent since the outset of the Rampion 2 project. Finally it is noted that throughout the impact assessment, Rampion are stating that the construction, operation and subsequent decommissioning of a 196km² structural project will have "***No Significant Effects have been identified in relation to potential impact of Rampion 2 on commercial fisheries***". As Rampion 1 has had significant impact on local fisheries, this statement can only be viewed as self-motivated rather than factually accurate. <u>Email 2: From Bill Brook to Brown and May, 18 September 2023</u> It is with interest that I read your email below! The statement "*We have carried out a huge programme of engagement and consultation over the past three years*", is not exactly true with regard to the local fishing industry. A couple of meetings in three years, that have resulted in very little is actually the sum total of the "*huge programme of engagement and consultation over the past three years*" with our sector. Not exactly impressive or indeed respectful.	**Chapter 10: Commercial fisheries, Volume 2, [APP-051]** assesses the impacts of the construction, operation and maintenance, and decommissioning of the Proposed Development on commercial fisheries. The assessment outcomes are not repeated in full in this response and can be accessed in the ES. The concerns of fisheries stakeholders have been considered in defining the scope of the commercial fisheries impact assessment, and in undertaking the assessment. Engagement with the local fishing industry is summarised in Section 10.3 **Chapter 10: Commercial fisheries, Volume 2, [APP-051]**. The Applicant has considered all feedback to date provided by the fishing industry, including Brighton & Newhaven Fish Sales Ltd. Early feedback received from stakeholders, including fishers, led to a significant change in the Rampion 2 design, in order to reduce potential impacts as far as possible, as documented in the Environmental Statement (ES). In comparison to the design put forward for consultation in the PEIR, the proposed Offshore Order Limit has been reduced by 35% and the number of turbines have been reduced by 22%. Engagement has primarily been undertaken via email communications from the Company Fishing Liaison Officer and meetings with five Fishing Working Groups, three of which already existed for Rampion 1 and two more which were created to reflect the change in geographical location of Rampion 2, further to the west. Bill Brock is a member of the Commercial Fisheries Working Group (CFWG), has been invited to three meetings to date and has attended all three meetings. The latest pre-application meeting was held in November 2022, with the announcement of the reduced offshore extent and turbine numbers, representing the final offshore DCO order limits. Fisheries engagement will continue throughout all phases of the Proposed Development in line with the approach to liaison set out in the **Outline Fisheries Liaison and Co-existence Plan, [APP-241]** secured through condition 11 (g) Schedule 11 and 12 of the **Draft DCO [PEPD-009]**. Furthermore, in efforts to be transparent, the Applicant has considered feedback received from Bill Brock since application submission, and provided communications to the wider fishing industry, aiming to answer Bill Brock's questions or concerns while also ensuring that all fisheries stakeholders are provided with the same and most up to date information, and so that fisheries stakeholders are equally informed and have the resources so that they can engage in the examination process if they desire. These communications are attached – see emails sent on 28 September 2023 and 19 February 2024 (**Appendices A and B**) by

Ref	Written Representation comment	Applicant's response
	As with Rampion 1, you intend to disrupt and displace the local fishing sector with your planned offshore construction and infrastructure, yet to date you have not had any meaningful discussion, negotiation nor agreement in place with local fishermen. The contempt this shows our sector is disappointing yet to be expected as this was true of the previous Rampion process Perhaps you would be kind enough to pass on the rising anger towards RWE due to their continuingly ignoring of the fact that they are wishing to conduct business in an area already populated with persons doing the same! <u>Email 3: From Brown and May to Bill Brook, 14 September 2023</u> Please see the below message issued on behalf of Rampion 2. I am writing to inform you that on 7th September, the Rampion 2 Development Consent Order (DCO) application for an offshore wind farm off the coast of Sussex, was accepted for examination by the Government's Planning Inspectorate. We have carried out a huge programme of engagement and consultation over the past three years and have subsequently made changes to the project proposals in response to feedback from statutory consultees and the Sussex community and we thank the local communities in Sussex for taking the time to provide feedback on the project proposals to date. The application being examined includes detailed proposals for the Rampion 2 Offshore Wind Farm, the final Environmental Statement which sets out potential impacts and mitigations, and a Consultation Report which details the engagement and consultations carried out over the past three years and how the Project Team has taken account of the feedback received. Situated to the west of the existing Rampion Offshore Wind Farm, Rampion 2, if consented, would include up to 90 turbines a minimum of eight miles offshore. An offshore export cable route would bring the power ashore under Climping Beach on the coast, and the underground cable route would continue inland to a new substation called Oakendene near Cowfold, then finally connect the power to the national electricity network at Bolney in Mid Sussex. The Rampion 2 Offshore Wind Farm could generate enough electricity to power the equivalent of over one million homes and reduce carbon emissions by around 1.8 million tonnes. This means Rampion and Rampion 2 combined could power the equivalent of all of the homes in Sussex, twice over. Now that the DCO application is accepted for examination by the Planning Inspectorate, in accordance with Section 56 of the Planning Act 2008, the Rampion 2 Project Team will publicise Notices of the accepted application in local and national newspapers, setting out how the community can register their opinions with the Planning Inspectorate. The public will be able to view the final proposals and register as an 'interested party' with the Planning Inspectorate at the Project Page of the Planning Inspectorate website at Rampion 2 Offshore Wind Farm | National Infrastructure Planning (planninginspectorate.gov.uk). Anyone wishing to be kept informed or to participate in the examination can register at the same website. The Examination process is expected to take six months, and a final decision on whether consent will be granted will be made by the Secretary of State for the Department of Energy Security and Net Zero by early 2025.	the Applicant's Company Fishing Liaison Officer, Brown and May Marine Ltd. The email sent on 19 February 2024 (**Appendix B**), also encourages fishers to provide a representation if any details are not sufficiently captured in the documents submitted by the Applicant. The Applicant acknowledges Bill Brock's request to remove reference to Brighton & Newhaven Fish Sales Ltd and Leach Fishing, however, these references are based on finalised meeting minutes, and responses to statutory consultation. The details within the ES are, therefore, factually accurate and The Applicant does not intend to remove the reference to Brighton & Newhaven Fish Sales Ltd and Leach Fishing from the ES. The Applicant acknowledges that post offshore design freeze engagement efforts decreased comparatively, as noted in an email sent by Brown and May Marine on behalf of the project on the 19 February 2024 (**Appendix B**), however, this is reflective of no changes to the offshore design of Rampion 2 since the last Fisheries Working Group (FWG) meetings, held in November 2022. The Applicant focused its engagement with fisheries stakeholders prior to offshore design freeze to ensure all concerns and feedback from fisheries stakeholders could be documented and considered before the design was fixed and ahead of application. The Applicant is conscious not to organise meetings where there are no material updates to offshore activities, design or otherwise, to minimise stakeholder fatigue and time wasting. Following DCO application, the Applicant has communicated that those who wish to have their feedback and position considered in examination on 14 September 2023 (**Appendix C**), should do so by engaging with the Planning Inspectorate's examination process, signing up as an interested party and providing representations and/or engaging with the PINS websites as they see fit. It is the Applicant's preference that all feedback is formally documented through the Planning Inspectorate's process, for due consideration by the Examining Authority and transparency for the benefit of all (please see communication in attachment). The Outline Fisheries Liaison and Coexistence Plan has been drafted in a way which mirrors the formatting and level of detail of Rampion 1's Fisheries Liaison and Coexistence Plan (FLCP), for which fishers were heavily involved in the drafting. The Applicant wants to emphasise that the document submitted in the DCO application is an outline document, and that the Applicant will engage with fisheries stakeholders including the Fishing Working Groups, to finalise this document, post consent.

Table 2-6 Applicant's Response to Brian Conrad Whiting's Written Representations [REP1-075]

Ref	Written Representation comment	Applicant's response
2.6.1	As a retired builder and his wife who enjoy their holidays at Brookside Caravan Park, if this project is approved we think this will reduce the quality of our holiday/ break. The humming noise of the turbines and maintenance will spoil our time away to visit family.	A screening assessment of the operational noise effects of the Proposed Development as a result of the Wind Turbine Generators on residential receptors (including caravan parks) during the operation and maintenance phase have been assessed in **Chapter 21: Noise and vibration, Volume 2** of the ES **[PEPD-018]** and **Appendix 21.3: Preliminary operational noise predictions, Volume 2** of the ES **[APP-178]**. The offshore array area is located approximately 13km from the nearest shoreline. This screening assessment concluded that no residential receptors are predicted that there will be no exceedances above the lower applicable noise limit (35dB L_{A90}) as stated in ETSU-R-97 The Assessment and Rating of Noise from Wind Farms (The Working Group on Noise from Wind Turbines, 1996). Therefore, a detailed noise assessment is not required as it is expected that the Wind Turbine Generators will comply with the noise limits in accordance with ETSU-R-97. The operational only access immediately to the north of the caravan park will not give rise to significant levels of noise. Infrequent vehicle pass-bys (for periodic testing or unscheduled maintenance, as described above) would not be out of character for the area, given that agricultural vehicles would be expected to access the field and that there is an A-road adjacent to the east boundary of the caravan park. For further information, please see the Applicant's response to Relevant Representations regarding Brookside Caravan Park (Table 6-8, **Applicant's Response to Relevant Representations [REP1-017]**.

Table 2-7 Applicant's Response to Christopher Nigel Guy's Written Representations [REP1-077]

Ref	Written Representation comment	Applicant's response
2.7.1	Within the time of public consultation at Cowfold the assessments on key issues of impact were so inadequate (or evasive) as to justify the choice in preference to other sites which, e.g. did have adequate environmental assessments made in 2012. Oakendene is in sight to the North from the rising ground of the High Weald, ANOB. The substation, however, would be much further from the NG which it would serve than both the alternative sites considered.	**Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** describes the alternatives studied by the Applicant and a comparison of their environmental effects across the project as a whole. This includes the alternatives considered and consulted on prior to the DCO Application. As described in **Chapter 3 Alternatives, Volume 2** of the ES **[APP-044]**, the Proposed Development has been developed through a multi-disciplinary design process including environment, engineering, landowner, and cost considerations. The Applicant has sought to avoid, reduce, or minimise the effects through the design process and also by identifying and securing embedded environmental measures. It is acknowledged that some residual effects remain across the site. The Applicant notes that paragraph 4.4.1 NPS EN-1 (2011), against which the Proposed Development is to be assessed, states there is no "*general requirement to consider alternatives or to establish whether the proposed project represents the best option*". This is reflected in paragraph 4.3.9 of NPS-EN1 (2023), which came into force in January 2024. Some specific policies require consideration of alternatives as set out in the National Policy Statement EN-1 (Department of Energy and Climate Change, 2011a), however these do not apply in relation to the comparison of the substation options. Section 3.6 of **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** provides the information on the onshore substation site selection process. Section 3.6 describes the site selection process and the reasons for other sites being discounted based on the multi-disciplinary factors identified in the paragraph above. The selection of Oakendene is clearly stated as favourable for engineering, cost, and landowner considerations in paragraphs 3.6.23 to 3.6.25 of **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**. Significant weight was also given to the environmental constraints and related policy in the overall balance of the decision. This Applicant has also developed further embedded environmental measures that have been presented in the application including the design principles in the **Design and Access Statement [AS-003]**, **Outline Landscape and Ecology Management Plan [APP-232]** and **Outline Operational Drainage Plan [APP-223]** secured by requirements 8, 12 and 18 of the **Draft DCO [PEPD-009]** respectively. The Applicant has provided further information on the decision to select the Oakendene site for the onshore substation (see Appendix 2 – Further information for Action Point 4, **Applicant's Response to Action Points Arising from Issue Specific Hearing 1 [REP1-021]** (submitted at Examination Deadline 1).
2.7.2	Mitigation proposals for conserving the ecology of the site which is rich in bio-diversity are not encouraging nor is replacement of individual oak trees in the way of cable runs seriously documented.	**Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the Environmental Statement (ES) **[APP-063]** describes the effects on the terrestrial ecology features present. The mitigation hierarchy has been applied through the design of the Proposed Development so that efforts have been made to avoid ecological features, minimise levels of effect where avoidance is not possible (e.g. trenchless crossings), mitigate effects (e.g. through sensitive temporary lighting design) and compensate for residual effects. Although there will be short term effects on a number of ecological features, the approach to construction, the reinstatement of habitats and habitat creation (both at the onshore substation site and as part of biodiversity net gain delivery) will provide a positive legacy for terrestrial ecology in the medium to long term. The ES assessments undertaken have concluded that no significant effects on terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development. **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]** identifies the location of permanent loss of hedgerow and woodland (noting that reinstatement in these areas will be of mixed scrub). The only other habitats where permanent loss will be evident is in modified grassland and arable field. Habitat reinstatement and indicative habitat creation within the Proposed DCO Order Limits is described in the **Outline Landscape and Ecology Management Plan [APP-232**]. A detailed Landscape Ecology and Management Plan will be produced through Requirements 12 and 13 of the **Draft DCO [PEPD-009]**.

Ref	Written Representation comment	Applicant's response
2.7.3	The westerly works compound proposal would be a disaster, increasing cross-traffic flows to the main site nearby and degrading the already congested stretch of the A272. The excessive number of parked vehicles juggling with cement lorries etc would impose heavy environmental risks to the adjacent tributary of the River Adur.	Please see the Applicant's response in **Table 2-4** above regarding concerns related to transport effects related to the Oakendene Industrial Estate. It should be noted that the westerly compound is intended to serve the installation of the cable, not the construction of the substation on the adjacent site. For further information, please see the Applicant's response to Relevant Representations regarding Oakendene Industrial Estate (Table LI3, **Applicant's Response to Relevant Representations** **[REP1-017]**.
2.7.4	The economic future of the Industrial Estate would be in doubt but there could be no avoiding a huge economic impact due to worsening traffic delays on the main road linking Cowfold village with the A23. All the above issues of Rampion2's likely impact are yet to be addressed.	For further information, please see the Applicant's response to Relevant Representations regarding Oakendene Industrial Estate (Table LI3, **Applicant's Response to Relevant Representations** **[REP1-017]**.

Table 2-8 Applicant's Response to Clare Woolcock's Written Representations [REP1-078]

Ref	Written Representation comment	Applicant's response

2.8.1	I am very concerned that any application should be approved in the absence of clear plans to avoid the AQMA, an accurate vehicle analysis from Rampion, any details for traffic management on the A272, a firm solution to the Oakdene flooding issue and any proper visual representations of the visual impact.	A range of embedded environmental measures have been provided by the Applicant as detailed within the **Commitments Register [REP1-015]** (updated at Examination Deadline 1) which are secured through **Outline Construction Traffic Management Plan (CTMP) [REP1-010]** which has been updated at Deadline 1 submission. This includes:
		
		• Commitment C-157: *The proposed heavy goods vehicle (HGV) routing during the construction period to individual accesses will be developed to avoid major settlements of Storrington, Cowfold, Steyning, Wineham, Henfield, Woodmancote and other smaller settlements where possible*; and
		• Commitment C-158: *The proposed heavy good vehicle (HGV) routing during the construction period to individual accesses will avoid the Air Quality Management Area in Cowfold where possible.*
		
		These commitments are also reflected in Table 5-1 of the **Outline CTMP [REP1-010]** secured via Requirement 24 of the **Draft DCO [PEPD-009]** which has been updated at Deadline 1 submission and confirms prescribed local HGV access routes for all sections of the onshore cable corridor and Table 5-2 which details specific local constraints and proposed management of construction traffic routes.
		
		These commitments ensure that HGV construction traffic will route along the A27 and A23 to gain access to the A272 east of Cowfold wherever possible, thereby avoiding the village centre. Therefore, only accesses A-52, A-56 and A-57 will require construction traffic to route through Cowfold Village centre. As calculated by using data included in Table 5-3 of the **Outline CTMP [REP1-010]** which has been updated at Examination Deadline 1 submission, the impact of this commitment is the removal of up to 22,000 two-way HGV trips (11,000 HGVs) from Cowfold Village centre over the construction phase.
		
		Whilst Commitments C-157 and C-158 discourages traffic from routing through the Cowfold AQMA for robustness within the **Chapter 23 Transport, Volume 2** of the ES **[APP-064]**, it has been assumed that approximately 25% of HGV traffic will route through Cowfold from the A24 and A272 east of the village centre when entering or exiting construction accesses at Oakendene, Kent Street or Wineham Lane. This accounts for the potential delivery of material or equipment to / from locations directly west of Cowfold or use of the Strategic Road Network and provides a robust assessment of impacts within Cowfold.
		
		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 [REP1-006]** (submitted at Deadline 1) and **Appendix 23.2: Traffic Generation Technical Note, Volume 4** of the ES **[REP1-008]** (updated at Examination Deadline 1). At peak construction, taking account of the construction traffic routing contained within the **Outline CTMP [REP1-010]** (updated at Examination Deadline 1), the following effects have been identified for Cowfold:
		
		• At A281 south of Cowfold (Receptor 23):
		  ▸ An 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):

Ref	Written Representation comment	Applicant's response

- 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):
  - 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):
  - 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.

As noted within Institute of Environmental Management and Assessment (IEMA) 1993 publication *Guidelines for the Environment Assessment of Road Traffic* (IEMA, 1993) and 2023 publication *Environmental Assessment of Traffic and Movement* (IEMA, 2023) 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.

Chapter 19: Air quality, Volume 2 of the ES **[APP-060]** presents an assessment of air quality impacts from construction traffic. The assessment concludes that the Proposed Development will not result in significant impacts 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-173]** with the assessment in **Chapter 19: Air quality, Volume 2** of the ES **[APP-060]** concluding that there are no significant impacts. Additional scenarios were tested in **Chapter 32: ES Addendum [REP1-006]** (submitted at Deadline 1) with the same conclusions. An **Outline Construction Traffic Management Plan (CTMP) [REP1-010]** which has been updated at Deadline 1 submission is included as part of the DCO Application which details the routing of heavy goods vehicles (HGVs) during the construction phase of the Proposed Development. The **Outline CTMP [REP1-010]** which has been updated at Deadline 1 submission is underpinned by commitment C-158 of the **Commitment Register [REP1-015]** which states proposed heavy goods vehicle (HGV) routeing during the construction period to individual accesses will avoid the AQMA in Cowfold where possible. This is secured by Requirement 24 of the **Draft DCO [PEPD-009]**.

Chapter 26: Water environment, Volume 2 of the ES **[APP-067]** considers the potential effects of the Proposed Development to receptors sensitive to flood risk. The likely impact of the Proposed Development on flood risk receptors has been assessed to be not significant. This has been informed by the findings within **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** and considers the embedded environmental measures detailed in the **Outline Code of Construction Practice [PEPD-033]**, key measures include: C-5, C-28, C-73, and C-117 which are secured through requirement 22 of the **Draft Development Consent Order [PEPD-009]**.
As described in **Chapter 18: Landscape and visual impact, Volume 2** of the ES **[APP-059],** the LVIA study area for the Oakendene substation has been subject to detailed desk and site- based assessment as well as consultation on viewpoint location. The site is partly screened by existing mature vegetation and the design process focuses on protecting and enhancing this existing screening. The assessment includes five viewpoints, however a new request for access is being sought so that the views from the property can be added to the assessment.

Ref	Written Representation comment	Applicant's response
		There is a practical difficulty in positioning viewpoints too close to a development to the extent that they cannot be viewed in their landscape context and the whole of the image would be taken up by a close-range image of development which cannot be modelled at a detailed level and would extend beyond the confirms of the image. Receptors this close to development obviously have a high magnitude of change and that is reported in **Chapter 18: Landscape and Visual Impacts, Volume 2** of the ES **[APP-059]** where this occurs. Viewpoints at further distance are considered more useful in that they help to define the outer geographical extent of significant effects. The Indicative Landscape Design for the Oakendene Substation and its design principles are set out in the **DAS** **[AS-003]** and further expanded on in the **Outline LEMP** **[APP-232]**.
2.8.2	Further more, subsequent meetings with Rampion have uncovered inaccurate, missing and misleading information has been submitted by Rampion relating to the corporate links between Rampion and the Kent Street proposal, a grossly misleading traffic survey, the absence of any fire strategy, failure provide any risk assessment relating chemical and fire pollution or sound, vibration and lighting with respect to habitats and species.	It is not clear from this representation what 'the Kent Street proposal' is.
2.8.3	This is in addition to the earlier submitted objections relating to lack of consultation, better alternative sites, and destruction of the ancient and unspoiled landscape nature and the huge range of wildlife it supports, together with recent doubts about the economic validity of the project.	**Consultation** 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]**. 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]**. During each consultation, the Applicant's environmental information provided a full account of the impacts of draft proposals on the environment and communities, and outlined mitigation proposals. This was set out in the consultation materials for each consultation, as follows: • Statutory Project-Wide Consultation, July-September 2021 as set out in the Preliminary Environmental Information Report (PEIR) (Rampion Extension Development, 2021). • Reopened Statutory Project-Wide Consultation, February – April 2022 as set out in the PEIR (RED, 2021). • Statutory Onshore Consultation, October – November 2022 as set out in the PEIR Supplementary Information Report (SIR) (RED, 2022). • Targeted Onshore Consultation, February – March 2023 as set out in the PEIR Further Supplementary Information Report (FSIR) (RED, 2023). For further information please see Appendix 15 Promotion of Rampion 2 Consultations in and around Cowfold 2021-2022 (**Applicant's Response to Relevant Representations** **[REP1-017]** submitted at Deadline 1.

Ref	Written Representation comment	Applicant's response
		Alternatives Please see the Applicant's response in **Table 2.7, reference 2.7.1** above regarding concerns related to ecological effects. **Terrestrial ecology** Please see the Applicant's response in **Table 2.7, reference 2.7.2** above regarding concerns related to ecological effects. **Project viability** The Proposed Development is sited in a location which is suitable for constructing an offshore wind farm and has a sufficient wind resource to make it viable. The operational Rampion 1 project demonstrates the viability siting offshore wind farms in the general area along the Sussex coast line. The Proposed Development is anticipated to produce the annual equivalent of that needed to supply over 1 million homes. The Applicant has over 20 years of experience in constructing and operating offshore wind farms, and has determined that Rampion 2 is a viable site and productive location for wind energy generation, with a predicted wind speed of ~9.3 m/s.

Table 2-9 Applicant's Response to Connie Davies's Written Representations [REP1-080 & REP1-081]

Ref	Written Representation comment	Applicant's response
Water and Flooding at the proposed substation site at Oakendene		
2.9.1	**Summary** This document is addressed to WSCC as Local Lead Flood authority. Please note that HDC was only invited to meetings regarding the proposed substation at Oakendene in June 2022, a month before the public announcement, and five months before the consultation closed. There appears to be limited research, based on desk top studies and an inaccurate interpretation of the Environmental Agency flood maps. Moreover, the research relies on inaccurate historical information regarding flooding at Oakendene from surface water, ground water and ordinary watercourses. There seems to be no flood risk assessments or modelling to account for the proposed piling or construction or an evaluation of their consequences for the local residents or communities downstream. Each item will be discussed in detail within this document.	The assessment of flood risk and outline design was prepared in accordance with the West Sussex County Council (WSCC) and Horsham District Council (HDC) advice, as recorded in meeting minutes included in Annex A of the **Appendix 26.2: Flood Risk Assessment), Volume 4** of the Environmental Statement (ES) **[APP-216]**. As outlined in the **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**, the onshore substation at Oakendene is situated within Flood Zone 1 (low probability of flooding). The main sources of flood risk at the onshore substation site are fluvial and surface water, associated with run-off due to the clayey ground conditions. The approach to assessment of fluvial flood risk from the ordinary watercourse to the south of the substation site was agreed with the Lead Local Flood Authority (LLFA) (WSCC) and the Local Planning Authority (LPA) (HDC) during a consultation meeting on 22 June 2022. It was agreed that the 0.1% Annual Exceedance Probability (AEP) flood extent (defined by the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping) was a suitably precautionary proxy for the 1% AEP plus a climate change allowance for the operation and maintenance phase (2030 to 2060). The HDC flood officer commented that as long as the onshore substation was positioned outside of the 0.1% AEP extent HDC would not be concerned. HDC also advised that there are no HDC records of historical flooding incidents at the onshore substation site at Oakendene. No advice to the contrary was provided by WSCC during the pre-Development Consent Order application consultation.
2.9.2	The following documents have been assessed: 6.2.26, 6.4.26.4, 6.4.26.2, 6.3.26(1), 6.2.26(2), 6.4.26.1, 6.4.26.3. Oakendene was not included in the hydrogeological risk assessment or the flood risk assessment for pluvial or fluvial floodplains, and there appears to have been no soil samples or geology tests conducted on the Oakendene site. The application frequently refers to EN-1 and relevant local authority plans and policies, but has largely ignored these guidelines and principals in its application. The Environmental Agency flood maps relating to the two sites appear to have been misinterpreted by Rampion and flooding risks downplayed at Oakendene.	Oakendene overlies the Wealden Clay Formation, which the Defra MAGIC website (Defra, 2023) identifies as unproductive strata with low groundwater vulnerability. The online British Geological Survey (2022) GeoIndex Viewer describes this geology as being low permeability and generally having no groundwater except at shallow depths. The Oakendene site was not included in the **Appendix 26.4: Hydrogeological Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-218]** because the main purpose of that study was to assess any potentially significant effects on public and private water supplies drawing from the Chalk principal aquifer outcrop and shallow subcrop along the proposed cable route further to the south-west, from Poling north-east to near Washington. With regards to flood risk, the Applicant refers to response **reference 2.9.1** above with regards to the approach to assessment of flood risk to the Oakendene substation site, as agreed with West Sussex County Council (WSCC) and Horsham District Council (HDC). On the basis that the substation footprint and associated sustainable drainage (SuDS) basins avoids the 0.1% Annual Exceedance Probability (AEP) Risk of Flooding from Surface Water (RoFSW) extent, the substation site is not considered to be in a floodplain.
Inadequate investigation of Oakendene site, prior to decision being announced		

Ref	Written Representation comment	Applicant's response
2.9.3	There is no evidence to suggest that there was a thorough investigation of the two alternative sites, in terms of traffic impact, flooding/geology or environmental/ecology. Looking at the minutes of meetings, HDC only became aware that Oakendene had been proposed in June 2022, and Rampion announced their decision in July 2022. However, there was no environmental/ecological studies, geological or traffic surveys/modelling for this site. It was clear from a public meeting held with Rampion in Cowfold, one month before the end of the consultation process in November 2022, that Rampion were not aware that Oakendene had suffered from surface water flooding, nor that Kent St was a single- track lane, assessed as "inappropriate" in their Woods report, nor that a High voltage cable lay under the proposed site.	The Bolney Road / Kent Street onshore substation search area in which the chosen Oakendene site is located was identified in the Preliminary Environmental Information Report (PEIR) in 2021. Application of the Sequential Test is set out in Section 9.1 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**, which confirms that all sources of flood risk were considered through the project siting and design process. A sequential approach was taken to all aspects of the development, as detailed in Paragraph 9.1.2 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**, which states *"…A sequential approach to flood risk then informed the determination of the onshore cable corridor (and thus proposed DCO Order Limits) between the landfall at Climping and the existing National Grid Bolney substation to ensure that the Proposed Development and associated temporary construction infrastructure and works will be sited in areas of lower flood risk if possible..."* Paragraphs 9.1.29 to 9.1.40 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** outline the approach taken with respect to the substation site. Of the shortlisted two options of Oakendene and Wineham Lane North, the Wineham Lane North site was marginally preferable from a flood risk perspective based on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping. However, at both sites the risk of surface water flooding was ultimately deemed to be low following the provision of appropriate mitigation (for which greater space was available at Oakendene to achieve appropriate mitigation compared to the spatially constrained Wineham Lane North site), and therefore any preference was considered to be marginal. The final selection of the Oakendene onshore substation (at marginally higher surface water flood risk than the Wineham Lane North substation search area option, but with more space available to implement mitigation) was therefore driven by other technical and engineering constraints. With regards to historic flooding records, this anecdotal information is noted and welcomed. As noted in response **reference 2.9.1** above, Horsham District Council (HDC) advised that there are no HDC records of historical flooding incidents at the onshore substation site at Oakendene. No advice to the contrary was provided by West Sussex County Council (WSCC) during the statutory consultation. The Applicant would like to make clear that this was not interpreted to mean that no flooding occurs at the site, but that there are noted records of flooding at the site itself. This is understandable given the rural nature of the site. Assessment of flood risk at the site has followed a precautionary approach as set out in response **reference 2.9.1** above. Properties in Oakendene at existing surface water flood risk are upslope of the development, with no direct hydrological connectivity. The following embedded environmental measures (as outlined in Table 5-9 of the **Outline Code of Construction Practice** **[PEPD-033]**) are of relevance to ensure that the existing functionality and conveyance capacity of the drainage ditches and culvert beneath the A272 culvert are maintained to ensure no detrimental impact to upslope flood risk: C-28, C-30, C-73, C-119, C-175, C-126, C-130, C-179, C-181, and C-183.
Fundamental Flaws to assumption being made		
2.9.4	Reading through the minutes of the meetings of 1.4.22 found in document 6.4.26.2, on p174, it's clear that there was an underlying assumption that Rampion 2 would be located on Wineham Lane, because participants were "trying to learn lessons from	With regards to flood risk and identification of the floodplain, the Applicant refers to response **references 2.9.1** and **2.9.3** above.

Ref	Written Representation comment	Applicant's response
	Rampion 1" and Oakendene had not been included in assessments. However, this assumption is not appropriate for Oakendene as there are significant differences between the two proposed substation sites. Rampion 2 is 30% bigger, with the entrance to the site directly off the fast moving, busy A272, which caters for over 18000 vehicles daily. Whereas Rampion 1 was located off the relatively quiet Wineham Lane, which is often used by HGV's because it is wider and has two lanes. Oakendene is also on a floodplain which has been designated as an area of "high flood risk" according to the Environmental Agency maps. Properties nearby have flooded badly and residents regularly ask the council to clear ditches and pipes in order to reduce their risk of flooding.	Information regarding the Oakendene Substation alternatives have been addressed in Table 6.19 'Design and siting of the onshore substation at Oakendene in the **Applicant's Responses to Relevant Representations** **[REP1-017]** and further information is available in Appendix 2 – Further information for Action Point 4, **Applicant's Response to Action Points Arising from Issue Specific Hearing 1** **[REP1-018]** submitted at Deadline 1.
Why did Rampion choose a floodplain when a perfectly good alternative site, at Wineham Lane, was available?		
2.9.5	1 The EN-1 planning guidelines encourage developers to avoid essential infrastructure from being built on vulnerable land, such as floodplains, just in case they suffer outages or loss of power due to frequent flooding. Such outages would affect wide areas of the South East, during the worst weather conditions. 2 Why has Rampion chosen such a vulnerable site, when a perfectly good alternative site is available at Wineham Lane North?	Please refer to response **reference 2.9.3** above regarding the choice between the two substation sites. Please also refer to response **reference 2.9.1** above. The substation footprint has been sited outside of the Environment Agency's Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south. Therefore, the substation is not situated in the floodplain.
2.9.6	During the meeting on 9.11.2020 in 6.4.26.2 page 159, point 15- Oakendene was not even discussed as a substation site, therefore it was not included in the "Flood risk assessment in the fluvial or pluvial floodplains". Neither was it included in terms of floodplain storage loss and the impact of increased flooding for the neighbours and those living downstream was not assessed.	Please refer to response **reference 2.9.1** with regards to the assessment of flood risk at the substation site and subsequent substation layout. The substation footprint has been sited outside of the Environment Agency's Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south, as agreed with HDC during a consultation meeting on 22 June 2022. Therefore, there is no loss of floodplain storage.
2.9.7	The meeting on 22.3.22 demonstrates that the underlying assumption was that the substation would be built at Wineham Lane, since there were no discussions about Oakenene and there was no representation from HDC, which would cover that area. During this meeting, RC (from Woods Gp) stated in points 4 & 5, that "the loss of fluvial floodplain storage… would increase the water levels elsewhere". There was also a discussion (in point 7) about the problems of Natural England objecting to moving floodplain soil away from site. TL from the EA made some excellent points regarding the need for additional information, when considering floodplains, however the discussion did not extend to, or cover Oakendene, or whether a receptor should be located nearby. The point about soil removal, it is highly likely to be necessary at Oakendene as new hardstanding and tracks will need to be installed, but this item does not appear to have been examined.	The meeting held on 22 March 2022 between Rampion and the Environment Agency was focused on onshore construction activities in the floodplain. Neither the Oakendene or Wineham Lane substation options (being considered at the time) were discussed on the basis that neither of the sites are situated within the Environment Agency Flood Zones. As set out in response **reference 2.9.1**, the Oakendene substation footprint has been sited outside of the Environment Agency's Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south, as agreed with HDC during a consultation meeting on 22 June 2022. Therefore, the site is not situated in the floodplain of this watercourse.
2.9.8	During the meeting on 22.6.22 between WSCC, HDC, MSCC and Woods Gp, the following statement was made by MB (from HDC) "MB advised that as long as the substation was positioned outside the 0.1% AEP surface water flood extent, he would not be concerned. MB advised that HDC records of historical flooding indicated that no flood incidents at Bolney Rd or Kent St had been recorded." (According to neighbours, there have been a number of flood incidents for local residents and HDC is called out on a regular basis to deal with flooding issues).	Reference to MB (from Horsham District Council, HDC) comments noted. The anecdotal information provided with regard to flooding incidents is noted. The Applicant refers to response **reference 2.9.3** above with respect to embedded environmental measures to ensure no detrimental impact to adjacent flood risk.

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2.9.9	According to the Environmental Agency flood maps, it would appear that Oakendene suffers from both 0.1% and above 3.3% AEP, thus classifying it as "at high risk of surface flooding". Having walked across these fields in November and May, these maps are possibly out of date because the flooding is far more extensive and widespread, with many areas being permanently submerged during the winter months, due to the impermeable wealden clay. Please let us know if you would like photos showing 4-6" of water flooding these meadows. Please refer to the maps on p199 (6.4.26.2)showing the extensive flooding at Oakendene, and p198 comparing Oakendene with Wineham Lane, which has no such flooding issues. The Oakendene meadows have a number of watercourses running through the land, as well as the 7km Cowfold Stream, and several lakes.	Photos provided in the CowfoldvRampion Local Impact Report are noted and welcomed. The photos are entirely consistent with the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping upon which the Applicant has based his assessment of flood risk as set out in Paragraph 5.7.14 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]**, in agreement with WSCC and HDC. These photos therefore provide a means of validation of the Environment Agency's RoFSW mapping, providing further confidence in the assessment and minimising uncertainty. The Applicant undertook a site visit to the substation site and watercourse on 2 February 2024. It is acknowledged that minimal rainfall (<1mm) fell during the preceding week (based on review of the Cowfold rainfall gauge), however the watercourse was noted to be in-channel and no standing water was observed across the substation site. For a detailed review of the photos, refer to **Applicant's Response to CowfoldvRampion Report (Document Reference 8.37)**.
2.9.10	These maps obviously take no account of the pilings, or the displacement of water as a result of the concrete base/foundations. The displacement of water is expected to be significant and will thus increase the risk of flooding of neighbouring properties and also affect those communities downstream. No analysis or modelling has been completed for the consequences of construction on the alternative proposed sites.	The **Outline Operational Drainage Plan [APP-223]** outlines the approach to manage surface water drainage through the operational phase of the project, following the drainage hierarchy and puts forwards a range of relevant sustainable drainage systems (SuDS) features. The final Operational Drainage Plan must accord with the **Outline Operational Drainage Plan [APP-223]** and is secured at Oakendene via Requirement 17 of the **Draft Development Consent Order [PEPD-009]**. Please refer to response **reference 2.9.1** with regards to the assessment of flood risk at the substation site and subsequent substation layout. The substation footprint has been sited outside of the Environment Agency's Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south, as agreed with HDC during a consultation meeting on 22 June 2022. Therefore, there is no loss of floodplain storage. The Applicant is confident the precautionary approach in the **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]** and **Design and Access Statement [AS-003]** will ensure the onshore substation will not be at flood risk, nor increase flood risk elsewhere. This will be addressed through the adherence to National Grid Target Guidance (C-230) that is secured via the **Design and Access Statement [AS-003]** and Requirement 8 within the **Draft Development Consent Order [PEPD-009]**.
2.9.11	Surface water flooding is a real concern for several local residents at neighbouring properties close to Oakendene. One household had to move out for an entire year, due to the extensive flood damage. A number of residents frequently contact HDC to clear the ditches, re bore holes and clear pipes that run under A272, in order to avoid more flooding. This is a very real concern to a number of residents in the vicinity of Oakendene. The 3 situation is only likely to get considerably worse if hardstanding and piling is installed at the site.	The anecdotal information provided with regards to flooding incidents is noted. The Applicant refers to response **reference 2.9.3** above with respect to embedded environmental measures to ensure no detrimental impact to adjacent flood risk. In addition, the Applicant refers to response **reference 2.9.10** above with regards to the management of surface water runoff from the substation.
2.9.12	According to the Environmental Agency, the properties within the same Oakendene post code, which are currently at "high risk" of surface water flooding according to Gov analysis, are: Coopers Cottage, Cass Joinery at unit C11, Oakendene Estates office, South Lodge on Bolney Rd and the Coach House. Properties that are	The Applicant welcomes additional anecdotal information provided here. Not all of these properties have been located, however the majority of those that have are situated on Oakendene Industrial Estate approximately 350m west of the substation site.

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	currently at "medium risk" are: Ashurst Cottage, and the following businesses Ultimate Autos at C7, Holders Tree Services and the Two units at C1-C2. There may be more properties at risk, however this was the only postcode that was checked.	The Applicant refers to response **reference 2.9.3** above with respect to embedded environmental measures to ensure no detrimental impact to adjacent flood risk.
Legislation and good practice		
2.9.13	NPS EN=1 paragraph 5.7.5 identifies a variety of minimum requirements for Flood Risk Assessments (FRA's). These do not appear to have been completed for both sites. Paragraph 5.7.7 states that "Applicants for projects which may be affected by, or may add to, flood risk should arrange preapplication discussions with the EA, and, where relevant, other bodies such as Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRAs, and identify the information that will be required by the IPC (I [now the Planning Inspectorate] to reach a decision on the application when it is submitted."	As set out in Section 1.3 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]**, key stakeholders have been consulted throughout the lifetime of the project to inform the scope and requirements of the Flood Risk Assessment.
2.9.14	According to 6.2.26 Table 2-1 on p26 Legislation Relevance to protection of groundwater Overarching National Policy Statement (NPS) for Energy EN-1 Department of Energy and Climate Change (DECC) (2011) EN-1 states that "Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES or equivalent".	Assessments of the existing status and impacts of the Proposed Development on the water environment (including groundwater) are presented in **Chapter 26: Water environment**, **Volume 2** of the ES **[APP-067]**, **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**, **Appendix 26.3:Water Framework Directive Compliance Assessment, Volume 4** of the ES **[APP-218]** and **Appendix 26.4: Hydrogeological Risk Assessment, Volume 4** of the ES **[APP-218]**.
2.9.15	No such studies appear to have been completed for the Oakendene or Wineham Lane sites. If they have been completed and comparisons made, please may we see copies of the results. Questions: 1 What type of screening/analysis has been completed for the two proposed substation sites? Have they included soil analysis, flowpath screening/analysis, contour polygon screening, assessment of pluvial threats, fluvial and pluvial flood hazard assessments, EA flood maps updated, potential depth of inundation, site characteristics, such as existing drainage and topographic data? Accurate analysis of local historical flooding at the proposed sites?. Comparison of the Flood study modelling for the two sites?	The impacts of the construction, operation and decommissioning of the proposed onshore substation at Oakendene have been assessed based on a consideration of all available baseline information and embedded environmental measures and are summarised in Tables 26-27, 26-29 and 26-31 of **Chapter 26: Water environment**, **Volume 2** of the Environmental Statement (ES) **[APP-067]**. **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** presents the site-specific flood risk assessment for the project. Consideration of flood risk between the two substation sites considered is detailed in response **reference 2.9.3** above.
2.9.16	2 How deep are the pilings expected to be for the Oakendene sub station? What are the impacts /consequences of dewatering and drilling activities on ground water levels for deeper excavations? (1.2.10 p9, 6.4.26.4)	Environmental measure C-152 of the **Commitments Register** **[REP1-015]** states that *"In the event that piling is selected for installation of the onshore substation foundations, a detailed piling risk assessment will be prepared. This will be submitted to the Environment Agency for approval, prior to the commencement of construction"*. This is secured by Requirement 22 of the **Draft Development Consent Order** **[PEPD-009]**. The impacts of the construction of the proposed onshore substation at Oakendene including with respect to groundwater dewatering and piling have been assessed based on a consideration of all available baseline information and embedded environmental measures and are summarised in Table 26-27 of **Chapter 26: Water environment**, **Volume 2** of the Environmental Statement (ES)

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		[APP-067]. **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** presents the site-specific flood risk assessment for the project.
2.9.17	3 6.4.26.1- p62 the Cowfold stream has been "screened out". Should this be screened in? and included in the analysis since it is located on the proposed substation site at Oakendene. i) If pilin gs and concrete are poured as the foundation for the sub station, what consequential affects will it have on the surface water? and on the Properties that are currently categorised as at "high risk" of surface water flooding? ii) What will be the affect on properties downstream, along the River Adur?	The abstraction to which this 'screened out' comment refers (rather than the watercourse) is taken 2.1 km to the north-east and upgradient of the proposed Order Limits, such that it is hydraulically disconnected from the scheme and therefore 'screened out' from further assessment. The Cowfold Stream Water Framework Directive (WFD) water body itself remains 'screened in'. With regards to flood risk, please refer to response **reference 2.9.10**. The Applicant is confident the precautionary approach in the **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** and **Design and Access Statement** **[AS-003]** will ensure the onshore substation will not be at flood risk, nor increase flood risk elsewhere.
2.9.18	4 According to 6.4.26.2 section 5.3.10 There is an area of isolated high risk 3.33%AEP. According to minutes on 22.6.2022, This area has only been assessed using historic aerial imagery and no soil analysis. Would it be possible to arrange a detailed site investigation during the winter months from November to April? Furthermore, Rampion state that "the underlying topography used within the RoFSW modelling pre-dates this development and does not provide an up to date overview of surface water flood risk at the site." Therefore, an up to date survey is requested.	Paragraph 5.3.10 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** relates to the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping at the National Grid Bolney substation extension site, rather than the Oakendene substation. No further assessment of surface water flood risk is deemed necessary given that the mapped area of high risk relates to a historic pond, which would naturally accumulate surface water runoff. As stated in Paragraph 5.3.10, the pond no longer exists.
2.9.19	5 According to 5.3.15 "the development have the potential to increase the overall extend of lower permeability surfaces within the proposed DCO Order Limits. These are associated with the development of permanent hardstanding at the onshore substation at Oakendene. This could lead to an increase in peak runoff rates (and volumes) and a consequent increase in flood risk for downstream receptors." Rampion were obviously aware of this increased flood risk. Please can this be investigated thoroughly using up to date information including modelling and soil samples. Rampion mention the need for suitable drainage strategies, for both surface run-off and surface run-on, but have not detailed them.	The **Outline Operational Drainage Plan** **[APP-223]** outlines the approach to manage surface water drainage through the operational phase of the project, following the drainage hierarchy and puts forwards a range of relevant sustainable drainage systems (SuDS) features. The final Operational Drainage Plan will be developed at the detailed design stage in liaison with West Sussex County Council (WSCC) as the Lead Local Flood Authority (LLFA) and will incorporate detailed drainage modelling. The Operational Drainage Plan must accord with the **Outline Operational Drainage Plan** **[APP-223]** and is secured via Requirement 17 of the **Draft Development Consent Order** **[PEPD-009]**. A new environmental measure (C-293) will be added to the **Outline Operational Drainage Plan** **[APP-223]** at Deadline 3 and secured via Requirement 17 of the **Draft** Development Consent Order **[PEPD-009]** to reinforce a commitment to winter groundwater monitoring with respect to the SuDS.
2.9.20	6 On p88, note 6.4.5 Loss of floodplain storage. Rampion state that "the creation of temporary raised structures in fluvial floodplain during construction works, such as raised stone haul roads and associated stockpiles of topsoil, could lead to a loss of floodplain storage and thus increase water levels elsewhere". Would this lead to flooding downstream? There were meetings held on 9.11.2020 & 22.3.22 (see 6.4.26.2, minutes in Annex A, agenda item 15 & 7) where these items were mentioned, however Oakendene was not discussed or evaluated with regard to flooding at that time or since.	The approach to mitigation of flood risk associated with a loss of floodplain storage is detailed in the Paragraphs 6.4.5 to 6.4.9 of **Appendix 26.2: Flood Risk Assessment, Volume 4**, and Paragraph 6.4.6 is quoted below: *"The general approach will be to keep raised structures (stockpiles and raised stone haul road) to a minimum in the fluvial floodplain, and to avoid them entirely in those areas where potential third-party receptors have been identified that could be impacted."* Commitment measures C-131, C-179, C-180, C-133, C119 and C-175 as outlined in Table 8-1 of **Appendix 26.2: Flood Risk Assessment, Volume 4** and within the **Commitments Register** **[REP1-015]** outline provisions to address the potential for flood risk impact elsewhere as a result of

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		loss in floodplain storage. Paragraph 6.4.19 concludes that *"…there will be negligible change in the risk of fluvial or tidal flooding to third party receptors as a result of temporary construction activities associated with the Proposed Development."* With regard to Oakendene, please refer to response **reference 2.9.1**. The substation footprint has been sited outside of the Environment Agency Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south. Therefore, the substation is not situated in the floodplain and there will be no structures within the floodplain and no loss of floodplain storage.
2.9.21	7 On p89 there is a note on "excess soil and floodplain volume". The simple rule will be that for each tipper truck bringing material into the floodplain, to create the haul road, it should leave the floodplain with the equivalent load of soil, that no truck should leave empty. Where will this floodplain soil go? Will this increase the environmental damage and the carbon footprint? "Due to the potentially soft ground conditions in the floodplain, whilst the use of trackway would be preferred overall, it is possible that trackway would still require stone based footing". How many additional HGV's would this involve?	Locations for temporary soil storage are shown in Figures 26.2.1 to 26.2.4 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**, secured by Requirements 22 and 23 of the **Draft Development Consent Order** **[PEPD-009]**. All storage locations are located outside of the floodplain, in Environment Agency Flood Zone 1.
2.9.22	8 According to 6.4.20 as shown in figure 26.2.5a-e, Annex B, "the mapping indicates that the north eastern section of the proposed DCO Order limits is traversed by a number of surface runoff pathways and minor watercourse draining into the River Arun and Cowfold stream. Regions of high risk are also 5 mapped intersecting the construction compounds at Washington and the Oakendene substation". Please refer to the EA flood maps showing the surface water flooding at Oakendene and compare it against the negligible risk at Wineham Lane (found in document 6.4.26.2 pages 198 & 199). How could these two sites be considered comparable in terms of surface water flooding risk? On p198 & p199 Figure 26.2.5e clearly shows Oakendene has a high risk of surface water flooding, with areas over 3.33%AEP, whereas Wineham Lane has minimal risk.	Please refer to the Applicant's response to **reference 2.9.3** above.
2.9.23	9 In item 6.4.26, Oakendene has not been listed as a third party receptor- should the Oakendene site/Cowfold stream be listed as a receptor?	Potential receptors are identified in Table 26-10 of **Chapter 26: Water environment**, **Volume 2** of the ES **[APP-067]**. They comprise water features, resources or users in the Study Area (including the Oakendene area and Cowfold Stream) that may experience likely significant effects due to the Proposed Development.
2.9.24	10 Questions to WSCC and HDC – have they completed a thorough investigation of the two alternative substation sites? In accordance with the guidelines provided in EN-1? Including soil analysis, extent of surface water flooding, flood maps. Have they completed a site inspection of Oakendene and Wineham Lane North after a period of sustained rainfall? The difference in drainage between the two sites is significant. Oakendene suffers from substantial surface water flooding, while the soil at Wineham Lane drains incredibly well, with no evidence of heavy rainfall. We have photos of both sites taken in November to show significant and obvious differences between the two sites. Please let us know if these would be helpful.	With respect to the choice of the substation site, please refer to response **reference 2.9.3** above. Please refer to response **reference 2.9.9** above with respect to the photos of the site.

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2.9.25	11 Will the substation be positioned outside the 0.1%AEP surface water flood zone? As directed by MB from HDC	As stated in Paragraph 5.7.14 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]**, the footprint is sited outside of the 0.1% AEP Environment Agency Risk of Flooding from Surface Water (RoFSW) extent associated with the southern watercourse. In addition, as stated in Paragraph 2.4.7 of the **Outline Operational Drainage Plan** **[APP-223]** all sustainable drainage (SuDS) basin footprints are sited outside of this extent to avoid any loss of floodplain.
2.9.26	12 Point 6.4.31 on p93, relating to dewatering of excavations. How is it possible to ensure that such excavation works and piling will not result in an increase in flood risk downstream?	Paragraph 6.4.31 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** states that: *"In order to ensure such works do not result in an increase in flood risk downstream water from excavations will preferably be discharged to ground and allowed to infiltrate. Where this is not possible, and direct discharge to a watercourse is necessary, this could conceivably increase downstream water levels and flows. Dewatering will therefore be suspended if there are any fluvial flood alerts or warnings in place in those watercourses downstream. Such events would coincide with heavy rainfall, during which works may cease in any case."* This is captured in Commitment C-134, Table 8.1 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** and **Commitments Register** **[REP1-015]** and secured by Requirement 22 of the **Draft Development Consent Order** **[PEPD-009]**.
2.9.27	13 On p131, item 9.1.36, the two potential onshore substation sites were compared. Apparently "the Wineham Lane North onshore substation search area was identified to be marginally preferable from a flood risk sequential approach perspective on the basis of approximately 97 percent of the onshore search area being at low or very low risk of surface water flooding". Who carried out this analysis and formed these inaccurate conclusions? This statement appears to be incorrect given the EA flood maps and evident flooding of Oakendene, whilst Wineham Lane remained unaffected, during November, December and January. We have yet to assess February and March.	With respect to the choice of substation site, please refer to the Applicant's response to **reference 2.9.3** above. With respect to photos of the substation site, please refer to response **reference 2.9.9** above. As noted, the Applicant undertook a site visit to the substation site and watercourse on 2 February 2024. It is acknowledged that minimal rainfall (<1mm) fell during the preceding week (based on review of the Cowfold rainfall gauge), however the watercourse was noted to be in-channel and no standing water was observed across the substation site.
2.9.28	14 On p131, a reason for not choosing Wineham Lane North was that according to point 9.1.35 " As a result of non-statutory consultation feedback and the proximity to sensitive receptors (ancient woodland and a listed building), Wineham Lane South onshore substation search area was removed from the PEIR Assessment Boundary". Oakendene, also has two listed buildings in close proximity and also Tainfield ancient woods, but was included in the PEIR Assessment Boundary..	Information regarding the Oakendene Substation alternatives have been addressed in Table 6.19 "*Design and siting of the onshore substation at Oakendene*" in the **Applicant's Responses to Relevant Representations** **[REP1-017**] and further information is available in Appendix 2 – Further information for Action Point 4, **Applicant's Response to Action Points Arising from Issue Specific Hearing 1** **[REP1-018]** submitted at Deadline 1.
2.9.29	15 On p132- What were the "other technical and engineering constraints" at Wineham Lane North? Were they impossible to overcome ? Given that the alternative was a floodplain at Oakendene.	Information regarding the Oakendene Substation alternatives have been addressed in Table 6.19 *"Design and siting of the onshore substation at Oakendene*" in the **Applicant's Responses to Relevant Representations** **[REP1-017**] and further information is available in Appendix 2 – Further information for Action Point 4, **Applicant's Response to Action Points Arising from Issue Specific Hearing 1** **[REP1-018]** submitted at Deadline 1.

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2.9.30 to 2.9.32	16 The EN-1 planning guidelines encourage developers to avoid essential infrastructure from being built on vulnerable land, such as floodplains, just in case they suffer outages or loss of power due to frequent flooding. Why has 6 Rampion chosen such a vulnerable site, when a perfectly good alternative site is available at Wineham Lane North? On p16 Policy W DM3 (ADC, 2018): SuDS sets out the requirement to identify opportunities in the early stage of the design process of a development to incorporate a range of SuDS to increase the levels of water capture and storage and improve water quality. The question is, why go to all this trouble and expose increased unnecessary risks, when an alternative site is available? 17 On p17 of 6.2.26, Rampion state that "In addition, floodplains (Flood Zone 3b) should be avoided and development is only acceptable in Flood Zones 2 and 3 following completion of tests, such as those within the recommendations set out in the Horsham District SFRA (HDC, 2010). The policy also states that proposals will require a sitespecific FRA for all developments over 1 hectare in Flood Zone 1 and all proposals in Flood Zones 2 and 3." My question is have WSCC & HDC seen the results of these extensive tests for the comparable sites? 18 P17-18. Mid Sussex District Plan (2014-2031) (Adopted March 2018) (MSDC, 2018) Policy DP41 (MSDC, 2018): Flood Risk and Drainage sets out how development proposals will be considered within areas at risk of flooding. The objective is to promote development that makes the best use of resources and increases the sustainability of communities and their ability to adapt to climate change. Rampions response is "Development proposals in areas at risk of flooding should be supported by site-specific flood risk assessments." The Question is, has MSDC and HDC seen the site specific flood risk assessments? And if so, please may we have a copy.	Please refer to response **reference 2.9.3** above. Please also refer to response **reference 2.9.1** above. The substation footprint has been sited outside of the Environment Agency Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south. Therefore, the substation is not situated in the floodplain and there will be no loss of floodplain storage. **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]** presents the site-specific flood risk assessment for the project.
2.9.33	19 on p18, Rampion state: Particular attention will be paid to those areas that have experienced flooding in the past and proposals for development should seek to reduce the risk of flooding by achieving a reduction from existing run-off rates. The policy also states that the preferred hierarchy of managing surface water drainage from any development is: 1. Infiltration measures; 2. Attenuation and discharge to watercourses; and, if these cannot be met; and 3. Discharge to surface water-only sewers. Land that is considered to be required for current and future flood management will be safeguarded from development and proposals will have regard to relevant flood risk plans and strategies. The reader is then re directed to 6.4.26.2, which doesn't answer the question. My question is, are WSCC and HDC satisfied with the assessments and the limited information provided by Rampion. Please may we have a copy of the soil surveys, geological surveys, incorporating the EA surface water flood maps and details of Rampion's proposals for mitigating these problems.	Whilst the question is not directed the Applicant, the Applicant refers to the following key documents of relevance which set out the flood risk assessment and various mitigation measures: • **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) [**APP-216**]; • **Outline Operational Drainage Plan** **[APP-223];** and • **Outline Code of Construction Practice** **[PEPD-033].** The latter two documents are secured in Requirements 17 and 18, and 22 respectively of the **Draft Development Consent Order** **[PEPD-009]**.

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2.9.34	20 Are WSCC and HDC and MSC satisfied that sufficient analysis has been completed on the effects of pollution or risks to the water course through the construction activities? Rampion 1 suffered a diesel spillage, which they tried to ignore until local residents alerted the Environmental Agency. If such an event were to occur at Oakendene, the situation would be significantly worse given the extensive water courses and vicinity to the Cowfold Stream, which feeds the River Adur.	Whilst the question is not directed the Applicant, it would advise that surface water drainage through the construction phase of the project will be managed through the **Outline Code of Construction Practice (CoCP)** **[PEPD-033]** and via the Construction Phase Drainage Plan (as outlined in Table 3-1 which will accompany the stage-specific CoCP to be submitted post-consent and approved by the local authority). Paragraph 5.10.9 states that "*Details of construction phase drainage will be developed by the Contractor(s) and will be presented in a Construction Phase Drainage Plan and approved as part of the stage specific CoCP. Details of the Construction Phase Drainage Plan will be subject to consultation with WSCC and other relevant consenting authorities prior to the start of construction*". This will be secured as part of the construction phase drainage plan via Requirement 22 (c) of the **Draft Development Consent Order** **[PEPD-009]**. Relevant embedded environmental measures within the **Commitments Register** **[REP1-015]** include C-8 (refuelling), C-73 (drainage design), C-76 (pollution prevention plans), C-77 (dewatering), C-134 (timing of dewatering), C-142 (discharge), C-149 (oil capture), C-150 (plant maintenance), C-151 (contractor responsibilities), C-152 (piling risk assessment) and C-167 (tanks and pipes).
2.9.35	21 On p19 Policy SD50 (SDNPA, 2019): Sustainable Drainage Systems sets out how flood risk management opportunities should be sought to reduce the overall level of floor risk. Rampions response: This policy states "that development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change". The question is: Are WSCC, HDC and MSC satisfied that Rampion can achieve the above statement regarding Oakendene? If so, what evidence/modelling has been completed?	The policy referred to is within the South Downs National Park Authority (SDNPA) Local Plan. The Oakendene substation site is not situated within the SDNPA and therefore the policy is not of direct relevance with respect to the substation site. However, the Applicant refers to the **Outline Operational Drainage Plan** **[APP-223]** which sets out the drainage strategy for the Oakendene substation site. The final Operational Drainage Plan will be developed at the detailed design stage in liaison with WSCC as the Lead Local Flood Authority (LLFA) and will incorporate detailed drainage modelling. The Operational Drainage Plan must accord with the **Outline Operational Drainage Plan** **[APP-223]** and is secured via Requirement 17 of the **Draft Development Consent Order** **[PEPD-009]**. In addition, an embedded environmental measure (C-28) has been put in place for the delivery of construction drainage plan within the **Outline Code of Construction Practice** **[PEPD-033]** as secured via Requirement 22 of the **Draft Development Consent Order** **[PEPD-009]**. The construction drainage plan will ensure the management of surface water runoff throughout the construction phase. It has further been agreed with WSCC and HDC that winter groundwater monitoring will be undertaken at the site as part of the detailed design stage, post-Development Consent Order award, the result of which will be used to inform the detailed drainage design. A new environmental measure (C-293) will be added to the **Outline Operational Drainage Plan** **[APP-223]** at Deadline 3 and secured via Requirement 17 of the **Draft Development Consent Order** **[PEPD-009]** to reinforce this commitment to winter groundwater monitoring.
2.9.36	22 On p32 de watering consequences have been mentioned as a result of excavations. Is there any evidence to suggest that an assessment has been completed at Oakendene?	The impacts of the construction of the proposed onshore substation at Oakendene including with respect to groundwater dewatering and piling have been assessed based on a consideration of all available baseline information and embedded environmental measures and are summarised in Table 26-27 of **Chapter 26: Water environment**, **Volume 2** of the Environmental Statement (ES) **[APP-067]**.

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		Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES **[APP-216]** presents the site-specific flood risk assessment for the project.
2.9.37	23 Has there been a site visit from the Environmental Agency during the winter months to examine Oakendene and the Cowfold Stream, as a tributary of the River Adur? When was the flood map last updated?	Please refer to the Applicant's response to **reference 2.9.9** above. The date of the Environment Agency Risk of Flooding from Surface Water (RoFSW) mapping at the Oakendene substation upon which the assessment is based is unknown. However, based on validation against the photos provided as noted in **reference 2.9.9** above, the mapping correlates well with photos of the recent recorded flood events.
2.9.38	24 Asked about details of their proposals, Rampion state "Engagement will continue during the post-DCO consent, detailed design stage for the preparation of Environmental Permit and FRAP applications. RED will commence that process in advance of construction works". Would it not be better to examine the proposals prior to granting permission?	It is appropriate to continue discussions post-Development Consent Order consent, informed by the detailed design. Embedded environmental measures are in place to ensure this engagement takes place, for example C-17, C-126 and C-138 of the **Commitments Register** **[REP1-015]** and will be secured by Requirements 22 and 23 of the **Draft Development Consent Order** **[PEPD-009]**.
2.9.39	25 P55 MSDC. "No significant effects have been identified in the PEIR but the Water Environment submissions and Flood Risk Assessment that will be compiled when the substation location is finalised to then form part of the DCO application will need to be fully assessed (by) Mid Sussex." Rampions response: Noted, no further action required. The onshore substation location is now outside of the jurisdiction of MSDC. Therefore, MSDC has deferred to HDC in relation to matters pertaining to onshore substation drainage, as noted in Section 26.3.	The Applicant has no further comments on this paragraph at this time.
2.9.40	26 In section 2.44 WSCC listed a number of areas of concern and for different locations, but did not mention Oakendene. Has Oakendene been included in this analysis?	The nature of the concern is unclear. However, it is important to note that impacts of the construction, operation and decommissioning of the proposed onshore substation at Oakendene have been assessed based on a consideration of all available baseline information and embedded environmental measures and are summarised in Tables 26-27, 26-29 and 26-31 of **Chapter 26: Water environment**, **Volume 2** of the Environmental Statement (ES) **[APP-067]**. **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** presents the site-specific flood risk assessment for the project.
2.9.41	27 On p60 Polling Parish Council were given reassurances about no surface water flooding at Polling. No such reassurances were given to Cowfold parish council regarding the residents adjacent to Oakendene or to the surrounding businesses and homes that could be directly affected.	Please refer to response **reference 2.9.3** with regard to existing surface water flood risk and anecdotal information regarding historic flood incidents in Oakendene.
2.9.42	28 P106- Changes in Land use from agricultural land to industrial sites could cause changes in the hydrological, hydrogeological and geological conditions. P108 regarding the onshore substation site up to 6 hectares (ha) onshore Oakendene substation with associated structures and infrastructure and up to 2.5ha additional temporary works area; duration of construction: up to 3 years; and the maximum potential for displacement of near-surface groundwater has been associated with piling construction techniques. What are the consequences for local people and communities downstream, regarding "maximum potential for displacement of near-surface ground water"?	The terms of temporary dewatering from excavations to surface water guidance (Environment Agency, 2021d) are referenced in Section 26.2 of **Chapter 26: Water environment**, **Volume 2** of the Environmental Statement (ES) **[APP-067]** and the need for compliance is included as embedded environmental measures (C-29, C-77, C-134, C-141, C-142) in the **Commitments Register** **[REP1-015]**, referenced as part of the **Outline Code of Construction Practice** [**PEPD-033**] and secured by Requirement 8 in the **Draft Development Consent Order** **[PEPD-009]**. The impacts of the construction of the proposed onshore substation at Oakendene including those associated with groundwater dewatering have been assessed based on a consideration of all

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		available baseline information and embedded environmental measures and are summarised in Table 26-27 of **Chapter 26: Water environment**, **Volume 2** of the ES **[APP-067]**. **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** presents the site-specific flood risk assessment for the project.
2.9.43	29 On p124, C-117 Rampion state "Works on areas identified as floodplain (Flood Zones 2 and 3) will be programmed to avoid the period between October and February inclusive to avoid disturbance of waterbirds, and where possible, will be programmed to occur in late summer/ early autumn, to avoid interaction with PEIR Outline CoCP" How likely is it that Rampion will avoid the winter months when building the substation? What effect will it have on the timing of the program?	Please refer to response **reference 2.9.1**. The substation footprint has been sited outside of the Environment Agency Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south. Therefore, the substation is not situated in the floodplain.
2.9.44	30 P128. C-129 Temporary construction compounds will be surfaced with semipermeable aggregate material (similar to access roads as per C-120) where practical, with the exception of fuel storage areas and similar where pollution containment in the event of a spillage is the priority. Areas of temporary construction compounds that are used for fuel storage, plant maintenance and refuelling will be surfaced with fully impermeable materials to prevent any infiltration of contaminated runoff and contain bunding in line with C-8 and C167. PEIR Outline CoCP (Document Reference: 7.2) and DCO requirement. This measure will help minimise changes to flow rates / pathways, and the potential for accidental contamination entering watercourses or groundwater. How will this be managed on the Oakendene floodplain?	Please refer to response **reference 2.9.35** with respect to management of surface water at the Oakendene substation site through the construction and operational phases. Please also refer to response **reference 2.9.1**. The substation footprint has been sited outside of the Environment Agency Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south. Therefore, the substation is not situated in the floodplain.
2.9.45	31 P130. C-134 During construction, dewatering activities (of excavations) will be halted if a flood alert or flood warning is in place downstream, in order to minimise any impacts on flood flow conveyance and to maintain access for watercourse maintenance. PEIR Outline CoCP (Document Reference: 7.2) and DCO requirement. This measure will help minimise any impacts on watercourse conveyance. What safety measures have been put in place?	With respect to safety measures for construction activities, Table 4-6 in Section 4.8 of the **Outline Code of Construction Practice (CoCP)** **[PEPD-033]** outlines commitments relevant to emergency planning procedures which includes commitment C 118 *"Emergency Response Plans (ERP's) for flood events will be prepared for all construction activities, working areas, access and egress routes in floodplain areas (tidal and fluvial)"*. The requirements of the Emergency Response Plan are outlined in Section 8.2 of the **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**. Paragraph 8.2.3 includes provisions for surface water flood risk outlining that *"the circumstances under which different responses will be implemented should be specified, with an escalation of response associated with increasing levels of danger. For example, a 'be prepared' alert may be raised upon receipt of an Environment Agency Flood Alert or a Met Office Severe Weather Warning for heavy rain, followed by an 'evacuate' order upon receipt of an Environment Agency Flood Warning, or at the discretion of the site Health, Safety, Security and Environment (HSSE) Manager, based upon an appraisal of local conditions".* The CoCP is secured by Requirement 22 of the **Draft Development Consent Order** **[PEPD-009]**.
2.9.46	32 On p183, there appears to be no mention of Oakendene as a receptor, why is that?	Potential receptors are identified in Table 26-10 of **Chapter 26: Water environment**, **Volume 2** of the ES **[APP-067]**. They comprise water features, resources or users in the Study Area (including the Oakendene area) that may experience likely significant effects due to the Proposed Development.

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2.9.47	33 Decommissioning. This phase is expected to take four years. Who will be responsible for paying for it? Is there a sinking fund already set up by Rampion?	The operational lifetime of the Proposed Development is assumed to be around 30 years. A decommissioning plan and programme will be developed prior to construction and updated during operation of Proposed Development to account for any changes to decommissioning best-practice and developments in technology. At the end of the operational lifetime of the Proposed Development it is anticipated that all structures above the seabed will be completely removed. The decommissioning sequence will generally be the reverse of the construction sequence and involve similar types and numbers of vessels and equipment. The decommissioning duration of the offshore infrastructure may take the same amount of time as construction of the Proposed Development, up to four years, although this indicative timing may reduce. The Energy Act (2004) requires that a decommissioning plan be submitted to and approved by the relevant Secretary of State, a draft of which will be submitted prior to the construction of the Proposed Development. The decommissioning plan and programme will be updated during the Proposed Development's lifespan. A description of the onshore and offshore decommissioning of the Proposed Development can be found in Section 4.9 of **Chapter 4: The Proposed Development, Volume 2** of the Environmental Statement (ES) **[APP-045]**.
Inaccurate/Misleading statements		
2.9.48	1 Appendix 26.1. 6.4.25.1 on p22, there is reference to the Cowfold stream, "stream is intersected by the proposed DCO order limits within the north-eastern section of the onshore temporary construction corridor near Cowfold". This description is inaccurate, since it is the proposed substation site at Oakendene and so it is more relevant and significant needing more attention.	The identification of the Cowfold Stream Water Framework Directive (WFD) water body as a potential receptor in Table 2-2 of **Chapter 26: Water environment**, **Volume 2** of the Environmental Statement (ES) **[APP-067]** is correct. That this water body is indeed intercepted by the Proposed Development is shown on Figure 26-1 of **Chapter 26: Water Environment Figures (Part 1 of 2), Volume 3** of the ES **[APP-117]**.
2.9.49	2 On p62 of 6.4.26.1- 10/41/323101 described as "tributary of Cowfold Stream". This has been screened "out" of the analysis. As it is in the proposed DCO order limits, should it be included and not screened out?	The abstraction to which this refers (rather than the watercourse) is taken 2.1 km to the north-east and upgradient of the proposed Development Consent Order Limits, such that it is hydraulically disconnected from the scheme and therefore 'screened out' from further assessment. The Cowfold Stream Water Framework Directive (WFD) water body itself remains 'screened in.'
2.9.50	3 On p86, Rampion have stated that there is minimal risk of surface water flooding, however having visited the site and that of Wineham Lane, this statement appears to be inaccurate or out of date. Please see attached file of photographs. Also please refer to the EA flood map and also records of local residents suffering from surface water flooding.	Please refer to the Applicant's responses to **references 2.9.1, 2.9.3** and **2.9.9** above.
2.9.51	4 In document 6.4.26.2 on A28 on p180, the minutes of meeting 22.6.22 WSCC drainage and flood team and HDC (MB) drainage engineer (first meeting for HDC about the substation at Oakendene).	The Applicant has no further comments on this paragraph at this time.
2.9.52	5 " RC (wood Gp) advised that a decision on selection for the substation site from the 2 x option sites presented at PEIR was imminent". Therefore up until that June 2022, neither council had made enquiries or conducted any	West Sussex County Council (WSCC) as the Lead Local Flood Authority (LLFA) was consulted in April 2022 to gain feedback on the Preliminary Environmental Information Report (PEIR). The Applicant was made aware in advance of the meeting that Mid Sussex District Council (MSDC)

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	investigation relating to Oakendene. Mid Sussex CC had discussed Wineham Lane on previous occasions. There appears to have been an underlying assumption that the substation would be located at Wineham Lane.	also had a flood risk and drainage officer, who was informally consulted by WSCC on flood risk matters in the MSDC area, and thus the invitation was extended to MSDC for the April 2022 meeting. At that meeting in April the Applicant was subsequently made aware that an informal agreement between WSCC and Horsham District Council (HDC) also existed, and thus held an additional consultation meeting to gain feedback on the PEIR proposals from HDC. This being an informal arrangement, however, LLFA responsibilities have always remained with WSCC, who attended both meetings. It should be added that both meetings were positive and the approach to the application was agreed, as reflected in the minutes.
2.9.53	6 It was also noted that there were no flooding issues at Rampion 1 and so this shouldn't be an issue with Rampion 2 "KM (from WSCC) noted that on Rampion 1 overall there were no flooding issues from a construction perspective that he was aware of, as temporary arrangements were dealt with by the contractor and that it didn't give West Sussex County Council major concerns." The major problem with this statement and assumption, is that the soil composition, geology and drainage of the two sites are completely different and that different methods of drainage will need to be employed. On visiting the two site in November and May, Oakendene had standing water and was flooded, whilst Wineham Lane sites had drained very well, with no puddles, or standing water.	Baseline conditions at the two sites are acknowledged to be different. Please refer to response **reference 2.9.3** above regarding application of the Sequential Test between the two sites.
2.9.54	7 A great deal of control is handed to the contractor and considering they hadn't previously built a substation on a floodplain, this decision may be unwise. The minutes record " KM noted that on Rampion 1 overall there were no flooding issues from a construction perspective that he was aware of, as temporary arrangements were dealt with by the contractor and that it didn't give West Sussex County Council major concerns." There were no flooding issues with Rampion 1, because the land drains well and is not a flood plain.	Please also refer to response **reference 2.9.1** above. The substation footprint has been sited outside of the Environment Agency Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south. Therefore, the substation is not situated in the floodplain. Work will have to adhere to the standards and procedures in the **Outline Code of Construction Practice [PEPD-033]** secured by Requirement 22 of the **Draft Development Consent Order [PEPD-009]** and only suitably qualified and experienced contractors will be employed for the work. There are a number of environmental measures in the **Commitments Register [REP1-015]** to reinforce this message e.g. C-28 (specialist drainage contractor), C-147 (contractor training) and C-151 (contractor responsibilities regarding preventing water pollution).
2.9.55	8 "RC advised that the intent is to retain flexibility for the contractor to decide based on site-specific locations and requirements. RC also noted that land drainage requirements would be addressed postconstruction".	The Applicant has no further comments on this paragraph at this time.
2.9.56	9 Surface water flooding- discussed at the meeting on 1.4.22 There was no one representative from HDC at this meeting, since Oakendene had not been identified as the potential substation site at that time. There have been a number of recorded surface water flooding incidents from nearby properties. The statement by MB appears to be incorrect with this regard.	Please refer to response **reference 2.9.52** above regarding attendees at the meeting. Please refer to response **reference 2.9.3** above with regards to anecdotal information of nearby property flooding.
2.9.57	10 " RC (from Wood Gp) talked through the Risk of Flooding from Surface Water (RoSWF) maps to identify potential sources of flood risk. The flood risk from the southern watercourse which is a tributary of the Cowfold stream was discussed.	The Applicant has no further comments on this paragraph at this time.

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2.9.58	11 RC asked for feedback on this approach.	The Applicant has no further comments on this paragraph at this time.
2.9.59	12 MB advised that as long as the substation was positioned outside the 0.1% AEP surface water flood extent, he would not be concerned. MB advised that HDC records of historical flooding indicated that no flood incidents at Bolney Rd or Kent St had been recorded." This final sentence is incorrect, since neighbouring properties have experienced surface water flooding and the council has been called out to clear the ditches and pipes. Please refer to maps on p199, these clearly show that there are extensive areas where water is well in excess of .01% AEP, infact it is over 3.33% and at high risk of surface water flooding.	Please refer to response **reference 2.9.3** above with regards to anecdotal information of nearby property flooding.
2.9.60	It's interesting to note that the design will be submitted after permission is granted, which seems illogical. "The operational drainage strategy will talk about these types of things which the Contractor will decide where to put within the footprint. The design will come once the consent has been granted. MB agreed with this type of approach and advised that a 2 stage approach would be more than sufficient."	The **Outline Operational Drainage Plan** **[APP-223]** outlines the indicative approach to manage surface water drainage through the operational phase of the project, following the drainage hierarchy and puts forwards a range of relevant sustainable drainage systems (SuDS) features. The final Operational Drainage Plan will be developed at the detailed design stage in liaison with West Sussex County Council (WSCC) as the Lead Local Flood Authority (LLFA) and will incorporate detailed drainage modelling. The Operational Drainage Plan must accord with the **Outline Operational Drainage Plan** **[APP-223]** and is secured via Requirement 17 of the **Draft Development Consent Order** **[PEPD-009]**. A new environmental measure will be added to the **Commitments Register** **[REP1-015]** to reinforce a commitment to winter groundwater monitoring with respect to the SuDS.
2.9.61	Please refer to maps on p198 & 199 showing the extensive surface water related to Oakendene and no such issues at Wineham Lane.	Please refer to response **reference 2.9.3** and **2.9.9** above.
2.9.62	On p169 of 6.4.26.2 during a meeting on 22.3.22 TL (from the EA) made some very useful observations and recommendations:"	The Applicant has no further comments on this paragraph at this time.
2.9.63	TL advised that evidence to prove that the approach proposed would not impact the existing flood storage situation would be required. RC asked TL for further clarification on what this evidence might look like. Also highlighting that the approach proposed intends to demonstrate that, by design, no impacts would occur and thus no modelling or calculations would be required (as there would be no loss to calculate).	The Applicant has no further comments on this paragraph at this time.
2.9.64	TL requested that information be compiled to provide a visual representation and that this should cover the following: • how the floodplain could be amended; • where the topsoil strip would happen; • where would the volume go; and • where would it be moved to would inform his advice/position. TL outlined that the amount of evidence required would likely be dependent on the floodplains in question and surrounding receptors, so this would need to be considered.	The approach to construction works in the floodplain is detailed in Section 6.4 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP 216]**, developed based on the feedback received from the Environment Agency.

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2.9.65	TL would consult colleagues to get further steer on any evidence requirements, and any shared experiences from the Rampion 1 project for instance."	The Applicant has no further comments on this paragraph at this time.
2.9.66	13 during the construction of Rampion 1, there was apparently no flooding and these drainage decisions were left to the contractor. They gave the impression that as a consequence of no flooding problems with Rampion 1, that Rampion 2 should not flood either and that these decisions should be left with the contractor. However, these are two very different sites. Oakendene is a flood plain which suffers from regular surface water flooding, whilst Wineham Lane soil drains very well.	Please refer to response **reference 2.9.1** and **2.9.9** above.
2.9.67	14 P132 section 9.1.38 This statement is incorrect, given the maps and evident flooding at Oakendene and none at Wineham Lane. "The final selection of the Oakendene onshore substation (at marginally higher surface water flood risk than the Wineham Lane North substation search area option) has therefore been driven by other technical and engineering constraints. However, the onshore substation site is situated in Flood Zone 1 and considered to be at a comparable level of surface water flood risk, with the incorporation of suitable flood risk management and drainage measures as outlined in Section 8, and is thus concluded to have been determined appropriately via a sequential approach." Assessing the surface water flood maps on p23 Figure 26.8, it is clear that the Oakendene site suffers from surface water flooding, whilst Wineham Lane does not.	Please refer to response **reference 2.9.3** above.
2.9.68	15 On p17, Policy 38 HDC, 2015): Flooding Development sets out measures that proposals will follow with respect to flood risk management. Rampion response: The policy states that priority will be given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. The selection of Oakendene seems to contradict Rampion's response.	Please refer to response **reference 2.9.3** above.
2.9.69	17 On p131, item 9.1.36, the two potential onshore substation sites were compared. Apparently "the Wineham Lane North onshore substation search area was identified to be marginally preferable from a flood risk sequential approach perspective on the basis of approximately 97 percent of the onshore search area being at low or very low risk of surface water flooding". Who carried out this analysis? Since the statement appears incorrect when looking at the flood maps and when visiting the sites during the winter months.	Please refer to response **reference 2.9.3** above.
Relevant Legislation and local policies		
2.9.70	1 According to 6.2.26 Table 2-1 on p26 Legislation Relevance to protection of groundwater Overarching National Policy Statement (NPS) for Energy EN-1 Department of Energy and Climate Change (DECC) (2011) EN-1 states that "Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and	Assessments of the existing status and impacts of the Proposed Development on the water environment are presented in **Chapter 26: Water environment**, **Volume 2** of the Environmental Statement (ES) **[APP-067]**, **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**, **Appendix 26.3:Water Framework Directive Compliance Assessment, Volume 4** of

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	physical characteristics of the water environment as part of the ES or equivalent". No such studies appear to have been conducted for the Oakendene or Wineham Lane sites. When will these be completed?	the ES **[APP-217]** and **Appendix 26.4: Hydrogeological Risk Assessment, Volume 4** of the ES **[APP-218]**.
2.9.71	2 On p38 WSCC have stated "WSCC welcomes the embedded environmental measure C-75, which states that construction and permanent development in identified floodplains within the Scoping Boundary will be avoided where possible. WSCC expects any work where this cannot be avoided to be robustly justified through the site selection process, and any mitigation proposed to be compliant with all relevant policies, including the NPPF." Rampion could avoid the flood plain, but using the Wineham Lane site. Has WSCC been given sufficient assurances and evidence from Rampion? If so, please may we see copies.	Please refer to response **reference 2.9.1**. The substation footprint has been sited outside of the Environment Agency Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south. Therefore, the substation is not situated in the floodplain. Please also refer to response **reference 2.9.3** above with respect to the choice of the substation site and Sequential Test.
2.9.72	3 Drainage and SuDS: "Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding". Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS. The alternative site at Wineham Lane North doesn't appear to have been thoroughly examined. Nor has Rampion confirmed where exactly they are proposing to place the substation.	Please also refer to response **reference 2.9.3** above with respect to assessment of flood risk at each site and Sequential Test. The indicative substation footprint is shown in Figure 26.2.6a of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216],** which as stated in response **reference 2.9.1** above avoids the 0.1% Annual Exceedance Probability (AEP) extent associated with the watercourse to the south of the site. Additional surface water flood risk and flow paths across the site (non-related to the flood risk associated with the southern watercourse) would be adequately dealt with via the drainage infrastructure for the site, as set out in the **Outline Operational Drainage Plan** **[APP-223]**, secured by Requirement 17 of the **Draft Development Consent Order** **[PEPD-009]**. Appendix A of the **Outline Operational Drainage Plan** **[APP-223]** presents the indicative landscape and sustainable drainage (SuDS) plan for the Oakendene site. The SuDS features are similarly situated outside of the 0.1% AEP extent associated with the watercourse to the south, thereby avoiding the floodplain.
2.9.73	4 The Exception Test, 2.2.14 NPS EN-1 (DESNZ 2023a). The test provides a method of allowing necessary developments to go ahead in situations where suitable sites at lower risk of flooding are not available" . However the alternative site at Wineham Lane North has no such flood risk and is available. Please refer to attached EA flood risk maps.	Please refer to response **reference 2.9.3** above.
2.9.74	5 On p103, point 26.6.77 and 26.6.81 The Environmental Agencies RoFSW mapping indicates a "regions of high surface water flood risk are shown to intersect the onshore substation site, the temporary construction compounds and Oakendene (Cowfold stream tributary)." "The most significant areas of Flood Zones 2 and 3 are located in the lower tidal reaches of the River Arun at Littlehampton in the southern section of the onshore cable corridor, and on the River Adur and the Cowfold Stream in the north-eastern section of the onshore cable corridor. When was the site survey carried out at Oakendene? And at What time of year? Please may we have copies.	As detailed in response **reference 2.9.1** above and in Section 5.3 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]**, assessment of surface water flood risk has been based on the Environment Agency Risk of Flooding from Surface Water (RoFSW) mapping data. Please refer to response **reference 2.9.9** above with regards to findings from a site visit undertaken in February 2024.

Ref	Written Representation comment	Applicant's response
2.9.75	6 P20 Drainage and SuDS "To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property" (Paragraph 5.8.24). "The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change 12 throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect." (Paragraph 5.8.27)	The Applicant has no further comments on this paragraph at this time.
2.9.76	7 According to 6.4.26.2 Chapter 26.7 Table 26-20 on p18 The NPS EN-1 have flood risk specific requirements. "Flood risk -the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere". Has this been determined? "Functional floodplain. "Energy projects should not normally be consented within Flood Zone 3b, or Zone C2, on land expected to fall within these zones within its predictable lifetime (paragraph 5.58.41)	Assessment and management of flood risk to the project is set out in Sections 6 and 7 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216].** The Applicant is confident the precautionary approach in the **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** and **Design and Access Statement** **[AS-003]** will ensure the onshore substation will not be at flood risk, nor increase flood risk elsewhere. This is addressed through the adherence to National Grid Target Guidance (C-230) secured via the **Design and Access Statement** **[AS-003]** and Requirement 8 within the **Draft Development Consent Order** **[PEPD-009]**. The **Outline Operational Drainage Plan** **[APP-223]** outlines the approach to manage surface water drainage and runoff through the operational phase of the project, following the drainage hierarchy and puts forwards a range of relevant sustainable drainage systems (SuDS) Features. The final Operational Drainage Plan must accord with the **Outline Operational Drainage Plan** **[APP-223]** and is secured via Requirement 17 of the **Draft Development Consent Order** **[PEPD-009]**. In addition, an embedded environmental measure (C-28) has been put in place for the delivery of construction drainage plan within the **Outline Code of Construction Practice** **[PEPD-033]** as secured via Requirement 22 of the **Draft Development Consent Order** **[PEPD-009]**. The construction drainage plan will ensure the management of surface water runoff throughout the construction phase. With respect to the floodplain, please refer to response **reference 2.9.1**. The substation footprint has been sited outside of the Environment Agency Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent for the watercourse to the south. Therefore, the substation is not situated in the floodplain.
2.9.77	8 P13. NPS EN-5 restates the requirements of NPS EN-1 that due consideration and assessment is given to the effects of future climate change on flood risk to electricity transmission infrastructure (Section 2.4).	The Applicant has no further comments on this paragraph at this time.
2.9.78	9 Paragraph 2.4.1 requires that "Applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it would be resilient to: flooding, particularly The FRA presented in Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2) has addressed the issue of climate change and flood vulnerability resilience.	The Applicant has no further comments on this paragraph at this time.

Ref	Written Representation comment	Applicant's response
2.9.79	10 Page 13 Policy description Relevance to assessment for substations that are vital for the electricity transmission and distribution network; effects of wind and storms on overhead lines; higher average temperatures leading to increased transmission losses; and earth movement or subsidence caused by flooding or drought (for underground cables)."	The Applicant has no further comments on this paragraph at this time.
2.9.80	11 on p17, Policy 38 HDC, 2015): Flooding Development sets out measures that proposals will follow with respect to flood risk management. Rampion response: The policy states that priority will be given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. This Statement from Rampion seems to contradict the decision for choosing Oakenene.	Please refer to response **reference 2.9.3** above with regards to the choice between the substation sites.
2.9.81	12 P13. NPS EN-5 restates the requirements of NPS EN-1 that due consideration and assessment is given to the effects of future climate change on flood risk to electricity transmission infrastructure (Section 2.4).	The Applicant has no further comments on this paragraph at this time.
2.9.82	13 on p17, Policy 38 HDC, 2015): Flooding Development sets out measures that proposals will follow with respect to flood risk management. Rampion response: The policy states that priority will be given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. The selection of Oakendene seems to contradict Rampion's response.	Please refer to response **reference 2.9.3** above with regards to the choice between the substation sites.
2.9.83	14 In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to: • remain operational and safe for users in times of flood; • result in no net loss of floodplain storage; • not impede water flows and not increase flood risk elsewhere.	Please refer to response **reference 2.9.1** with respect to the assessment of flood risk to the substation and avoidance of the floodplain.
2.9.84	15 NPS EN=1 paragraph 5.7.5 identifies a variety of minimum requirements for Flood Risk Assessments (FRA's). Have these assessments been completed ? and if so, please may we see the results.	Table 2-1 of **Appendix 26.2: Flood Risk Assessment (FRA), Volume 4** of the ES **[APP-216]** details the NPS EN-1 minimum requirements for FRAs referred to. Column 3 of the table points the reader to the relevant section of the FRA where each requirement is met.

Table 2-10 Applicant's Response to David Jenkins's Written Representations [REP1-093]

Ref	Written Representation comment	Applicant's response
2.10.1	I would like to add to my previous statement that my household is in full support of our local Parish Council objections and the Cowfold/ Rampion Impact Statement	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-11 Applicant's Response to Diane Mary Playford's Written Representations [REP1-091]

Ref	Written Representation comment	Applicant's response
2.11.1	I would like to add to my written representation that I fully endorse the Cowfold v Rampion Impact Statement. Additionally at the Cowfold Parish Council meeting they stated their strong objections to the Rampion planning proposals and I would like to add that I also support their stance. This is entirely the wrong place for such intrusive and inappropriate large structures with devastating consequences on the environment, lives of the Cowfold community and those travelling on the surrounding roads. The Cowfold Parish Council speak on behalf of the entire community.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-12 Applicant's Response to Elizabeth Leanne Marogna's Written Representations [REP1-094 & REP1-095]

Ref	Written Representation comment	Applicant's response
2.12.1	**Summary** This Application is not suitable for the location chosen for the following reason:	Please see the Applicant's response in to **references 2.12.2** to **12.12.5** below regarding concerns related to location of the Proposed Development.
2.12.2	1. The 'Sussex Bay', inshore coastal Sussex waters, is home to seven Marine Conservation Zones MCZs . In the centre of these, and very closely bordering Kingmere MCZ and Offshore Overfalls MCZ, is the Rampion 2 proposal. Although the project area is not overlapping these MCZs, it is impossible to prevent impacts from affecting these areas. Impacts from piling (noise, concussion of seabed and water, sedimentation), operation (electromagnetic fields, continuous noise, non-native invasive species) are all likely if this Application were accepted. These risks are difficult, if not impossible, to mitigate and the effects of the above would be impossible to record accurately.	The Applicant has undertaken an Environmental Impact Assessment (EIA) of the Proposed Development to consider and assess the likely significant effects of the Proposed Development. **Volume 2** of the ES **[APP-047** to **APP-070]** reports the findings of the EIA. The DCO Application includes a series of documents that address the potential effects for onshore and offshore ecology and habitats. These include the following aspect chapters: • **Chapter 8: Fish and shellfish ecology, Volume 2** of the ES **[APP-049]**; • **Chapter 9: Benthic, subtidal and intertidal ecology, Volume 2** of the ES **[APP-050]**; • **Chapter 11: Marine mammals, Volume 2** of the ES **[REP1-004]**; and • **Chapter 12: Offshore and intertidal ornithology, Volume 2** of the ES **[APP-053]**. Further to the Environmental Statement chapters, a number of additional documents have been submitted that are focused on onshore and offshore ecology and habitats: • **Report to Inform Appropriate Assessment [APP-038]**; • **Habitats Regulations Assessment (Without Prejudice) Derogation Case [APP-039]**; • **Draft Marine Conservation Zone Assessment [APP-040]**; • **Outline Project Environmental Management Plan [APP-233]**; • **Draft Unexploded Ordnance Clearance Marine Mammal Mitigation Protocol [APP-237]**; and • **In Principle Sensitive Features Mitigation Plan [REP1-012]**. The ES assessments undertaken have concluded that no significant effects on marine ecology, terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development. Similarly, the **Habitats Regulations Assessment (Without Prejudice) Derogation Case [APP-039]** concludes that there will be no adverse effect to any of the protected sites assessed. The Proposed Development includes implementation of embedded environmental measures (as shown in Table 9-16 of **Chapter 9: Benthic, subtidal and intertidal ecology**, Volume 2 of the ES [**APP-050**]) to avoid the introduction or spread of Marine Invasive Non-Native Species (INNS) through the implementation of the **Outline Project Environmental Management Plan [APP-233]** (commitment C-95). The Final PEMP will include a biosecurity plan to ensure that the risk of potential introduction and spread of Marine INNS from increased vessel activity is minimised as secured through the Final PEMP that is required under deemed Marine Licence Condition 11 of Schedules 11 and 12 of the **Draft DCO [PEPD-009]**).
2.12.3	2. The cable route is proposed to come ashore and drill underground (Horizontal Directional Drilling) very near to a Site of Special Scientific Interest (SSSI) and a Nature Reserve (Climping & West Beach respectively). The Applicant argues this drilling would not disturb the wildlife above, however, the array itself would create a physical barrier	The Applicant notes that the export cable will be installed by Horizontal Directional Drilling and that there will be only underground works in the intertidal area, Commitment C-43 of the **Commitments Register [REP1-015]** (as secured by Work No. 5— (a) up to four temporary horizontal directional drilling exit pits located seaward of MLWS Schedule 1, Part 1 of the **draft DCO [PEPD-009])**. Commitment C-43 of the **Commitments Register [REP1-015]**:

Ref	Written Representation comment	Applicant's response
	to birds, bats and insects that migrate and forage in the proposed project area. This would contribute to Biodiversity Net Loss. There are 18 Red List species of insects found at Climping Beach & West Beach Nature Reserve.	Offshore The subsea export cable ducts will be drilled underneath the beach using horizontal directional drilling (HDD) techniques. As noted in **Table 9-6** of **Chapter 9: Benthic Subtidal and Intertidal Ecology, Volume 2** **[APP-050]**: The onshore landfall proposed Order Limits overlaps with Climping SSSI. However, this is to allow for an area of HDD works, which will be underneath the cliff face and the intertidal area. It will not be on the surface of the beach. The overlap with the proposed Order Limits has not been removed, to allow space for the HDD. Potential indirect effects to features have been assessed within **Section 9.9** of **Chapter 9: Benthic Subtidal and Intertidal Ecology, Volume 2** **[APP-050]**. **Chapter 22: Terrestrial Ecology and Nature Conservation, Volume 2** of the ES **[APP-063]** assesses the potential effects on the Climping Beach SSSI and its cited features; namely its shingle vegetation, semi-fixed dune community, fixed dune community and non-breeding population of sanderling. No works will take place within the offshore environment closer than 60m from the SSSI boundary and construction works onshore will be at least 200m from it. There are a range of commitments that allow for the control of indirect effects from the land fall such as commitment C-76 (implementation of pollution prevention plans) to control risks of loss of pollutants (including dust) and C-217 (restriction of winter working) to prevent disturbance of sanderling, these are secured via the **Outline Code of Construction Practice** **[PEPD-033]** through Requirement 22 of the **Draft DCO** **[PEPD-009]** (see **Commitments Register** **[REP1-015]**). The design of the Proposed Development and the measures to minimise and mitigate effects results in no significant effects on either Climping Beach SSSI or ancient woodland being predicted in **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**. The Applicant can confirm that there will be no direct impacts to the Climping Beach SSSI and Worthing Lumps Local Wildlife Site (LWS). Access to these areas by works vehicles or equipment will not be required. Impacts on birds, bats, insects are assessed following relevant legislation and best practice in: • **Chapter 12: Offshore and intertidal ornithology, Volume 2** of the ES **[APP-053]**; and • **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**. The **Outline Landscape and Ecology Management Plan** **[APP-232]** include relevant embedded environmental measures and is secured via Requirement 12 of the **Draft DCO** **[PEPD-009].** The ES assessments undertaken have concluded that no significant effects on terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development and secured through the requirements referred to above. Similarly, the **Report to Inform Appropriate Assessment** **[APP-038]** concludes that there will be no adverse effect to any of the protected sites assessed.
2.12.4	3. The onshore cable route would, if accepted in its current Application, cut a scar across marshes, through ancient hedges and woods, and through the South Down National Park (SDNP), a highly protected Nationally loved natural asset. The offshore cable route would cut a swathe of destruction through the seabed, not only linking the Array to shore, but also interlinking all of the turbines (up to 90).	The methodologies that will be used to ensure onshore construction (including restoration) are undertaken in a sensitive and appropriate way can be found in the **Outline Construction Method Statement** **[APP-255]**, the **Outline Code of Construction Practice** **[APP-224]**, and the **Outline Landscape and Ecology Management Plan (LEMP)** **[APP-232]**. These documents are secured under Requirements 12, 22, and 23 of the **Draft DCO** **[PEPD-009]**. The Applicant also refers to the measures in the **Outline Soils Management Plan** **[APP-226]** as secured in the **Draft DCO** **[PEPD-009]** (updated at Deadline 2) by Requirement 22 (5) (f).

Ref	Written Representation comment	Applicant's response
		The offshore construction methodology is set out in the **Outline Project Environmental Management Plan** (PEMP) **[APP-233]**. The purpose of the Outline PEMP is to set out the framework for the Final Project Environmental Management Plan (Final PEMP) including the controls that are proposed to manage the environmental risks associated with the construction and operation of the offshore components of Rampion 2. The document is based on the Rampion 2 Environmental Statement, industry good practice, and relevant legislation. An **Offshore In Principle Monitoring Plan** **[APP-239]** has been submitted to set out the monitoring measures as required by the conditions contained within the deemed Marine Licences (dMLs) as stated in the **Draft Development Consent Order** **[PEPD-009]**.
2.12.5	4. The sub-station is proposed on an untouched flood plain in the sleepy village of Cowfold, which "contains huge biodiversity and acts as a massive carbon store, (making) achieving biodiversity net gain challenging. Based on Rampion 1's poor track record regarding replanting, numerous breaches of the DCO requirements, which caused pollution and contamination, and on-going regular flooding around Rampion 1 (cable corridor), there is a real danger of long-term damage and polluting the watercourses which feed the river Adur. There are a significant number and variety of protected and red- listed species including nesting nightingales, great crested newts, badgers, and turtle doves, that will be adversely affected, by the destruction of habitats, and noise and light pollution from both the construction and operation of the substation. The nightingale breeding sites are, perhaps, amongst the most significant in Sussex, and will not recover."	**Chapter 26: Water environment, Volume 2** of the Environmental Statement (ES) **[APP-067]** considers the potential impact of pollution to the River Adur and Cowfold Stream resulting from the Proposed Development. The assessment concludes that there is likely to be no significant impact to water quality in the River Adur and Cowfold Stream during the construction or operational phases of the Proposed Development. The assessment also concludes that the impact resulting from changes to watercourse morphology as a result of works on or near watercourses is not expected to be significant. The **Outline Code of Construction Practice** **[PEPD-033]** includes embedded environmental measures which will be implemented at all construction areas to prevent pollution events occurring and limit the impact to nearby receptors, including watercourses. The Contractor(s) will be required to produce and adhere to a Pollution Prevention Plan (PPP) and Pollution Incident Response Plan (PIRP), as per Commitments C-8, C-14, C-72, C-129, C-150, C-151, and C-167 in **Commitments Register** **[REP1-015]** and secured through Requirement 22 of the **Draft Development Consent Order** **[PEPD-009]**. The Applicant has undertaken an Environmental Impact Assessment (EIA) of the Proposed Development to consider and assess the likely significant effects of the Proposed Development. **Chapter 6: Coastal processes, Volume 2** of the ES **[APP-047]** to **Chapter 29: Climate change, Volume 2** **[APP-070]** of the ES reports the findings of the EIA. The Development Consent Order (DCO) Application includes a series of documents that address the potential effects for onshore and offshore ecology and habitats. These include the following aspect chapters: • **Chapter 12: Offshore and intertidal ornithology, Volume 2** of the ES **[APP-053]**; and • **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**. Further to the ES chapters, a number of additional documents have been submitted that are focused on onshore and offshore ecology and habitats, as follows: • **Report to Inform Appropriate Assessment** **[APP-038]**; • **Habitats Regulations Assessment (Without Prejudice) Derogation Case** **[APP-039]**; and • **Outline Landscape and Ecology Management Plan** **[APP-232]**. The ES assessments undertaken have concluded that no significant effects on terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development. Similarly, the **Habitats Regulations Assessment (Without Prejudice) Derogation Case** **[APP-039]** concludes that there will be no adverse effect to any of the protected sites assessed.

Ref	Written Representation comment	Applicant's response
2.12.6	1. The construction of the project, if granted permission, would be disrupting to humans and wildlife alike, in such destructive ways as:	Please see the Applicant's response in to **references 2.12.7** to **12.12.12** below regarding concerns related to the Proposed Development.
2.12.7	The piling noise of 241dB underwater, equivalent to 158dB in the air, is akin to a Howitzer Heavy Artillery gun going off at every strike. The physics of water are different from air as water is nearly incompressible, meaning that sound travels further without attenuation and the physical effects of the concussive impact of the sound waveforms. Marine inhabitants would be, there is no question about this, affected by the powerful sonic blasts. This would range from fleeing from their habitat (disrupting feeding, breeding, etc), physical injury such as deafness, concussion, and in some cases death will occur.	The Applicant has undertaken an EIA of the Proposed Development to consider and assess the likely significant effects of the Proposed Development. The DCO Application includes a series of documents that address the potential effects of noise on ecological receptors. These include the following aspect chapters: • **Chapter 8: Fish and shellfish ecology, Volume 2** of the ES **[APP-049];** • **Chapter 9: Benthic, subtidal and intertidal ecology, Volume 2** of the ES **[APP-050]**; • **Chapter 11: Marine mammals, Volume 2** of the ES **[REP1-004]**; and • **Chapter 12: Offshore and intertidal ornithology, Volume 2** of the ES **[APP-052]**. The assessment concluded that the magnitude of impact on all marine species in the chapters outlined above (fish, shellfish, benthic, marine mammals, ornithology) from potential changes to noise and vibration exposure as a result of the construction and operation of the Proposed Development following the implantation of embedded environmental measures is negligible to minor adverse, which is not significant in EIA terms. A number of plans and protocols that outline the management measures and mitigation proposed throughout the offshore construction stage to reduce the effects of noise and vibration on marine ecology receptors, including commitments C-52, C-54, C-102, C-265, C-274, C-280, and C-281. These measures restrict the offshore construction works programme around sensitive breeding seasons, use of low noise technology, sequencing approach, soft start and ramp up procedures: • **Draft Piling Marine Mammal Mitigation Protocol [APP-236]** secured through condition 11 (l) of Schedule 11 and 12 of the **Draft DCO [PEPD-009]**; • **Draft Unexploded Ordnance Clearance Marine Mammal Mitigation Protocol [APP-237]** secured through condition 11 (m) of Schedule 11 and 12 of the **Draft DCO [PEPD-009]**; and • **In Principle Sensitive Features Mitigation Plan [REP1-012]** secured through condition 11 (k) of Schedule 11 and 12 of the **Draft DCO [PEPD-009]**.
2.12.8	This proposal starts only 8 miles out and is unprecedented in its scale this close to shore. The Sussex Bay is home to the miraculous regrowth of Kelp Forest, this habitat is protected by Covention. the Joint Nature Conservation Committee (JNCC) and The Convention for the Protection of the Marine Environment of the North-East Atlantic (the 'OSPAR Convention' Co-signed and ratified by the UK 22 September 1992) have listed Kelp habitats in this area (Region III) as a threatened/declining habitat and are thus protected: ARTICLE 2 In fulfilling their obligation under the Convention to take, individually and jointly, the necessary measures to protect the maritime area against the adverse effects of human activities so as to safeguard human health and to conserve marine ecosystems and, when practicable, restore marine areas which have been adversely affected,	The potential effects of the Proposed Development on the sea bed and kelp reserves have been addressed in the **Chapter 9: Benthic, subtidal and intertidal ecology, Volume 2** of the ES **[APP-050]**. The impact of habitat disturbance will represent a local spatial extent, short term intermittent impact, affecting a relatively small portion of the benthic subtidal habitats in the proposed DCO Order Limits. However, the proposed export cable corridor will enter a recently designated "no-trawling zone" and a site for kelp restoration and protection (see paragraph 9.6.36 to 9.6.37 of **Chapter 9: Benthic, subtidal and intertidal ecology, Volume 2** of the ES **[APP-050]**). Due to the short-term and localised nature of this impact and the tolerance and recoverability of the majority of the benthic receptors including kelp, the assessment concludes that is likely to be no significant effects on the sea bed or for kelp reserves.

Ref	Written Representation comment	Applicant's response
	as well as their obligation under the Convention on Biological Diversity of 5 June 1992 to develop strategies, plans or programmes for the conservation and sustainable use of biological diversity, Contracting Parties shall: a. take the necessary measures to protect and conserve the ecosystems and the biological diversity of the maritime area, and to restore, where practicable, marine areas which have been adversely affected; and b. cooperate in adopting programmes and measures for those purposes for the control of the human activities identified by the application of the criteria in Appendix 3. 3 [Taken from Annex V to the Convention "On the Protection and Conservation of the Ecosystems and Biological Diversity of the Maritime Area". Despite the claims by the Applicant that the sedimentation* will not cause any issue in the short, medium nor long term, this particular Kelp forest is unlike others that are found on geologically firmer substrates and thus not comparable to present studies on Kelp and Offshore Wind Turbine construction. Strong bedrock is the perfect substrate for Kelp to grow, such as that found off the Scottish Isles, while this region (South East UK) has a mixed bed of fine and coarse substrate and chalk. Compounded by aggregate dredging up-current (as per usual west-east/longshore) from the Kelp, sediment is the biggest threat to a thriving Kelp forest. This threatened/endangered habitat is beginning to return due to a nearshore Trawler Byelaw (March 2021); historical trawling practices decimated 97% of this habitat. Sediment from construction of the turbines (piling and cable laying/burying) and decommissioning (cutting of towers/removal of cabling) will cause a layer of sediment that prevents the holdfast (the structure that anchors the kelp to the seabed) from finding stable enough substrate to maintain its life, washing ashore or out to sea instead. It would also cloud the water, suffocating light and oxygen from Kelp and also from the invertebrates, fish and mammals that inhabit this ecosystem. Kelp is for marine life a nursery, feeding & breeding area and is of vital significance to biodiversity.	
2.12.9	PEIR of Rampion 2: Seabed disturbance during construction: Temporary disturbance to seabed habitat 26,421,466 sq. mtrs Total clearance of seabed for cables 4,500,000 sq mtrs Total clearance for foundations and legs 1,900,000 sq mtrs Estimate weight of the removed material hundreds of metric tons of 'sand and boulders', will be scoured. Total introduced hard substrate at seabed level 1,117,400 sq.mtrs. Decommissioning 25-30 yrs, disturbance of seabed habitat, 9,916,000 sq mtrs.	The process for mitigating against the potential for impacts on sensitive features to ensure all effects are minimised, inclusive of impacts and effects from the operation and maintenance phase is detailed in the **In Principle Sensitive Features Mitigation Plan [REP1-012]**. This Plan details the hierarchy of mitigation, following an avoid, reduce, mitigate process. Where mitigations are required during the operation and maintenance phase of the development, the principles of the mitigation have been captured in the **Outline Offshore Operations and Maintenance Plan [APP-238]** at high level. The details of which will be finalised once the final design information is available, and captured in the Final Offshore Operations and Maintenance Plan post-consent (as required under the deemed Marine Licence (dML) Condition 3 in Schedules 11 and 12 of the **Draft DCO [PEPD-009]**.

Ref	Written Representation comment	Applicant's response
		The Applicant has updated commitment C-272 to include reference to the operation phase of the Proposed Development. *C-272 Adoption of specialist offshore export cable laying and installation techniques will minimise the direct and indirect (secondary) seabed disturbance footprint to reduce impacts, which will provide mitigation of impacts to all seabed habitats, but particularly chalk and reef areas as well as potential (unknown) black seabream nesting locations, where avoidance is not possible. The Applicant will seek to utilise the most appropriate technology available at the time of construction* ***and during operation, if required,*** *to reduce the direct footprint impact from cutting machinery, where practicable.* This will be added to the next iteration of the **In Principle Monitoring Plan** **[APP-240]**, the delivery of which is secured in Condition 11(1)(j) of the dMLs (Schedules 11 and 12 of the **draft DCO** **[PEPD-009]**).
2.12.10	Another feature of the seabed in this area, which should render this Application unsuitable is Subtidal Chalk. It is a • UKBAP Priority Habitat • Listed in Annex 1 of the Habitats Directive: Reefs • Occurs in marine Special Areas of Conservation (SAC), designated for their reef habitats. • Chalk (as subtidal chalk feature in MCZ and reef feature in SACs): chalk habitats are a relatively scarce resource. Britain has the greatest proportion of coastal chalk in Europe, despite this, chalk forms only 0.6% of the British coastline. Due to its scarce nature and inability to recover morphologically from physical impacts, cabling through chalk features should be avoided. As per other highly sensitive features, there may be instances where it is possible to cable within the site but only on other less sensitive habitats, avoiding impacting the chalk, however with the number of cables associated with windfarm developments this is becoming increasingly challenging.	The assessment of permanent habitat loss is presented in Section 9 of **Chapter 9: Benthic, subtidal and intertidal ecology, Volume 2** **[APP-050]**, with the sensitivity of chalk afforded a 'high' sensitivity category within the assessment as a result of its protected status. The Applicant has committed to undertaking targeted pre-construction surveys of priority habitats as referenced in the **Offshore In Principle Monitoring Plan** **[APP-240]** and secured in Condition 16(2)(b) of the dMLs (Schedules 11 and 12 of the draft DCO **[PEPD-009]**. The Applicant will ensure the extent of these features are mapped as part of these surveys and can confirm that these data will be less than two years old to inform installation and operation/maintenance activities. Proposals for micrositing around priority habitats are presented within the **In Principle Sensitive Features Mitigation Plan** **[APP-239]**. The final construction design for landfall HDD will be determined post-consent and will be based on detailed geotechnical and geological data to develop the final HDD alignment that is in keeping with its commitments including minimising the distance of the route through subtidal chalk as per C-269 (secured in Condition 11(1)(c)(v) of the dMLs (Schedules 11 and 12 of the **draft DCO** **[PEPD-009])** in the **Commitments Register** **[REP1-015]**. The final Plan is to be submitted to and approved in writing by the MMO, as secured in Condition 11(1)(k) of the dMLs (Schedules 11 and 12 of the **draft DCO** **[PEPD-009]**). Additionally, Condition 11 (1)(a) of the dMLs (Schedules 11 and 12 of the **draft DCO** **[PEPD-009]**) secures a design plan that must include details of any exclusion zones/ environmental micrositing requirements.
2.12.11	Seahorses: The Applicant erroneously states: 8.9.23 Records of seahorses are limited across the southwestern region, however again there are specific locations where seahorse is a listed feature, as described in above (Section 8.6), where individuals will be aggregated whilst breeding through the summer period. As outlined for black seabream, there are also wider areas within which seahorse will represent noise-sensitive receptors, specifically during the overwintering period for these species when it is understood they migrate to deeper waters further offshore. Low numbers of spiny/long-snouted and short-snouted seahorses have been observed in the area of the Proposed Development in common with the wider region. Neil Garrick-Maidment, FBNA. Executive Director and Founder of The Seahorse Trust, Fellow of the British Naturalist Association, Visiting	The Applicant is confident that based on these data presented in **Chapter 8, Fish and Shellfish Ecology, Volume 2** **[APP-049]**, seahorse numbers within the vicinity of the Proposed Development are generally low. The Applicant has undertaken a suitably precautionary assessment and assumed the presence of overwintering seahorse in the vicinity of the Proposed Development. Therefore, as detailed in the **In Principle Sensitive Features Mitigation Plan** **[REP1-012]**, as a further precaution, the Applicant has committed to the use of at least one offshore piling noise mitigation technology for the duration of the construction phase, this will ensure any potential for impact on seahorse in its offshore winter phase is minimised. Furthermore, the Applicant would like to direct the Interested Party to **Appendix 11.3: Underwater Noise Assessment Technical Report, Volume 4** **[APP-149]**, where the built in precaution of the noise modelling is detailed, and therefore the TTS impact ranges on seahorse are considered over precautionary.

Ref	Written Representation comment	Applicant's response
	Fellow to the faculty of science and technology. Bournemouth University. Recipient of the David Bellamy Award for distinction as a field naturalist 2023 commented on this Environmental Statement, stating that they have records from the fishing industry of seahorses overwintering offshore in large numbers	
2.12.12	2. Insects were not considered by the Applicant; Insects are numerically the largest of animal groups to be destroyed by wind farms. The turbines will represent a physical obstacle to regular, unmitigable natural processes such as Insect migration. The South Coast is an important insect migration highway. Insect impacts have the potential to arise when considering: • The Woodland Trust states "Without insects we could not grow food, or sustain wildlife, which would be lost forever." At least 75 percent of global food crop types depend on insect pollinators, including 70 of the 100 most important human food crops. • Insects are key pollinators and without them human life would not be sustainable in its current density. They are crucial to ecosystems with respect to energy, nutrient, and biomass transport; regulation of crop pests; pollen transfer. • 4 billion Hoverflies (80 tons of biomass) travel above southern Britain each year in seasonally adaptive directions, redistributing tons of essential nutrients and billions of pollen grains between Britain and Europe. 6 trillion aphids are consumed, and billions of flower visits are carried out by Hoverflies alone. • 300 – 1,000 tons of insect biomass migrate across the Channel to and from the Southern area of the UK annually. • 3.5 trillion insects fly or windsurf over southern UK each year. The loss of insects via wind turbines is now a known phenomenon. • Model calculation of the amount of insect biomass that traverses wind rotors during operation provides a first estimate of the order of magnitude of 24,000 tons of insects crossing the German wind park throughout the summer season. Based on conservative model assumptions, five percent of the insects flying through a rotor could be actually damaged. The related loss of 1,200 tons per year since more than fifteen years could be relevant for population stability. • Recently, the annual loss of insect biomass at wind turbines was estimated for Germany to amount 1,200 t for the plant growth period, which equates to about 1.2 trillion killed insects per year, assuming 1 mg insect body mass. Accordingly, a single turbine located in the	**Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]** assessed the potential effects of the Proposed Development on invertebrates which included surveying. Key habitats for terrestrial invertebrates are avoided by the onshore cable corridor or are crossed by trenchless crossings, and embedded environmental measures have been included in the DCO Application to minimise, reduce, and avoid potential effects. Terrestrial invertebrates were scoped out from requiring further assessment due to the lack of pathway of effects and limits potential scale of impact. Further recent reviews of potential ecological effects of offshore wind farms have not identified insect collision as a risk. These include a 2021 study completed on behalf of the International Union for Conservation of Nature (IUCN) (Bennun et al., 2021, see Appendix 28) and one published in the journal Nature in 2022 (Galparsoro et al., 2022). Migrating insects were not assessed as they were not raised in **Appendix 5.1: Planning Inspectorate's Scoping Opinion, Volume 4** of the ES **[APP-125]** and the National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023) is silent on the matter, although it specifically mentions collision risks associated with birds and marine mammals. Further recent reviews of potential ecological effects of offshore wind farms have not identified insect collision as a risk. The ES assessments undertaken have concluded that no significant effects on terrestrial ecology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development. Similarly, the **Report to Inform Appropriate Assessment** **[APP-038]** concludes that there will be no adverse effect to any of the protected sites assessed.

Ref	Written Representation comment	Applicant's response
	temperate zone might kill about 40 million insects per year. Furthermore, Scheimpflug Lidar measurements at operating wind turbines confirm a high insect activity in the risk zone of turbines.	
2.12.13	3. I refer to, and give support to, the Relevant Representations and Statutory Consultee Statements by Sussex Wildlife Trust, Natural England and Campaign to Protect Rural England for the potential impacts of this Project. We are in support of the Principal Areas of Disagreement statements by West Sussex County Council, Horsham District Council, Arun District Council.	The Applicant acknowledges this comment. Please refer to the Applicant's response to the Sussex Wildlife Trust, Natural England and Campaign to Protect Rural England relevant representations in **Applicant's Response to Relevant Representations [REP1-017]** submitted at Deadline 1.
2.12.14	4. I fully endorse the Cowfold Residents Impact Statement on Rampion 2, dated 2 Feb 2024, submitted to the Planning Inspectorate as a Written Representation.	The Applicant acknowledges this comment. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-13 Applicant's Response to Ellen Jane Finely's Written Representations [REP1-096]

Ref	Written Representation comment	Applicant's response
2.13.1	I would like to confirm that I support CowfoldvRampion and their Impact Statement, which is based on the evidence gathered from the views of the local community including myself. Can you please add this comment to my other WR.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-14 Applicant's Response to Jane Lamb's Written Representations [REP1-105]

Ref	Written Representation comment	Applicant's response
2.14.1	In November 23 Enso Energy Limited came to do a hydrological survey with a brand-new John Deere tractor two 4-wheel drive vehicles towing a water bowser and a borehole digger. I repeatedly told them the land was saturated weeks before and we were on a high-water table (they knew best though) and this was without the amount of rain we are having at present. They entered the fields through a gate off of Kent Street as this was the nearest field where they needed to do the work, and we did not want them messing up further fields or coming through the Industrial Estate. They entered through the gate and got ten to fifteen foot in and sunk, guess I knew what was talking about when I said how the levels in the water table were. They spent the day there and at 1pm we went across with a machine and pulled them out. They then abandoned the idea. This is one of the many reasons this should not take place at Oakendene.	The Applicant has no further comments on this paragraph of the Interested Party's Written Representation.
2.14.2	Up to now there has been a lack of the parish council's involvement with trying to save our precious land, maybe they thought that the village will benefit from the hand outs and promise of regeneration. However, at an emergency meeting of the parish council on 26th February, I am pleased to see that they have finally realised that OAKENDENE provides a lot of jobs for the local people and gives a lot of business to the village shops when people go off for lunch or coffee, or just to get a sandwich. I can honestly say thank goodness the Cowfold V Rampion group are there to represent the community as they have done so well in gathering facts and evidence and given the people a voice who don't know how to deal with such things	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.
2.14.3	If this goes ahead the flooding risk for Oakendene will be catastrophic and will most likely over time force closure as no one will want a unit or compound that will flood. Where will the trade for the village be then. As I said previously, we are not on mains drainage and rely on the land to be our drainage system, and thankfully we have worked with nature over the years and have been able to achieve this. Should acres of our land be lost to this sub station then clearly this will no longer be the case. When will people and Government learn, you can not keep taking the land without facing consequences, flooding and the destruction of the countryside the wildlife that we are destroying when we will learn we have to work with nature to try and recover from the destruction we have already caused?	The indicative site layout has been developed accordingly, taking risk of flooding into account. The Applicant is confident that the precautionary approach in **Appendix 26.2: Flood Risk Assessment, Volume 4 o**f the Environmental Statement (ES) **[APP-216]** and **Outline Operational Drainage Plan [APP-223]** will ensure the substation will not be at flood risk, nor increase flood risk elsewhere. Meetings were held with West Sussex County Council (WSCC, as the Lead Local Flood Authority (LLFA)) and Horsham District Council (HDC, as the LPA) throughout stakeholder consultation to understand local sources of flood risk at the Oakendene site. Assessment of flood risk to the substation has been based on the Environment Agency Risk of Flooding from Surface Water (RoFSW) mapping, as detailed in Paragraph 5.7.14 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**. The substation footprint avoids the RoFSW 0.1% Annual Exceedance Probability (AEP) (1 in 1,000 year return period) extent for the watercourse to the south of the site (tributary of the Cowfold Stream), as agreed with WSCC as a suitable approach. The substation is also situated well outside of the flood extent associated with the downstream lake. Numerous embedded environmental measures have been set out in 7.22 **Commitments Register [REP1-015]** (C-28, C-73, C-140, C-77, C-134 and C-141) for the management of surface water within the Proposed Development during both the construction and operational phase, including the **Outline Code of Construction**

Ref	Written Representation comment	Applicant's response
		Practice (CoCP) **[PEPD-033]**. Section 5.10.9 of the CoCP sets out the requirements for the Construction Phase Drainage Plan, stating the following: *"Details of construction phase drainage will be developed by the Contractor(s) and will be presented in a Construction Phase Drainage Plan and approved as part of the stage specific CoCP. This will be developed following detailed drainage investigations and hydrological assessments to determine potential location-specific risks in relation to the water environment and identify appropriate measures to avoid or reduce risk. .... Details of the Construction Phase Drainage Plan will be subject to consultation with WSCC (and other relevant consenting authorities including the Environment Agency) prior to the start of construction."* These measures will ensure that surface water will be managed on-site to drain the site appropriately and to mitigate against the potential for waterlogged ground, whilst ensuring that discharges remain at pre-development rates (so that there will be no detrimental impact to downstream flood risk) and avoiding impact on the local environment. With regard to the impact of the development to surface water runoff and downstream flood risk, the **Outline Operational Drainage Plan** **[APP-223]** sets out the drainage strategy for managing surface water run-on and runoff from the substation throughout the operational lifetime of the development. The proposed Sustainable Drainage (SuDS) measures as shown in the Indicative SuDS Plan in Appendix A provide the proposed approach for discharges being limited to greenfield QBAR (mean annual flood) rates and / or two l/s/ha (whichever is greater). These measures will ensure that surface water runoff rates remain unchanged (and for more extreme events, reduced) from the current greenfield rate.
2.14.4	Also, I noted whilst listening to the meetings that the number of vehicles was going to be far more than originally thought this again has just not been thought out and other options not explored.	The assessment of effects of the Proposed Development on the transportation infrastructure, including the strategic and local road network, Public Right of Ways, Sustrans national cycle network, has been undertaken in **Chapter 23: Transport, Volume 2** of the ES **[APP-064]**. Given local concerns, further scenarios have been modelled and reported in **Chapter 32: ES Addendum** **[REP1-006]**. Environmental measures will be implemented to manage the potential effects from construction traffic. These are detailed in the **Commitments Register** **[REP1-015]** which has been updated at the Deadline 1 submission and are secured through the **Outline Construction Traffic Management Plan (CTMP)** **[REP1-010]**, **Outline Construction Workforce Travel Plan** **[APP-229]**, **Outline Public Rights of Way Management Plan** **[APP-230]** secured through requirements 24 and 20 of the **draft DCO** **[PEPD-009]**.
2.14.5	Oakendene is in the draft Horsham plan policy as a KEY area of local and FUTRE employment and should be safeguarded not DESTROYED. There are other options and better options than the Oakendene and the route they are taking to get here.	Please see the Applicant's response in **Table 2.4** above regarding concerns related to transport effects related to the Oakendene Industrial Estate. It should be noted that the westerly compound is intended to serve the installation of the cable, not the construction of the substation on the adjacent site. For further information, please see the Applicant's response to Relevant Representations regarding Oakendene Industrial Estate (Table LI3, **Applicant's Response to Relevant Representations** **[REP1-017]**.

Table 2-15 Applicant's Response to Janine Creaye's Written Representations [REP1-106 to REP1-114]

Ref	Written Representation comment	Applicant's response
2.15.1	SUMMARY The subject of this report is the biodiversity under threat from the Rampion Windfarm project if the substation is located at Oakendene. The report covers the undisturbed River Adur catchment area around the Cowfold Stream, tributaries and flood meadows between A281 in Shermanbury and A272 in Cowfold, where the cable construction and haul roads would cause irreparable damage, as well as covering ecology under threat from the substation construction itself. This document provides photographic evidence, recorded data, and personal testimony. It includes tables of the 230 entries made in iRecord in 2023, and added to Sussex Biodiversity Records. These are broken down into species groups as appropriate. Sections by subject: 1) Flood patterns that drive this biodiversity. Photographs and testimony. 2) Nightingales and other red list birds under threat. Including iRecord entries and 2 nightingale surveys made with a Sussex Ornithological Society surveyor in April and May 2023. 3) Grassland habitat of Unimproved Lowland Meadow at Crateman's Farm. This has not been surveyed in the Rampion submission. This report includes an initial professional ecologist survey and photographic evidence of meadow plant species, pollenating insects, lichens etc. 4) Ecology of Kings/Moatfield Lane and Kent Street verges. Including photographic and data record evidence of toad migration, ancient woodland indicator species, glow worm presence, crested newt presence, owls and moths. 5) Green Lane wildlife corridor and tree boundary. This includes evidence of history, badger presence, wildlife use, oak tree assessment for veteran features and age. 6) Badger networks threatened by cable construction. This includes an independent professional Badger Survey undertaken in May 2023. 7) Adders, grass snakes and slow worms. Photographic and data record evidence as well as testimony. 8) Tree and scrub loss from this location. Assessments of numbers, visual impact and veteran features in photographs and tables. The report ends with a summary of the psychological impact caused by anticipation of disturbance, actual construction process, and by the long-term closure of footpaths in the area, as well as the wider impact of such projects on biodiversity in this country when the options are not thought through. This is to be read in conjunction with Cowfold v Rampion Local Impact report	Please see the Applicant's response in **references 2.15.2** to **12.15.56** below regarding concerns raised.
2.15.2	We believe that the option of the Wineham Lane North site was not fully explored or compared to Oakendene. The selection has been deemed as 'a marginal preference for Oakendene' in the DCO submission with no	**Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** describes the alternatives studied by the Applicant and a

Ref	Written Representation comment	Applicant's response
	convincing reasons as to why it went ahead. The ecological damage caused by the haul road and cable construction from Gratwicke on the A281 through to a substation at Oakendene, then on again to join Bolney Substation, will far outweigh the benefits of choosing this option. This is currently an undisturbed section of the River Adur catchment area. It is a patchwork of small fields, flood meadows, dense lichen covered hedges, and mature oak trees. The alternative substation site as an expansion to the existing Bolney substation does not involve this mosaic of unfarmed flood meadow round the Cowfold Stream and tributaries, but covers territory which has already been disrupted by Rampion 1.	comparison of their environmental effects across the project as a whole. This includes the alternatives considered and consulted on prior to the Development Consent Order application. As described in **Chapter 3 Alternatives, Volume 2** of the ES **[APP-044]**, the Proposed Development has been developed through a multi-disciplinary design process including environment, engineering, landowner, and cost considerations. The Applicant has sought to avoid, reduce, or minimise the effects through the design process and also by identifying and securing embedded environmental measures. It is acknowledged that some residual effects remain across the site. The Applicant notes that paragraph 4.4.1 NPS EN-1 (2011), against which the Proposed Development is to be assessed, states there is no "*general requirement to consider alternatives or to establish whether the proposed project represents the best option*". This is reflected in paragraph 4.3.9 of NPS-EN1 (2023), which came into force in January 2024. Some specific policies require consideration of alternatives as set out in the National Policy Statement EN-1 (Department of Energy and Climate Change, 2011a), however these do not apply in relation to the comparison of the substation options. Section 3.6 of **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** provides the information on the onshore substation site selection process. **Section 3.6** describes the site selection process and the reasons for other sites being discounted based on the multi-disciplinary factors identified in the paragraph above. The selection of Oakendene is clearly stated as favourable for engineering, cost, and landowner considerations in paragraphs 3.6.23 to 3.6.25 of **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**. Significant weight was also given to the environmental constraints and related policy in the overall balance of the decision. This Applicant has also developed further embedded environmental measures that have been presented in the application including the design principles in the **Design and Access Statement** **[AS-003]**, **Outline Landscape and Ecology Management Plan** **[APP-232]** and **Outline Operational Drainage Plan** **[APP-223]** secured by requirements 8, 12 and 18 of the **Draft DCO** **[PEPD-009]** respectively. As requested by the Examining Authority at Issue Specific Hearing 1, the Applicant has provided further information on the decision to discount the Wineham Lane North site for the onshore substation (**Applicant's Post Hearing Submission – Issue Specific Hearing 1, Appendix 2 – Further information for Action Point 4 – Wineham Lane North** **[REP1-021]** submitted at Examination Deadline 1).
2.15.3	We can see that the surveys submitted have omitted to show priority habitat in this area approaching the substation, failed to survey BAP priority species, and red-list bird species have either not been surveyed in the cable route or have been greatly underrepresented. The scale of tree and scrub loss in this 5km longer option is underplayed and unnecessary. No biodiversity data was released in advance of the DCO making it impossible for wildlife organisations and local people to assess evidence accurately. We saw surveys being undertaken just	Terrestrial ecology and nature conservation receptors relating to the Project have been considered in the **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**. Further information regarding the embedded environmental measures to avoid, prevent or reduce the terrestrial ecology and nature conservation impacts

Ref	Written Representation comment	Applicant's response
	before the DCO submission (and are dated as such in the submission) so they could not possibly have been assessed against the alternatives. There is no detailed survey data for the Wineham alternative given to compare the two.	arising during the construction of the Proposed Development are presented in the **Outline Code of Construction Practice (CoCP) [PEPD-033]** secured through requirement 22 of the **Draft DCO [PEPD-009]**. The cable route and substation have been covered by a range of biodiversity surveys with a range of legally protected and notable species identified see **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**. The mitigation hierarchy has been implemented to firstly avoid (for example veteran trees in the area), minimise (reduce hedgerow losses where possible), mitigate (advanced planting of alternative habitat for dormouse and compensate (through habitat creation around the proposed substation) in this area. This is demonstrated within the **Outline Code of Construction Practice (CoCP) [PEPD-033]** and **Outline Landscape and Ecology Management Plan** [**APP-232**]. Embedded environmental measures, detailed within **Appendix 22.16: Arboricultural Impact Assessment, Volume 4** of the ES **[APP-194]** will be implemented to necessitate unnecessary tree removal or pruning, alongside maintaining the quality, condition, or safety of remaining trees secured through requirement 22 of the **Draft DCO [PEPD-009]**.
2.15.4	Most residents of Cowfold did not know that a substation was planned to be built at Oakendene until the last consultation October/November 2022 which is clearly demonstrated by the amount of opposition that has arisen since then. This was three months after the option had been chosen (July 2022), therefore there has been no consultation with local people that includes the choice of substation site. We have not been consulted when the impact on this area is so great. Local people including landowners have not been directly consulted on the biodiversity and people surveying have not been allowed to engage in dialogue with local people. There are many comments in the survey data submitted about land being 'inaccessible' yet few landowners were asked, and those that were have told us that they gave permission, yet the surveyors stuck to the limited access of public footpaths.	**Consultation** 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, Volumes 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]**. 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]**. During each consultation, the Applicant's environmental information provided a full account of the impacts of draft proposals on the environment and communities, and outlined mitigation proposals. This was set out in the consultation materials for each consultation, as follows: • Statutory Project-Wide Consultation, July-September 2021 as set out in the Preliminary Environmental Information Report (PEIR) (Rampion Extension Development, 2021). • Reopened Statutory Project-Wide Consultation, February – April 2022 as set out in the PEIR (RED, 2021).

Ref	Written Representation comment	Applicant's response
		• Statutory Onshore Consultation, October – November 2022 as set out in the PEIR Supplementary Information Report (SIR) (RED, 2022). • Targeted Onshore Consultation, February – March 2023 as set out in the PEIR Further Supplementary Information Report (FSIR) (RED, 2023). For further information please see Appendix 15 Promotion of Rampion 2 Consultations in and around Cowfold 2021-2022 (**Applicant's Response to Relevant Representations** **[REP1-017]** submitted at Deadline 1).
2.15.5	I have lived working as a visual artist from my garden studio and in that time have been photographing and noting the ecology and wildlife around me as it is part of how I work as a sculptor. All the photos in this document are a result of that, except those which were supplied by other residents and are marked by name. This single track, privately maintained, dead end lane is crossed twice by the cable construction if the proposed Oakendene substation goes ahead, and the area will lose unimproved lowland meadow, masses of thorny scrub, obvious wildlife corridors and many mature oak trees from around the fields. This is an irreplaceable well established wildlife habitat, the loss of which would be felt by all who live, walk, work and exercise dogs and horses around these lanes for more decades to come than the turbines last. It is undisturbed because the flooding has prevented much human activity like farming and road building. This then means that there has been little wildlife recording to show up in 'desk study', because it is largely in private hands, albeit crossed with well-used public footpaths. The bigger picture is that this country has lost more of its diversity (according to the 2023 State of Nature Report) than most others in Europe, so if we do not defend these valuable havens we unnecessarily lose so much more. There is a River Adur Landscape Recovery project which has received funding from Defra, is spearheaded by Knepp Estate's Wildland Foundation, and is supported by the Wilder Horsham District policy. That project aims to improve the flood areas of the river, join up wildlife corridors and increase biodiversity along and around the tributaries. This Eastern branch of the very same river has much of the same dense habitat which supports similar endangered wildlife (nightingales, skylarks, turtle doves, grass snakes and adders, beautiful demoiselles, brown hairstreak butterflies, crested newts, amphibians, etc) yet has had so little attention to date. It all has an influence on carbon storage and stabilising climate change. It must not be sacrificed when it is not necessary to do so. Just because this has not been designated in the past for its wildlife value does not prove that there are no irreplaceable habitats here. Habitat Regulations list 'possible Special Areas of Conservation' for consideration. This needs independent assessment now from both local authorities and through this planning process, not dismissal. have been trying to communicate with Rampion on the biodiversity value and habitat threats since I found out by word of mouth about the windfarm proposal from the landowner at Crateman's Farm, Dragons Lane, Cowfold in late July 2021. This property is on my daily walk around the flood meadows opposite my property. I have sent RWE photos, film recordings, data, responded to formal Consultations, met with Carter Jonas and RWE representatives on site, corresponded by letter, but find little reference in the submission that any of my points have been taken into consideration in any decisions made (a note on the bottom of 2 tables in Document 22.2 " A local resident living in the vicinity of the Cowfold Stream provided records of breeding nightingale in areas of	Please see the Applicant's response in **references 2.15.6** to **12.15.56** below regarding concerns raised.

Ref	Written Representation comment	Applicant's response
	scrub)adjacent to the watercourse and within the wider flood zone." And "In addition, a local resident provided field observations for the Cowfold Stream and surrounding area when within and close to the proposed DCO Order Limits."). No effective mitigation has been proposed as a result. The responses to my letters (see final section below) detail that the cable route is not counted as an issue by RWE regardless of the threat to priority habitat, red list and Biodiversity Action Plan species. The damage is all considered temporary, but at 4 years construction minimum and at least two before reinstatement, with extensive tree and scrub loss, flood disruption, light pollution, soil destruction (for both haul road and trench), vibration and noise this cannot be considered temporary to ecology, especially where much is already on the verge of extinction in this country. I finally received some replies to my letters but each time only when I had attended drop-in Rampion events and drawn attention to the unanswered letters. Each reply has come from a different person. The statements received have been dismissive and pointed out that toads, reptiles and separate breeding bird species - red list or otherwise, do not need to be surveyed in the cable route. My repeated requests for copies of the Rampion surveys always met with promises, then silence, then finally that they would not be released until DCO submission. Please read the following in conjunction with Cowfold v Rampion Local Impact Report's annotated responses to the DCO. This Report is to provide recorded data, photographic evidence and personal testimony. I have made 230 entries into iRecord in 2023, some are retrospective sightings of endangered species. All but a few insects have now been verified. Two nightingale surveys, a professional badger survey	
2.15.6	A key to this site is the River Adur flood meadows. I wrote in the consultation of 2021: 'The cable route would go through small fields that regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more obvious flood meadow. These are used by herons and grey lag geese and many wild meadow plants and reeds grow across the wetter areas. I have even found a fish (perch) in a field where the Cowfold Stream has flooded and then retreated. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can still use it. ' I sent photos of floods including these 4 below yet this does not seem to have been taken into consideration when choosing the substation option, and the substation location has only had flooding swales added to the plans on submission. These were not present on the plans shown to the public at the Cowfold meeting in July 2023. [Photographs of Cowfold stream in flood]	Commitment C-117 (see **Commitments Register** [**REP1-015**]) is in place to schedule work in Flood Zones 2 and 3 outside of the period between October and February to avoid the period when wildfowl are most likely to be present. This is secured via Requirement 22 of the **Draft Development Consent Order** [**PEPD-009]** that requires agreement of stage-specific Code of Construction Practice documents. In addition, and in accordance with Commitment C-5 in Table 8-1 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216],** the Cowfold Stream will be crossed using Horizontal Directional Drilling (HDD) or other trenchless technology given that this watercourse is a Main River. In addition, Commitment C-123 sets out provisions with regard to the siting of HDD pits outside of the floodplain, stating that: *"Starter (and exit) pits for Horizontal Directional Drilling (HDD) and other trenchless technologies will be micro-sited outside of the floodplain where possible (by moving the pit further away from watercourses)."* Therefore, there is anticipated to be no impact to the pattern of floodplain flow and storage on the Cowfold Stream floodplain associated with construction activities. With regard to selection of the substation site, Section 9.1 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** sets out the application of the Sequential Test. As noted in Paragraph 9.1.36, the

Ref	Written Representation comment	Applicant's response
		Oakendene substation site was recognised to be at marginally higher risk of surface water flood risk than the Wineham Lane site. However, Paragraph 9.1.37 concludes that surface water flood risk at both sites would be comparable, following the implementation of surface water flood risk mitigation and drainage design. The **Outline Operational Drainage Plan** **[APP-223]** sets out the strategy for managing surface water flood risk across the site and is secured via Requirement 17 of the **Draft Development Consent Order** **[PEPD-009]**.
2.15.7	The map in Rampion's own Peir report makes very clear that the flood pattern will be far more of a problem to construction works and substation site in this option than the Wineham Lane North option which remained under consideration until July 2022. There is a tributary which is the site of a toad migration and a whole section which runs within the flood areas of the Cowfold stream as well as the obvious flooding all round where the substation is sited. The flooding is increasing with the change in weather patterns and we believe records on this may need updating.	With regard to assessment of flood risk to the Oakendene substation site, assessment has been based on the Environment Agency Risk of Flooding from Surface Water (RoFSW) mapping, as detailed in Paragraph 5.7.14 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]**. The substation footprint avoids the RoFSW 0.1% Annual Exceedance Probability (AEP) (1 in 1,000 year return period) extent for the watercourse to the south of the site (tributary of the Cowfold Stream), as agreed with Horsham District Council (HDC) and West Sussex County Council (WSCC) as a suitable approach. The substation is also situated well outside of the flood extent associated with the downstream lake. With regard to the choice of the final substation site, refer to response **reference 2.15.6** above. Consideration of climate change to flood risk is considered in Section 5.7 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** and Section 3.2 of the **Outline Operational Drainage Plan** **[APP-223]**. Assessment of climate change is based on current Environment Agency guidance (Environment Agency, 2022) and in accordance with the relevant guidance provided in NPS EN-1 (2011).
2.15.8	The flood water drives the biodiversity for so many reasons. It prevents productive farming, it prevents development of houses and barns, it means no made-up roads and little air pollution, it only allows muddy footpaths and bridle paths which limit access (especially as the footbridges are regularly underwater even sometimes in the height of summer), it allows scrub to establish in very dense thickets over decades, which is critical to provide red list species safe breeding sites. If the flooding means that construction cannot happen in winter (as suggested in DCO) the frog and toad migrations happen in February - April the nightingales, cuckoos, sky larks breed from April through summer, the meadows are alive with breeding insects and many plants are spreading wildflower seed into August and beyond, so there is little time to construct which is not going to devastate the ecology. To establish haul roads, as there are no other roads, the field structure will be destroyed by alien material added to stop vehicles sinking as the water table remains high. [Rampion 2 PEIR map of substation options] [Photography of Cowfold Stream Floods]	The Applicant acknowledges the comment and refers back to the assessment of ecological effects within **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the Environmental Statement (ES) **[APP-063]**.
2.15.9	This flood pattern is common in winter including many times already this season (ie 4 thDecember, 5 th January, 9 th and 18 th February) where the foot bridges over the stream are blocked by fast moving flood water.	This is noted by the Applicant. It is unclear which stream is referred to by the respondent, however the assessment of flood risk associated with

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		rivers and streams has been based on available data as detailed in Section 5 and 6 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]**, in agreement with key stakeholders such as West Sussex County Council (WSCC), Horsham District Council (HDC) and the Environment Agency.
2.15.10	The photo above shows the river Adur flooding the A281 at Mockbridge near Henfield which causes the road to be closed a number of times each year between Cowfold and Henfield. Climate change is already increasing this issue. Where will the water go if the substation is built right in the catchment area and the cable construction process leaves trenches of lm deep (however quickly back filled in until reinstatement), with the fields compacted by extensive haul roads and unrestored for years? The extensive loss of trees and hedge in the floodplain will also remove the stabilizing influence of how these take up flood water (we estimate nearly 100 mature trees will be lost in this cable section to Oakendene, see below for detail). Houses and businesses will be newly flooded where they weren't before, many plants will die underwater and habitats will change, displacing much wildlife. The risk of flooding to homes and roads is incalculable, and unnecessary.	With respect to the impact of the substation to downstream flood risk, please refer to response **reference 2.15.7** above. The substation and associated sustainable drainage (SuDS) basins are situated outside of the Environment Agency Risk of Flooding from Surface Water (RoFSW) 0.1% Annual Exceedance Probability (AEP) extent, therefore outside of the floodplain and there will be no loss of floodplain storage. In addition, the Applicant refers to the outline drainage strategy presented as set out within the **Outline Operational Drainage Plan** **[APP-223]**. This has been designed to maintain greenfield run-off rates to ensure no detrimental impact to surface water runoff and downstream flood risk. The final Operational Drainage Plan will accord with the **Outline Operational Drainage Plan** **[APP-223]** secured via **Draft Development Consent Order** **[PEPD-009]** Requirement 17. The photograph provided is noted by the Applicant. The location referred to is situated on the River Adur eastern branch, which the cable route does not cross. Nonetheless, flood risk associated with the River Adur is detailed in Paragraphs 5.2.21 to 5.2.25 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**. As shown in Figure 26.2.2, the location referred to is in an area of high flood risk within Flood Zone 3. With respect to assessment of the impact of climate change to flood risk, please refer to **reference 2.15.7** above. With respect to the impact of cable trenches please refer to **reference 2.15.6** above. Risk to third party receptors is considered in Section 6.4 of **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**. The section concludes that following implementation of measures as detailed in Section 8, there will be no increase of flood risk to third party receptors. **Appendix 22.16 Arboricultural Impact Assessment, Volume 4** of the ES **[APP-194]** is currently being updated for submission at Deadline 3, alongside updates to the vegetation retention plans in the **Outline Code of Construction Practice** **[PEPD-033]**.
2.15.11	[Photograph of nightingale by Cowfold Stream] A BTO Red Listed species which has declined in numbers by 92% since 1970's in the UK. Sussex Ornithological society state that Sussex has 13% of the national breeding nightingales. This site is very special to that population. 22 separate territories have been recorded in 2023, directly within this section of the	Please see response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations** **(Document Reference: 8.53)** submitted at Deadline 2, specifically Section 10. It is noted that the data being referred to in

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	cable route. (Knepp Castle Wilding Project recorded 44 territories in 3500 acres, most of those round the Cowfold Stream are concentrated in less than 50 acres. 51 iRecord nightingale entries were added and verified in 2023, each is backed by film recordings, 36 recording were made this year and 15 were added from previous years. These records are added to the Sussex Biodiversity Records Office database. Two surveys were made with an experienced bird recorder for Sussex Ornithological Society, Geoff Hunt. Surveys were 30th April and 29th May 2023, all in the cable route field edges or directly in the construction path. There are many private sections of the cable route that were not included in these recordings, so the actual numbers are significantly higher. In the DCO there were only 5 nightingales listed in the Environmental Statement, Volume 4, Appendix 22.13 Breeding Bird Survey for the whole onshore route. This does not reflect the situation. As Chris Tomlinsons of Rampion has replied to my letter that all breeding birds are simply grouped together in their assessments of the cable route regardless of priority listing, this is not an adequate picture.	**references 2.15.11** to **2.15.17** below is the same as that described in the CowfoldvRampion written representation.
2.15.12	Below are survey and territory maps for nightingales in 2023, and one for territories in 2021/2022. Nesting sites are fairly consistent from year to year in my experience, until the thorny scrub is removed by new landowners - then they will not return to these sites. I sent RWE and Carter Jonas territory maps in 2021 before the choice was made (see below). [Mapped Nightingale recordings in the Rampion 2 cable route approach to Oakendene area].	Please see the Applicant's response to **reference 2.15.11** above.
2.15.13	The habitat currently here is very specific for nightingales: undisturbed, unpolluted, very dense thorny scrub (they nest around 30cm off the ground). It takes many years to establish. Whole sections of this are marked to be taken out in the process of cable construction around Cratemans Farm, disturbed by HDD equipment through Gratwicke and Moatfield Farm and disturbed by tree and hedge removal at the boundary field between Moatfield Lane and Wilcocks Farm.	Please see the Applicant's response to **reference 2.15.11** above.
2.15.14	Losses There are contradictions in submitted documents from Rampion as the same area marked for tree loss at Crateman's Farm (G265) is marked as scrub retained (HS688), yet it is in the middle of the cable trench. This hardly seems believable, so we are taking it that the scrub is lost in the process of cabling and tree removal as the disruption would have the same impact. Some of this is 6 - 8m across and cut straight through. Other nesting sites are marked to be notched or cleared ie HS1388a and HS1388b. The tree, hedge and scrub maps are marked as being made in July 2023 so these cannot have been compared with alternatives, as this was decided by July 2022.	Please see the Applicant's response to **reference 2.15.11** above.
2.15.15	The Rampion 2 Category 5: Reports Design and Access Statement in the DCO documents (Date: August 2023 Revision A) paragraph 3.5.4) advises that at Oakendene: "Compensatory habitat is proposed from woodland and scrub features lost in the locality and this will provide breeding habitat for nightingale as a species of interest in areas associated with the Cowfold Stream catchment' and further in the document 'habitats created following construction will provide suitable habitat for many of the notable species known to be present in the area, including breeding nightingale (through provision of damp scrub and woodland for nesting and foraging)"	Please see the Applicant's response to **reference 2.15.11** above.
2.15.16	I answered this point to Chris Tomlinson when he wrote almost the same words to me by letter which shows a misunderstanding of the habitat and appropriate requirements for these birds. No notice has been taken to follow through with mitigation. What is required is not the 'woodland' or any 'damp scrub' Rampion talk of providing. It is dense thorny scrub which is several metres thick and dense right to the ground.	Please see the Applicant's response to **reference 2.15.11** above.
2.15.17	Isabella Tree Of Knepp Wilding Project has written in her 2018 'Wilding' book of why nightingales have been attracted to breed at Knepp in such numbers: The majority (86 percent) of the birds had taken up sites in	The Applicant has no further comments on this paragraph at this time.

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	overgrown hedgerows, twenty-five to forty-five feet deep, where there is around 60 per cent blackthorn with thorny cover extending right to the ground. ...fringed with brambles, nettles and long grasses...where the cavernous, cathedral-like structure of the thicket's interior offers a safe haven for adults and their fledgling chicks to peck about for insects in the leaf- litter. 'So a nightingale - Knepp reveals - is not a woodland bird. Trees need not play a part in the picture at all' she goes on to talk of the favoured territory as 'open - grown thorny scrub, thickly vegetated banks and double hedgerows replete with insects'.	
2.15.18	If left undisturbed for decades the blackthorn scrub renews itself without extensive management (as I have seen suggested). Over decades if undisturbed it continually runs forwards and sideways ever colonising new ground and generating the necessary fresh growth to stay dense to the ground. This is how it comes to be so thick, not just by forced management of rotational cutting which loses continuity of breeding. This stability is what the nightingales are thriving on here. The reinstatement of small boundary hedges for Rampion 1 has failed in many places and even basic single hedge plants are not succeeding to establish out of their plastic tubes, 7 years on. This will not provide compensatory habitat let alone the net gain proposed. We can have no faith that any reinstatement will be followed up on the evidence of Rampion 1.	The Applicant has no further comments on this paragraph at this time.
2.15.19	Sussex wildlife Trust have suggested in their earlier consultation response that a normal hedge takes 15 years to restore, so how long to reinstate territory that is at least 25 feet thick as Knepp suggests is required for this population? None of this appears to be taken into consideration by Rampion 2 and the population will inevitably be decimated in the decades of no habitat. The turbines only last 25 year.	The Applicant notes that the Statutory Biodiversity Metric (used to calculate BNG) provides a range of years to reach target condition for a species-rich native hedgerow as between 1 and 12 years (1 year for poor condition, 5 for moderate condition and 12 for good condition), if the hedgerow has standard trees this increases to 1 year, 10 years and 20 years respectively. It is notable that the assessment Section 22.9 of **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]** is on the basis of most hedges being reinstated ten years after planting.
2.15.20	A further point to the threat of how easy it is to lose nightingale territory and how under threat they are in the River Adur catchment area is that In 2005 when we moved into this location the biggest concentration of nightingales was in the scrub that grew around the clearings within Taintfield Wood, next to the substation site, however where the ground was cleared of scrub by the landowner (leaving the trees intact) approximately 10- 15 years ago, the nightingales have never returned, despite some ground cover naturally coming back. Trees alone are not suitable. Nightingales however are still breeding in the untouched hedgerow/scrub just to the south of Taintfield wood where a battery storage installation has been proposed. Gratwicke Stud Farm removed all hedgerow from the Cowfold Stream and ploughed up the fields to plant grass in September 2020. Nightingales also have not returned to those cleared sites on the north bank of the Cowfold Stream as there is no cover and the bank is collapsing because of the removal of roots. The fields are often still underwater with floods (see above). This has compressed nightingale territory further to concentrate in blackthorn scrub around Crateman's fields and along the tributary that tracks across Moatfield Lane below Oak Cottage garden, and on to King's pond on Kent Street. The cable construction follows so exactly all of this remaining territory. See maps above for distribution at surveys.	Please see the Applicant's response to **reference 2.15.11** above.
2.15.21	The Bolney North option had only 4 singing males on record for 2012 and nothing recorded since. Allowing for a lack of recording, it still does not have the obvious rich habitat that is held by the flood meadows around the Cowfold Stream and tributaries in this part of the River Adur catchment. IRecord entries which follow do not include the numbers recorded per site but gives a summary of the data.	Please see the Applicant's response to **reference 2.15.11** above.

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	[Table of raw data]	
2.15.22	OTHER THREATENED BIRD SPECIES (see iRecord entries for detail) From Rampion's breeding bird surveys: 'There was a notable increase in both density and diversity of the breeding bird assemblage within the northern section of the proposed DCO Order Limits, centred around the large woodland/scrub and hedgerow mosaics, and within the River Adur and Cowfold Stream floodplains: in areas of suitable breeding habitat' Yet there is no explanation as to why this was then the chosen option. One of the justifications I received by letter was that it was chosen for biodiversity reasons, which is directly contradicted here	The Applicant refers to the **Appendix 22.13 Breeding bird survey, Volume 4** of the ES **[APP-190]** and the assessment in **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**.
2.15.23	Skylarks (BTO Red listed, recent dramatic decline) nest on the ground in the Crateman's fields where Rampion materials are meant to be stored for the years of construction work and where vehicles will come and go. We have made sound recordings and have 6 verified records added to iRecord last year. The first was recorded singing over the fields this year 11/2/2024 Cuckoos are in dramatic decline, they are BTO Red listed and not heard at all in many areas now, but still call each year along the edge of the Crateman's field. We added 2 records last year. Turtle doves are in the records for this area and have been heard last year. We see many barn owls along Moatfield Lane at night and one nests in a Crateman's Farm barn regularly, 4 records have been entered in 2023. We are surrounded by tawny owls on Moatfield Lane, around Taintfield wood and across the fields, these are in long-term decline and have been given Amber list status. We have entered 5 records in 2023 but hear them most nights in October - December. House martins (Red list, 37% decline between 1995 - 2020 most severe in SE England) have been recorded as skimming on masse over the cable route off Moatfield Lane as it joins Wilcocks Farm. Swallows have been seen each year on Kings Lane and added to the records last year. We have entered records for fieldfares seen over Crateman's field when the ecologist Perry Hockin undertook his survey. Grey lag geese are often seen in the fields and very often at Oakendene by the lake, these are Amber listed. Great white egrets have been seen at Oakendene and off Moatfield lane (Amber listed), Green woodpeckers are a common sight in the garden at Oak Cottage adjacent to the cable route, chiffchaffs and Yellow hammers (Red list) have been heard by the cowfold stream and have been entered into the records last year. Song thrushes are Amber listed and can be heard and seen in many places in this area. We recorded one at Taintfield Wood by the substation site in 2023. Buzzards and Red Kites are a common sight over Kings Lane and Oakendene. I feed many dunnocks and house sparrows at my feeders daily, house sparrows are now on the Red list because of significant decline, dunnocks are Amber listed. [Photograph of birds in the local area]	The Applicant refers to the **Appendix 22.13 Breeding bird survey, Volume 4** of the ES **[APP-190]** and the assessment in **Chapter 22 Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**.
2.15.24	We believe that there is priority habitat at Cratemans Farm and just because it has not been designated as such to date, should not be marked for destruction without proper assessment. The uk has lost 97% of flower meadows since 1950s Ecologist, Perry Hockin of Aborweald has described the whole habitat as 'irreplaceable'. The Landowner's agent has described the meadows as 'species rich grassland' (see letter below). Yet there are no surveys of these flower meadows in the DCO submission. The only Rampion survey of Cratemans meadows is labelled 'Talbot and Baker 2' and is detailed as being on the edge of the Cowfold Stream ie the most severe flood area. The survey labelled Talbot and Baker 1 is in Gratwicke stud farm where the dense scrub was grubbed out along the Cowfold Stream edge and the ground was turned over for grass planting in 2020 destroying most of the habitat that would support the range of biodiversity. We have gathered good evidence of MG5 Priority habitat Unimproved Lowland Meadow indicator species. However the DCO submission states that there is no priority habitat in the area. We do not believe this to be true if the necessary surveys were made in the summer months.	Please see response to CowfoldvRampion (**Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)**), specifically Section 10. It is noted that the data being referred to in 2.15.24 to 2.15.37 below is the same as that described in the CowfoldvRampion written representation.
	The historic context of this habitat site is described in the DCO submission:	

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2.15.25 to 2.15.16	"2.84.2 The asset is located within the extent of Crateman's Farm Historic Farmstead (MWS9939), characterised by the Historic Farms and Landscape Character in West Sussex Project (Forum Heritage 2000) as a 17th century three- sided L-Plan loose courtyard farmstead with additional detached elements to the main plan.... Mature trees are present to the northeast and west, flanking the lane in this direction but views are largely open to the arable fields beyond in every direction. The setting of the asset is chiefly associated with its farm location and rural surroundings. 2.84.4 The asset's historic interests comprise its associations with the past, its illustration of historical developments in the area and through contributions made by its setting... The setting contributes to the historic interest of the asset through illustrative qualities relating to its place within the associated farmstead." The construction phase at this farm includes a trenchless crossing equipment compound in the middle of the most flower and insect rich meadow, a separate haul road destroying an adjacent meadow and then breaking through by taking out a section of tree and scrub boundary, open trench cutting through a drainage ditch and dense scrub of over 6 m thick and the loss of further tree and scrub on the way to another Horizontal Direct Drilling compound near to the Cowfold Stream. There is a further HDD compound near the Cowfold Stream causing more pollution and meadow loss. There is an access and area marked for materials compound off Dragons lane just North of the Farmhouse itself and very close to a snake breeding site. This is in the same field as the HDD compound. There is disruption from every angle.	The Applicant has no further comments on this paragraph at this time.
2.15.27 to 5.15.37	The quality of surveys undertaken by Rampion for the meadows at Crateman's farm totally underplays what will be lost by the haul route, cable trenching and temporary compound here with inevitable access along Dragons Lane (this access is denied in some statements yet clearly marked on the maps). These fields have not been ploughed for 65 years according to the landowner and I have witnessed that they have only been sheep grazed some years in the last 18. Fertiliser and pesticides have not been used for over 60 years, which is very rare in this area of Sussex where fields are used for horse grazing and thistles and ragwort are endemic. The wildlife has freely established nests on the ground, in the blackthorn scrub and in the trees. The feeding and breeding sites have been used consistently over decades and this cannot be simply reinstated or offset by net gain elsewhere. The water table remains at ground level if not above in the lower areas of these fields for most of the winter, and they can flood temporarily any time of year. Soft rush, march woundwort and fleabane grow in the fields nearer the stream. The best quality wildflower meadow is all across the higher areas of fields. It is a rare habitat for many insects, mammals and birds. There are two well used footpaths across these meadows which local people have enjoyed using for years (especially during Covid lockdowns) and which will be closed for the construction and the soil structure destroyed permanently by additions for the haul road and trenchless crossing compounds. I have been working with Geoff Hunt to record plant life in two specific fields at Crateman s this year. Despite asking from 2021 onwards we were not provided with Rampion surveys to compare to our records, and, as mentioned, we now know that the Rampion surveys did not cover the meadows anyway. Finding this only at the submission stage did not give us adequate time to commission our own professional reports at the correct time, however we finally put together funds to employ an ecologist to summarise and add to our assessments in October 2023, which although out of season still showed the indicator species of priority habitat: Unimproved Lowland Meadows. To add to this assessment, I have been photographing these fields for years [Photography of local meadow] Field A Survey recorded July/August 2023 noting what we could identify Tufted vetch, Common Bird's-foot-trefoil, common fleabane, knapweed, creeping thistle, meadow buttercup, soft rush, red clover, meadow brown butterfly, numerous meadow grasshoppers (film recordings made), migrant hawker dragonfly, Extras to the	Please see the Applicant's response to **reference 2.15.24** above.

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	above added by ecologist 20th October 2023 are yarrow, chickweed, black medick, pignut, cinquefoil, sweet vernal grass, crested dog's-tail grass, self-heal, spindle tree (field edge). Entered into iRecord. Perry Hockin, ecologist Arbor Weald site visit 20th October 2023 'The grassland is overall dominated by grass species comprising perennial rye grass, Yorkshire fog, creeping bent, cocksfoot, annual meadow grass, rough stalked meadow grass, and red fescue. Wavey hair grass, sweet vernal grass, timothy, crested dogstail, were also recorded in abundance. 19 other species were recorded, they comprised chickweed, meadow vetchling, tufted vetch, common sorrel, cuckoo flower, red clover, sheep sorrel, creeping cinquefoil, creeping buttercup, self-heal, black medick, yarrow, greater knapweed, wood dock, meadow buttercup, pignut, fleabane, soft rush, ground ivy, Springy turf moss Rhytidiadelphus squarrosus was recorded throughout the site, indicating excellent grassland health and complex soil conditions.' From Perry Hockin's 20th October 2023 Phase 1 Habitat Survey report (see below for full report): 'Some areas of the grassland towards the top of the hill away from the Cowfold stream could be classed as 'MG-5' grassland, which is of a particularly high quality. Further surveying will be required to ascertain whether indicator species are present during the summer months. Surveying by local residents has revealed species in addition to those recorded in October 2023, including indicators of 'MG-5' grassland, and the land owner's agent has expanded on Rampion's designation of 'Semi-improved grassland' with the addition of the 'Species rich' tag which could potentially also apply to areas of unimproved grassland.'.... It is my professional opinion that the grassland on site with surrounding habitats comprising scrub, hedgerows and scattered trees, as well as the riparian habitat within the Cowfold Stream has produced a complex ecosystem strongly networked with the habitats in the wider landscape. The proposed development of the site in its current form would result in a substantial and irrevocable loss to biodiversity that cannot be compensated, specifically by the usage of traditional cut and cover techniques which will affect the delicate soil conditions for hundreds of years to come, and by the usage of Field A as a HDD operational depot. Further surveying at the ideal time of year will be required to ascertain the full extent of species present within the fields and hedgerows, including the protected species that utilise them. It is my professional opinion that as crossing the Cowfold Stream will require Horizontal Directional Drilling (HDD) that this section be extended to cover as much of the areas around Fields A and B as possible. Furthermore, the route should be adjusted to affect the less diverse areas of heavily grazed horse pasture in the immediate wider landscape. ' Natural England Technical Information Note TIN147 National Vegetation classification: MG5 grassland In the first paragraph lists English crested dogstail grass and common knapweed as the basis of MG5 meadow, which are both abundant in field A and B, it goes on to list 'Characteristic herbs include: common knapweed, ox-eye daisy, birds foot trefoil, lady's bedstraw, common sorrel, meadow vetchling, meadow buttercup, ribwort plantain, cowslip and common cat's ear'. The only ones of this list that I haven't seen here are ox-eye daisy, lady's bedstraw, cowslip, and common cat's ear. However I am not a botanist and I just may not recognise all these plants. I use photographs for all my iRecord entries if I do not have an ecologist with me to identify species. The photos do not show in the iRecord summaries but I have included a round-up of some of these images here. Other species listed in this noted as indicators of 'long continuity of 'traditional management' (ie no phase of land use change such as ploughing..) are wood anemone and pignut which are present here. 'Species normally associated with woodlands that are sometimes found in MG5 grasslands include:' wood anemone and native bluebells which are here and along Moatfield Lane. Bird species which are listed as using MG5 for breeding and/or foraging include skylark, yellowhammer, starling, fieldfare and rook, all of which are seen on these meadows and skylark, yellowhammer and fieldfare have been entered into the records in 2023. Damper forms of	

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	MG5 can include Rushes, meadowsweet and cuckoo flower all of which grow on the Cowfold Stream edge of the field or just the other side of the scrub. [Table of raw data] Further indications of the ecosystem in these fields are the number of other species recorded here, particularly insects. The grasshoppers were so numerous this year that every step across the diagonal footpath in Field A would startle many. The slow-motion film on an iPhone showed them catapulting in all directions, flying into the air and spinning over as they went. The cumulative sound of the meadow in July was incredible. As the meadow grasshoppers cannot actually fly and just jump, they were easier than ever before to photograph, because once landed again they rely on staying very still to avoid predators. Some of these photos are below. [Photography of grasshoppers] More indications of the quality of these fields are the insects which I have been photographing and entering into records last year all from the Cratemans farm land. Marbled whites were common last year, peacocks, meadow browns are always numerous, gatekeepers and large skipper were all photographed at Cratemans, many in the field edge where the Rampion access is marked north of the farmhouse. The number of butterfly species although not rare individually, is indicative of the quality of the grassland and scrub here that they rely on to feed. The following photos and data entries are from species that were seen on bramble, nettle, thistle and grasses particularly. Field A and B had many marbled whites, gatekeepers and meadow browns which can be seen as indicative of the unimproved status of these fields. [Table of raw data] [Photography of butterflies] Further indications of habitat quality at Crateman's Farm Another insect that is particular to this very specific undisturbed habitat is the beautiful demoiselles which are seen at the most Southerly corner of Field A near the Cowfold Stream every year. They are an indicator of the stream quality. They mate on the sunny hedges and lay eggs on plants in the stream. I have many photos and entries have been made into the biodiversity records during 2023. These damselflies are not widespread because they require such specific stream locations to breed. This includes flowing water with high levels of oxygen and little sediment. They also require very undisturbed stream sides with sheltered shady areas to cool the water. They are not common around this section of the river Adur itself. Mostly you only see banded demoiselles which are more tolerant of disturbance and water quality. [Photography of damselflies] Another indicator of the unpolluted quality of the air around these meadows are the lichens on trees and hedge plants at the field edges. These do not spread where the levels of nitrous oxide are high in the air. This is as a consequence of there being no public roads and few motor vehicles generally. Construction work of two HDD compounds, haul roads and trenching equipment will cause unnecessary damage to this rare unpolluted environment. We believe that proper, in-depth field surveys must be completed in summer to establish the true quality of these meadows or they will be lost unnecessarily. The soil structure cannot be reinstated in our lifetimes. The DEFRA maps show very little priority habitat of Unimproved Lowland Meadow in the Horsham District or West Sussex in general. [Photography of lichens at Cratemans Farm] [Arborweald Phase 1 habitat survey] [Tim Facer consultation response]	

Ref	Written Representation comment	Applicant's response
2.15.38	4) THE ECOLOGY OF KENT STREET AND MOATFIELD/KINGS LANE VERGES This includes: Toad migration Remnants of ancient woodland with indicative plant species Glow worms Crested newts Owl hunting grounds, barn, tawny and little owls Rarer butterflies, moths and other Insects	The Applicant has no further comments on this paragraph at this time.
2.15.39	TOADS Every year between February and April frogs and toads migrate to the pond at 'Kings' on Kent Street to breed. They are UK BAP Priority species and specifically the migration is protected. They can travel several kilometres in the breeding season, mostly by road and the construction would kill them. Some males will sit in the road, or the tributary where it joins the pond at night, in order to be ready for the arrival of females, particularly all across Kent Street Lane. On the first warm damp nights of the year there can be too many to avoid driving over so there are always a few killed even on these very quiet roads. Often finding dead ones is how you know that they are on the move, but they also rear up in the headlights, so can be very visible. The Cowfold Stream tributary which runs across Moatfield Lane at the bottom of Oak Cottage garden, and on to where the males await females by Kings pond, is to be crossed by the open trench cabling (see map below) which risks stopping the necessary water flow so they may not breed all through the construction phase. Light pollution as well as noise and vibration of pumps during winter construction may stop them breeding all together. They have to move in the dark to avoid predators. In winter it will be dark before construction stops. I have drawn attention to this with Rampion 5 times in consultation responses and letters yet the first reply I have had which mentions them is that they are not surveyed on the cable route, despite the information given. It was also stated by letter that just notching the hedges will help them, which is hardly relevant as they migrate mostly on the roads (see letter included from Chris Tomlinson dated 26th May 2023 below). The DCO submission also says that toads do not need to be surveyed as no ponds are destroyed in construction, but if they are not considered how can mitigation include keeping the bisected tributary flowing, or even the breeding season be avoided altogether by construction? Surely this needs assessment? [Photography of toads in the local area]	An Ecological Clerk of Works (ECoW) will be present to monitor works and individual reptiles and amphibians can be accounted for during vegetation clearance. The ECoW is specified in commitment C-207, which is secured through Requirement 22 of the **draft DCO** **[PEPD-009]** via the agreement of stage specific Code of Construction Practice documents. Where necessary measures can be put in place to avoid toads entering working areas.
2.15.40	REMNANTS OF ANCIENT WOODLAND IN THE VERGES The two cable trench crossings with haul roads destroy the verges of Kings/Moatfield Lane, which hold more meadow plants than the majority of adjacent fields (as these are cut early for hay and used for horse grazing). So much life exists at the edges of fields and woodland. At the Kent Street end of this private road early purple orchids, native bluebells, banks of primroses, cuckoo plants and meadow sweet grow on the verges to be crossed by construction vehicles and trench. Around Moatfield farm, dogs mercury grows out from the hedges (including in Oak Cottage garden), wood anemones have spread along the lane from Woodcock Shaw opposite Moatfield farm, There is a bank of wild primroses under the sign for Moatfield Farm in the cable route and lesser and greater stitchwort grow along the polo field edges in the cable route. These are all in the Woodland Trust's list of ancient woodland indicators. Further indications of these lanes being remnants of ancient woodland are the proximity of spindle which grows all round here and wild service trees which are on Dragons Lane by the access routes at Cratemans Farm, Buckhatch Lane, the field opposite Moatfield Farm, and the field at the very end of Moatfield lane. Pendulous sedge grows in Buckhatch Lane. These are all indicator species for ancient woodland. Much of this would get destroyed by the change of soil put down by the haul road and access bridges. There is nothing like these undisturbed, private, single-track lanes in alternative routes. Because of this rich plant life along the Lane we see many unusual moths and other insects (see photos). Moths particularly are	The Applicant has no further comments on this paragraph at this time.

Ref	Written Representation comment	Applicant's response
	being recognised as critical pollinators of plants. The construction will impact these with pollution, noise, light disturbance at HDD compounds and substation, and the obvious loss of habitat where haul roads and trenches cause tree, scrub, hedge and meadow loss. The alternative routes must be considered in more detail. [Photography of indicator species of Ancient Woodland at edges of Moatfield/Kings Lane]	
2.15.41	Crested newts I have seen these in my pond, at my front doorstep and in my kitchen (which most likely came out from under the suspended floor). I am adjacent to the cable route, my pond being at the closest point and a strip of flood meadow lies in between, which is likely where they forage and overwinter. Over the past years I have seen them many times, and have no doubt that they are still here. They have been added to the records in 2023, 1 have sent records and photos to RWE in 2021 and 2022. Although they have been found in the Oakendene area in Rampion surveys there were many errors, lack of equipment and inconclusive lab results so they are greatly underplayed (see Cowfold v Rampion LIR Biodiversity section) They were not conclusively found in Moatfield Farm pond and nobody asked me about my land or pond. Surely this is inadequate. [Photography of crested newts in the local area]	The Applicant describes in **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]** that it will apply to join the district level licence scheme in West Sussex to ensure strategic compensation is put in place for great crested newts. In addition, commitment C-214 (see **Commitments Register** **[REP1-015]**) provides local mitigation. This commitment is which is secured through Requirement 22 of the **draft DCO** **[PEPD-009]** via the agreement of stage specific Code of Construction Practice documents.
2.15.42	Glow Worms There are glow worms that breed in the lane right in the path of the cable. They have declined by 3/4 since 2001 and are a UK BAP priority species. I recorded 9 glow worms in a Survey of Moatfield/Kings Lane 16 th July this year, and I was still adding to the records on 15 th September with a sighting right by the cable crossing in Moatfield Lane and close to an HDD compound. We believe that the impact of overnight lighting is not being considered enough during construction, this is known to stop glow worms breeding. [Photography of glow worms in the local area]	The design of temporary lighting for construction (at HDD compounds, construction compounds and the substation) will be designed in line with guidelines from the Bat Conservation Trust and Institute of Lighting Professionals, as described in commitment C-105 (see **Commitments Register** **[REP1-015]**). This is secured through Requirement 22 of the **draft DCO** **[PEPD-009]** via the agreement of stage specific Code of Construction Practice documents.
2.15.43	I have recorded badgers running along the lane 2023 year. They have set routes that they follow and if you return home at night, it is not uncommon to startle them somewhere on their foraging track (see detail below). I often see owls in the lane and have entered 5 tawny owls, 4 barn owls and a little owl into the records in 2023.	The Applicant has no further comments on this paragraph at this time.
2.15.44	All the following insects were recorded as seen in Kings/Moatfield Lane, around the cable route. Noise, vibration and lighting for HSDD Compounds at Moatfield and Cratemans Farms, 24 hour pumps to stop trench flooding etc will have an impact particularly on the nocturnal insect population here. It has been noted by Wineham Parish council that pumps were running continuously for 18 months during Rampion 1 construction. [Photography of insects recorded as seen in Kings/ Moatfield Lane]	The Applicant has no further comments on this paragraph at this time.
2.15.45	5) GREEN LANE dating over 150 years with veteran oaks, field maples and hawthorn, would be cut through by cable construction There are 22 trees in the cable construction crossing here as marked in the DCO order limits, at least 11 of which are marked to be removed in the centre. 5 are significant oak trees of over 2.5M girth, but the greatest significance is the continuity of this wildlife corridor that comes directly from Buckhatch Lane which can be dated to before 1649 (there is documentation on it being repaired then). [Photography of animal track]	The **Appendix 22.16: Arboricultural Impact Assessment, Volume 2** of the ES **[APP-194]** is currently being updated for submission at Deadline 3, alongside updates to the vegetation retention plans in the **Outline Code of Construction Practice** **[PEPD-033]**.
2.15.46	The trees in the DCO documentation are group labelled as G35 and although they are ringed by a green line indicating category A 'high quality' no mature oaks or single trees are marked out which fails to draw attention to their maturity, veteran features and wildlife value. On less detailed maps they are not even indicated as being woodland.	The **Appendix 22.16 Arboricultural Impact Assessment, Volume 2** of the ES **[APP-194]** is currently being updated for submission at Deadline 3, alongside updates to the vegetation retention plans in the **Outline Code of Construction Practice** **[PEPD-033]**.

Ref	Written Representation comment	Applicant's response
2.15.47	Woodland Trust says that a Veteran tree is: A tree with habitat features such as wounds or decay. 'Key habitat features of a veteran tree: Evidence of decay processes, such as hollowing in the trunk, fruit bodies of fungi known to cause wood decay and cavities or rot holes (eg. where limbs have broken off or bark is damaged). Significant amounts of dead wood: many dead limbs or branches (larger than 20cm in diameter) in the crown or fallen.' Trees with such veteran features are shown in the photos below and are all in the cable path. I have drawn attention to this boundary, and wildlife corridor in each letter to RWE. Although Rampion have surveyed the trees as category A High Quality Trees in the DCO maps, no mitigation has been put forward, nor mention of its history, landscape or value as an ecological corridor. The field this is viewed from has been the site of annual charity polo events, the backdrop being the beautiful tree boundaries. The loss is unnecessary but nobody will discuss mitigation, see letters below. There is an active badger sett in the middle of the cable construction path (see badger section below) and often when I take people to survey this site there are deer running through as we arrive, as witnessed by Perry Hockin (ecological survey October 2023), Geoff Hunt (nightingale surveys June/July 2023) and Chris Skinner undertaking the badger survey in May 2023.	Please refer to **Appendix 22.16 Arboricultural Impact Assessment, Volume 2** of the ES **[APP-194]** for information on how veteran trees were identified. This was done in line with BS5837:2012, with additional information taken from Natural England and Forestry Commission standing advice and description within the National Planning Policy Framework.
2.15.48	I don't believe it is adequate to just move badgers where the sett is in the path of the cable construction as has been stated by RWE at drop in events. If the wildlife corridor is well established there is a lot more at stake than one family, it is part of a territory for a community. I commissioned a survey in 2023 from qualified professionals (see below). A whole area is undisturbed badger territory. There is a major sett in [REDACTED]. [Photography of badger footprints]	The Applicant has no further comments on this paragraph at this time.
2.15.49	Other wildlife seen: a roe doe Capreolus capreolus, was startled by us during our survey and ran across the meadow at 16:25; a pair of buzzards Buteo buteo, circled overhead; c6 nightingales Luscinia megarhynchoswere heard in the late morning whilst on survey. [Redacted badger report]	The Applicant has no further comments on this paragraph at this time.
2.15.50	We found so many slow worms and grass snakes next to the cable route that we have entered 15 new entries into the records for 2023 (both in decline and Uk Priority Species). We have good evidence of adders which are deemed to be under threat of extinction in the next 20 years. The landowner of Crateman's farm says that he has handed the shed adder skins to relatives in past years. I have photographed a dead adder on the path by Crateman's pond, my neighbour (Andrew Porter) on Moatfield Lane has seen adders on his compost heap adjacent to the cable route. These reptiles breed in the same sites year on year and it is thought to be human disturbance as well as loss of habitat which is causing this critical decline. They are very susceptible to vibration disturbance and there is a Rampion access/materials compound proposed to be set up next to their breeding site. I have been drawing attention to this with RWE since I sent records in 2021 but I had confirmation that reptiles are not surveyed in the cable route by James Alexandro 23rd December 2022, and again by Chris Tomlinson in 26th May 2023 writing 'desk study is normally considered sufficient for the cable route' (see letters below). So how can these vulnerable threatened species be protected if they are not even acknowledged or their breeding sites identified? Does 'green energy' have to destroy the BAP protected wildlife in its path, particularly when there were less damaging options available? [Photography of Snakes at Cratemans and Moatfield Lane]	Reptiles are often found on construction sites and are commonly dealt with under a method statement as described in the **Outline Code of Construction Practice** **[PEPD-033]**. Stage specific onshore construction method statements are secured via requirement 23 of the **Draft DCO** **[PEPD-009]**.
2.15.51	The 5km extended route incurred by this Substation site choice loses many more mature oaks (many over 200 years old) and masses of dense thorny scrub and hedgerow which is critical to why it is habitat for so much biodiversity. No alterations or mitigations to this route have been discussed with the public or statuary consultees as the only consultation to follow the selection of substation site focussed on showing alternatives to the	The Applicant has no further comments on this paragraph at this time.

Ref	Written Representation comment	Applicant's response
	established sections from Ciimping up, which had been receiving responses since 2021. No images were given and no alterations to routes were on offer for the substation section. Many impacted local people only heard of the whole proposal at this final consultation so could not have made objections or be heard by this stage. Residents at the end of Kings Lane did not receive any direct correspondence on the Rampion proposals until early 2023 long after the final consultation had closed.	
2.15.52	The maps from Annex 2, Arboricultural Impact Plans which were finally provided at the DCO submission are difficult for landowners and residents to assess, as much of the tree loss is grouped under one copse number and having assessed the Green Lane in some detail, I know that this can involve very significant oak trees and at least 11 in number in one cable crossing alone. Some of the land used has no public footpaths, so is difficult to access, unless much more time can be spent obtaining permissions. But taking an estimate of this tree loss, 19 tree groups have areas marked for removal in this section Gratwicke to Bolney Substation. This could represent the loss of 76 trees, and of this, 8 groups are marked as 'high quality' which could represent 28 of those trees being good oak trees. There are 38 trees marked individually for loss, of this 14 are assessed as 'High Quality'. That would mean the loss of at least 46 high quality trees and 114 trees in total incurred by this substation choice alone, particularly because it is the longest cable route. This in no way covers the loss of scrub and more importantly continuity of habit/animal breeding sites which are impacted by the losses in this area.	**Appendix 22.16: Arboricultural Impact Assessment, Volume 2** of the ES **[APP-194]** records trees, groups of trees and woodland in line with BS5837:2012.
2.15.53	**Oakendene location** By far the worst loss of individual trees is at Oakendene, many of which are oaks and some show many notable 'veteran' features (as described by the Woodland Trust above). These include dead branches left in situ, hollows making wildlife homes and fruiting fungi on the bark. Two notable trees which are marked for removal are labelled T265 with a girth of 390cm, so around 200 years old, and T262 at 420cm girth and around 220 years old (see images below). Other significant trees at this site are T281, T279, T273 T270 all over 100 years old and the latter being nearer 140 years old. Each oak is a whole ecosystem in the landscape and each a potential home to over 2,300 wildlife species.	The Applicant has no further comments on this paragraph at this time.
2.15.54	**Cratemans** The difficulty of reading this information is particularly notable at Cratemans. The inset plans 39 and 43 for this shows 5 areas of red for removal, but each tree is grouped together with all the density of scrub and no separate trees picked out. However this removal decimates the most wildlife rich location in the whole Oakendene approach section. One boundary simply marked G263 has a drainage channel between areas of tree and scrub which are around 6-8 metres thick. Add to this the trenchless crossing compound in the middle of the highest quality unimproved lowland meadow, and a haul road in the adjacent one causing the tree boundary to be cut through for access, the farm's historic and biodiverse qualities are likely to be decimated. Around each tree boundary is dense scrub which will also be lost in the process. Again, we cannot emphasise enough the wildlife value of this scrub habitat. From Joint Nature Conservation Council REPORT 2000 Thorny Scrub: Although under-researched to date, 'Scrub is recognised to have considerable nature conservation value, both in its own right and as a habitat for flora and fauna...Many priority species in the UK Biodiversity Action Plan depend on scrub.'	The Applicant has no further comments on this paragraph at this time.
2.15.55	Oakfield Farm field Has tree boundaries on two sides which have great landscape and ecological value and are cut through by open trenching (inset map 44). For a single site this has a disproportionate impact. No detail was given until submission and still it is unclear how many trees are lost because they are largely just labelled as tree groups albeit one group to the East recognized as High Quality. [Photography of trees in the local area]	The Applicant has no further comments on this paragraph at this time.

Ref	Written Representation comment	Applicant's response
2.15.56	The psychological impact on local people is underplayed in these proposals. What is not considered is the lifestyle of people in this area. They have farms and horses, gardens, studios and workshops that they work in. They are often outdoors a lot of the day, all year round. It is not just a visual impact that effects human health and wellbeing, our lives are already ruined by these proposals. Another group of people come from the residential areas of Cowfold where pollution is high due to the traffic build up on A272 and A281, to enjoy quiet walks in the countryside. A further group of people come from further afield in Sussex and enjoy guided group walks through these meadows. The monks from St Hughes monastery regularly walk through in their white robes and wellingtons. The anticipation of noise, vibration, vehicle activity where it is so quiet and the industrialisation of such a rich biodiverse area has meant that the impact has long begun on mental health for all these people. The anticipation that the footpaths will be closed for years is devastating to people's way of life. Many people who choose to live out in the countryside here are middle to older age and the prospect of over 10 years of disruption to the area is devastating. A large part of this is the contemplation of permanent loss of trees, landscape and biodiversity when we are hearing daily about climate change and how to counter it. The turbines only last 25 years. The tree, habitat, wildlife loss is for many more decades. This planet cannot afford this for the sake of electricity for a set number of people for a short while. There are better locations and better options.	The Applicant has no further comments on this paragraph at this time.

Table 2-16 Applicant's Response to John Anthony Lucas's Written Representations [REP1-120]

Ref	Written Representation comment	Applicant's response
2.16.1	I am happy for the Rampion extension to go ahead providing this phase of the wind farm is no closer to the shore than the original. Any visual impact would be completely overshadowed by the enormous environmental/ecological benefit delivered for current and future generations in the fight against impending climate disaster.	The acknowledgement that Proposed Development will contribute to climate change mitigation is welcomed by the Applicant. The offshore elements of Rampion 2 will be located between 13km and 26km from the Sussex Coast adjacent to the existing Rampion 1 site and will not be closer to the shore. 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 NPS EN-1 (November 2023) and NPS EN-3 (November 2023), for which there is an urgent need to deliver. The assessment set out in **Chapter 29: Climate change, Volume 2** of the ES **[APP-070]** concludes the Proposed Development has a lifetime GHG emissions saving of 35,901ktCO_2e.

Table 2-17 Applicant's Response to John Hughes's Written Representations [REP1-121]

Ref	Written Representation comment	Applicant's response
2.17.1	Firstly I wish to state that I fully endorse and agree with all the concerns and comments made in the Cowfold Residence Impact Statement. There has been little mention so far of the very negative impact the Rampion 2 project will have on the Oakendean Industrial Site. There are many thriving businesses on this site providing much needed local employment. Rampion 2 I understand plan to use The Oakendean Industrial Site entrance as an access, stating that they do not consider it a problem as it is used mainly by small vans and cars. This is not the case. At least three businesses on the site, a composting site, Steel framework makers and a company providing gravel and scalping for the building trade all use heavy goods vehicles. Many local residents have their cars serviced and MOT and then walk back to their homes using local footpaths many of which will be closed during the long Rampion 2 construction period. Some of the businesses on the site will be very seriously impacted by Rampion 2 and some I have no doubt will have to relocate if they are to remain viable. The impact on the Oakendean Industrial Site has not in my opinion been fully considered by Rampion 2 and needs to be looked at in more detail.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2. Please see the Applicant's response in **Table 2.4** above regarding concerns related to transport effects related to the Oakendene Industrial Estate.

Table 2-18 Applicant's Response to Jonathan Dittmer's Written Representations [REP1-122]

Ref	Written Representation comment	Applicant's response
2.18.1	I agree with the Cowfold Vs Rampion website views, and that of Cowfold parish council, the consultation has been very poor, and other sites not fully considered	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-19 Applicant's Response to Lawrence Haas and Faye Chistensen's Written Representations [REP1-123]

Ref	Written Representation comment	Applicant's response
2.19.1	With regard to the consideration of Alternatives in the Issue Specific Hearing, Item 2, Day 1, on 7 Feb 2024: The NPS (2011) has a policy requirement to consider alternatives in the Rampion Examination under EN-1 (overarching) Section 4.4., Alternatives. This is a case-specific policy requirement as Rampion 2 infrastructure would physically and visually interfere with designated landscapes and their functions (e.g., South Downs National Park), where EN-1, para 5.9.10 applies. The Examination is to *"…. include assessment of: (including) the cost of, and scope for, developing all or part of the development elsewhere outside the designated area, or meeting the need for it in some other way, taking account of the policy on Alternatives set out in Section 4.4".* Suggestions from IPs on talking account of relevant expert testimony and appropriate power system value analysis are offered in pre-Examination representations and submissions recorded in the Examination Library including: • PEPD-096: Item 2 in the PCS written submission for the procedural deadline • RR-062; RR-287 and RR-197 as relevant IP Representations, and • AS-006: The South Downs National Park PAD Statement Relevant SDNP comment as item **SDA-01** on Section 4.4 Alternatives in its PAD Statement in November 2023 as **AS-006** was: *"The consideration of alternatives for the scheme has not sufficiently demonstrated that meeting the need for offshore renewable energy could not be met through a scheme that did not intersect the South Downs National Park (SDNP).* ***It is therefore the case that this 'test' of the National Policy Statement EN-1 paragraph 5.9.10 has not been met."*** *(our underlining).* With regard to the "need for the Project" as indicated in the previous version of the agenda for Day 1 in the Rule 6 Letter earlier in January 2024: We believe that need should be framed in the context of the need for low emission generation (as in the NPS Energy revision, Nov, 2023) that will also be taken into account by the Secretary of State DESNZ when the ExA's recommendation is considered. The aim is to achieve	Section 4.4 of NPS EN-1 (DECC, 2011) indicates the need to present the main alternatives considered as part of the Proposed Development and to demonstrate consideration of environmental, social and economic effects including, where relevant, technical and commercial feasibility (paragraph 4.2.2). Section 4.2 of the draft NPS EN-1 (DESNZ, 2023) reiterates the requirement to present the main alternatives, also noting that "*only alternatives that can meet the objectives of the proposed development need to be considered*" (paragraph 4.2.21). Therefore the Applicant has considered the reasonable alternative options relating to the development of an offshore wind farm technology. **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** describes the alternatives studied by the Applicant and a comparison of their environmental effects across the project as a whole. This includes the alternatives considered and consulted on prior to the DCO Application. As described in **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**, the Proposed Development has been developed through a multi-disciplinary design process including environment, engineering, landowner and cost considerations. The Applicant has sought to avoid, reduce or minimise the effects through the design process and also by identifying and securing embedded environmental measures. It is acknowledged that some residual effects remain. Section 4.4 of the **Planning Statement** **[APP-036]** sets out the consideration of the key policy test regarding nationally significant infrastructure development taking place in the SDNP in line with the requirements of 5.9.10 of NPS EN-1 (DECC, 2011) and this aligns with the protections for National Parks in paragraph 5.10.32 of the revised NPS EN-1 (DESNZ, 2023). The consideration of the need for the development is outlined in paragraphs 4.4.7 – 4.4.21 of the **Planning Statement** **[APP-036]**. The consideration of the cost and scope of development alternatives outside the SDNP is outlined in paragraphs 4.4.22 – 4.4.67. This section draws on **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]** which details the process of site selection and the consideration of alternatives. Section 3.3 of **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]** outlines the alternatives considered in terms of grid connection and Section 3.4 sets out the alternatives considered in terms of landfall and onshore cable route. Together, these sections outline the cost and scope of delivering the reasonable alternatives outside of the SDNP. Therefore, this has been appropriately considered, as summarised in the **Planning Statement** **[APP-036]**. The detrimental effects on the environment, landscape and recreational opportunities and extent to which these could be moderated is considered in paragraphs 4.4.68 – 4.4.90 of the **Planning Statement** **[APP-036]**. Specifically, paragraphs 4.4.69 – 4.4.75 considers the environment; paragraphs 4.4.76 – 4.4.84 consider landscape; and paragraphs 4.4.85 – 4.4.88 consider recreational activities. Section 4.4 of the **Planning Statement** **[APP-036]** draws on various assessments in the aspect chapters within the ES (particularly **Chapter 25: Historic environment, Volume 2** of the ES **[PEPD-020]**, **Chapter 18: Landscape and visual impact, Volume 2** of the ES **[APP-059]**; and **Chapter 17: Socio-economics, Volume 2** of the ES **[APP-058]**) to outline the detrimental effects of the onshore cable route and the extent to which these could be avoided, prevented, reduced or offset. The **Commitments Register** **[REP1-015]** sets out the full range of embedded environmental measures to minimise or mitigate the environmental effects a number of which are relevant to the South Downs National Park which are secured by Requirements 12, 15, 16, 20, and 22 of the **Draft DCO** **[PEPD-009]**.

Ref	Written Representation comment	Applicant's response
	the goal of decarbonisation of power supply to the national grid by 2035. For a £3-4 billion investment decision having far reaching local and national consequences we believe that consideration is best informed by the required Section 4.4 Alternative assessment: 1. looking across all metrics for the national benefits identified in the NPS; 2. considering the Alternative generation systems now designated as critical national priorities (for low emission generation) to achieve secure, reliable and affordable supply and reduce risk to National Energy Security (as in **PEPD-096** Item 2).h The approach would reveal whether they are capable of providing the same or greater national benefit over the same timeframe as Rampion 2 (from about 2030 to 2050), without the adverse local impacts, and offer greater value for money in the local and wider national interest. The above is consistent with delivering Government's wider objectives as provided in National Policy Statements: EN-1, Para 2.2.27 … *" The Government's wider objectives for energy infrastructure include contributing to sustainable development and ensuring that our energy infrastructure is safe. Sustainable development is relevant not just in terms of addressing climate change, but because the way energy infrastructure is deployed affects the well-being of society and the economy…"* and EN-1 (2011) para 2.2.4. *"It is important that, in doing this, the planning system ensures that development consent decisions take account of the views of affected communities and respect the principles of sustainable development."*	The Applicant has had due regard to the nationally designated SDNP in the design of the Proposed Development. **Chapter 3: Alternatives, Volume 2** of the ES **[APP-075]** which provides further description and summary of the evolution of the design. The Applicant refers to the submission at Deadline 1 of the **Further Information on Action Point 27 – South Downs National Park [REP1-024]** which sets out further information. In summary this sets out: • How the Applicant has sought to avoid, minimise, mitigate, and compensate onshore landscape and visual impacts from the onshore cable construction which could impact the SDNP or its setting. • The established design and embedded environmental measures, which set out an approach to avoid and/or minimise the effects on heritage assets, through a strategy of evaluation and mitigation (both avoidance through engineering solutions and investigation and recording). • That there are no predicted significant effects on ecology associated with the Proposed Development following the application of the mitigation hierarchy and the embedded environmental measures. The Applicant therefore considers that it has appropriately considered the key policy tests in NPS EN 1 5.9.10 (DECC, 2011) and protections for National Parks in paragraph 5.10.32 of the revised EN-1 (DESNZ, 2023) relating to development taking place within the SDNP. The importance of large-scale offshore wind in contributing to the mix of energy generation required in the UK is clear in the original version of NPS EN-1 (DECC, 2011), against which the DCO Application is assessed, and NPS EN-1 (DESNZ, 2023a) which came into force in January 2024. Furthermore, NPS EN-1 (DESNZ, 2023a) defines large scale offshore wind infrastructure as a Critical National Priority (CNP). Section 3.2 within **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]** outlines the site selection for the offshore array and examines the considerations that led to the identification of the location as a suitable location for offshore wind including taking into account the findings of the Strategic Environmental Assessment (SEA) of suitable areas for offshore wind conducted by the then Department of Energy and Climate Change (DECC) in 2009. There is a demonstrable and urgent need for the Proposed Development (as demonstrated in Section 4.2 of the **Planning Statement [APP-036]** and the infrastructure subject to the DCO Application is identified as a Critical National Priority (in line with the 2023 NPS EN-1 and EN-3, which came into force in 2024). The Planning Statement paragraphs Section 5.4 summaries the benefits and adverse impacts of the Proposed Development and Section 5.5 notes the reasons for Applicant's conclusion that the benefits of the scheme outweigh the adverse impacts taking account of proposed mitigation. The Applicant has submitted a NPS accordance tracker showing compliance with the 2011 and 2023 NPS, which came into force in 2024, at Deadline 2 (see **Applicant's National Policy Statement Tracker (Document Reference: 8.38)**).

Table 2-20 Applicant's Response to Luke Davies's Written Representations [REP1-124]

Ref	Written representation comment	Applicant's response
2.20.1	I would like to confirm that I contributed to the Cowfoldvrampion impact statement and fully endorse the contents	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-21 Applicant's Response to Margaret Marcelle Madron's Written Representations [REP1-127]

Ref	Written Representation comment	Applicant's response
2.21.1	My major concern is what will be the environmental impact be on my property whilst these cables are being installed fairly close to my property and will there be any continuing impact on my property and its enjoyment. If so how will we be compensated for this and any continuance of any detrimental impact.	The Applicant has undertaken an Environmental Impact Assessment (EIA) which considers and assesses the likely significant effects of the Proposed Development on receptors (including residential dwellings). The Environmental Statement (ES) **Volume 2** of the 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: • **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 20: Soils and agriculture, Volume 2** of the ES **[APP-061];** • **Chapter 21: Noise and vibration, Volume 2** of the ES **[PEPD-018]**; • **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**; • **Chapter 23: Transport, Volume 2** of the ES **[APP-064]**; • **Chapter 25: Historic environment, Volume 2** of the ES **[PEPD-020]**; • **Chapter 26: Water environment, Volume 2** of the ES **[APP-067]**; and • **Chapter 28: Population and human health, Volume 2** of the ES **[APP-069]** (including effects from exposure to electromagnetic fields). 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]**. 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]**.
2.21.2	Will Rampion ensure that at all times there will be free access from our property in and out to the wider community and cause no unnecessary obstruction like has occurred in the past by other companies.	Mindful of residents' concerns, the Applicant updated the **Outline CoCP** **[PEPD-033]** at the Pre-Examination Deadline. Additional detail has been provided at Section 5.7.10 to explain how construction and access will be managed. In summary: • Access restrictions will be kept to a minimum, with a diversion provided if possible; • Contractors will work with local stakeholders and accommodate reasonable requests for access; • The trench will be covered outside of working hours, and access will be restored in emergencies; and • Closures will be communicated to local residents in advance. The Applicant is willing to discuss appropriate and reasonable mitigation measures across the property during construction. Measures within the stage specific Code of Construction Practice are secured through requirement 22 of the **Draft Development Consent Order** **[PEPD-009]**.

Table 2-22 Applicant's Response to Maria Tozzi's Written Representations [REP1-128]

Ref	Written Representation comment	Applicant's response
2.22.1	I have previously contributed to the CowfoldvRampion impact statement as the proposals would affect me on a daily basis.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-23 Applicant's Response to Martin Buglar's Written Representations [REP1-129]

Ref	Written Representation comment	Applicant's response
2.23.1	Very concerned on the impact of the traffic on the A272, Picts Lane, Kent Street, John Bulls Lane for an extended period of time when there are more suitable locations that Rampion appear to have dismissed. Quality of air and the considerable impact to the ecology and wildlife.	The Applicant can confirm that Picts Lane and Bulls Lane do not form part of the construction traffic routes to be secured through for the Proposed Development as defined within the **Outline Construction Traffic Management Plan (CTMP) [REP1-010]**. **Traffic Impacts** To limit the effects on the A272 and Cowfold AQMA receptors a range of embedded environmental measures have been provided by the Applicant as detailed within the **Commitments Register [REP1-015]** which has been updated at the Examination Deadline 1 submission and secured through the **Outline Construction Traffic Management Plan (CTMP) [REP1-010]** which were updated at the Examination Deadline 1 submission including: • Commitment C-157: The proposed heavy goods vehicle (HGV) routing during the construction period to individual accesses will be developed to avoid major settlements of Storrington, Cowfold, Steyning, Wineham, Henfield, Woodmancote and other smaller settlements where possible; and • Commitment C-158: The proposed heavy goods vehicle (HGV) routing during the construction period to individual accesses will avoid the Air Quality Management Area (AQMA) in Cowfold where possible. These commitments are also reflected in Table 5-1 of the **Outline CTMP [REP1-010]** which has been updated at the Examination Deadline 1 submission and confirms prescribed local Heavy Goods Vehicle (HGV) access routes for all sections of the onshore cable corridor and Table 5-2 which details specific local constraints and proposed management of construction traffic routes. These commitments ensure that HGV construction traffic will route along the A27 and A23 to gain access to the A272 east of Cowfold wherever possible, thereby avoiding the village centre. Therefore, only accesses A-52, A-56 and A-57 will require construction traffic to route through Cowfold Village centre. As calculated by using data included in Table 5-3 of the **Outline CTMP [REP1-010]** which has been updated at the Examination Deadline 1 submission, the impact of this commitment is the removal of up to 22,000 two-way HGV trips (11,000 HGVs) from Cowfold Village centre over the construction phase. Whilst commitment C-157 and C-158 (**Commitments Register [REP1-015]**, updated at Examination Deadline 1) discourages traffic from routeing through the Cowfold AQMA for robustness within **Chapter 23: Transport, Volume 2** of the ES **[APP-064]**, it has been assumed that approximately 25% of HGV traffic will route through Cowfold from the A24 and A272 east of the village centre when entering or exiting construction accesses at Oakendene, Kent Street or Wineham Lane. This accounts for the potential delivery of material or equipment to / from locations directly west of Cowfold where it would not be possible to adhere to commitments C-157 and C-158 of the **Commitments Register [REP1-015]** or use of the Strategic Road Network and provides a robust assessment of impacts within Cowfold. At peak construction, taking account of the construction traffic routing contained within the **Outline CTMP [REP1-010]** which has been updated at the Examination Deadline 1 submission, the following effects have been identified for Cowfold: • At A281 south of Cowfold (Receptor 23): ▸ An HGV peak week increase of 12 HGVs per day, equivalent to an increase of 7.5% and approximately one HGV per hour; and

Ref	Written Representation comment	Applicant's response

- 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):
  - 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):
  - 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):
  - 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.

Based on these construction traffic flows and the conclusions of the **Chapter 23 Transport, Volume 2** of the ES **[APP-064]** and **Chapter 32: ES Addendum, Volume 2** of the ES **[REP1-006]** (submitted at Examination Deadline 1), no significant effects have been identified in relation to transport receptors within the centre of Cowfold. This mitigation will be secured through the stage specific CTMP, secured through Requirement 24 of the **Draft DCO** **[PEPD-009]**.

<u>Kent Street</u>
Kent Street is identified within the **Outline CTMP** **[REP1-010]** as a single track road which will be used as a construction traffic route to accesses A-61 and A-64 as shown on Figure 7.6.4d within the **Outline CTMP** **[REP1-010]**.

It should be noted that both access A-61 and A-64 are located north of residential properties on Kent Street and therefore construction traffic will not route past these properties. This reflects commitment C-157 (**Commitment Register** **[REP1-015]**) which states that HGVs should avoid smaller settlements where possible, the prescribed local access routes defined in Table 5-1 of the **Outline CTMP** **[REP1-010]** and the mitigation identified to avoid the use of small single-track roads as much as possible as defined in Table 5-2 of the **Outline CTMP** **[REP1-010]**.

Given the single lane track nature of Kent Street, the Applicant is currently reviewing options for the implementation of traffic management along Kent Street and accesses A-61 and A-64 to provide safe access for construction and general traffic. This may involve measures such the implementation of a speed limit reduction, passing places, or managed access via banksmen.

The outcomes of this review will be discussed with West Sussex County Council at the earliest opportunity with the aim of reaching an agreement in principle to the traffic management strategy. This would then be secured through a detailed CTMP for the stage of the authorised development comprising Kent Street which will be required to be submitted and approved by the highways authority before commencement within that stage in accordance with requirement 24(1)(a) of the **Draft Development Consent Order (DCO)** **[PEPD-009]**.

Ref	Written Representation comment	Applicant's response
		Air quality Impacts from road traffic emissions at sensitive receptor locations within Cowfold, and Cowfold AQMA specifically, have been assessed and are reported within the **Chapter 19: Air quality, Volume 2** of the ES **[APP-060]**. The air dispersion traffic modelling used traffic data based on annual peak daily traffic, rather the annual average daily traffic stipulated in the Defra guidance. Therefore, the completed assessment was highly conservative. Impacts from emissions of NO_2, PM_{10} and $PM_{2.5}$ were considered. The assessment concluded that the impact from construction traffic emissions is negligible at all sensitive receptor locations, including residential receptors within the AQMA, taking account of the mitigation secured through the stage specific CTMP via Requirement 24 of the **Draft DCO** **[PEPD-009]**. The Applicant has provided further information on the decision to discount the Wineham Lane North site for the onshore substation (see Appendix 2 – Further information for Action Point 4, **Applicant's Response to Action Points Arising from Issue Specific Hearing 1** **[REP1-018]** (submitted at Examination Deadline 1). **Terrestrial ecology** **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the Environmental Statement (ES) **[APP-063]** describes the effects on the terrestrial ecology features present. The mitigation hierarchy has been applied through the design of the Proposed Development so that efforts have been made to avoid ecological features, minimise levels of effect where avoidance is not possible (e.g. trenchless crossings), mitigate effects (e.g. through sensitive temporary lighting design) and compensate for residual effects. Although there will be short term effects on a number of ecological features, the approach to construction, the reinstatement of habitats and habitat creation (both at the onshore substation site and as part of biodiversity net gain delivery) will provide a positive legacy for terrestrial ecology in the medium to long term. The ES assessments undertaken have concluded that no significant effects on terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development. **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]** identifies the location of permanent loss of hedgerow and woodland (noting that reinstatement in these areas will be of mixed scrub), this is limited through Appendix B Vegetation Retention Plan of the **Outline CoCP** **[PEPD-033]** secured via Requirement 22 of the **Draft DCO** **[PEPD-009]**. The only other habitats where permanent loss will be evident is in modified grassland and arable field. Habitat reinstatement and indicative habitat creation within the Proposed DCO Order Limits is described in the **Outline Landscape and Ecology Management Plan** **[APP-232**]. A detailed Landscape Ecology and Management Plan will be produced through Requirements 12 and 13 of the **draft DCO** **[PEPD-009]**.

Table 2-24 Applicant's Response to Matthew Davies's Written Representations [REP1-130]

Ref	Written Representation comment	Applicant's response
2.24.1	I wish to verify my participation in crafting the Cowfoldvrampion impact statement and express my complete support for its contents.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-25 Applicant's Response to Maurice & Geraldine Huggett's Written Representations [REP1-131]

Ref	Written Representation comment	Applicant's response
2.25.1	I attended the Cowfold Parish Councils Extraordinary Planning Meeting last night and we wish to register our support for the Parish Councils Commitment to oppose The Rampion 2 Project and we also support the Cowfold V Rampion Impact Statement which demonstrates the problems the local community will suffer if this ill thought out project is allowed to progress. The meeting was packed with local residents who were clearly supportive of the local councils commitment to challenge the project as to being not appropriate to a small country village, just the huge increase in traffic should be enough to condemn this capital project	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-26 Applicant's Response to Michael Naish's Written Representations [REP1-175]

Ref	Written Representation comment	Applicant's response
2.26.1	Whilst I appreciate that I have registered to have my say within the 30 day period, as a South Coast resident very close to the project, I wish to pass on one concern for consideration of the planning committee. My concern relates to the decommissioning of this asset at end of life and to avoid a repeat of the ongoing open cast mines saga in South Wales, where despite assurances being given at planning stage that the decommissioning will be conducted at end of life, the company went into liquidation before this was started. This can be avoided through either an insurance policy taken out by the energy provider in the event of insolvency, or through an upfront retention payment held for the planned asset lifecycle. The former will of course be lower cost and likely preferred I feel my preponderance support for this project is irrelevant to this consideration, which I request is kindly passed on to the relevant person(s) / decision makers for consideration. If this is not the right forum for comment, then please do advise how best I go about sharing this or getting this to the right person(s) for consideration?	The operational lifetime of the Proposed Development is assumed to be around 30 years. A decommissioning plan and programme will be developed prior to construction and updated during operation of Proposed Development to account for any changes to decommissioning best-practice and developments in technology secured through Requirements 11 (offshore) and 34 (onshore) of the **draft DCO** **[PEPD-009]**. Section 4.9 within **Chapter 4: The Proposed Development, Volume 2** of the ES **[APP-045]** outlines the proposals for decommissioning both for offshore and onshore infrastructure. At the end of the operational lifetime of the Proposed Development, it is anticipated that all structures above the seabed will be completely removed. The decommissioning sequence will generally be the reverse of the construction sequence and involve similar types and numbers of vessels and equipment. The decommissioning duration of the offshore infrastructure may take the same amount of time as construction of the Proposed Development, up to four years, although this indicative timing may reduce. No assessment has been undertaken for the decommissioning of onshore cable route as it is anticipated that the onshore electrical cables will be left in situ with ends cut, sealed and buried to minimise environmental effects associated with removal. The Energy Act (2004) requires that a decommissioning plan be submitted to and approved by the relevant Secretary of State, a draft of which will be submitted prior to the construction of the Proposed Development secured through Requirements 11 and 34 of the **draft DCO** **[PEPD-009]**. The decommissioning plan and programme will be updated during the Proposed Development's lifespan. A description of the onshore and offshore decommissioning of the Proposed Development can be found in Section 4.9 of **Chapter 4: The Proposed Development, Volume 2** of the ES **[APP-045]**.

Table 2-27 Applicant's Response to Mrs Lorraine Powell's Written Representations [REP1-125]

Ref	Written Representation comment	Applicant's response
2.27.1	I have already made a written representation and have an Interested Party number but could not log cate it. I am the landlady of the he now only pub left in Cowfold, the impact on traffic through the village should this project go ahead, will be devastating on our business. 500 pubs closed their doors for food in 2023, this is set to be similar in 2024, the industry has been so heavily affected by the pandemic bad now the cost of living crisis, this project could possibly see the end of our last village pub, should it go ahead. I have contributed to the Cowfold v rampion impact statement and support it, it represents my views. I reiterate, I have registered as an Interested Party in October 2023 but could not locate by Interested Party number.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2. Please see the Applicant's response in **reference 2.4.1** above regarding concerns related to transport effects on Cowfold village.

Table 2-28 Applicant's Response to Mrs Valerie Ann Swaffer's Written Representations [REP1-170]

Ref	Written Representation comment	Applicant's response
2.28.1	I would like to add my support and endorse the evidence which has been presented by CowfoldvRampion who act for our community. I also want to add my support to our parish council in their objections to the proposals which I heard at the meeting I attended on 26th Feb. I believe this project, if allowed to go ahead, will damage our community and the beautiful countryside in every way possible. This project is simply in the wrong place with Rampion not considering alternatives.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-29 Applicant's Response to Natalie Dittmer's Written Representations [REP1-135]

Ref	Written Representation comment	Applicant's response
2.29.1	To confirm that I have contributed to the evidence presented by cowfoldvrampion and support their impact statement	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-30 Applicant's Response to Nicola Jane Hanley's Written Representations [REP1-136]

Ref	Written Representation comment	Applicant's response
2.30.1	I write with reference to Action Point 4 arising from Issue Specific Hearing 1 and the Examining Authority's request that the Applicant provide additional evidence and justification to explain why the Wineham Lane North site was discounted for the onshore substation site with a focus on the engineering and environmental constraints of the site. The Applicant conducted a non-statutory consultation in January and February 2021 on three possible onshore substation sites, and a statutory public consultation on the remaining two sites – Wineham Lane North ('WLN') and Oakendene - in July to September 2021. Parish Councils and residents were all invited to submit their comments and views on the alternative site options. The decision to select the Oakendene site was announced in July 2022. The WLN site was considered as the alternative onshore substation site in the Rampion 1 project but was rejected because the site was found to have a high number of long-lived healthy trees, mature trees around its perimeter and its northern boundary abutted Ancient Woodland. One field within the site was also found to consist of species-rich unimproved grassland which represented the best example of the UKBAP Priority Habitat – Lowland Meadows in the Rampion 1 project onshore survey area. See Rampion 1 Environmental Statement Section 3 – Alternatives. A section of the site was also excavated as part of the Archaeological Survey by Archaeology South East commissioned for the Rampion 1 project. The excavation found a large quantity of pottery pieces (representing a third of all pottery pieces found along the entire length of the 26km cable corridor), a fire pit and hearth, flint work and a loom weight all dating to the late Iron Age/early Roman period around the mid 1st century AD. As well as the ecological and archaeological constraints, the WLN site is crossed by two PRoWs, two High Voltage underground cables, several pylons and overhead power lines. It is immediately adjacent to the Rampion 1 substation, and planning permission has already been granted by Mid Sussex District Council ('MSDC') for a 42 acre Solar Park on adjacent fields (DM/15/0644). There is currently a planning application with MSDC submitted by One Planet Development Ltd for a Battery Energy Storage System on part of the WLN site itself (DM/23/0769) and an EIA Screening Opinion application (DM/21/4285) made for a field that is another part of the WLN site by WP Grid Services Ltd, a subsidiary of Welsh Power, for a Grid Balancing project. I live at (REDACTED), a Grade II listed building located approximately 300m to the north of the WLN site. one of four listed buildings located within 400m of the WLN site. The WLN site once formed part of the Estate and the site is the subject of an agreement pursuant to s34 of the Town and Country Planning Act 1932. The purpose of the agreement is to protect the countryside including the WLN site, and is consistent with paragraph 174 of the NPPF which seeks to protect the intrinsic character and beauty of the countryside and to protect agricultural land. Any industrial development on the site would therefore conflict with and fundamentally undermine the purpose of the s34 Agreement. To support our objections to the Battery Energy Storage System currently being considered by MSDC (application DM/23/0769), my husband and I commissioned and submitted an independent Heritage Appraisal by HCUK Group dated May 2023 on the potential impact the BESS project might have on the setting of our listed property. The Heritage Appraisal concluded at paragraph 5.3:	The **Consultation Report [APP-027]**, sets out the numerous rounds of statutory and non-statutory consultation including notices, advertisements and leaflets around the proposed cable route, including the village of Cowfold. **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** describes the alternatives studied by the Applicant and a comparison of their environmental effects across the project as a whole. This includes the alternatives considered and consulted on prior to the DCO Application. As described in **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**, the Proposed Development has been developed through a multi-disciplinary design process including environment, engineering, landowner, and cost considerations. The Applicant has sought to avoid, reduce, or minimise the effects through the design process and also by identifying and securing embedded environmental measures. It is acknowledged that some residual effects remain across the site. Section 3.6 of **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** provides the information on the onshore substation site selection process. Section 3.6 describes the site selection process and the reasons for other sites being discounted based on the multi-disciplinary factors identified in the paragraph above. The selection of Oakendene is clearly stated as favourable for engineering, cost, and landowner considerations in paragraphs 3.6.23 to 3.6.25 of **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**. Significant weight was also given to the environmental constraints and related policy in the overall balance of the decision. This Applicant has also developed further embedded environmental measures that have been presented in the application including the design principles in the **Design and Access Statement [AS-003]**, **Outline Landscape and Ecology Management Plan [APP-232]** and **Outline Operational Drainage Plan [APP-223]** secured via Requirements 8, 12, and 17 of the **Draft DCO [PEPD-009]** respectively. As requested by the Examining Authority at Issue Specific Hearing 1, the Applicant has provided further information on the decision to discount the Wineham Lane North site for the onshore substation (**Applicant's Post Hearing Submission – Issue Specific Hearing 1, Appendix 2 – Further information for Action Point 4 – Wineham Lane North [REP1-021]** submitted at Deadline 1). The existing Rampion 1 substation has been considered within the existing baseline of the environmental impact assessment, the approach to the cumulative effects assessment is provided in Section 5.13 of **Chapter 5: Approach to the EIA, Volume 2** of the **ES [APP-046]**. A scoping exercise was undertaken to establish which heritage assets should be scoped into the assessment. The methodology used and results of this exercise are provided in **Appendix 25.7: Settings assessment scoping report, Volume 4** of the ES **[APP-213]**. Listed buildings within Cowfold and Cowfold Conservation Area were considered at this scoping stage. Changes to setting of these assets and the potential effects on their heritage significance was considered, which included the perception of

Ref	Written Representation comment	Applicant's response
	"It is difficult to see how the proposed development can be described as anything other than harmful within the context of paragraph 202 of the NPPF – that is, less than substantial harm, to the significance of the grade II listed building". The MSDC Conservation Officer concluded in her assessment (submitted on 7th August 2023 in planning application DM/23/0769) that the proposal will have a fundamental impact on the character of the (WLN) site which will result "in less than substantial harm to the special interest of" In summary, I would suggest that the WLN site is not a potential alternative site for the Rampion 2 substation. Whilst writing, I refer the Examining Authority to the judgment of the High Court of England and Wales given on 18th February 2021 in Pearce v the Secretary of State for BEIS, in the application for a judicial review to challenge the decision of the defendant not to take the cumulative impacts of two offshore wind projects into account but instead chose to assess the impact of one project in isolation. Given that the Rampion 1 substation is on a site immediately adjacent to the south of the WLN site I would suggest that pursuant to this High Court judgment, any decision to select the WLN site for the Rampion 2 substation must include an assessment of the cumulative landscape and visual impact that would occur if the Rampion 2 substation infrastructure were added to the Rampion 1 infrastructure and the consented 42 acre solar park.	construction traffic is acknowledged in the rationale for this scoping exercise, where relevant. The assessment methodology used to determine effects on heritage assets, is described in in **Chapter 25: Historic Environment, Volume 2** of the ES **[PEPD-020]** and is in line with relevant policy and guidance. This takes into account the existing baseline information and setting of each asset, and what change might be introduced as a result of Rampion 2. Effects on the historic landscape was assessed **Chapter 25: Historic Environment, Volume 2** of the ES **[PEPD-020]**.

Table 2-31 Applicant's Response to Nicole Edwards's Written Representations [REP1-137]

Ref	Written Representation comment	Applicant's response
2.31.1	I have previously made a written representation on 6/11/23 and wish to add to add to my comments that I fully agree with The Cowfold Residents Impact Statement compiled by CowfoldvsRampion and in addition support Cowfold Parish Council in their concerns and objections against this project. The impact of both the build period and completed sub station will cause detrimental economical hardship to Cowfold village, decimate a fragile environmental ecosystem, exacerbate health issues due to increased vehicle pollution and forever industrialise an ancient rural landscape It seems unfathomable that Cowfold has been chosen as Rampion's substation site when no local consultation was undertaken and Rampion do not appear to have justified why Cowfold was chosen in preference to their existing site at Wineham Lane North.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2. The **Consultation Report [APP-027]**, sets out the numerous rounds of statutory and non-statutory consultation including notices, advertisements and leaflets around the proposed cable route, including the village of Cowfold. Additionally, the Applicant attended a public Q&A session organised by the Parish Council in November 2022, and hosted a public information event in June 2023. Issues pertaining to Cowfold are drawn together from page 35 of the **Consultation Report [APP-027]**. **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** describes the alternatives studied by the Applicant and a comparison of their environmental effects across the project as a whole. This includes the alternatives considered and consulted on prior to the DCO Application. As described in **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**, the Proposed Development has been developed through a multi-disciplinary design process including environment, engineering, landowner, and cost considerations. The Applicant has sought to avoid, reduce, or minimise the effects through the design process and also by identifying and securing embedded environmental measures. It is acknowledged that some residual effects remain across the site. Section 3.6 of **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** provides the information on the onshore substation site selection process. **Section 3.6** describes the site selection process and the reasons for other sites being discounted based on the multi-disciplinary factors identified in the paragraph above. The selection of Oakendene is clearly stated as favourable for engineering, cost, and landowner considerations in paragraphs 3.6.23 to 3.6.25 of **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**. Significant weight was also given to the environmental constraints and related policy in the overall balance of the decision. This Applicant has also developed further embedded environmental measures that have been presented in the application including the design principles in the **Design and Access Statement [AS-003]**, **Outline Landscape and Ecology Management Plan [APP-232]** and **Outline Operational Drainage Plan [APP-223]** secured via Requirements 8, 12, and 17 of the **Draft DCO [PEPD-009]** respectively. As requested by the Examining Authority at Issue Specific Hearing 1, the Applicant has provided further information on the decision to discount the Wineham Lane North site for the onshore substation (**Applicant's Post Hearing Submission – Issue Specific Hearing 1, Appendix 2 – Further information for Action Point 4 – Wineham Lane North [REP1-021]** submitted at Examination Deadline 1). Please see the Applicant's response in **reference 2.4.1** above regarding concerns related to transport effects on Cowfold village.

Table 2-32 Applicant's Response to Mr Norman Swaffer's Written Representations [REP1-138]

Ref	Written Representation comment	Applicant's response
2.32.1	I support and endorse the evidence which has been submitted by "CowfoldvRampion" who have been acting on behalf of our local community, and also our local Parish Council in their objections to the proposed development as detailed in the council meeting on 26th Feb. The main objections I have relate to the destruction of habitat and associated wildlife in this proposed site. The fact that road access is off the very busy two-lane A272 onto very narrow minor roads which were not constructed for large vehicles. There is little remaining of traditional rural countryside in this part of Mid Sussex and should be valued as such. These are the main reasons for my opposition.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2. Please see the Applicant's response in **reference 2.41.1** above regarding concerns related to ecological and transport effects.

Table 2-33 Applicant's Response to Paulette Jane Northam's Written Representations [REP1-142]

Ref	Written Representation comment	Applicant's response
2.33.1	Not being familiar with the process it is unclear to me whether at this stage I should be repeating my objection/comments regarding the project or adding to them in response to the meetings in Brighton earlier this month so I apologise in advance if I've got it wrong but would appreciate this further comment being read. What the meetings did do was to spark a number of conversations both locally in person and online (social media and other forums). I felt it incumbent on me to make representation to you to inform you of the quite shocking number of people who have no idea that Rampion 2 is a different project. So many seem to think that the current wind turbines (Rampion 1) are 'it', all done and dusted. I have basically been told I am making false claims when I talk about 90 additional turbines, potentially 325metres high etc etc etc. How can it be that local people don't know of such a significant project that will change their locality for decades to come, possibly forever? It boils down to poor communication and poor consultation - one might have thought that the consultation side of it would have been dealt with after the first flawed attempt.	**Consultation** 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, Volumes 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]**. 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]**. During each consultation, the Applicant's environmental information provided a full account of the impacts of draft proposals on the environment and communities, and outlined mitigation proposals. This was set out in the consultation materials for each consultation, as follows: • Statutory Project-Wide Consultation, July-September 2021 as set out in the Preliminary Environmental Information Report (PEIR) (Rampion Extension Development, 2021). • Reopened Statutory Project-Wide Consultation, February – April 2022 as set out in the PEIR (RED, 2021). • Statutory Onshore Consultation, October – November 2022 as set out in the PEIR Supplementary Information Report (SIR) (RED, 2022). • Targeted Onshore Consultation, February – March 2023 as set out in the PEIR Further Supplementary Information Report (FSIR) (RED, 2023). For further information please see Appendix 15 Promotion of Rampion 2 Consultations in and around Cowfold 2021-2022 (**Applicant's Response to Relevant Representations [REP1-017]** submitted at Deadline 1.
2.33.2	Even for someone like me who has kept abreast of the project, RWE have failed to address issues like, for example, what the visual effect of the turbines will be on the coastline. It has been down to the likes of 'Protect Coastal Sussex' to put together animations from different vantage points. Clearly, if people aren't even aware of what Rampion 2 is they will not be searching for information on the project and so will not have had the opportunity to grasp the enormity of what is proposed to be done to such a significant part of what is currently a beautiful seascape. Indeed, even if people are aware of the project, surely it should have been the responsibility of RWE to provide such graphics (in all other planning applications that I am aware of this is a necessity in order to ensure that those affected by the plans have all the detail they need on which to make an informed comment).	The seascape and visual effects of the Proposed Development wind turbine generators (WTGs) are assessed in **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]**. The Applicant notes that significant effects on views experienced by people living, working, and visiting West Sussex have been identified at a number of representative viewpoints along the West Sussex coastline and from within the South Downs National Park. Design principles are described in Section 15.7 of **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]**, which sets out how the design evolution has resulted in changes and embedded environmental measures to help mitigate the visual effects of the Proposed Development, in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, it's spread and quantity of wind turbine generators (WTGs) within it. Opportunities to reduce effects through turbine 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 **Seascape, Landscape and Visual MDS Clarification Note [REP1-037]** (submitted at Examination Deadline 1), which provides further justification that the maximum design scenario (MDS), with a balance of WTG

Ref	Written Representation comment	Applicant's response
	RWE do appear to be lacking in this respect - it simply shouldn't be down to a third party to provide such detail but, in this instance, thank goodness PCS did.	numbers between the Zone 6 and western Extension Area, is representative of the worst case in terms of seascape, landscape and visual effects.
2.33.3	Protect Coastal Sussex have done so much work on this project and have voiced all my concerns (much better than I have been able) and more. I urge you to study very carefully the detail they have so meticulously brought together and to hold RWE to account.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the Protect Coastal Sussex written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.
2.33.4	I end by repeating my strong belief that whilst wind energy does make a significant contribution to our energy supplies the siting of Rampion 2 is simply not appropriate, there being other more efficacious sites further out to sea which will not have such devastating effects on the locality in which it is situated.	National Policy Statement (NPS) EN-1 (DECC, 2011a), extant at the time of submission of the DCO Application and against which it will be tested, outlines that there is an urgent need for new renewable electricity projects. The Proposed Development type (offshore wind) is recognised as being a critical national priority (CNP) in NPS EN-1 and NPS EN-3 (DESNZ, 2023a; 2023b), which came into force in January 2024, for which there is an urgent need to deliver. The Proposed Development 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. Wind turbines are extremely efficient and generate electricity around 85% of the time. The wind resource is free, there is no extraction or transportation of fuel, no burning of fuel or wasted heat energy. The developer for Rampion 2, RWE, has over 20 years of experience in constructing and operating offshore wind farms, and has determined that Rampion 2 is a viable site and productive location for wind energy generation, with a predicted wind speed of ~9.3 m/s. The latest figures show that the operating Rampion Wind Farm exceeded target generation[1] by 15% in 2023. Rampion has exceeded its target for three of the four complete years of operation from 2020-23 and in terms of total generation across this period, Rampion has exceeded the target by 8%[2]. It is not only the wind resource that makes Rampion 2 a suitable location for an offshore wind farm. With the southeast of England being one of the most densely populated regions in Europe, it's a huge demand centre for electricity. Rampion 2 can therefore create a greater contribution to electricity generation close to where the demand centre is located, which reduces transmission. The range of assessments in **Volume 2** of the ES **[APP-047 to APP-070]** demonstrate how the Applicant has taken into account how the Proposed Development would affect social, economic and environmental well-being. The Applicant considers that the Proposed Development represents sustainable development. 1. Target generation is 1,367GWh per year. Assumed capacity factors for offshore wind, The Contracts for Difference (Standard Terms) Regulations August 2014, DECC. Generation: 400MW x 0.39 x 8760 x 1,000 = 1,366,560,000KWh / 1,367GWh pa) 2. Total target for 2020 – 2023 = 5,468GWh (4 x 1,367GWh). Total actual generation for 2020 – 2023 = 5,919GWh (2020 = 1,600GWh, 2021 = 1,363GWh, 2022 = 1,376, 2023 = 1,580GWh.

Table 2-34 Applicant's Response to Peter Fairhall and Patricia Fairhall's Written Representations [REP1-143]

Ref	Written Representation comment	Applicant's response
2.34.1	To carve up a huge area of Sussex for this project, causing devastation to the countryside and massive disruption to those living along the cable route and near to the proposed substation. Not to mention those trying to go about their daily business is poorly thought out. Surely if this has to go ahead the best plan would be to use the existing Rampion 1 route and to extend the Wineham substation. We fully support the evidence supplied by Cowfold v Rampion, our community voice.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-35 Applicant's Response to Robert Finely's Written Representations [REP1-147]

Ref	Written Representation comment	Applicant's response
2.35.1	I have already sent in comments on this application but cannot find my unique number. I would just like to add to my previous WR that I fully support Cowfold v Rampion and their Impact Statement which is written based on the comments that we as local residents have submitted.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-36 Applicant's Response to Ruth Aldred's Written Representations [REP1-149]

Ref	Written Representation comment	Applicant's response
2.36.1	I am strongly against Rampion 2 and the industrial sized substation proposed for the village of Cowfold. It has no place so close to a "village." something of this industrial size needs to be located close to a town not a village. Destruction of our peaceful surrounding countryside which we desperately need as an escape from the hideous amount of traffic that drives through the village is criminal. HGV's posing risks to our pedestrians, especially children and the elderly due to the pavements being so narrow and close to the road. HGV's are literally inches away from our residents on the footpaths. To even contemplate the exposure to even more danger if this substation goes ahead is unthinkable. I fear there will be a fatality if not fatalities due to the extra traffic it will generate. We all know it only takes on vehicle to break down on the A272 east or westbound and it then becomes absolute carneage with quering traffic. Only this morning when I was driving to work eastbound there were very lengthy delays coming into the village due to a works vehicle stopped at the side of the road. Have Rampion 2 thought about the impact any delay on the A272, such as a broken down vehicle or road accident, both of which happen regularly, would have on their construction traffic and the delays they would get stuck in. The village of Cowfold is not the place for a substation and battery farm. It is too close to the village and the A272 CANNOT cope with anymore traffic. The A272 either side of the village is renowned for potholes, and anymore deliberately generated construction traffic would just add to the damage to the road surface. I suggest the substation goes just off the A23 or near a town, Burgess Hill, if they have to absolutely go ahead with Rampion 2, and lets face it, wind farms don't last forever, and the turbinmes are better placed in the North Sea! Not on the picturesque south coast.	**Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** describes the alternatives studied by the Applicant and a comparison of their environmental effects across the project as a whole. This includes the alternatives considered and consulted on prior to the DCO Application. As described in **Chapter 3 Alternatives, Volume 2** of the ES **[APP-044]**, the Proposed Development has been developed through a multi-disciplinary design process including environment, engineering, landowner, and cost considerations. The Applicant has sought to avoid, reduce, or minimise the effects through the design process and also by identifying and securing embedded environmental measures. It is acknowledged that some residual effects remain across the site. The Applicant notes that paragraph 4.4.1 NPS EN-1 (2011), against which the Proposed Development is to be assessed, states there is no "*general requirement to consider alternatives or to establish whether the proposed project represents the best option*". This is reflected in paragraph 4.3.9 of NPS-EN1 (2023), which came into force in January 2024. Some specific policies require consideration of alternatives as set out in the National Policy Statement EN-1 (Department of Energy and Climate Change, 2011a), however these do not apply in relation to the comparison of the substation options. Section 3.6 of **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** provides the information on the onshore substation site selection process. **Section 3.6** describes the site selection process and the reasons for other sites being discounted based on the multi-disciplinary factors identified in the paragraph above. The selection of Oakendene is clearly stated as favourable for engineering, cost, and landowner considerations in paragraphs 3.6.23 to 3.6.25 of **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**. Significant weight was also given to the environmental constraints and related policy in the overall balance of the decision. This Applicant has also developed further embedded environmental measures that have been presented in the application including the design principles in the **Design and Access Statement [AS-003]**, **Outline Landscape and Ecology Management Plan [APP-232]** and **Outline Operational Drainage Plan [APP-223]** secured by requirements 8, 12 and 18 of the **Draft DCO [PEPD-009]** respectively. As part of the DCO process a thorough assessment of the likely impact of traffic upon the local road network and highway assets during the construction phase of works has been completed. Traffic volumes and accident analysis on the A272 have been observed and presented in **Chapter 23: Transport, Volume 2** of the ES **[APP-064]** and **Chapter 32: ES Addendum, Volume 2** of the ES **[REP1-006]** submitted at Examination Deadline 1. Accident data for a five year period from 1st January 2017 to 31st December 2021 has been assessed within **Chapter 23: Transport, Volume 2** of the ES **[APP-064]** and **Chapter 32: ES Addendum, Volume 2** of the ES **[REP1-006]** for all highway links where sensitive receptors were identified and within the vicinity of all temporary and permanent access junctions. This identified that the A272 between the A281 and A23 has a higher accident rate than the national average for rural A-roads. To ensure safe access is achieved to / from Oakendene substation the access junction will be design 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 during before the end of the examination period. The proposed routing strategy is further detailed in the **Outline Construction Traffic Management Plan (CTMP) [REP1-010]**. The CTMP would be secured by Requirement 24 of the **Draft DCO [PEPD-009]**. For further information, please see the Applicant's response in **reference 2.41.1** above regarding concerns related to transport effects.

Ref	Written Representation comment	Applicant's response
		The Applicant can confirm that the Proposed Development does not include a battery farm and that reference is made to a different planning application.
2.36.2	I fully support the views of CowfoldvRampiion.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations** **(Document Reference: 8.53)** submitted at Deadline 2.

Table 2-37 Applicant's Response to Shane Colvin's Written Representations [REP1-150]

Ref	Written Representation comment	Applicant's response
2.37.1	I would like to support the written representation made by Cowfold Parish Council. I would also wish to support all the evidence presented by CowfoldvRampion. This project is wholly inappropriate for this community, of which I am a member, and all the comments and evidence bear this out.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-38 Applicant's Response to Shuna Le Moine's Written Representations [REP1-151 & 152]

Ref	Written Representation comment	Applicant's response
2.38.1	Littlehampton is a pretty sad area really. As with so many places, post Covid and Amazon, we have many empty shops in the town centre and low footfall partly because we have so few shops and partly because the type of shops which are opening are targeted at a very narrow section of society. Namely Tattooists (3) Nail Salons (4) Hair dressers (3) Barbers (6) betting shops (3), vaping shops (4), charity shops (6) and various takeaways. We have a Lidl, a small Iceland and a smallish Sainsbury's. We also have a wonderful, but tiny, sports shop, established in 1946. Plus a Tackle and outfitters shop for anglers. The only greengrocers has closed down. The dry-cleaners is closing down, No banks, No clothes shops, no shoe shops, no stylish anything shops at all. BUT we have the beach, with a stunning sea view. We have life guards along one stretch - so safer for families. We have a fab café on the front with two terraces and lots of windows overlooking the sea, with Yoga at sunrise, sailboard and surfboard lessons, music and other events. Opposite this café is our excellent new sports centre, The Wave, with many machines on its fully glazed first floor training room facing the sea. We also are fortunate to have another stylish, architect designed (Thomas Heatherwick) restaurant on the beach front, also glass-fronted to enjoy the sea and the horizon. And we have a wonderfully long promenade from Rustington to the quite new harbour-fronted development beside the Arun river entrance. As I said in my nervous 'statement' on February 6th, Littlehampton has been given a 'Levelling Up' grant of £7,234,201, to improve the amenities at the green along the western end of the East Beach seafront. On the West beach, the other side of the Arun, the sandy shore is more extensive and there are dunes – It is a lot quieter here, as there is little parking, and to get there you must either walk across the footbridge and then all along the mouth of the Arun, or catch a, summer months only, little ferry, or drive around to the other side of the river. But it is lovely for its more secluded nature, and from West Beach you can walk along the beach to Climping which is an SSSI. Climping Gap supports important populations of wintering birds. Notably numbers of wintering Sanderling, which, in particular, are of European significance. I say all this because I want you to realise that our seafront is our Golden Asset and greatly appreciated by both the residents and the many visitors who come all year around, especially when the sun is out, and not only in the summer. From the beach you can watch the sun as it rises, and later, the setting sun sinks into the watery western horizon. On bonfire night we congregate on the beach to see the fireworks exploding into the sky. We appreciate the long natural views to our horizon, often animated with paddle-boarders passing by, or little boats, but mainly with birds. Wind surfing and Sail boarding are both hugely popular, and watching the boarders fly into the sky is wonderfully exhilarating. All with a largely natural backdrop – though somewhat marred, by Rampion 1 to the East which we must now live with. But, if you look straight ahead, or to the west you can pretend it isn't there. The Kelp Forests, encouraged by Sir David Attenborough, who backed the campaign to save them from destruction, have been slowly re-establishing themselves all along the Sussex bay since the trawler ban. BBC South posted a video narrated by Sir David, in Autumn 2019, which you can still watch on line. It begins: "Off our coasts there are magical underwater forests. These underwater forests are among the most productive places on earth, supporting a huge range of marine life. The forests are vital nursery grounds, giving sanctuary to the young of many commercial fish as they feed and hide among its fronds. And if you are lucky you might glimpse a common cuttlefish, or the exceedingly rare short-snouted seahorse. In fact these forests are so	The Applicant has undertaken an Environmental Impact Assessment (EIA) of the Proposed Development to consider and assess the likely significant effects of the Proposed Development. **Chapter 6: Coastal processes, Volume 2** of the ES **[APP-047]** to **Chapter 29: Climate change, Volume 2** **[APP-070]** of the Environmental Statement (ES) reports the findings of the EIA. The assessment within **Chapter 17: Socio-economics, Volume 2** of the ES **[APP-058]** explores the impact on tourism and finds that overall, when all influencing factors are considered, the effect of the Proposed Development on the volume and value of tourism across Sussex is expected to be negligible across employment, gross value added, volume and value of the tourism economy, access to and enjoyment of onshore recreation activity, which is considered not significant in EIA terms. The seascape and visual effects of the Proposed Development wind turbine generators (WTGs) are assessed in **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]**. The Applicant notes that significant effects on views experienced by people living, working, and visiting West Sussex have been identified at a number of representative viewpoints along the West Sussex coastline and from within the South Downs National Park. Design principles are described in Section 15.7 of **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]**, which sets out how the design evolution has resulted in changes and embedded environmental measures to help mitigate the visual effects of the Proposed Development, in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, it's spread and quantity of wind turbine generators (WTGs) within it. Opportunities to reduce effects through turbine 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 **Seascape, Landscape and Visual MDS Clarification Note** **[REP1-037]** (submitted at Examination Deadline 1), which provides further justification that the maximum design scenario (MDS), with a balance of WTG numbers between the Zone 6 and western Extension Area, is representative of the worst case in terms of seascape, landscape and visual effects. The DCO Application includes a series of documents that address the potential effects for onshore and offshore ecology and habitats. These include the following aspect chapters: • **Chapter 8: Fish and shellfish ecology, Volume 2** of the ES **[APP-049]**; • **Chapter 9: Benthic, subtidal and intertidal ecology, Volume 2** of the ES **[APP-050]**; • **Chapter 11: Marine mammals, Volume 2** of the ES **[REP1-004]**; • **Chapter 12: Offshore and intertidal ornithology, Volume 2** of the ES **[APP-053]**; and

Ref	Written Representation comment	Applicant's response
	special that they are one of the of the most biodiverse environments on the planet" RWE have been so so canny. Well, they are being paid well and much is at stake. Including a lot of British taxpayers' money. I trust that the application will be treated fairly and with consideration to all who will be affected by it, including those who fly or swim and have no voice. I find it bewildering that so many people voted for Brexit, only to discover that non UK organisations had been invited to obliterate our coast line in a way that no European country would allow. And this, at a time when they are dismantling turbines in Germany. I also found it extraordinary that RWE evidently employed and handsomely paid all those British 'specialists' who turned up at the meeting representing Rampion 2. Clever. Not a foreign accent amongst them. Clever too that RWE have so played to the British desire to do the right thing and save the planet, that they have, by being so polished, exaggerating any benefits and not even illustrating their horrifying proposal, convinced most of the public they have no cause for concern. … And strangely, so very few people even realise what is about to arrive on their doorstep. Hence the almost empty room at the consultation. After all, RWE suggest it's just an 'extension' of Rampion 1. It's for the best. Your electricity will be cheaper. There will be more jobs. It will be beautiful, people will come from miles to admire it. Really? Protect Coastal Sussex (P.C.S.) has spent months researching the reality of what harms this wind-farm would cause. They have also a member who has considerable expertise and international experience in 'Energy'. This member has outlined the three more reliable and just as readily available alternatives. 90 gigantic wind turbines installed along the Sussex Coast would not be the solution to our energy requirements. There are other more reliable and far less destructive options. I sincerely hope that you will NOT recommend approval	• **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]**. Further to the ES chapters, a number of additional documents have been submitted that are focused on onshore and offshore ecology and habitats: • **Report to Inform Appropriate Assessment** **[APP-038]**; • **Habitats Regulations Assessment (Without Prejudice) Derogation Case** **[APP-039]**; • **Draft Marine Conservation Zone Assessment** **[APP-040]**; • **Outline Landscape and Ecology Management Plan** **[APP-232]**; • **Outline Project Environmental Management Plan** **[APP-233]**; • **Draft Unexploded Ordnance Clearance Marine Mammal Mitigation Protocol** **[APP-237]**; and • **In Principle Sensitive Features Mitigation Plan** **[REP1-012]**. The ES assessments undertaken have concluded that no significant effects on marine ecology, terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development. Similarly, the **Habitats Regulations Assessment (Without Prejudice) Derogation Case** **[APP-039]** concludes that there will be no adverse effect to any of the protected sites assessed. **Consultation** 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, Volumes 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]**. 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]**. During each consultation, the Applicant's environmental information provided a full account of the impacts of draft proposals on the environment and communities, and outlined mitigation proposals. This was set out in the consultation materials for each consultation, as follows: • Statutory Project-Wide Consultation, July-September 2021 as set out in the Preliminary Environmental Information Report (PEIR) (Rampion Extension Development, 2021).

Ref	Written Representation comment	Applicant's response
		• Reopened Statutory Project-Wide Consultation, February – April 2022 as set out in the PEIR (RED, 2021). • Statutory Onshore Consultation, October – November 2022 as set out in the PEIR Supplementary Information Report (SIR) (RED, 2022). • Targeted Onshore Consultation, February – March 2023 as set out in the PEIR Further Supplementary Information Report (FSIR) (RED, 2023). For further information please see Appendix 15 Promotion of Rampion 2 Consultations in and around Cowfold 2021-2022 (**Applicant's Response to Relevant Representations [REP1-017]** submitted at Deadline 1). Please refer to the Applicant's response to the Protect Coastal Sussex written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-39 Applicant's Response to Spencer Shires's Written Representations [REP1-155]

Ref	Written Representation comment	Applicant's response
2.39.1	As a rule I support wind turbines, but they must be far enough off shore and out of migratory routes so as to not affect wild life or be an eye sore to tourism. As a resident of Selsey, we are told that we aren't to be affected and therefor consulted about this extension, even though as a peninsula we protrude from the coast and looking east and south east we see all the way to Brighton and off course Rampion 1. We are very much affected by this proposed extension. It will blight the view from our Selsey, who were not deemed affected at all to be included even in the original objection opportunity. This will affect our tourism, and when it is too late to do anything about it. I object to the increased height to 1000 feet of the new turbines, and the fact that it will fence in right across the south coast causing an unbroken barrier to the migratory routes of our at risk bird population not to mention the (newly nested at Isle of Wight) white tail eagles that do range that far from the shore. Rampion 2 should be further off-shore and with many breaks to allow birds a way through. Wind farms should not be so close to the shore as a rule and as originally advised by government, this advice has been ignored and they are getting ever closer and ever taller, even Rampion 1 will soon start to replace the existing wind turbines with the much larger ones. People just don't perceive just how much taller these new turbines will be compared to the older ones.	**Consultation** 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, Volumes 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]**. 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** **[APP-009]**. During each consultation, the Applicant's environmental information provided a full account of the impacts of draft proposals on the environment and communities, and outlined mitigation proposals. This was set out in the consultation materials for each consultation, as follows: • Statutory Project-Wide Consultation, July-September 2021 as set out in the Preliminary Environmental Information Report (PEIR) (Rampion Extension Development, 2021). • Reopened Statutory Project-Wide Consultation, February – April 2022 as set out in the PEIR (RED, 2021). • Statutory Onshore Consultation, October – November 2022 as set out in the PEIR Supplementary Information Report (SIR) (RED, 2022). • Targeted Onshore Consultation, February – March 2023 as set out in the PEIR Further Supplementary Information Report (FSIR) (RED, 2023). The seascape and visual effects of the Proposed Development wind turbine generators (WTGs) are assessed in **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]**. The Applicant notes that significant effects on views experienced by people living, working, and visiting West Sussex have been identified at a number of representative viewpoints along the West Sussex coastline and from within the South Downs National Park. Design principles are described in Section 15.7 of **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]**, which sets out how the design evolution has resulted in changes and embedded environmental measures to help mitigate the visual effects of the Proposed Development, in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, it's spread and quantity of wind turbine generators (WTGs) within it. Opportunities to reduce effects through turbine 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 **Seascape, Landscape and Visual MDS Clarification Note** **[REP1-037]** (submitted at Examination Deadline 1), which provides further justification that the maximum design scenario (MDS), with a balance of WTG numbers between the Zone 6 and western Extension Area, is representative of the worst case in terms of seascape, landscape and visual effects. The assessment within **Chapter 17: Socio-economics, Volume 2** of the ES **[APP-058]** explores the impact on tourism and finds that overall, when all influencing factors are considered, the effect of the Proposed Development on the volume and value of tourism across Sussex is expected to be negligible across employment, gross value

Ref	Written Representation comment	Applicant's response
		added, volume and value of the tourism economy, access to and enjoyment of onshore recreation activity, which is considered not significant in EIA terms. **Chapter 12: Offshore and intertidal ornithology, Volume 2** of the ES **[APP-053]** addresses the potential displacement, disturbance, and indirect effects for migrating birds and the proposed embedded environmental measures are set out in Table 12-20, for the effect of turbines on birds, this includes: • C-89 – *There will be a minimum blade tip clearance of at least 22m above MHWS.* As bird flight heights tend to be at lower altitudes, collision risk is reduced if the blade tip clearance is larger. The blade tip clearance for the Proposed Development has been increased to 22m to minimise this risk whilst considering other factors (i.e. SLVIA concerns). This parameter is secured in Requirement 2 and Schedule 11 *Deemed Marine Licence under the 2009 Act – Generation Assets* of the **Draft DCO** **[PEPD-009]**. Following the implementation of the measures set out in Table 12-20, no significant effects are predicted to occur. **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]** addresses the potential impact of the Proposed Development on wintering birds. The assessment concludes the likely effect will be negligible and not significant.
2.39.2	There is also the risk to unearthing the unexploded WW2 ordinance that is continually revealed/washed up all along our shore line, German bombers dropped many along our shores on return to Germany, please note what has just be found/exploded in Plymouth and the upheaval that caused to the Plymouth residents, who knows what will be unearthed by the proposed construction work, baring in mind the supposedly protected Sea Kelp Forest, I wonder what Sir David Attenborough will say about this, his pet project.	The Applicant is not seeking UXO clearance consent at this stage. Paragraph 4.3.18 within **Chapter 4: The Proposed Development, Volume 2** of the ES **[APP-045]** outlines that for the offshore elements of the Proposed Development geophysical and geotechnical surveys would be carried out to determine the presence of Unexploded Ordnance (UXO). Paragraph 4.3.21 within **Chapter 4: The Proposed Development, Volume 2** of the ES **[APP-045]** describes where UXO are identified the initial process will be to undertake a risk assessment to determine the appropriate action (including avoidance, removal or in situ detonation. Should UXO be identified within the Proposed Development area that require removal for safety reasons, a separate Marine Licence will be applied for at that stage, when details of the number, location(s) and size(s) of the UXO are better understood. This will include assessment of the potential for seabed disturbance and effects on proximal sensitive habitats, as relevant and appropriate. The Applicant has included a Commitment (C-275 of the **Commitments Register [REP1-015]**), to the use of low order techniques as the primary method for detonation (where required).
2.39.3	I also worry for the diminishing Selsey fishing fleet, who would be most definitely affected by this extension, the poor old fisherman who were promised so much after Brexit and got so little.	The impact of the Proposed Development on commercial fisheries is assessed in **Chapter 10: Commercial fisheries, Volume 2** of the ES **[APP-051]**. A desk-based review of literature and existing datasets has been undertaken to establish a baseline of commercial fisheries activity ongoing in the area. This understanding of the baseline has been further informed by consultation with the commercial fisheries industry in the area. Commercial fisheries receptors that have been identified and which are considered within the assessment include the following: potting fleet (i.e. vessels fishing with pots and traps); dredging fleet (i.e. vessels fishing with dredges); netting fleet (i.e. vessels fishing with nets); beam trawl fleet (i.e. vessels fishing with beam trawls); demersal otter trawl fleet (i.e. vessels fishing with demersal trawls); and pelagic trawl fleet (i.e. vessels fishing with pelagic trawls). These fleets are comprised of both UK-registered fishing vessels and fishing vessels from European Member States. The assessment has considered the effects from the construction, operational and decommissioning activities of the Proposed Development including: reduction in access to, or exclusion from established fishing grounds; displacement leading to gear conflict and increased fishing pressure on adjacent grounds; disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity; increased vessel traffic associated with the Proposed Development within fishing grounds leading to interference

Ref	Written Representation comment	Applicant's response
		with fishing activity; additional steaming to alternative fishing grounds for vessels that would otherwise fish within the Proposed Development area; and physical presence of infrastructure leading to gear snagging. A range of environmental measures are embedded as part of the Proposed Development design to remove or reduce any significant environmental effects on commercial fisheries as far as possible. These are set out in Table 10-12 of **Chapter 10: Commercial fisheries, Volume 2** of the ES **[APP-051]**. Additionally, an **Outline Fisheries Liaison and Co-existence Plan** **[REP1-013]** has been submitted with the DCO Application and is secured in condition 11 (g) of Schedule 11 and 12 of the **Draft DCO** **[PEPD-009]**. Based on the proposed location of the offshore infrastructure and its subsequent operation, plus the incorporation of appropriate environmental measures, no significant effects have been identified in relation to the potential impact of the Proposed Development on commercial fisheries.

Table 2-40 Applicant's Response to Susan Davies's Written Representations [REP1-157 to REP1-159]

Ref	Written Representation comment	Applicant's response
2.40.1	1 Alternative substation sites at Wineham Lane It is evident from the absence of topographic, hydrological, geotechnical, groundwater assessment, traffic and ecological data that comprehensive comparative study has not been conducted for the alternative substation sites. It's difficult to understand why the battery facility application along Wineham Lane (DM/24/0136) has not been included in the DCO Application, considering it is owned by the Rampion joint venture, the ownership of which should have been disclosed.	**Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** describes the alternatives studied by the Applicant and a comparison of their environmental effects across the project as a whole. This includes the alternatives considered and consulted on prior to the DCO Application. As described in **Chapter 3 Alternatives, Volume 2** of the ES **[APP-044]**, the Proposed Development has been developed through a multi-disciplinary design process including environment, engineering, landowner, and cost considerations. The Applicant has sought to avoid, reduce, or minimise the effects through the design process and also by identifying and securing embedded environmental measures. It is acknowledged that some residual effects remain across the site. The Applicant notes that paragraph 4.4.1 NPS EN-1 (2011), against which the Proposed Development is to be assessed, states there is no "*general requirement to consider alternatives or to establish whether the proposed project represents the best option*". This is reflected in paragraph 4.3.9 of NPS-EN1 (2023), which came into force in January 2024. Some specific policies require consideration of alternatives as set out in the National Policy Statement EN-1 (Department of Energy and Climate Change, 2011a), however these do not apply in relation to the comparison of the substation options. Section 3.6 of **Chapter 3: Alternatives, Volume 2** of the Environmental Statement (ES) **[APP-044]** provides the information on the onshore substation site selection process. Section 3.6 describes the site selection process and the reasons for other sites being discounted based on the multi-disciplinary factors identified in the paragraph above. The selection of Oakendene is clearly stated as favourable for engineering, cost, and landowner considerations in paragraphs 3.6.23 to 3.6.25 of **Chapter 3: Alternatives, Volume 2** of the ES **[APP-044]**. Significant weight was also given to the environmental constraints and related policy in the overall balance of the decision. This Applicant has also developed further embedded environmental measures that have been presented in the application including the design principles in the **Design and Access Statement [AS-003]**, **Outline Landscape and Ecology Management Plan [APP-232]** and **Outline Operational Drainage Plan [APP-223]** secured by requirements 8, 12 and 18 of the **Draft DCO [PEPD-009]** respectively. The application (DM/24/0136) was submitted to Mid Sussex District Council on 11th January 2024. As a result, this application has not been included within the Environmental Statement as it was being submitted after the Rampion 2 DCO Application submission in August 2023.
2.40.2	It is entirely understandable that our neighbours near Wineham Lane objected to the proposed Rampion substation 2 being built on Wineham Lane. When they pass by Rampion 1, they are reminded of broken promises, poor replanting, and the massive scars left on their beautiful countryside. They endured several years of neglect from Rampion, with unanswered emails, unreturned calls, numerous concerns ignored and summer weekends ruined by noisy construction.	The methodologies that will be used to ensure onshore construction (including restoration) are undertaken in a sensitive and appropriate way can be found in the **Outline Construction Method Statement [APP-255]**, the **Outline Code of Construction Practice [APP-224]**, and the **Outline Landscape and Ecology Management Plan (LEMP) [APP-232]**. These documents are secured under Requirements 12, 22, and 23 of the **Draft DCO [PEPD-009]**. The Applicant also refers to the measures in the **Outline Soils Management Plan [APP-226]** as secured in the **Draft DCO [PEPD-009]** (updated at Deadline 2) by Requirement 22 (5) (f).
2.40.3	If Rampion substation 2 is constructed on Wineham Lane, our neighbours should be compensated for the duration of the project. Rampion 1 was initially estimated to take 17 months, but ended up taking 72 months, over 3 times longer than expected. Serious consideration should be given to liquidated damages to be paid to the neighbours who will be affected by this significant disruption	There is no proposal for the construction of the Rampion 2 substation on Wineham Lane; only for a small (<1ha) extension to the existing National Grid Bolney substation.

Ref	Written Representation comment	Applicant's response

2.40.4	2 Traffic and Highways - the proposed substation at Oakendene/Kent Street.
	
	In relation to the proposed substation at Oakendene/Kent street, the Traffic and Highways section extensively references NPPF, National Highways guidelines and policies from relevant councils. However, Rampion have failed to adhere to several guidelines and only superficially acknowledged local policies. A closer examination of the documents reveals inadequate due diligence, missing data and insufficient information and a lack of comparisons between the two proposed sites. The reader is frequently directed to specific chapters or appendices, only to discover the absence of relevant information and data. References are made to traffic modelling at Oakendene which has not been completed. Please refer to document attached, Highways and Traffic, which provides several examples, though it is not an exhaustive list.
	
	A crucial point that appears to have been downplayed is that the Oakendene site is accessible only directly off the fast- moving, busy and hazardous A272. This implies that tens of thousands of construction vehicles will have to significantly reduce speed to enter the site safely. In contrast, the entrance to the Wineham Lane site is much safer, as it is a 5m wide, relatively quiet lane
	
	Considering that this section of the A272 is a perilous road affecting thousands of road users daily, it seems prudent to conduct a comprehensive traffic survey, traffic modelling and a Traffic Impact Assessment for both options to make an informed decision.
	
	i) Local residents have expressed concerns that the village is already at capacity, with consistent and regular traffic queues of 1-1.5miles, often extending to Kent St and beyond during rush hours. They have faced utter chaos and significant disruption when there are temporary traffic lights operating on the A272 approaching Cowfold village. During such instances, drivers divert from the A272 and A281 to surrounding lanes to avoid congestion. These concerns have been raised at parish council meetings and covered in the local press. According to a traffic survey conducted in October 2023 on Wineham Lane for a battery facility application, on a typical day, approximately 80-90 cars use Wineham Lane. However, during a road-disrupting accident on the A272 which lasted a couple of days, over 800 vehicles diverting down this narrow lane. Notably, an accident involving a horse -box overturning along this lane, was not included in any official Road Traffic Accident data.
	
	ii)Rampion has not disclosed the numbers of HGV, LGV and workers' vehicles making two- way journeys to the substation site. Initially advised that there would be 8040 HGV's, the number now appears to be at least three times that, exceeding 20,000, but no details of workers' vehicles. This data is crucial for assessing the impact on the existing road network. It is essential to know the numbers during peak
		Traffic Impacts
		To limit the effects on the A272 and Cowfold AQMA receptors a range of embedded environmental measures have been provided by the Applicant as detailed within the **Commitments Register** **[REP1-015]** which has been updated at the Examination Deadline 1 submission and secured through the **Outline Construction Traffic Management Plan (CTMP)** **[REP1-010]** secured through Requirement 24 of the **Draft DCO** **[PEPD-009]**, which were updated at the Examination Deadline 1 submission including:
		
		• Commitment C-157: The proposed heavy goods vehicle (HGV) routing during the construction period to individual accesses will be developed to avoid major settlements of Storrington, Cowfold, Steyning, Wineham, Henfield, Woodmancote and other smaller settlements where possible; and
		• Commitment C-158: The proposed heavy goods vehicle (HGV) routing during the construction period to individual accesses will avoid the Air Quality Management Area (AQMA) in Cowfold where possible.
		
		These commitments are also reflected in Table 5-1 of the **Outline CTMP** **[REP1-010]** which has been updated at the Examination Deadline 1 submission and confirms prescribed local Heavy Goods Vehicle (HGV) access routes for all sections of the onshore cable corridor and Table 5-2 which details specific local constraints and proposed management of construction traffic routes.
		
		These commitments ensure that HGV construction traffic will route along the A27 and A23 to gain access to the A272 east of Cowfold wherever possible, thereby avoiding the village centre. Therefore, only accesses A-52, A-56 and A-57 will require construction traffic to route through Cowfold Village centre. As calculated by using data included in Table 5-3 of the **Outline CTMP** **[REP1-010]** which has been updated at the Examination Deadline 1 submission, the impact of this commitment is the removal of up to 22,000 two-way HGV trips (11,000 HGVs) from Cowfold Village centre over the construction phase.
		
		Whilst commitment C-157 and C-158 (**Commitments Register** **[REP1-015]**, updated at Examination Deadline 1) discourages traffic from routeing through the Cowfold AQMA for robustness within **Chapter 23: Transport, Volume 2** of the ES **[APP-064]**, it has been assumed that approximately 25% of HGV traffic will route through Cowfold from the A24 and A272 east of the village centre when entering or exiting construction accesses at Oakendene, Kent Street or Wineham Lane. This accounts for the potential delivery of material or equipment to / from locations directly west of Cowfold where it would not be possible to adhere to commitments C-157 and C-158 of the **Commitments Register** **[REP1-015]** or use of the Strategic Road Network and provides a robust assessment of impacts within Cowfold.
		
		At peak construction, taking account of the construction traffic routing contained within the **Outline CTMP** **[REP1-010]** which has been updated at the Examination Deadline 1 submission, the following effects have been identified for Cowfold:
		
		• At A281 south of Cowfold (Receptor 23):
		  ▸ An 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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	weeks, the duration of these peak weeks, and whether they plan to avoid rush hours, as recommended by National Highways. iii)The A272 is a lengthy road with some sections being more hazardous than others. Rampion has not assessed the number and severity of RTA's on the A272 at the two alternative locations. Oakendene experiences twice as many RTA's compared to Wineham Lane. iv)There is no assessment of the impact on the surrounding lanes, which will be used as cut-throughs, nor on the surrounding villages, through which traffic will divert. v)Rampion refers to traffic modelling for the two sites, but it has not been located within their documents. vi) Crucially, Rampion has not disclosed their proposed "temporary traffic control measures" for Oakendene and Kent St. Many residents voiced concerns during the Cowfold meetings, but no answers were provided. Worries centre around the safety aspect of this hazardous stretch of road and how thousands of HGV's and other construction vehicles will safely exit this site, cutting across two lanes of fast moving A272 traffic. Furthermore, there are concerns that the existing traffic congestion and pollution will worsen, creating chaos for the 18,000 daily road users and the local community. These traffic control measures were not necessary at Wineham Lane, as demonstrated during the construction of Rampion 1. vii)There has been no comparative Road Traffic Impact report for the two alternative locations, nor any completed Traffic Modelling, despite Rampion's reference to it in their application. There are also no details of the holding area, where HGV's will park, while waiting to enter the site. viii) To reduce speed along the A272 and safely direct thousands of commercial vehicles off this hazardous stretch of road, into the proposed Oakendene site, visibility splays will be needed. However, insufficient details have been provided regarding the distance between them and the safety aspect has not been examined. This would not be necessary at Wineham Lane, as it already has a wide visibility splay and the site entrance is not off the main road, making it significantly safer. ix)The Wineham Lane site is 2.5 miles away from the village of Cowfold and does not experience daily congested traffic. When Rampion 1 was constructed, there was no need to introduce traffic	▸ 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): ▸ 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): ▸ 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. Based on these construction traffic flows and the conclusions of the **Chapter 23 Transport, Volume 2** of the ES **[APP-064]** and **Chapter 32: ES Addendum, Volume 2** of the ES **[REP1-006]** (submitted at Examination Deadline 1), no significant effects have been identified in relation to transport receptors within the centre of Cowfold. Mitigation within the **Outline CTMP** **[REP1-010]** is secured via Requirement 24 of the **Draft DCO** **[PEPD-009]**. <u>Kent Street</u> Kent Street is identified within the **Outline CTMP** **[REP1-010]** as a single track road which will be used as a construction traffic route to accesses A-61 and A-64 as shown on Figure 7.6.4d within the **Outline CTMP** **[REP1-010]**. It should be noted that both access A-61 and A-64 are located north of residential properties on Kent Street and therefore construction traffic will not route past these properties. This reflects commitment C-157 (**Commitment Register** **[REP1-015]**) which states that HGVs should avoid smaller settlements where possible, the prescribed local access routes defined in Table 5-1 of the **Outline CTMP** **[REP1-010]** and the mitigation identified to avoid the use of small single-track roads as much as possible as defined in Table 5-2 of the **Outline CTMP** **[REP1-010]** secured via Requirement 24 of the **Draft DCO** **[PEPD-009]**. Given the single lane track nature of Kent Street, the Applicant is currently reviewing options for the implementation of traffic management along Kent Street and accesses A-61 and A-64 to provide safe access for construction and general traffic. This may involve measures such the implementation of a speed limit reduction, passing places, or managed access via banksmen. The outcomes of this review will be discussed with West Sussex County Council at the earliest opportunity with the aim of reaching an agreement in principle to the traffic management strategy. This would be detailed in the **Outline CTMP** **[REP1-010]** as discussed above, which would then be secured through a detailed CTMP for the stage of the authorised development comprising Kent Street which will be required to be submitted and

Ref	Written Representation comment	Applicant's response
	control measures along the A272. Wineham Lane is a significantly quieter road with fewer vehicles using it. x) Rampion has given the impression that Kent St and Wineham Lane are comparable. On the contrary, Wineham Lane is a 5m wide 2- lane road, suitable for HGV's built in the 1960's to accommodate the construction of the National Grid substation, but it has low traffic numbers. Kent St. in contrast, is a 3m wide single lane, with narrow grass verges, not suitable for HGV's or heavy traffic. It has width restriction notices at either end and a narrow bridge. xi) During the first meeting at Cowfold in November 2022, Rampion did not realise that Kent St was a minor single track lane, and locals pointed out that the Woods report deemed it "unsuitable" for the proposal. However, looking at the application, Rampion have now decided to use both Kent St and Dragons Lane (another unsuitable lane) for construction traffic, as they have realised that Cowfold is an AQMA and has to be avoided if possible.	approved by the highways authority before commencement within that stage in accordance with requirement 24(1)(a) of the **Draft DCO** **[PEPD-009]**. It should be noted that there is no proposal to use Dragons Lane for construction traffic.
2.40.5	3 Economic and financial impact on businesses on Oakendene estate and Cowfold businesses i There are over 70 businesses on or around the Oakendene site, with an additional 60 in the village. Originally the Oakendene site was established to enable local people to start their own businesses and then it grew enabling a wider range of businesses to flourish. Theses are mainly artisan businesses either sole traders or partnerships, ranging from carpenters and engineers to gardening businesses. Many rely on 'just in time' deliveries, which could be disrupted as a result of the traffic congestion and the extra time delays. ii Other local businesses in Cowfold will suffer. The pub and cafe mentioned difficulties in attracting and retaining staff, especially if the commute is even more problematic. The local driving instructor is fearful for his business's survival, if he has to endure long traffic queues with his students to get to for training.	Access to the construction compound site via the Industrial Estate entrance from the A272 and access management measures will be designed taking into account the existing use of the road. Continued access use by Industrial Estate tenants will be facilitated. As part of the DCO process a thorough assessment of the likely impact of traffic upon the local road network and highway assets during the construction phase of works has been completed. Traffic volumes effects on the Oakendene Industrial Estate have been observed and presented in the **Chapter 23: Transport, Volume 2** of the ES **[APP-064]**. The proposed routing strategy is further detailed in the **Outline Construction Traffic Management Plan (CTMP)** **[REP1-010]**. The CTMP would be secured by Requirement 24 of the **Draft DCO** **[PEPD-009]**. Please see the Applicant's response in **reference 2.4.1** above regarding concerns related to transport effects on Cowfold village.
2.40.6	4 Flooding and pollution of Oakendene and downstream communities It's not entirely surprising that Rampion proposed Oakendene as a substation site. As a floodplain, the land is considerably cheaper, saving them money, and it's relatively flat, making it easier to build upon. However it is surprising that they selected this site prior to completing comparable hydrological and geotechnical research. This is a critical decision for the Planning Inspectorate and Secretary of State, whether to run the risk of choosing a floodplain, when a safer alternative site is available. The significant drawback is the increased risk of flooding for neighbouring homes and businesses, as well as potential flooding downstream. Flooding can lead to equipment damage, power	The onshore substation footprint and associated SuDS basins are not situated within the floodplain. The assessment of flood risk and outline design was prepared in accordance with the West Sussex County Council (WSCC) and Horsham District Council (HDC) advice, as recorded in meeting minutes included in Annex A of the **Appendix 26.2: Flood Risk Assessment, Volume 4** of the Environmental Statement (ES) **[APP-216]**. As outlined in the **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]**, the onshore substation at Oakendene is situated within Flood Zone 1 (low probability of flooding). The approach to assessment of fluvial flood risk from the ordinary watercourse to the south of the substation site was agreed with the Lead Local Flood Authority (LLFA) (WSCC) and the Local Planning Authority (LPA) (HDC) during a consultation meeting on 22 June 2022. It was agreed that the 0.1% Annual Exceedance Probability (AEP) flood extent (defined by the Environment Agency's Risk of Flooding from Surface Water

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	outages and increased maintenance and higher insurance costs due to elevated risks. Power outages, would affect thousands of homes, businesses and other facilities disrupting essential services such as lighting, heating and cooling and electronic communication. Health and safety concerns may arise, affecting medical equipment, security systems and other critical devices. Communication issues may also arise with disruptions to telecommunications and internet services during power outages. Considering climate change and increasingly severe weather conditions, heavy rain can damage power lines, transformers and other electrical equipment, exacerbating problems. Despite the government and Rampion's declared support for environmental issues and bio diversity, building on a floodplain would have negative environmental consequences, given the ecological importance of these natural habitats.	(RoFSW) mapping) was a suitably precautionary proxy for the 1% AEP plus a climate change allowance for the operation and maintenance phase (2030 to 2060). The HDC flood officer commented that as long as the onshore substation was positioned outside of the 0.1% AEP extent HDC would not be concerned. The indicative site layout has been developed accordingly, taking risk of flooding into account. With regard to the impact of the development to surface water runoff and downstream flood risk, the **Outline Operational Drainage Plan** **[APP-223]** sets out the drainage strategy for managing surface water run-on and runoff from the substation throughout the operational lifetime of the development. The proposed sustainable drainage (SuDS) measures as shown in the Indicative SuDS Plan in Appendix A provide the proposed approach for discharges being limited to greenfield QBAR (mean annual flood) rates and / or two l/s/ha (whichever is greater). These measures would ensure that surface water runoff rates remain unchanged (and for more extreme events, reduced) from the current greenfield rate. The final Operational Drainage Plan must accord with the **Outline Operational Drainage Plan** **[APP-223]** and will be secured via Requirement 17. The Applicant is confident that the precautionary approach in **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES **[APP-216]** and **Outline Operational Drainage Plan** **[APP-223]** will ensure the substation will not be at flood risk, nor increase flood risk elsewhere.
2.40.7	The cables are surrounded by oil, to keep them cool and these have been known to leak, necessitating their inclusion in the pollution risk assessment. Rampion 1 also suffered a diesel spillage, addressed only after the Environmental Agency was alerted by local residents. In the event of such an incident at Oakendene, the consequences would likely be more severe, considering the numerous water courses and proximity to lakes and the Cowfold Stream.	The cables would not be surrounded by oil. An image of the type proposed is included at Graphic 4-12 of **Chapter 4: The proposed development, Volume 2** of the Environmental Statement (ES) **[APP-045]**. **Chapter 26: Water environment, Volume 2** of the ES **[APP-067]** considers the potential impact of pollution to the River Adur and Cowfold Stream, resulting from the Proposed Development. The assessment concludes that there is likely to be no significant impact to water quality in the River Adur and Cowfold Stream during the construction or operational phases of the Proposed Development. The assessment also concludes that the impact resulting from changes to watercourse morphology as a result of works on or near watercourses is not expected to be significant. The **Outline Code of Construction Practice** **[PEPD-033]** includes embedded environmental measures that will be implemented at all construction areas to prevent pollution events occurring and limit the impact to nearby receptors, including watercourses. The Contractor(s) will be required to produce and adhere to a Pollution Prevention Plan (PPP) and Pollution Incident Response Plan (PIRP), as per Commitments C-8, C-14, C-72, C-129, C-150, C-151, and C-167 in the **Commitments Register** **[REP1-015]** and secured through Requirement 22 of the **Draft Development Consent Order** **[PEPD-009]**).
2.40.8	During the first meeting in Cowfold in October 2021, Rampion confirmed that they would consider lowering the structure, to make it less visible from the road. However, upon discovering that it was a floodplain, nothing further was said. It is likely, though, that they may need to elevate the structure to avoid flooding, making it even more visible and pronounced.	Please see the Applicant's response in **reference 2.40.6** above regarding concerns related to flooding at the Oakendene substation site. The Indicative Landscape Design for the Oakendene Substation and its design principles are set out in the **DAS** **[AS-003]** and further expanded on in the **Outline LEMP** **[APP-232]**. The site is partly screened by existing mature vegetation and the design process focuses on protecting and enhancing this existing screening. As described in **Chapter 18: Landscape and visual impact, Volume 2** of the ES **[APP-059]**, the LVIA study area for the Oakendene substation has been subject to detailed desk and site-based assessment as well as consultation on viewpoint location.

Table 2-41 Applicant's Response to Susan J. Ball's Written Representations [REP1-160]

Ref	Written Representation comment	Applicant's response
2.41.1	On behalf of my entire household, I thoroughly endorse the evidence presented by CowfoldvRampion in their impact statement and also Cowfold parish Council in their objection to the proposals, voiced in the PC meeting of 26th February. The community are united and vocal in their opinion that this project is the wrong project in the wrong place. As I have lived in the area for most of my life, I am familiar with many of the sites which will be adversely affected by the proposal, many of which would be quite impossible to reinstate, causing a massive loss of local biodiversity. Rampion have not been clear enough at all in their plans or paid adequate attention to local concerns which have been very clearly voiced, they are also failing to answer perfectly legitimate concerns when voiced by properties that are directly affected by their plans; we are part of an established, working rural community that cannot be simply reorganised by an ill-conceived 'desk-top' project of this magnitude. We therefore deserve to be clearly heard and to have our concerns properly addressed on every level.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to Cowfold Parish Council in **Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)** and the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2. **Consultation** 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, Volumes 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]**. 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]**. During each consultation, the Applicant's environmental information provided a full account of the impacts of draft proposals on the environment and communities, and outlined mitigation proposals. This was set out in the consultation materials for each consultation, as follows: • Statutory Project-Wide Consultation, July-September 2021 as set out in the Preliminary Environmental Information Report (PEIR) (Rampion Extension Development, 2021). • Reopened Statutory Project-Wide Consultation, February – April 2022 as set out in the PEIR (RED, 2021). • Statutory Onshore Consultation, October – November 2022 as set out in the PEIR Supplementary Information Report (SIR) (RED, 2022). • Targeted Onshore Consultation, February – March 2023 as set out in the PEIR Further Supplementary Information Report (FSIR) (RED, 2023). For further information please see Appendix 15 Promotion of Rampion 2 Consultations in and around Cowfold 2021-2022 (**Applicant's Response to Relevant Representations [REP1-017]** submitted at Deadline 1. **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the Environmental Statement (ES) **[APP-063]** describes the effects on the terrestrial ecology features present. The mitigation hierarchy has been applied through the design of the Proposed Development so that efforts have been made to avoid ecological features, minimise levels of effect where avoidance is not possible (e.g. trenchless crossings), mitigate effects (e.g. through sensitive temporary lighting design) and compensate for residual effects this is limited through Appendix B Vegetation Retention Plan of the **Outline CoCP [PEPD-033]** secured via Requirement 22 of the **Draft DCO [PEPD-009]**. Although there will be short term effects on a number of ecological features, the approach to construction, the reinstatement of habitats and habitat creation (both at the onshore substation site and as part of biodiversity net gain delivery) will provide a positive legacy for terrestrial ecology in the medium to long term. This mitigation is secured through the **Outline CoCP [PEPD-033]** via Requirement 22, **Outline LEMP [APP-232]** via Requirement 12, and Requirement 14 of the **Draft DCO [PEPD-009]**. The ES assessments undertaken have concluded that no significant effects on terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development.

Table 2-42 Applicant's Response to William Davies's Written Representations [REP1-171]

Ref	Written Representation comment	Applicant's response
2.42.1	I confirm that I contributed to the Cowfoldvrampion impact statement and fully endorse the contents. I support all the work undertaken by the Cowfold group and I am very concerned about the huge impact this would have on the village and its community, the wildlife and the traffic problems for all road users in this area.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

Table 2-43 Applicant's Response to Diana Allam's Written Representations [REP1-090]

Ref	Written Representation comment	Applicant's response
2.43.1	I am sending this written representation in the vague hope that it gets read and that my concerns are addressed and not mitigated or ignored. I say this as two years ago I read Rampion 2 web page on the project, and it appeared to imply that they already had permission for this project and it was just a case of mitigating local concerns, this isn't correct is it?	Please see the Applicant's response in to **references 2.43.2** to **12.43.9** below regarding concerns raised by the Interested Parties Written Representation.
2.43.2	I object to the expansion of Rampion 2 wind farm for various reasons. Here are some of my concerns. 1 This part of the south coast i.e. Selsey and the Manhood peninsula and surrounding areas was used during Second World War as a dumping and target range, using live ordinance, being close to Portsmouth German bombs were also dropped on their return journey. Several times a year our coast guards are called upon to deal with live ordinance / EOD's washed up on our beaches. So I am extremely concerned about the major drilling/ explosions that will take place to the sea bed this close to the shore line. Will signs be placed along the south coast including Bognor Regis, Littlehampton & Worthing, to warn holiday makers particularly around Butlins in Bognor about finding EOD's. I do wonder how this will affect the tourist industry along this coast. The possibility of just one EOD being picked up by a child is a nightmare no one wants. Can RWE guarantee that the major works on the sea bed will not be the cause of more ordinance washing up on our beaches?	Paragraph 4.3.18 within **Chapter 4: The Proposed Development, Volume 2** of the ES **[APP-045]** outlines that for the offshore elements of the Proposed Development geophysical and geotechnical surveys would be carried out to determine the presence of Unexploded Ordnance (UXO). Paragraph 4.3.21 within **Chapter 4: The Proposed Development, Volume 2** of the ES **[APP-045]** describes where UXO are identified the initial process will be to undertake a risk assessment to determine the appropriate action (including avoidance, removal or in situ detonation. A separate marine license would be secured for clearance of UXO.
2.43.3	2 The proposed expansion is a horizontal barrier across the major migratory corridor for wildlife that comes up from Africa through Europe and across the channel through here. This includes Bats and Insects and birds including Swifts. That is why there are so many RSPB nature reserves in the area. These proposed wind turbines are to be a 1000 feet high, this would likely cause mass bird strikes, and these dead birds will appear on our beaches first then after a few years there will be no birds or wildlife flying through this area and most of these birds are endangered as it is. Can RWE guarantee no bird strikes or disruption to flight paths?, or will it be as in Wales a sudden and coincidental rise in bird flu cases after the turbines are in place? Also 6 sea eagles have been released from the Isle of Wight, one of which has been seen in the Manhood Peninsula, these turbines are particularly lethal to raptors, these turbines would be within their range. How do RWE propose to protect these rare birds.	**Chapter 12: Offshore and intertidal ornithology, Volume 2** of the ES **[APP-053]** addresses the potential displacement, disturbance, and indirect effects for migrating birds. The assessment concludes that a negligible and not significant effect is likely for all species surveyed. **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]** addresses the potential impact of the Proposed Development on wintering birds. The assessment concludes the likely effect will be negligible and not significant. **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES **[APP-063]** assessed the potential effects of the Proposed Development on invertebrates which included surveying. Key habitats for terrestrial invertebrates are avoided by the onshore cable corridor or are crossed by trenchless crossings, and embedded environmental measures have been included in the DCO Application to minimise, reduce, and avoid potential impacts. The terrestrial invertebrates were scoped out from requiring further assessment due to the lack of pathway of effects and limits potential scale of impact. Migrating insects were not assessed as they were not raised in the **Planning Inspectorate's Scoping Opinion** **[APP-125]** and the National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023) is silent on the matter, although it specifically mentions collision risks associated with birds and marine mammals. Further recent reviews of potential ecological effects of offshore wind farms have not identified insect collision as a risk.

Ref	Written Representation comment	Applicant's response
		The ES assessments undertaken have concluded that no significant effects on marine ecology, terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans taking account of environmental measures embedded into the design of the Proposed Development. Similarly, the **Report to Inform Appropriate Assessment [APP-038]** concludes that there will be no adverse effect to any of the protected sites assessed.
2.43.4	3 What damage will be done to the David Attenborough PROTECTED sea kelp forest along the south coast? These Turbines only last 1 5 years, does this mean our sea bed will be disturbed every 1 5 years?	The potential effects of the Proposed Development on the sea bed and kelp reserves have been addressed in the **Chapter 9: Benthic, subtidal and intertidal ecology, Volume 2** of the ES **[APP-050]**. The impact of habitat disturbance will represent a local spatial extent, short term intermittent impact, affecting a relatively small portion of the benthic subtidal habitats in the proposed DCO Order Limits. However, the proposed export cable corridor will enter a recently designated "no-trawling zone" and a site for kelp restoration and protection (see paragraph 9.6.36 to 9.6.37 of **Chapter 9: Benthic, subtidal and intertidal ecology, Volume 2** of the ES **[APP-050]**). Due to the short-term and localised nature of this impact and the tolerance and recoverability of the majority of the benthic receptors including kelp, the assessment concludes that is likely to be no significant effects on the sea bed or for kelp reserves.
2.43.5	4 How will the turbine noise affect us, 7 miles away is not very far at sea level from Selsey.	A screening assessment of the operational noise effects of the Proposed Development as a result of the Wind Turbine Generators on residential receptors during the operation and maintenance phase have been assessed in **Chapter 21: Noise and vibration, Volume 2** of the ES **[APP-062]** and **Appendix 21.3: Preliminary operational noise predictions, Volume 2** of the ES **[APP-178]**. The offshore array area is located approximately 13km from the nearest shoreline. This screening assessment concluded that no residential receptors are predicted that there will be no exceedances above the lower applicable noise limit (35dB L_{A90}) as stated in ETSU-R-97 The Assessment and Rating of Noise from Wind Farms (The Working Group on Noise from Wind Turbines, 1996). Therefore, a detailed noise assessment is not required as it is expected that the Wind Turbine Generators will comply with the noise limits in accordance with ETSU-R-97.
2.43.6	5 What about the plight of our fisherman who will lose more fishing areas? And the upheaval will have a major impact on sea life.	The impact of the Proposed Development on commercial fisheries is assessed in **Chapter 10: Commercial fisheries, Volume 2** of the ES **[APP-051]**. A desk-based review of literature and existing datasets has been undertaken to establish a baseline of commercial fisheries activity ongoing in the area. This understanding of the baseline has been further informed by consultation with the commercial fisheries industry in the area. Commercial fisheries receptors that have been identified and which are considered within the assessment include the following: potting fleet (i.e. vessels fishing with pots and traps); dredging fleet (i.e. vessels fishing with dredges); netting fleet (i.e. vessels fishing with nets); beam trawl fleet (i.e. vessels fishing with beam trawls); demersal otter trawl fleet (i.e. vessels fishing with demersal trawls); and pelagic trawl fleet (i.e. vessels fishing with pelagic trawls). These fleets are comprised of both UK-registered fishing vessels and fishing vessels from European Member States. The assessment has considered the effects from the construction, operational and decommissioning activities of the Proposed Development including: reduction in access to, or exclusion from established fishing grounds; displacement leading to gear conflict and increased fishing pressure on adjacent grounds; disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity; increased vessel traffic associated with the Proposed Development within fishing grounds leading to interference with fishing activity; additional steaming to alternative fishing grounds for vessels that would otherwise fish within the Proposed Development area; and physical presence of infrastructure leading to gear snagging. A range of environmental measures are embedded as part of the Proposed Development design to remove or reduce any significant environmental effects on commercial fisheries as far as possible. These are set out in Table 10-12 of

Ref	Written Representation comment	Applicant's response
		Chapter 10: Commercial fisheries, Volume 2 of the ES **[APP-051]**. Additionally, an **Outline Fisheries Liaison and Co-existence Plan** **[REP1-013]** has been submitted with the DCO Application and is secured in condition 11 (g) of Schedule 11 and 12 of the **Draft DCO** **[PEPD-009]**. Based on the proposed location of the offshore infrastructure and its subsequent operation, plus the incorporation of appropriate environmental measures, no significant effects have been identified in relation to the potential impact of the Proposed Development on commercial fisheries.
2.43.7	6 The South Coast has been for decades a holiday destination for many poorer South London families. Poorer children deserve to see a clear view of the horizon to feel a sense of space and freedom. People enjoy boating, Jet skis, paddle boarding, these turbines in this area will trap and enclose our tourists, they will go elsewhere.	**Chapter 7: Other marine users, Volume 2** of the ES **[APP-048]** addresses the potential effects of the Proposed Development on recreational boating, sailing, and fishing. It also includes an assessment of effects on diving and water sports (including surfing). The assessments conclude the likely effects from the Proposed Development on these activities is not significant in EIA terms. The assessment within **Chapter 17: Socio-economics, Volume 2** of the ES **[APP-058]** explores the impact on tourism and finds that overall, when all influencing factors are considered, the effect of the Proposed Development on the volume and value of tourism across Sussex is expected to be negligible, which is considered not significant in EIA terms, see Section 17.9 to 17.11 of the chapter.
2.43.8	7 These turbines will destroy our tourist industry. From Selsey you have and almost (apart from Rampion 1 at a distance) unhindered view of the rising sun and moon phases. Photos of these are constantly featured on TV weather bulletins, this was free advertising for Selsey, interestingly they have stopped showing pictures of Brighton since the addition of Rampion 1 8 From the Selsey side of Pagham Nature Reserve is where we have a blue plaque for the composer Eric Coates who composed the theme music to desert island discs entitled The Sleepy Lagoon after the view that is now under threat, this is completely the wrong place for these 1000ft high turbines (whose to say that in another 1 5 years time they wont be increased to 1 500tf or even taller)	The visual effects of the wind turbine generators 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 of the chapter 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 within it. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. Please see the Applicant's response in to **reference 2.43.7** above regarding concerns raised on tourism impact.
2.43.9	PLEASE DON'T DESTROY OUR HERITAGE. The people in Selsey were not told about this expansion, unless they catch an article in the local paper. We had no posters or bill boards to inform us like they did in Worthing. This company RWE, does not feel that the people of Selsey matter and our concerns are not relevant, they have left Chichester and Selsey Councils out of the planning, why are they excluding us? What are they hiding? I am very disappointed that your inspectorate team did feel fit to view the proposed sight from East Beach Selsey last November, again do we not matter?	**Consultation** 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, Volumes 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]**. 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** **[APP-009]**. During each consultation, the Applicant's environmental information provided a full account of the impacts of draft proposals on the environment and communities, and outlined mitigation proposals. This was set out in the consultation materials for each consultation, as follows:

Ref	Written Representation comment	Applicant's response

- Statutory Project-Wide Consultation, July-September 2021 as set out in the Preliminary Environmental Information Report (PEIR) (Rampion Extension Development, 2021).
- Reopened Statutory Project-Wide Consultation, February – April 2022 as set out in the PEIR (RED, 2021).
- Statutory Onshore Consultation, October – November 2022 as set out in the PEIR Supplementary Information Report (SIR) (RED, 2022).
- Targeted Onshore Consultation, February – March 2023 as set out in the PEIR Further Supplementary Information Report (FSIR) (RED, 2023).

The Applicant used a range of communications channels to keep members of the public and interested stakeholders prior to and throughout the formal consultations including press releases and media, visitor centre, social media, contacting the project via writing/freephone/email/project website, and the project website. All consultations leaflets were distributed to postal address with information about the consultation and how people can have their say. The consultation materials were made available at deposit locations (including Selsey Library) which were available for inspection, free of charge.

As outlined in the **Consultation Report [APP-027]**, following Section 43 of the Planning Act 2008 Chichester District Council were consulted with regarding the Proposed Development, and responded with no objection.

Chichester District Council

Document	Location	Description
Rampion 2 Consultation Report Application Reference 5.1.	Page 55	*Table 3.3: Stakeholder meetings held outside of consultation periods.*
	Page 69	*Table 5.2: Local authorities identified under section 43.*
	Page 72	Consulted on the draft SoCC for comment due to the potential visual impact from the offshore wind turbines.
	Page 86	*Table 5.7: Stakeholder meetings during the consultation period.*
	Page 97	Consulted on the draft SoCC in 2022 for comment as they are potentially affected by onshore proposals.
Rampion 2 Consultation Report – Annex 1 Application Reference 5.1.1	Page 369	Additional bodies consulted who are potentially effected by offshore proposals.
	Page 383	Consulted on the draft SoCC in 2022 for comment as they are potentially affected by onshore proposals.
	Page 391	Consulted on the draft SoCC for comment due to the potential visual impact from the offshore wind turbines.

Ref	Written Representation comment	Applicant's response

Rampion 2 Consultation Report – Annex 2 Application Reference 5.1.2.	Page 7	Consulted on the draft SoCC in 2022 for comment as they are potentially affected by onshore proposals.
	Page 26	Reference in 6.1.2 Example letter to LPA
	Page 42	Consulted on the draft SoCC in 2022 for comment as they are potentially affected by onshore proposals.
	Page 146	Reference in 6.5.1 Section 46 notification. Neighbouring local authority.
Rampion 2 Consultation Report – Annex 3 Application Reference 5.1.3.	Page 264	Issue raised by Chichester District Council and Rampion 2 response.

Selsey Town Council

Document	Location	Description
Rampion 2 Consultation Report – Annex 1 Application Reference 5.1.1	Page 13	List of organisations invited to join the Project Liaison Groups - Identified as a Parish Council with a coastal view

Table 2-44 Applicant's Response to Steve Mansell's Written Representations [REP1-156]

Ref	Written Representation comment	Applicant's response
2.44.1	I would like to confirm that I have reviewed and endorse the contents of the Cowfold Resident's Impact Statement that was created following real consultations with local residents in contrast to previous analyses from the Rampion team.	The Applicant acknowledges this written representation. Please refer to the Applicant's response to the CowfoldVRampion written representation in **Applicant's Response to Non-Prescribed Consultees' Written Representations (Document Reference: 8.53)** submitted at Deadline 2.

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Appendix A Correspondence with Stakeholder 28 September 2023

[redacted]

From: [redacted]

Sent: 28 September 2023 15:21
To: [redacted]
Subject: Rampion 2 – Notice of acceptance opens Relevant Representations period and consultation on Outline Fisheries Liaison & Co-existence Plan
Attachments: 2308 EN010117-000177-7.19 Rampion 2 Outline Fisheries Liaison and Co-existence Plan.pdf

Please see the below message issued on behalf of Rampion 2.

Hello,

Please read to the bottom of this email which also includes details of the *Rampion 2 Outline Fisheries Liaison & Co-existence Plan*, on which the Rampion 2 Team would value your feedback.

Further to my email on 14th September regarding acceptance of the Rampion 2 Development Consent Order (DCO) application for examination by the Planning Inspectorate, we have now put up site notices and publicised Notice of the accepted application on our website and to statutory consultees, those with an interest in land, and local and national newspapers, in accordance with Section 56 of the Planning Act (2008). The Notice will be appearing in local and national newspapers in the coming days and weeks, including *Fishing News*.

The Notice summarises the project proposals, DCO application documents and details of how to make representations on our application. The application documents can be found on the Rampion 2 page of the Planning Inspectorate's website here Rampion 2 Offshore Wind Farm | National Infrastructure Planning (planninginspectorate.gov.uk). Any party wishing to make representations (giving notice of any interest in, or objection to, the Application) must register as an interested party and make their relevant representations on this webpage.

The period for submitting relevant representations commenced on Wednesday 20th September 2023 and will end at 11:59pm on Monday 6th November 2023.

The Examination process is expected to take six months, and a final decision on whether consent will be granted will be made by the Secretary of State for the Department of Energy Security and Net Zero by early 2025.

Further to the above, we would welcome your comments and suggestions on Rampion 2's Outline Fisheries Liaison and Co-existence Plan, submitted with the DCO application, as a plan to further develop in consultation with yourselves. The plan can be found on the Planning Inspectorate's website here Rampion 2 DCO Plan - Outline Commercial Fisheries Liaison and Co-existence Plan (planninginspectorate.gov.uk) and is also attached to this email for your convenience. Please return your comments to us in writing, ideally by COB 31st October.

Kind regards,

Meg Kalafat

Work mobile: [redacted]

Office: [redacted]

Brown & May Marine Ltd.
Progress Way, Mid Suffolk Business Park, Eye, Suffolk, IP23 7HU

Certificate number 11957
ISO 9001, ISO 14001, ISO 45001

Appendix B
Correspondence with Stakeholder 19 February 2024

[redacted]

From: Meg Kalafat <[redacted]
Sent: 19 February 2024 17:03
Cc: Ross Clifford; Sophie Farenden
Subject: Rampion 2 - Project Update

Hello,

Please see the below message issued on behalf of Rampion 2.

Dear Stakeholder,

After Rampion 2's application was accepted for examination by the Government's Planning Inspectorate in September 2023, Rampion 2's examination process has now commenced, with hearings starting on the 6th February 2024. Rampion 2 would like to acknowledge that engagement with fisheries stakeholders was much reduced in 2023 in comparison to previous years, however, we would like to clarify that there have been no changes to offshore design or proposals since the last Commercial Fisheries Working Group meetings in November 2022. All feedback shared by the fishing industry at that time (or in advance) has been considered, with responses to feedback detailed in the Commercial Fisheries Chapter of the Environmental Statement (Rampion 2 ES Chapter 10 Commercial fisheries (planninginspectorate.gov.uk)). With nothing new to report and in consideration of the examination process which allows all stakeholders to input if they so choose, Rampion 2 decided not to hold meetings with the relevant Commercial Fisheries Working Groups in 2023.

Regardless of this, Rampion 2 remain committed to notifying stakeholders of their opportunities to engage throughout Rampion 2's examination process and to feed into the draft Fisheries Liaison and Coexistence Plan, prepared for application submission. Emails were sent by the project FLO (Brown & May Marine) in September 2023.

In September 2023, fisheries stakeholders were notified via email of Rampion 2's acceptance for examination and informed that those with wishes to keep informed of, or participate in, the examination process can do so by registering as an *interested party* with the Planning Inspectorate at the Project Page of the Planning Inspectorate website.

Rampion 2 would like to remind fisheries stakeholders of the opportunity to engage with the Planning Inspectorate as Rampion 2's development consent application processes through the examination process, which is primarily a written process. Furthermore, Rampion 2 would like to encourage members of the fishing industry to raise any concerns or feedback which they would like to be considered by Rampion 2 and the Planning Inspectorate, or which they feel may not be sufficiently captured in the document's submitted by Rampion 2 for examination, through the submission of Written Representations.

The deadline to register as an interested party has now passed, however, Written Representations can still be submitted (by those registered as an interested party or not) by the 28th February 2024. This needs to be done on the Planning Inspectorate's website - (Have your say on an application (planninginspectorate.gov.uk)).

The examining authority will decide if submissions by parties that have not registered can be taken into account. If there is any difficulty in using online services, information can also be sent by email (Rampion2@planninginspectorate.gov.uk) or post. Equally it is possible to register to receive any updates from the project, by clicking on the following link (Get updates | Rampion 2 Offshore Wind Farm (planninginspectorate.gov.uk)).

Upcoming deadlines and events relating to Rampion 2's examination can also be found on the Planning Inspectorate's website here.

As the Fisheries Liaison and Coexistence Plan submitted at application is unfinalised (outline), there is still opportunity for fisheries stakeholders to feed into the final draft to ensure it is fit for purpose. Fishers may provide additional feedback through Written Representations, however, Rampion 2 aim to engage with fisheries stakeholders post-consent to finalise this document.

While stakeholders may continue to communicate with Brown and May Marine and the Rampion 2 team as examination progresses, fisheries stakeholders should be aware that examination is a formal, largely written, process and that they should engage through with the Planning Inspectorate to ensure their positions are taken into consideration by the Examining Authority.

Rampion 2 acknowledges that improved communication throughout 2023, to remind fishers of Rampion 2's intent to apply for development consent and to clarify that there has been no change to design since prior engagement with fishers, would have supported understanding of stakeholders and avoided any confusion which may have occurred. With this in mind, and in consideration of recent feedback shared from stakeholders, Rampion 2 are working to develop a clear fisheries engagement plan, outlining anticipated engagement efforts from now through to construction, which fishers will be able to provide feedback on.

We will be in touch in due course, to arrange further meetings following the development of this engagement plan.

Kind regards,

Meg Kalafat

Work mobile: [redacted]

Brown & May Marine Ltd.
Progress Way, Mid Suffolk Business Park, Eye, Suffolk, IP23 7HU

Certificate number 11957
ISO 9001, ISO 14001, ISO 45001

Appendix C
Correspondence with Stakeholder 14 September 2023

[redacted]

From:	Meg Kalafat [redacted]
Sent:	14 September
To:	Meg Kalafat
Cc:	Ross Clifford
Subject:	Rampion 2 Offshore Wind Farm - Application accepted for Examination by Planning Inspectorate

Hello,

Please see the below message issued on behalf of Rampion 2.

I am writing to inform you that on 7th September, the Rampion 2 Development Consent Order (DCO) application for an offshore wind farm off the coast of Sussex, was accepted for examination by the Government's Planning Inspectorate.

We have carried out a huge programme of engagement and consultation over the past three years and have subsequently made changes to the project proposals in response to feedback from statutory consultees and the Sussex community and we thank the local communities in Sussex for taking the time to provide feedback on the project proposals to date.

The application being examined includes detailed proposals for the Rampion 2 Offshore Wind Farm, the final Environmental Statement which sets out potential impacts and mitigations, and a Consultation Report which details the engagement and consultations carried out over the past three years and how the Project Team has taken account of the feedback received.

Situated to the west of the existing Rampion Offshore Wind Farm, Rampion 2, if consented, would include up to 90 turbines a minimum of eight miles offshore. An offshore export cable route would bring the power ashore under Climping Beach on the coast, and the underground cable route would continue inland to a new substation called Oakendene near Cowfold, then finally connect the power to the national electricity network at Bolney in Mid Sussex.

The Rampion 2 Offshore Wind Farm could generate enough electricity to power the equivalent of over one million homes and reduce carbon emissions by around 1.8 million tonnes. This means Rampion and Rampion 2 combined could power the equivalent of all of the homes in Sussex, twice over.

Now that the DCO application is accepted for examination by the Planning Inspectorate, in accordance with Section 56 of the Planning Act 2008, the Rampion 2 Project Team will publicise Notices of the accepted application in local and national newspapers, setting out how the community can register their opinions with the Planning Inspectorate. The public will be able to view the final proposals and register as an 'interested party' with the Planning Inspectorate at the Project Page of the Planning Inspectorate website at Rampion 2 Offshore Wind Farm | National Infrastructure Planning (planninginspectorate.gov.uk). Anyone wishing to be kept informed or to participate in the examination can register at the same website.

The Examination process is expected to take six months, and a final decision on whether consent will be granted will be made by the Secretary of State for the Department of Energy Security and Net Zero by early 2025.

Kind reagrds,

Meg Kalafat

Work mobile: [redacted]
Office: [redacted]

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Progress Way, Mid Suffolk Business Park, Eye, Suffolk, IP23 7HU

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