

*COMMENTS ON ANY FURTHER
INFORMATION / SUBMISSIONS
RECEIVED BY DEADLINE 2 AND
RESPONSES TO WRITTEN
QUESTIONS (EXQ1)*

Cowfold Residents' Comments at Deadline 3

CowfoldvRampion
cowfoldvrampion@gmail.com

Version 1 – 23 Apr 2024

Contents

Comments on any further information/submissions received by Deadline 2	2
Comments on Rampion documents:	2
REP2-003 The Draft DCO	2
REP2-008 Land rights tracker.....	2
REP2-013 Progress tracker	3
REP2-014 Response to Parish Council and MP WRs:	3
REP2-017 Review of IEMA guidelines	5
REP2-018 Action Points from ISH1:.....	5
REP2-020 Response to WSCC:.....	5
REP2-022 Response to HDC:	7
REP2-026 Response to Prescribed Consultees:.....	9
REP2-028 Response to Affected Parties:.....	9
REP2-029 Response to Members of the Public and Businesses:	13
REP2-030 Response to non-prescribed consultees:.....	15
Comments on Submissions by Statutory Consultees.....	19
REP2-034 WSCC:	19
REP2-036 Natural England Covering letter:	20
REP2-040 Natural England response to questions:.....	20
REP2-041 risks and issues log:	20
Comments on non-statutory responses.....	21
REP2-047 CvR response to Written Responses	21
REP2-064 Protect Coastal Sussex Responses to Written Questions	21
CowfoldvRampion Response to Written Questions (ExQ1):	22
Appendices.....	24
Appendix 1: Landscape and Visual Impact Assessment of Oakendene	24
Appendix 2: Water Neutrality and Flooding at Oakendene	27
Appendix 3: Beyond 2030 response to PCS deadline 2 submission	36
Appendix 4: Traffic calculations - impact on Cowfold village centre.....	37
Appendix 5: Kent Street Consultation report by CowfoldvRampion.	49

Comments on any further information/submissions received by Deadline 2

The following is a selective, not comprehensive, comment on the submissions received in deadline 2.

Comments on Rampion documents:

We are disappointed by the applicant's use of their ES to answer the questions/concerns raised in submissions. If we were happy with their ES, these questions/concerns would not be raised.

REP2-003 The Draft DCO

P68 Kings Lane/Moatfield Lane remains on the DCO as a Bridleway 1730 and footpath 1782 scheduled for temporary closure

NB page 106 looks at negotiations with Scottish and Southern Electricity Networks and the National Grid. SSEN appear to be network suppliers in Climping, UKPN at Oakendene and the Cowfold area.

Why is there nothing about UKPN when say they are in negotiation with them about the high voltage cable underlying Oakendene and along the cable route to Wineham?

We disagree with Rampion's intention not to include core hours in the DCO, as we believe this will lead to too much flexibility and deviation from the agreed hours. We also believe that still far too much generally is left to be decided once the project has been approved.

REP2-008 Land rights tracker.

We are of the opinion that the applicant is seeking to over play the extent to which consultation has taken place and progress has been made. For instance, for Interested Party Unique Reference Number (URN) 021, the applicant states that they have 'been in correspondence with the Land Interest since November 2022'. Whilst that may be true, it has not been about the land, until instigated by the IP.

Similarly, URN 028 has indeed been contacting them since August 2021, but again, nothing to do with resolving the question of disrupting the only access to her home.

URN 036: The applicant states that they have been in regular correspondence since July 2021. There has been some communication but not about any land rights. The applicant states: 'It is anticipated that Heads of Terms will be issued in due course.' The IP denies any discussion about heads of terms. A series of key outstanding issues is crossed out as if they are now resolved. This is not the case.

URN061: "The Applicant has continued to offer to work collaboratively with the Land Interest, and the latest correspondence with the Land Interest was in January 2024. Heads of Terms were issued to the Land Interest in January 2024." This collaborative working is in direct contradiction to the experience described by Lester Aldridge (REP1-168)

In the case of URN 002,016,018, 020, 021, 023, 027 the applicant seeks to make it appear that consultation has taken place in an acceptable way with the IPs. This is not true; IPs have struggled to get any meaningful information from the applicant. Also of note is that the applicant admits the consultation did not commence until October 2022, and even then, mentioned the contact was due to proximity to the cable route, which is not even correct apart from for URN 027.

In the case of URN 025 it can be seen that consultation did not even begin until *April 2023*

045 Knight Frank LLP (Knight Frank LLP) On Behalf of Oakendene Estate -- Langlands-Pearse and Others (Oakendene Estate -- Langlands-Pearse and Others) "*The Applicant and the Land Interest have met on numerous occasions, over a three-year period (2021 to 2024) negotiating terms for an Agreement for Lease for the use of the land for the Rampion 2 Substation Site.*" It seems unlikely that such negotiations would have been going on a year before the decision to 'choose' Oakendene was made.

REP2-013 Progress tracker

It is noticeable how little progress has been made nearly half way through the process, most items remain Amber, and the highly significant SDPA issues remain in Red, and are likely to remain so.

REP2-014 Response to Parish Council and MP WRs:

Table 2-1 Andrew Griffith

It is not acceptable simply to side step the reinstatement issues concerning Rampion 1. They are not irrelevant, as the applicant claims, because they are indicative of the likely reality of the reinstatement, mitigation and BNG claims made by the applicant

Table 2-3 Bolney PC

1.5: The PC reminds the applicant that "During these 'shoulder hours' **only quiet setting up and closing down of the construction sites was permitted and no loading or unloading of HGVs or other deliveries.** The reason for the quiet hours was to protect the amenity of local residents".

Rampion appear to be including far more in these shoulder hours than they were originally intended for: "The activities permitted during the shoulder hours include staff arrivals and departures, briefings and toolbox talks, **deliveries to site and unloading**, and activities including site and safety inspections and plant maintenance. "

1.10: We strongly support Bolney PC in their concerns that LGV and private worker vehicles will use the small lanes, not only around Bolney, but even more so around Cowfold, such as Picts Lane and Bulls Lane, (even Kent Street, where they will encounter construction vehicles), to avoid the congestion.

1.13: Bolney PC raise the issue of what happens when there are traffic lights on the A272, which is largely true, although we challenge their statement that 'Even without the use of traffic lights, queuing traffic can sometimes back up from Cowfold to the junction with Wineham Lane in the Parish of Bolney.' This *can* happen, but rarely; on a daily basis, the traffic from Cowfold village seldomly reaches back to Wineham Lane, but frequently passes Oakendene and extends towards Kent St. Aside from this, Bolney PC are speaking here from years of experience of what happens on this road when traffic lights are needed. This highlights the impossible dilemma which Rampion face and are refusing to face up to: with traffic lights, there will be dreadful queues on the A272. Without lights, there are still likely to be significant queues as vehicles stop to turn across the busy and often queuing traffic, or find it impossible to get out of the compounds (it is not unusual, even outside peak hours to be waiting for over 5 mins to get out of side roads in this part of the A272). There are also 3 entry and exit points very close together on this busy road. However, there will also be more accidents as visibility is extremely poor. It should be remembered that, even some decades ago when the traffic was much lighter, the main entrance to Oakendene Manor was moved from close to the proposed A63 as even in those days it was too dangerous. For safety reasons, traffic lights will be essential.

Please also note that while appearing to appease Bolney PC and allay their concerns, they do not in fact provide reassurance on all the access points, only one: *“On the basis of these peak construction traffic flows is not anticipated that traffic signals will be required at access A-63.”*

We challenge the figures as a significant underestimation, as the Applicant’s figures for traffic at A62 and A63 give peak week HGV numbers of **130** at A62 and A63 **combined**(652 total weekly HGVs divided by 5.5 days) whereas the Rampion 1 traffic appendix (Doc Ref 6.3.29 from the Rampion 1 archives) shows HGV numbers of **124** per day (a then increase in traffic flow of 10.2%, based on 16132 vehicles per day when the Rampion 1 DCO was submitted) and worker vehicles of 274 a day, **none of which arrived via A272 (all worker vehicles came from the south via the Albourne Road)** Rampion 2 is a much bigger project, and the background levels of traffic are significantly higher now, which will lead to congestion much more readily. In addition, there was no complicated ‘dance’ of traffic in and out of 3 close entry points, **all** worker vehicles will come along the A272 and Rampion 1 had no impact on the AQMA, being much further away.

1.16: Bolney PC very sensibly raise the concern that a holding bay must be included, again based on their actual experience. The applicant replies *“As the Proposed Development includes the Oakendene substation and compound that can be accessed directly from the A272, (which forms part of West Sussex County Councils’ (WSCC’s) lorry route network) it is not considered necessary to implement an HGV holding area.”*

Again, this shows a complete lack of understanding of, or indeed interest in, how the traffic *actually* behaves on this very busy road. Bolney PC’s question is based on very real experience of Rampion 1, not theoretical calculations as are Rampion’s traffic assessments.

Table 2-5 Cowfold PC

1.8: Regarding the parish Council’s concerns about the quality of the surveys locally, the applicant responds: *“The Applicant notes that Natural England have not highlighted a lack of survey information as a concern in terms of reaching conclusions within the Ecological Impact Assessment (see Deadline 1 Submission – Natural England’s Risk and Issues Log [REP1-059a].”*

However, it would appear from Natural England’s Deadline 2 submissions that they have revised this opinion in the light of IP submissions.

1.10: The applicant produces a list of HGV and LGV movements which, they believe, ‘proves’ that there will be no significant effects on traffic in Cowfold. This does not take into account the bottle neck effect of the mini roundabouts nor the impact of one vehicle every 7 minutes going in or out of A63 and A62 and the backing up into the village which will occur, or indeed the hundreds of passenger vehicles all trying to get in to them in the morning and leave in the evening.

Their reasoning is that *“As noted within Institute of Environmental Management and Assessment (IEMA) 1993 publication Guidelines for the Environment Assessment of Road Traffic (IEMA, 1993), an increase of less than 10% is not discernible environmental effect as is within day-to-day fluctuations in traffic flow.”* However, we know that these ‘day to day fluctuations’ **already do** cause major impacts on traffic flow.

Moreover, the EATM 2023 guidance also states in paragraph 2.17 that it **may not be appropriate to use this criteria for the assessment of air quality, noise, driver delay and road safety**. See para 1.2.8 of REP2-017 below. This confirms our contention that congestion is not a simple matter of traffic flow. The concerns of this community are based on the reality of every day traffic experience, not theoretical, flawed calculations as Rampion’s assessment is.

In addition, the increase in traffic flow on Kent Street is vastly more than 10%. Why have they consistently failed to provide any assessment of this tiny lane?

REP2-017 Review of IEMA guidelines

Both GEART and IEMA guidelines use the following to assist assessment of environmental effects of traffic:

Rule 1: Include highway links where traffic flows will increase by more than 30% (or the total number of heavy good vehicles will increase by more than 30%).

Rule 2: Include highway links of high sensitivity where traffic flows have increased by 10% or more.

We know that Rampion's use of Kent Street will more than double the total traffic on the lane and that the HGV use will increase by 4000% from the current daily number of 0-2(See ENSO energy survey data).

We would like to ask the Applicant if the Tables include delivery vehicles coming from other companies to the sites, or just Rampion's own vehicles?

Para 3.1.2 and 3.1: we strongly object to Kent Street being assessed as Rule 2 as on all criteria it is clearly in Rule 1

We dispute the fear and intimidation findings for Cowfold (link F) as when large vehicles are crossing the mini roundabouts in the village, and especially turning eg to go south down A281 or east to Oakendene, they often climb on to the pavements as they are too large. This is most definitely a cause of fear and concern for residents, especially the elderly, and parents of children walking to school, and has been the cause of accidents in the past.

Even more ludicrous is the 'negligible' conclusion for Kent Street, which has been downgraded from the 'moderate adverse' from GEART: "3.2.32 *The assessment using GEART 1993 Guidance within Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] concluded that the magnitude of change was Low and the significance of residual effect on fear and intimidation was Moderate Adverse (Significant). The assessment of fear and intimidation based on the EATM 2023 guidance therefore represents a change from the conclusions of the ES, with a removal of a significant effect for Kent Street.*" How convenient! But both are reliant in any case on a flawed estimate of current HGV numbers which have no basis in actual fact but are simple guesswork. The Hazard scores are nonsensical for a small lane like Kent Street as this totally fails to take into account that pedestrians and animals which walk there are usually **in the middle of the road and that there is nowhere else for them to go.**

REP2-018 Action Points from ISH1:

Agenda Item 3, Traffic and Access,3: We do not agree with the Applicant's view that the construction hours should not be on the DCO. There is no reason why an appropriately restricted Application for Amendment paragraph should not be included. The whole purpose of inclusion is that amendment should be exceptional. The applicant's seeking to enable otherwise should be a cause for concern.

REP2-020 Response to WSCC:

8.5: The applicant continues to remain in denial that there will be an adverse effect on the West Sussex economy, despite overwhelming evidence to the contrary

9.27: The applicant continues to remain in denial that the landscape impacts have been downplayed, despite overwhelming evidence to the contrary

9.37: As one can see from Rampion 1, even 10 years is not long enough to have much impact on the brutal landscape impacts of the substation, which are unlikely to be mitigated in the lifetime of the substation.

9.57: We disagree with the view that there will be no impact on the AONB. The report commissioned for HDC for the battery storage farm application adjacent to the proposed substation site suggests otherwise. (For detail, please see Appendix 4 below). Also, much of the 'dense vegetation' will be removed by the applicant, and their reasoning does not take into account the worsened impact of the bare deciduous trees in winter, or at night.

9.58: It is unacceptable for Rampion to claim that *"A viewpoint was considered at the new access point, but safety concerns precluded this location and Viewpoint SA2 was provided as an alternative."* We have provided multiple photographs from along this stretch of road without succumbing to injury. The truth is they sought to downplay the impact. To make matters worse, the viewpoint photographs from SA2 do not show the extensive removal of mature trees, hedging and scrub which will take place.

10.59: With regards to core working hours, REP1-009 Traffic Generation (tracked) paragraph 5.5.4 states: *"Generally, onshore substation construction will take place during daylight hours"* How is this consistent with core hours of 8am to 6pm and shoulder hours? Day light ends around 3pm in midwinter and it is still dark at 7am.

Table 13, 13g: The applicant fails to give any explanation to WSCC as to why open cut trenches must be used at Moatfield/Kings Lane. It is unacceptable that they are preventing access to so many homes. They continue to claim that they will be able to allow access when needed, including for emergency vehicles in the optimistic hope that if they keep saying it, it will somehow happen! This is just not possible for lanes like Moatfield/Kings Lane, as any rational person can see.

13.5: In response to WSCC question about transport impacts the applicant says *"Specifically related to parking, the Outline Construction Workforce Travel Plan [APP-229] includes the provision of multioccupancy vehicles to transport construction workers from temporary construction compounds to individual construction sites and will reduce the number of single occupancy vehicle trips and parking demand generated by the Proposed Development."* **Fine up to a point, but they still have to get to the compounds in the first place.** In addition, the Outline Operational Travel Plan [APP-227] notes that staff travelling by car share *"will be given priority over single occupancy car parking spaces."* **This is nonsense; what will happen to the workers who turn up in single occupancy vehicles and are not given priority; will they be left to clog up the surrounding lanes and highways?**

Similarly, to assert that *"these documents include a range of measures to promote walking, cycling and public transport"* is a misleading statement at best: we all know this is simply not possible for the substation or most of the cable route; there is no public transport and the main roads are too dangerous for cycling and walking.

13.25: We are delighted that WSCC has understood and accepts the serious concerns about the movements in and out of several access points so close together off the A272 and the congestion and safety issues which will arise. However, the applicant simply avoids addressing this at all.

13.27: Repairs to all roads, major and minor, must be carried out on an ongoing basis to ensure safe use by the public. However, this ongoing repair work will also cause significant disruption, particularly on minor roads such as Kent Street, which are likely to require temporary closure to carry out the work.

13.28: WSCC points out safety issues for pedestrians etc on Kent Street. Rampion dodges the answer.

13.29: WSCC highlights the impact on congestion at peak times. Rampion fails to understand that the shoulder hours they mention, and the beginning and end of their working day are precisely those hours when the A272 is busiest, and is when most of their traffic will be coming and going to and from the compounds.

They indicate they will operate a booking system, for deliveries to construction sites, to be spread across the working day 'where feasible', but they also that there is no need for a holding bay or a booking system to arrive at the compounds in the first place, which is obviously nonsensical.

15.3: We strongly agree with WSCC's view about the negative impacts on Oakendene Manor and believe that HDC is misguided in its conclusion that the impact would be less than substantial

16.3: For a detailed response, please see Appendix 2: Water Neutrality and Flooding below.

REP2-022 Response to HDC:

Table 2-1:

2.1: *"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. "*

Possibly, but only for a maximum of 5 years. Please see Appendix3: Beyond 2030 below.

3.3: *"The proposal for a Battery Energy Storage System is on land partly within the Rampion 2 cable corridor. Rampion Extension Development Ltd is confident that the two schemes are compatible and can both be built."*

We do not agree with this; there are significant conflicts between the mitigations required for the Battery Storage Farm and the cable route (which cover the same ground), the PRoW across the northern part of the field, and the need for fire service emergency access whilst the cable route is under construction. It is the case that both schemes appear to have the same parent company and that there is an argument the battery proposals should more honestly be included in the DCO. It seems highly unusual that a company imposing so many restrictions on landowners along the cable route, should be happy to accommodate this. Rampion's light dismissal of the problems faced by accommodating this proposal should ring alarm bells and a detailed plan of how the two will work together should be sought from the Applicant. Also please see the Landscape and Visual discussion in Appendix 1 below.

8.16: The applicant does not attempt to address HDC environmental concerns. They are simply dismissed as 'there won't be any'. We disagree with this as the impact on the A272 and Cowfold village will be significant.

8.17-18: The response to these concerns is typically too vague

9.16-17: The applicant ignores the evidence cited by HDC and by CowfoldvRampion for damage done to feeding, breeding and foraging creatures. The 'explanation' given is presented in such a way as to confuse, and doesn't actually explain anything. They ignore species well known to be affected by noise such as nightingales and other birds, and insects, which are the essential anchor of the food chain.

9.21-23: During construction the Applicant says that *“In terms of water neutrality during the construction phase of the wider Proposed Development, water for construction usage in the Sussex North Water Zone will not be taken from the mains and it will instead be imported from outside of the Zone via tankers to main compounds (for their welfare facilities systems and wheel washing) and Trenchless Crossing compounds (for welfare facilities, use in horizontal directional drilling (HDD) drilling fluids, batching of cement bound sand or concrete, wheel washing and dust suppression).”*

We agree with HDC that the tankering in of water for such an extensive number of requirements is unrealistic. It will add **significantly to the daily vehicle movements to the compounds and Kent Street**. Also, all of this copious amount of water, including for the daily wheel washing of hundreds of vehicles, will end up via the Cowfold Stream in the Adur. In the winter months this will exacerbate the already critical flooding problems.

10.22: We completely agree with HDC and find the Applicant’s comments to be disingenuous rather than a genuine attempt to address the questions. They have selectively chosen a phrase from the GLVIA guidelines to suit, but in fact when specifically discussing Kent Street in the Design and Access statement, Doc ref 5.8, section 3.3.3 they argue that people will be ‘focussed on driving’ so won’t notice the substation! The applicant notes that although there are supposedly walkers there is no footpath provision. This is to fail to understand the key point: *the lane is so quiet that footpaths are not needed*. Its main users are pedestrians and equestrians *and they are in the middle of the road*.

11.99: The Applicant’s response to a very reasonable argument about the levels of pollution from HGVs is wholly unconvincing. Again, they show that they have no real idea or understanding and simply alter the ‘facts’ to suit. Their argument distils to ‘actually the number of HGVs now won’t be as many as we said (Evidence?) so there won’t be a problem.’ How can *any* of the facts and figures they give us be believed therefore?

14.7: Sequential Test and Flood risk. We utterly dispute the Applicant’s argument that Paragraphs 9.1.29 to 9.1.40 of their Flood Risk Assessment document gives convincing evidence that the sequential test was applied, and if HDC thought so, they would not have asked the question. Our photographs and Rampion’s own maps show a very different picture.

Table 2-2:

B4: We disagree with the Applicant that during operation the visual effects from A272 and Kent Street will reduce to non-significant levels. Due to the extensive removal of mature vegetation, the size and final height of the substation, the fact that the A272 looks down towards the substation area and the extent of the substation along the length of so much of Kent Street, we are of the view that it will remain very visible for the entire lifespan of the substation.

B11: We would like to see a clear explanation of how meaningful advance planting is possible when the whole area will be used as a vast compound, and a bellmouth will be created destroying much of the existing vegetation. Hedge row ‘management’ in reality means hedgerow ‘removal’ at this site.

B12: We agree with HDC: again, the Applicant’s response is simply not credible, ignoring the reality and arguing the impossible.

B35: We disagree with the Applicant most strongly that there will “generally be no view of the substation and the existing rural character of the landscape will be retained.” Please see Appendix 1 below, in which a report commissioned by HDC reaches a very different conclusion to Rampion, for a much smaller proposal.

Table 2-5:

2.1: Deliveries, loading and unloading are still included in their planned shoulder hours. We refer you to Bolney PC's original representation: "During these 'shoulder hours' only quiet setting up and closing down of the construction sites was permitted and **no loading or unloading of HGVs or other deliveries**. The reason for the quiet hours was to protect the amenity of local residents."

Rampion say "*The use of shoulder hours, prior to main construction working hours, provides a buffer period for HGVs to arrive on site.*" This means that they will be competing with the busy morning traffic and will then all be moving off again *across* this peak traffic to their allocated sites.

2.3: The Applicant does not answer the question about workforce vehicles

REP2-026 Response to Prescribed Consultees:

Table 2-1 Response to Historic England:

6.5: Significant Effects are identified at Oakendene Manor. Whilst the Applicant points out that HDC believe the impacts to be less than substantial, they omit to say that WSCC, the main local authority heritage advisor, do not agree with HDC.

REP2-028 Response to Affected Parties:

Table 2-4 Response to Andrew Porter:

The response is unconvincing as to how emergency access can be provided or the likely success of the rubber matting

Table 2-8 Response to Emily Ball:

2.8.10: The environmental constraints of the alternative substation site are unconvincing as the hedge and tree loss at Oakendene is severe, as opposed to the mere proximity of a wood at the alternative, also the environmentally sensitive cable route to Oakendene must be considered an essential part of the assessment. If studies had indeed been done in a timely manner, this would have been obvious to them.

2.8.14: We do not agree that the Wineham Lane North site is only marginally preferable from a flood risk point. Our photographs and site visits provide evidence that there is a considerable difference.

2.8.16: The response does not address the legitimate concerns regarding viability of the Oakendene Industrial Estate other than to say it will not be an issue. The traffic numbers do not appear to include the traffic going in and out of the compounds and heading west, which is the majority, and the effect this will have on the flow of traffic on the already congested A272. The applicant directs her to a document over 1500 pages long, which mentions concerns raised about the industrial estate in various RRs but makes no attempt to address them!

They say access 'will be facilitated', but the truth is they have no idea how, even after over 3 years of 'consultation'.

2.8.19: With regards to safe movement of traffic in and out of A62, A63 and Kent Street, the applicant's "*aim*" is to reach agreement in principle on the layout of each of these access junctions prior to the end of the Examination. This means nothing at all; people 'aim' to do all sorts of things they never actually do.

With regards to the impact on Kent Street, the Applicant says: "*[we] concluded that the Proposed Development would generate significant environmental effects on Kent Street on fear and*

intimidation, pedestrian delay and pedestrian amenity.” They omit to mention that they have now downgraded this assessment to not ‘significant’ in the latest review (REP2-017, para 3.2.32).

2.8.29: Please see Appendix 2 below

2.8.34: As we have previously pointed out, the references to Janine Creaye’s evidence in the documents cited, is of the briefest nature and does not explain how they have taken it into account or indeed if they have done so at all.

2.8.38-40: The idea that water can be adequately tankered in to the compounds for the massive requirements there will be or down tiny lanes to TCC compounds is unrealistic. Also, the water will simply end up in the Cowfold Stream and will affect water neutrality. At times of heavy rain, where will it go?

2.8.42: With regards to the UKPN high voltage cables: *“The Applicant is aware of 2x 132kV circuits crossing a part of the area proposed for the onshore substation. The Applicant is in contact with the asset operator and will work with them to divert the existing power line away from areas required for the Proposed Development.”* There is no evidence that the Applicant has actually done so. UKPN do not feature in the draft DCO document or in any written representation. We have no information on how this diversion will affect A272 or Kent Street, or an impact it may have on planting at the substation.

Table 2-9 Response to Fred Turok:

2.9.5: The Applicant effectively dismisses Mr Turok’s concern about employment on the grounds that it ‘won’t be an issue’ and then quotes a number of irrelevant sections from the ES

2.9.10: *“At peak construction access A-62 and A-63 will serve approximately 600 two LGV movements per week (300 in and 300 out) or approximately 120 movements per day (60 in and 60 out). This is the total number of LGVs which includes delivery of equipment and materials that will be spread across the working day through use of the Delivery Management System (as noted in the Outline Construction Traffic Management Plan (CTMP) [REP1-010]). Whilst the Applicant accepts that there will be a peak in construction worker movements at the start and end of each day aligned with the proposed construction working hours it is not anticipated that these movements will be significant enough to require traffic signals.”*

These LGV numbers are far smaller than the numbers given to Bolney PC in REP2-014 para 1.13 (456 for A62 and 564 for A63).

NB also, this appears to accept that construction worker vehicles are NOT included in the LGV numbers, and WILL peak at the beginning and end of the day. BUT they do not anticipate this will cause much of a problem. It WILL! From Rampion 1, we ‘anticipate’ at least 350 passenger vehicles a day trying to cross the traffic to access or exit the compounds.

They then go on to say ‘but if traffic lights are needed...’ In other words, there IS no plan for the acceptable management of the construction traffic. After 3 years they have not come up with one. This should NOT be left until after the granting of the DCO.

2.9.11: To say that they have seen HGVs accessing the industrial estate is disingenuous and does not address the point, which is the *extent* of use by such vehicles

Table 2-11 Response to Green Properties:

2.11.7: The Applicant may take up to 7 years to begin work, if granted permission. In the light of the Beyond 2030 report (See Appendix 3 below) it is possible the nation may benefit from its contribution to net zero *for only 3 years*.

2.11.8-9, 25: The Applicant is very careful as to the wording of the response to this. It is surely too much of a coincidence that JBM Solar and Enso Energy, both with parent companies in the Macquarie company group are approaching landowners in the immediate vicinity of the substation site. The numerous applications around the Wineham substations would not appear to have such links. It is also perhaps merely coincidental that there also appears to be an excessive width of land in the DCO at the Enso Energy site as we have previously noted.

Table 2-13: Applicant's Response to James Smethurst

2.1.7: The author asks: *"In addition, at the onshore substation, plot number 33/9 is listed for both environmental mitigation and the substation construction (works numbers 16 and 17). How can the whole plot possibly be used for environmental mitigation? Has the entire plot been included in the environmental mitigation calculations (i.e. overestimating), and has the extensive destruction of habitats on the site also been included? (i.e. ensuring the negative balance is correct-similarly for any other mitigation site)"*

This is an important and legitimate question, which the Applicant **does not answer**.

2.1.9: The latest Land Rights Tracker overplays the progress made and is not reflected in the experience of the landowners who comment in RRs and WRs

2.1.10: *The applicant was asked to provide a convincing explanation of why the Rampion 1 cable route had not been reused (followed from Andrew Griffith's OFH speech)*

We do not find the Applicant's answer convincing

2.1.15: *The need for a holding bay as for Rampion 1 was to be considered*

The applicant replies: *"Given that the Oakdene compound and substation can be accessed directly from the A272 (part of the West Sussex County Council's lorry route network and the conclusions of the ES, the Applicant does not consider it necessary to implement a holding area for HGVs as part of the Proposed Development."*

This shows a continued lack of understanding of the traffic on this road, and the fact that, frequently *they will not be able to access the compounds* because of queueing traffic, and that getting in and out of the compounds will make this worse.

2.1.16: The Applicant is asked about how traffic turning in and out of the compounds and Kent Street can be safely managed on the A272 if there are to be no traffic lights We disagree with the conclusions drawn by the Applicant as the methodology on which it is based is flawed. (see Appendix 4 below) This community knows from daily experience that even one or two vehicles waiting to turn can bring the A272 to a standstill.

Table 2-14: Applicant's Response to Jeremy Smethurst

2.18.21: Whilst we are pleased that the Applicant can confirm that Picts Lane, Bulls Lane and Longhouse Lane are not permitted construction traffic routes for the Proposed Development, this is to miss the point of the question, which was to ask how the Applicant proposes to prevent the rat-

run use of these lanes whenever there is congestion on the A272. Their own delivery and passenger vehicles will also do this as all drivers will seek to use the fastest routes. As the Applicant does not accept there will be any congestion, despite all evidence and experience to the contrary, perhaps this is why the question has not been answered?

2.18.22: Although lengthy, the answer is mainly about operation not construction and does not really address the flood risk concerns raised

2.18.25: The 'anecdotal evidence' of flooding is in fact from Rampion's own surveyors and includes far more than just the southern boundary.

In the Sources of Information and Consultation section on Page 9 of the flood risk assessment document it is clear that HDC were not involved in the meetings about this topic until June 2022. The author asks **why** HDC were not present

The applicant replies:

"With regard to flood risk, WSCC as the 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) 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 them. At that meeting in April, the Applicant was subsequently made aware that an informal agreement between WSCC and 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."

We do not find this argument convincing, especially as *"Wood agreed to check and communicate which districts the substation option sites are in (MSDC or Horsham Council)." GD actioned - "Bolney Rd/ Kent Street Substation Option lies within HDC and the Wineham Lane North Option lies within MSDC"* In other words, up to that point they did not know that Oakendene was in Horsham district and had not been engaging with HDC about the site options, only Mid Sussex, skewing the decision-making process. Also, Mid Sussex had been to previous meetings. This is another attempt to try to cover up failings in the process.

Another problem is that, apart from the list of attendees and the Action Summaries, the minutes of the two meetings are identical.

"The Applicant acknowledges and apologises for the fact that the meeting minutes for the 22 June 2022 meeting held with WSCC, Arun District Council (ADC) and HDC are erroneously duplicated in Appendix A of Appendix 26.2: FRA, Volume 4 of the ES [APP-216] for the 1 April 2022 meeting following page 1. The Applicant notes therefore that the respondents have not been party to all the relevant meeting minutes.

The Applicant will consider resubmitting the Flood Risk Assessment with the correct minutes for the April meeting in full." Why only 'considering'?

We look forward to seeing the minutes in full.

2.18.39-41: These questions about the flooding at Oakendene and Cratemans are not addressed

Table 2-16 response to Henry Smethurst:

2.15.11: The author asks for details of how modelling has taken into account the impact on traffic flows and pollution at this point, *based on an understanding that the traffic is not free flowing through the village*. The applicant attempts to deliver a seemingly convincing answer, but based only on a partial truth. Please see Appendix 4 below for further details.

Table 2-17 Response to Meera Smethurst:

2.1.10-27: We welcome the ExA's decision to investigate these ecological considerations more fully in their latest Written Questions to Natural England and others for deadline 3.

Table 2-23 Response to Richard Luce:

2.22.2: We agree with Mr Luce's comments about Cratemans Farm which are, in his case, the result of observation over many years and we welcome the ExA's request for further assessment in the Written Questions for deadline 3 and for an accompanied site visit.

Table 2-27 Response to Ralph Dixon:

The experience of this landowner is reflected in numerous other WRs who complain of the 'failure to engage and consult sufficiently' e.g. Green Estates, Wiston Estate, Bill Brock and others. We have also experienced this with regards to so many aspects of the consultation, in particular the traffic and economic concerns and the continued denial of any negative ecological impacts, rather than any attempt to engage and address these issues. Can so many people be mistaken in their recollections, and only Rampion be right?

REP2-029 Response to Members of the Public and Businesses:

Table 2-4 Response to Atspeed:

This is a business on the Oakendene Industrial Estate. The applicant simply does not address his legitimate concerns about access to the industrial estate. Instead, they just provide 'evidence' as to why there will not be a problem. The documents Rampion lists have nothing in them about traffic management at Oakendene other than to say there will be some. Local people know far better what the reality will actually be. Their view is based on actual experience. Please listen before it is too late!

Table 2-7 response to Christopher Guy:

2.7.2: It is simply not credible that '*no significant effects on terrestrial ecology or ornithology are likely to occur as a result of the Proposed Development*', when hundreds of metres of hedge are to be removed, plus numerous significant trees and the disruption of connectivity and the loss of red list habitats

Table 2-8 Response to Clare Woolcock:

2.8.1: Everyone except Rampion must surely be agreed that the visual representations are wholly inadequate; a complaint echoed up and down the affected parts of the county. Why not admit it and seek to do better?

"The site is partly screened by existing mature vegetation and the design process focuses on protecting and enhancing this existing screening." In fact, much of this 'mature screening' is to be torn out, especially with regard to the visual impact from the A272

Table 2-9 Response to Connie Davies:

The author asks "How is it possible to ensure that excavation works and piling will not result in an increase in flood risk downstream?"

Rampion reply *“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 an extraordinary statement in many ways:

- it acknowledges that water will have to be discharged in to the stream.
- It cannot infiltrate if the ground is saturated, as it has been for much of this winter, so it *will* be affecting the water levels downstream.
- The water levels in the Cowfold Stream change rapidly and unpredictably and there may not be flood warnings. There have in fact been numerous warnings this winter. Does that mean work will cease for much of the season? If so, it will only occur when in conflict with breeding seasons instead.

2.9.35: It is not acceptable that groundwater monitoring will only be done post consent. We must have a clear understanding of final ground levels and detailed design *before* being able to fully assess impacts on the landscape, AONB etc

Table 2-12 Response to Elizabeth Morogna:

2.12.12: The Applicant’s response to key concerns about insect loss is misleading, possibly deliberately so: *“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).”*

These studies do not mention insects because they are not about insects. This is *not* the same as saying they conclude insect collision is not a risk. Common sense would suggest that it is highly likely that significant impacts do occur; one only has to think of the insects on car windscreens in the summer months. It is true that there are fewer studies than for birds and bats, but those which have been done show significant effects on this vital part of the food chain. Eg **Insect fatalities at wind turbines as biodiversity sinks** Christian C. Voigt, Journal of Conservation Science and Practice Volume 3, Issue 5, January 2021. This study looks at insects attached to the blades of wind turbines and concludes that 40 million insects may be killed by a single turbine each year, and that this may be an underestimate as many insects, especially larger ones, do not stick to the blades. **This is in fact a phenomenon well known to the wind turbine industry** as insect remains that stick to the leading edges of blades during low-wind periods can halve power generation during high-wind periods (Corten & Veldkamp, [2001](#)). Consequently, insect contamination of blades constitutes a significant problem for wind energy companies (Wilcox & White, [2016](#)), which led to the invention of cleaning techniques and the emergence of a service industry that removes insect and other detritus from blades .

Table 2-15 Response to Janine Creaye:

This is a shameful failure to address the important issues raised here. At best, they simply reiterate passages from the ES, which do not in fact address the concerns. At worst, they ignore the questions and issues raised altogether. This appears to be a common tactic employed by the applicant: see Applicant responses to submissions from Susie Fischel, Wistons, CowfoldvRampion Impact Statement traffic responses, or Sue Davies and Sue Ball asking about visual impacts and terrestrial

ecology-The applicant simply quotes their ES or reiterates 'no significant effects'(See Table 2-40, and Table 2-41) With regards to the environmental concerns, we are pleased that the ExA *has* listened and has asked for a further assessment by Natural England amongst others.

We remind the Applicant that all our data is verified by the Sussex Biodiversity Records Office, or in the case of the most recent data, is in the process of being verified.

REP2-030 Response to non-prescribed consultees:

Table 2-4 Applicant's Response to The Littlehampton Society:

1.5: The first paragraph is misleading; it gives the impression that insects are assessed in a number of ES documents. **In fact, there is no mention of insects in the documents listed.** Insects then appear to be scoped out of further assessment, for no convincing reason.

"The ES assessments undertaken have concluded that no significant effects on marine ecology, terrestrial ecology (including bats) or ornithology are likely to occur as a result of the Proposed Development". This is no more credible for the marine ecology than it was for the land. (See REP2-029 table 2-7 above), or indeed, for traffic impacts (see REP2-014 table 2-5 above)

Appendix A: Applicant's Response to CowfoldvRampion's Written Representations [REP1-089]

2.4.2: The Proposed Development will *not* make much contribution to the government target to achieve Net Zero by 2050. It will be superseded by the plans to distribute the excess power already available, or soon to be, by 2035 (see Beyond 2030 report and discussion Appendix 3 below).

2.6 Collision risk:

2.6.1: *"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."*

This statement is bizarre and appears to go against all common sense. Where is the evidence for this statement? Birds are of course seen soaring above this height all the time. It is well known that birds can fly at several thousand feet. In fact, the Scottish Government provides guidance for windfarms to assess the likely impacts of their turbines on bird species: their **"Offshore wind-birds on migration in Scottish Waters: strategic review"**, published 16 October 2023, contains detailed assessment of the impacts on a number of species. The following is a typical statement from the report:

"Assuming a minimum rotor height of 22 m above highest astronomic tide, data from the North Sea suggest that between 25 and 50% of flights may occur at rotor height. In light of the uncertainty surrounding this estimate, it is recommended that a precautionary estimate of 50% of flights at rotor height are assumed."

However, in some cases the conclusion is for 100% of a species to be at risk:

"Estimated mean flight heights for European White-fronted Geese are well within the rotor sweep of planned and existing offshore wind turbines. For this reason, it is recommended that a precautionary assumption of 100% of flights at collision risk height is used for the purposes of collision risk modelling."

The data is provided by a number of sources including BTO and RSPB, and provides rigorous scientific information, including telemetry tracking of birds, as often robust data is only available from onshore sites.

We would be grateful for comment by Natural England, SWT and SOS if possible.

If further evidence were to be needed:

The above video shows a large bird being struck and killed by an "environmentally friendly" wind turbine. If this bird had died as the result of an oil spill, it would have been broadcast all over the news media. There is plenty of evidence to show that hundreds of thousands of bats and birds are killed by wind turbines every single year. Why should the Rampion wind farm be different?

Natural England would appear to agree that there is substantial risk: **REP2-040(see Q9-1, black-backed gulls)** *"Natural England considers that there is evidence to suggest that the cumulative impact on great black-backed gull due to collision risk is 'moderate adverse' i.e. significant at the EIA scale, and the contribution of Rampion 2 to this impact is substantial."*

2.6.3: *"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."*

Natural England do not agree. From REP2-036: *"Our review of the documents submitted since our relevant/written representations have raised some significant terrestrial ecology concerns, particularly in relation to protected species, which we note are also reflected by other interested parties' submissions. "*

In REP1-168, the Interested Party's agent also raises the same kind of concerns as we do about the adequacy of the ecology surveys, in a different part of the DCO area, strongly suggesting our concerns about Rampion's surveys are more widespread:

- Page A-22: *"classification by WSP of all his hedges as unimportant, whereas Arborweald strongly believe all 5 meet the criteria for Important."* We believe Rampion's approach to the ecological assessment, as described by Perry Hockin and Arborweald has also been 'de minimis' at Oakendene and the northern cable route from Cratemans to Oakendene.
- Page A-23: *"One of the arguments presented by Rampion Extension Development Ltd. throughout the consultation process is that because wind power is effectively 'eco-friendly' and provides clean power – facts that are not in dispute – damage to habitats in the 'short' term is acceptable. This goes against the NERC Act 2006, the Environment Act 2021, the NPPF 2023, and the Conservation of Habitats and Species Regulations 2017, all of which legislate the need for biodiversity to be accounted for in any development, regardless of the benefits of that development."* The criticism that Rampion ride roughshod over the environment in the name of Green Energy is one which we share.
- Page A-53, para 5.36: Rampion have failed to recognise all trees, just as they have at the northern end of the cable route and Oakendene, downplaying the connectivity and the impacts of its loss.

- Page A-54, para 5.47: Value vs importance of hedgerows. This entirely chimes with what we see of Rampion's hedgerow assessment at Oakendene and the northern cable route
- Page A-60, para 6.8: The cable route between Cratemans and Oakendene also contains an ancient drove (green lane) which is a rich habitat and will similarly be destroyed. It has not been given sufficient importance in Rampion's assessment.
- Page A61, para 6.14-15: Here we find exactly the same kind of downplaying of grassland quality and scrub as at Cratemans. In an attempt to defend themselves they sneeringly reply (REP2-030 9.3.2): "The botanist that undertook the surveys in these two parcels of land did not note meadows of particular interest in the adjacent areas (brief notes are provided in the report). As this survey was done in mid-June 2022 (peak season for grassland flora being on show) it would suggest that interest was not piqued." We ask 'were they asked to note adjacent land outside what they had been asked to survey?' 'Rampion's statement is disingenuous and misleading. This minimalist choice of survey site is clearly not an isolated incident:
- Page A68, para 6.46: "Whilst it is the author's professional opinion that it would indeed be disproportionate to survey all habitats within the DCO limits, Rampion have pursued this approach to such a degree that only a small percentage of the route has been surveyed at all."
- Page A-72, para 7.9-13: we entirely agree with the report's comments on green power v green washing

4.3.5: The Applicant continues to ignore the light impact on neighbouring properties as opposed to the village, which is some distance away, or from Kent Street, the A272 or the High Weald AONB.

4.3.10: The Applicant continues to ignore the effect of standing traffic, both their own HGVs and other vehicles, and the building up of the existing traffic as these vehicles wait to turn. This will affect both the village centre and the Oakendene stretch of the A272.

4.3.16: This comment is effectively to dismiss the concerns of the residents and the valid points made by CvR, but without any evidence: a common tactic used by the applicant.

4.4.3: *"It should be reiterated that the permanent land take associated with Oakendene substation this infrastructure does not impact ProW or open space."* Of course it does; it impacts on the enjoyment of those spaces and routes. People do not go simply to walk, machine-like, along the PRoWs, they go to enjoy their surroundings.

4.4.5: *"However, Moatfield Lane is not proposed to be used as a construction traffic route and therefore, walkers, cyclists, and horse riders should not fear that they are in danger."* Disingenuous again; the Applicant is aware that the usually very quiet lane will be crossed repeatedly by large construction vehicles and in two separate places.

4.10.2: The Applicant is being obtuse; it is very clear what is meant-the congestion on the A272, and the movement of HGVs in and out of A62 will affect deliveries and put customers off. Everyone who uses this road knows this will happen, but the Applicant continues to refuse to acknowledge that there will be any traffic impacts of any kind.

5.2.4 and 6: The applicant continues to side step the fact that **the many thousands of LGVs and private vehicles are not included in these commitments (C-157 an C-158)**

5.2.7: These lists of traffic are still not addressing the effect of turning on and off the A272 at three points so close together. Please see responses to REP2-016 Table 2-5 and REP2-017 above.

6.3.10: We disagree that safety concerns were a reason for not taking proper A272 viewpoint photos; we managed it without difficulty. We do not believe that the curve mentioned is sufficient to screen the substation, as much of the substation is in the northernmost field and will be very visible. The hedges which currently provide some screening will be removed.

6.4.13: We disagree; this does not take the winter of night sky into account, or the fact that the AONB rises up. Also, please see the report from Place Services (Appendix 1 below).

“The High Weald AONB Partnership agreed that the effects would be minimal (email dated 12 July 2021)”. Please see Appendix 1 for further discussion of this.

7.2.3 and 7.2.8: The applicant still fails to understand that the issues raised about turning vehicles and traffic lights *are at the compounds* and not in the village centre. Please also see Appendix 4 below for further analysis of the modelling used by Rampion as stated in App-060. Rampion admit they have not used diurnal profiles in their AADT, but their reasoning in 7.2.9-11 is not sound.

8.5.5: Rampion still seem to be including “deliveries to site and unloading,” in their allowable ‘shoulder hour’ operations, despite Bolney PC making it clear that these were to be excluded from these periods

9.1.1: We await Natural England’s response to the question of adequacy of the surveys. Their responses so far in the risks and issues log (REP2-041) would suggest that they *do* have concerns

10.5.2: The measures proposed to ensure access to Moatfield/Kings Lane are nonsensical and meaningless. They would appear to be made up as they go along, like the rubber mats. We suggest the British Horse Society is consulted on this. It is impossible to ensure emergency access; by definition it is unpredictable, and the requirement is for *immediate* access or people may die.

10.6: Rampion say *“it is not considered necessary to implement an HGV holding area”* because they will have the Oakendene compounds. They have completely failed to understand that **they will not be able to get to the compounds** when the road is congested, as it frequently is. A holding bay is needed, but much further to the east, away from the part of the A272 where the traffic builds up.

12 Water Environment:

Please see Appendix 2 below

15.2 High voltage cable at Oakendene:

15.2.1: *“The UKPN 132kV cable is a known technical constraint of this site. The power to alter existing apparatus, including cables, is included in the Draft Development Consent Order [PEPD-009] as ‘further works’ within Schedule 1 Part 1.”*

This is all that the reference in PEPD-009 actually says: *“(h) works to alter the position of apparatus, including mains, sewers, drains and cables;”*. It does not attempt to answer the question of *when* this was first recognised as a ‘technical constraint’ nor what discussions with UKPN has revealed about *how* this might be dealt with and what the implications are.

The response is in fact a little like the inclusion of Janine Creaye’s consultation responses in the terrestrial ecology desk study (App 22.2) ie retrofitted to try to convince the reader that something was actually done when it wasn’t.

It is also interesting that, **whilst the draft DCO contains extensive reference to the National Grid regarding the Bolney substation, and to Scottish and Southern Electricity Networks, who are**

responsible for cables in the Climping area, there is no mention of UKPN at all. Yet the cables will have to be moved if the current proposals are to go ahead and UKPN rights protected.

In addition, there is no mention of the impact that moving them will have on the A272 or Kent Street, both of which will almost certainly have to be dug up.

15.4 Battery Storage proposal:

Rampion say *“The proposed access road would cross the alignment of the Rampion 2 export cable. **There is no electrical connection between the two projects as suggested by the interested party.**”* In fact, it is the Battery Storage applicant themselves who say this, and being a subsidiary of Macquarie it would not be a surprise if they were planning to join in to the Rampion cable:

From their landscape and Visual Assessment:

“Related Development

*4.10. **The proposed development at this Site is directly related to the Rampion 2 Offshore Wind Development**, which is at pre-examination stage as of Nov 2023, and seeks the installation of an “Offshore wind farm with up to 90 wind turbines, associated foundations and all the electrical infrastructure required to transmit the power into the national electricity network at Bolney in Mid Sussex.”*

*4.11. The proposals seek to introduce an onshore substation to the immediate southeast of Oakendene Manor, which would be approx. 500m north of the Site boundary. **The BESS unit would be used to store surplus electrical energy produced by the Rampion offshore wind farm, which would be transmitted into the national grid nearby during times of peak power usage.**”*

In addition, the battery storage plans clearly show the storage units sitting directly on top of the cable and well within the DCO boundary, not, as Rampion suggest, just the access road crossing the Rampion cable. The fact that Rampion say they have no issue with this proposal shows clear collaboration.

Rampion have side stepped the question of whether they are linked, but of interest is a similar concern raised by the owner of the land on the other side of Kent Street, where another Macquarie subsidiary, JBM Solar, is seeking a solar farm application on the Rampion DCO land (See REP1-101)

The battery storage farm statement above is clear evidence that the it and Rampion are linked and that the battery storage facility should form part of the DCO.

[Comments on Submissions by Statutory Consultees](#)

REP2-034 WSCC:

We share WSCC concerns about intended activities during shoulder hours. Also, the majority of HGVs if arriving in that time, will be arriving during times of peak congestion on the A272 and then going out and in at even worse times, as the beginning and end of their working day is also the peak traffic times on the road. In addition, the 100s of passenger vehicles will also be trying to arrive and leave at this time, crossing the heavy traffic and increasing the congestion and delay.

REP2-036 Natural England Covering letter:

3) Terrestrial Ecology

“Our review of the documents submitted since our relevant/written representations have raised some significant terrestrial ecology concerns, particularly in relation to protected species, which we note are also reflected by other interested parties’ submissions. “

This undermines Rampion’s repeated statement, when questioned about their surveys, that Natural England have no concerns.

REP2-040 Natural England response to questions:

It is noted that Natural England strongly disagree with the methodology, assumptions and findings of many of Rampion’s reports, also that surveys include insufficient detail to draw the conclusions they attempt to do. (eg 12-2) We believe this has significance when considering the methodology, assumptions and conclusions of the ecology, transport and other studies provided by the applicant for Oakendene and the A272.

REP2-041 risks and issues log:

We note and share NE concerns that

J5-8: Water neutrality is not adequately demonstrated

J51, 54-55: There are significant failings in the GCN surveys, as we have shown

J61-63: The applicant has not followed recommendations regarding adequate assessment of hazel dormouse

J97-99: Natural England comments reflect our concerns that the meadowland at Cratemans is unlikely to be restorable to its original quality and that the impact is therefore significant, both ecologically and to the heritage impact on the historic farmstead.

However,

J30-32: We respectfully remind NE that the applicant has not included the passenger vehicles arriving at the compounds nor the congestion they will cause. In addition, when compared to the numbers for the smaller Rampion 1, we believe the numbers to be a significant underestimation.

J73-74: we believe that when reviewed by NE, our documentary evidence will demonstrate that badger setts and habitats will be significantly affected by the northern end of the cable route approaching Oakendene.

Comments on non-statutory responses

REP2-047 CvR response to Written Responses

Further evidence of the Chilling Effect first referenced by Protect Coastal Sussex (REP1-145) and developed by CowfoldvRampion in REP2-047 is demonstrated in the account from Lester Aldridge and their client (REP1-168 and REP1-101), which does not mirror the much more positive interaction with the Interested Party painted in REP2-008 by the applicant.

The experience shared in these accounts reflects that of local residents including many members of CvR and we wholly endorse their comments.

They and their client feel the interactions from Rampion have failed to take into account his protected characteristic ie age. In the early stages of the consultation, the same is true for the occupant of Oakendene manor, an octogenarian who did not appreciate the significance of letters she was being sent. Rampion do not appear to have made any alternative effort to contact her, no doubt happy that no objections were being received. There is no evidence that two-way engagement was taking place before 2021, which is when her son found out. Indeed, Rampion's own document REP2-008 suggest this also: "*The Applicant and the Land Interest have met on numerous occasions, over a three-year period between 2021 and 2024*". In addition, the Land Interest first went to Cowfold PC only in Nov 2021 to ask for help (See minutes of the Cowfold Parish Council November 2021) to fight the application, over a year after the initial scoping report (and bearing in mind that the first consultation was July-September 2021).

When did they first have a discussion with Oakendene? What effort did they make to contact the owner in the initial stages?

The same is true of their failure to act on the lack of response from the hard-to-reach group of small businesses at Oakendene; proper consideration of the unusual circumstances of this mainly artisan group should have triggered an investigation in to why no consultation responses were coming from somewhere potentially so badly affected.

REP2-064 Protect Coastal Sussex Responses to Written Questions

2.7 The Carbon footprint of Rampion 2

We agree with the argument ably expounded by PCS that the windfarm will not contribute to decarbonisation beyond 2035, but will merely compete with other low emission generation sources. (see Appendix 3, Beyond 2030 below)

CowfoldvRampion Response to Written Questions (ExQ1):

- **HRA 1.9:** there are no references to insects in any of the references mentioned (see REP2-029 table 2-12, and REP2-030 table 2-4 above)
- **DCO 1.6:** “May alter the layout of any street” This requires careful consideration with respect to the implications for Kent Street, including the landscape, character and visual impact, and the A272, where alterations would have enormous impacts on thousands of daily travellers. Moreover, the DCO boundary is clear, and does not allow for any alteration of the layout of the A272.
- **LR1.2:** Book of Reference; There are 150 or so businesses in and around Cowfold who fear for their livelihoods due to the traffic delays and disruption which will occur if this goes ahead. Very few of them have made representations to the applicant or PINs about this, indeed very few of them are even aware of their rights in this respect, especially the hard-to-reach groups at the Oakendene Industrial Estate. We have highlighted their plight and listed them (see CvR IS REP1-089, section 5, appendix 4) However, we cannot claim that our list is complete. Even many of those who have written in do not seem to be on the list of potentially affected businesses, eg South Lodge shoot, the landlady of the local pub, a local driving instructor and a sculptor.
- **LR1.3:** Blight notice; There are many householders on Kent Street and Moatfield/Kings Lane who have already suffered in this respect, either having to sell their homes for significantly less than they otherwise would have been able to, or are unable to make their hoped for move at all, having lost up to 50% of the value of their homes. “Our house Kings has lost approximately 50% of its value since 2022 when Rampion was first brought to our attention”. Many more will be affected in the village, once the construction traffic starts to arrive.
- **AQ1.2:** We do not believe there is a specific commitment to totally avoid the AQMA in Cowfold. Both C-158b and 157 still appear to say ‘where possible’, which is, of course, no commitment at all.
- **AQ1.3:** Please see Appendix 4. NB the commitments register only covers HGVs and does not include the many thousands of LGVs or passenger vehicles which will hugely increase the congestion in the village and cause all vehicles, including HGVs to pollute for longer and more significantly as they stop and start.
- **BD1.1:** If you don’t know what is there in the first place to be destroyed, how can you accurately calculate BNG? Several submissions, including the CowfoldvRampion impact statement (REP1-089), Lester Aldridge (REP1-101), Sweethill Farm (REP1-163), Sullington Manor (REP1-100), make it clear that there has been inadequate baseline surveying, and downplaying of findings even when surveyed.
- **BD1.2:** The mitigation hierarchy has not been complied with; they have not adequately assessed the baseline or properly compared the alternatives (See REP1-089 and REP2-048)

- **FR1.2-4:** please refer to Appendix 2 below
- **HE 1.6:** Please also kindly consider the several, adjacent listed buildings on Kings Lane/Moatfield Lane from which the substation will also be visible, and Cratemans Farm
- **TA1.1:** IEMA guideline; Please see our response to Rampion's review of IEMA guidelines (REP2-017) above, and Appendix 4 below
- **TA1.2:** Traffic assessment methodology; Please see Appendix 4 below
- **TA1.4:** Kent Street; Please see our Kent Street Consultation Report, Appendix 5 below
- **TA1.9:** Traffic Movements and HGV Deliveries; Please see Appendix 4 below. Far from avoiding peak times, the applicant proposes the unloading of HGV deliveries at precisely those times.
- **TA1.14:** Traffic Effects; Please see Appendix 4 below. Traffic effects include not only noise and air pollution, but economic impacts and stress.
- **TE1.5:** Priority Habitats at Oakendene; We request that you please consider the inclusion of the green lane area in this assessment as it is ancient and a key habitat and wildlife corridor, which will be severely threatened by the cable route and haul road. There are likely to be a minimum of 11 trees felled here mostly mature oaks, also it is a visible wildlife corridor and historic ditch and bank boundary.
- **TE1.6, 1.7:** Tree loss and Value; Again, we would like to highlight the significance of the green lane in this respect as a number of ancient trees are under threat here, and we do not believe their importance has been properly evaluated
- **TE1.22:** Protected Species Badger; And again, we ask that you consider inclusion of the green lane as it is a key site for badger setts and habitats

Appendices

Appendix 1: Landscape and Visual Impact Assessment of Oakendene

In March 2024 Place Services provided a report for HDC on the site for the proposed battery storage farm, just a few metres south of the Oakendene substation proposed site and on the final part of the cable route. (DC/24/0054). Their conclusion: **Not supportive on landscape grounds.**

The battery storage farm is only 4m high whereas the substation is to be 12.5m tall from final ground level. (likely to be higher than currently because of flood issues). And the substation footprint is much larger. Therefore, there will be even more negative impact on surrounding landscape, PRoWs etc, and it will be even more visible from the High Weald AONB than the battery storage farm. Screening it from much of this landscape will be impossible as the ProWs either pass directly by it (PRoW 1786) or look down onto it from the area all around (ProWs 1786, 1787, 1789).

No similar comments were made in any of the landscape surveys commissioned for the Wineham Lane proposed battery storage farms carried out by the same consultants. None of these sites were rejected outright by them on landscape impact grounds, indicating that Kent Street and Oakendene are quite different in landscape value from the Wineham sites; another argument against Rampion's site selection process:

- DM/23/1184-Supportive subject to attached recommendations and / or conditions
- DM/23/0769(this is the One Planet application RED objects to as it is on their cable route,) i.e. Wineham Lane North: Supportive subject to attached recommendations and / or conditions
- DM/21/2276(Wineham Lane South) Supportive subject to attached recommendations and / or conditions

The points made in the report have a direct bearing on Rampion in the following key respects and corroborate the views expressed in the CowfoldvRampion Impact Statement. The whole report can be seen on the HDC planning website; extracts are shown below:

- The visual impacts on the many PRoWs. Screening it from much of this landscape will be impossible as the ProWs either pass directly by it or look down onto it from the area all around
- The damage to vistas to and from the High Weald AONB and South Downs National Park
- Horsham District Planning Framework-it falls foul of policies 25. 26. 30, 31
- The site and its surroundings “*remains predominantly rural with few features to detract from the tranquillity and wildness associated with open countryside*”. How much more will the enormous substation impact on this and the Cratemans and Cowfold Stream area?
- Other highly relevant comments: “**note is made that the site isn't covered by any local landscape designations, however, these have not been national policy for over 20 years and have been substantially phased out in local plans. Again, the pastoral character of the Site is disparaged. In relation to cultural heritage, we disagree that the Site is low in value. The district-level character assessment (Page 112) identifies ‘small fields carved out of woodland...’ as one of the key historic features**”
“Furthermore, ‘LI Technical Guidance Note | 02/21 Assessing landscape value outside national designations’ **makes clear that distinctiveness is a combination of rarity and**

representativeness, not rarity alone. Therefore, the fact that this field is typical of this landscape and the same as the one next door emphasises its representativeness. It has a strong sense of identity, apart from the pylon, and exhibits strength of expression of landscape characteristics We judge the value of this criterion at least as **medium**. Perceptual qualities we would also judge as more than **medium-low**, despite the presence of the pylon, due to the strength of the landscape character and its largely tranquil character. “

- “While the LVIA describes an audible influence from the industrial estate along COW 1787/2, during our site visit no such interruption to tranquillity was experienced from either the industrial estate or the main road.” (This is in direct contradiction of Rampion’s continual emphasising the Industrial Estate effect, inappropriately)
- “The LVIA Para 3.44 acknowledges that the presence of the High Weald National Landscape would increase the landscape value of the wider area to **very high**. However, the decision was made to scope this out of the assessment due to *the high degree of separation and lack of intervisibility between the Site and the High Weald National Landscape, it is considered that there would be no change on this designation, its special qualities or its setting and as such is scoped out from further assessment within this study*. Notwithstanding this, we recommend including this assessment within the scope of the LVIA **given the proximity of the National Landscape, and the views towards it that are available from the site.**” (Rampion have also tried to downplay the impact on the AONB. Given that it will be 12.5m high, as opposed to 4m, and on a vastly bigger footprint, it is safe to say that Rampion will be *worse!*)
- “We believe some viewpoints have been undervalued in terms of judgements and the value and sensitivity of long-distance open views have not been fully considered. These views are identified as key characteristics of the LCA J3 which states: *mostly small-scale intricate landscape localised areas with more open character.*” (The special value of this ancient landscape is something we have argued strongly about. It should be preserved)
- “To conclude, we are of the judgement that the proposed scheme will have an adverse impact on both landscape character, especially at the Site and immediate setting level, and visual amenity.....We also recommend that a wider sites assessment is undertaken to determine **whether alternative sites with fewer landscape and visual effects could be found for such a development.**”

The vista described in the battery storage farm report is highly rural. It is the same not only from ancient Kent Street, but from the A272 -totally rural to the North and South, stretching all the way to the Devils Dyke and South Downs National Park to the South. The substation would blight this and transform it into an industrial landscape.

Impact on the High Weald AONB:

In their response to CowfoldvRampion in REP2-030, para 6.4.13 Rampion state that “*The High Weald AONB Partnership agreed that the effects would be minimal (email dated 12 July 2021).*” We would **ask the ExA to request to see the email from the Partnership** to understand the exact context in which this comment was made. The comment does not seem to appear in any of the Consultation Reports, and when the initial scoping report was carried out in 2020, the scoping discussion focussed on : “*including areas of East Sussex extending to the edges of the High Weald up to 35-45km from Rampion 2;*” **NB East Sussex, not West Sussex**

and “**C-66** *The Proposed Development will aim to minimise effects on the special qualities of the South Downs National Park and High Weald AONB*”

In other words, they were concentrating on the impact of the **wind turbines** not the substation, as indeed was largely the case in the first round of the consultation generally.

The scoping report goes on to say:

*“6.2.66 Formal pre-application consultations with regards to LVIA will be undertaken primarily through specialist consultation via an Expert Topic Group (ETG) as part of the EPP, along with wider consultation through this Scoping Report and the PEIR. Numerous ETG meetings and site visits will be organised with representatives from Natural England, South Downs National Park Authority, **High Weald AONB Partnership**, West Sussex County Council, Arun District Council, Horsham District Council, Mid Sussex District Council and National Trust.*

6.2.67 Feedback received through this consultation process will be considered in preparing the PEIR and ES where appropriate to be submitted with the Development Consent Order (DCO) application.”

However, there does not appear to be any evidence of this discussion with High Weald AONB in the Consultation Reports

In addition, at that time, both Wineham Lane North and Oakendene were under consideration, and the emphasis was very much on ‘a new substation *‘in the vicinity of the existing substation at Wineham ‘.*

If this had been the nature of the discussion with the High Weald AONB, they would have had no objection, as the main Bolney substation is not visible from the AONB and is over 2km away from the AONB. **Have the High Weald Partnership been asked to comment specifically about the current proposals?** The Oakendene site is a mere few hundred metres away and is very exposed to the north, where the AONB looks down on it. Winter and night time impacts will be even more significant.

Appendix 2: Water Neutrality and Flooding at Oakendene

Water Neutrality

REP2-022 response to HDC:

The consideration of water neutrality must include construction as well as operation, as millions of times more water will be used during construction than operation.

9.21-23: During construction the Applicant says that *“In terms of water neutrality during the construction phase of the wider Proposed Development, water for construction usage in the Sussex North Water Zone **will not be taken from the mains and it will instead be imported from outside of the Zone via tankers** to main compounds (for their welfare facilities systems and wheel washing) and Trenchless Crossing compounds (for welfare facilities, use in horizontal directional drilling (HDD) drilling fluids, batching of cement bound sand or concrete, wheel washing and dust suppression).”*

Rampion have not stated the predicted water usage for construction and operation of the scheme, this is a material local planning constraint and it should have been respectfully addressed at earlier stages to HDC

They say water can be brought in by tanker but give no details on a strategy and / or quantity of water needed. This falls far below the bar expected, as the quantities of water needed during construction will be huge. The corresponding adverse effects on traffic journeys and congestion should be added to the DCO, including for Kent Street and the A281 as tankers will need to access the drilling sites and compound near the stream. The intended extraction points for water and tanker journey numbers and distances need to travel should be submitted to the ExA. Many of these large water tankers will no doubt come through Cowfold Village and along the A272.

HDC may (but not definitely) have a mitigation policy in place called SNOWS for the *operation* of the substation but currently no details on the much larger water usage during *construction* are provided. This is needed as soon as possible as traffic journeys will be very large and need to be added to Traffic Numbers in the Cowfold area. If the construction is indeed allocated a portion of HDC's water allowance under the SNOWs policy, this will leave very little for the District's own development plans, so does not appear to be an acceptable solution.

The following policy statement from HDC is how they currently refuse applications in the area that do not adequately address water neutrality

“Insufficient information has been provided to demonstrate with a sufficient degree of certainty that the proposed development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 185 and 186 of the National Planning Policy Framework (2023), thus the Local Planning Authority is unable to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority Habitats & Species)”.

It is very unfair in planning terms that other local developments and good quality sustainable schemes have been refused or put on hold due to Water Neutrality where only small amounts of offsetting would be needed. Rampion's scheme is so large during the construction phase that by

comparison, local projects would pale into significance. The Water Neutrality proof and intended usage needs to be provided by Rampion so as to not make a mockery of the current policy.

HDC have correctly responded in point 9.23 that “tankering water is unenforceable (it cannot be practically required that a tanker arrives, with a prescribed quantity of water.....)”

Rampion respond by saying water neutrality will be achieved for both construction and operation of the development. But how can this be stated without proper calculations? It is mere wishful thinking.

We agree with HDC that the tankering in of water for such an extensive number of requirements is unrealistic. It will add significantly to the daily vehicle movements to the compounds and Kent Street. Also, all of this copious amount of water, including for the daily wheel washing of hundreds of vehicles, will end up via the Cowfold Stream in the Adur. In the winter months this will exacerbate the already critical flooding problems.

REP2-029:

Table 2-9 Response to Connie Davies:

The author asks “How is it possible to ensure that excavation works and piling will not result in an increase in flood risk downstream?”

Rampion reply *“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 an extraordinary statement in many ways:

- it acknowledges that water will have to be discharged in to the stream.
- It cannot infiltrate if the ground is saturated, as it has been for much of this winter, so it *will* be affecting the water levels downstream.
- In exactly what circumstances will infiltration ‘not be possible’? All the time? Thos should be clarified.
- The water levels in the Cowfold Stream change rapidly and unpredictably and there may not be flood warnings. There have in fact been numerous warnings this winter. Does that mean work will cease for much of the season? If so, it will only occur when in conflict with breeding seasons instead.

Flooding and ground saturation:

REP2-022 Response to HDC:

14.7: Sequential Test and Flood risk. We utterly dispute the Applicant’s argument that Paragraphs 9.1.29 to 9.1.40 of their Flood Risk Assessment document gives convincing evidence that the sequential test was applied, and, presumably, if HDC thought otherwise, they wouldn’t have asked

the question. Our photographs and Rampion's own maps show there is a marked difference between Wineham Lane North and Oakendene

REP2-030 Appendix A response to CowfoldvRampion:

The Applicant seeks to focus too much on the exact location the photographs were taken from. This is to miss the point; that the whole site is saturated. They are not unsubstantiated 'claims' as the associated text in the Impact Statement demonstrates.

12.1.5: yes, it may have been one of the wettest Octobers on record, but records will continue to be broken.

12.1.9: On their site visit in February, there may not have been standing water, but they are careful not to mention the ground conditions. However, we are absolutely certain that the ground would have been extremely boggy as it has been so throughout the winter, and at the time of writing, remains so.

Table 12.1 Photo review:

CowfoldvRampion to confirm exact date of photographs, where missing, due to inconsistencies as seen in photo 3, Page 228. Trees are shown 'in leaf' in Photo 1 alongside Photo 3 of the same trees which are bare (it is assumed Photo 3 was taken later in the winter and erroneously date stamped as 3 November 2023).

We apologise for the error and can confirm that the photo showing the leafless trees should be on the December 2023 page. It was inadvertently moved to the November page during the formatting and labelling of the pictures for inclusion in the document. Whilst it proves the Rampion team have sharp eyes, it does not fundamentally alter the importance of what the photos show, in that they clearly demonstrate significant flooding at different stages of the year; autumn and winter. We strongly refute any suggestions that the images have been manipulated with any intention to deceive. The original date-stamped images can be provided to the ExA if they feel it would be helpful.

Rampion assert that the photos are simply consistent with Environment Agency mapping - within area of high risk. They seek to imply that the photographs we have sent represent isolated issues around the perimeter of the site. This is however not the case. The true situation is far worse than the, probably outdated, maps suggest. The whole area has been boggy and with frequent standing water throughout the last 6 months. No farm vehicles can currently be used on the land without risk of getting stuck or compacting the soil, as indeed have the fields which surround this location. The evidence from Jane Lamb is compelling (REP1-105), as is that of their own surveyors in a site walkover in October 2021, a different year altogether (See historic parkscape documents).

The photographs below confirm this. They were taken on 5th November 2023. Numbers 5-10 were taken in what will be roughly the middle of the substation site. There is no ditch at the western boundary of that field. **They are well outside the high surface water flood risk areas in Figure 26.2.5a of the Flood Risk Assessment.** The person standing in the distance in photograph 10 is attempting to demonstrate that the field is just as wet in the centre, away from the boundary altogether. In picture number 9 the photographer has moved closer to show the state of the field where the person with the stick is. The stick is in the same position in the middle of the field in both photographs.

Photos 1-4 are in the field south of the tributary, which rises up to the south away from the tributary. Even this higher ground is saturated.

Number 11 is on even higher ground in the field where the battery storage farm application has been made and where the tractor and bore hole digger were bogged in (See REP1-105)

Photograph number 12, taken on 5th April 2024, shows the northeastern field, which will be partly within the substation footprint and partly compound. We did not attempt to gain access to the field, instead the picture was taken from the A272. Clumps of rushes can be seen across the field, which are, of course, most happy in boggy or marshy land. This land is higher than the southern end of the site. If it to be of any use as a compound it will require extensive laying down of other materials, otherwise the same fate will befall the vehicles, including staff vehicles, as was met by the bore hole digger, and the inevitable severe compaction will cause the water to be squeezed out, heading downhill towards the tributary and eventually the Adur. The extra vehicles delivering the hard core must be factored in to traffic calculations.

REP2-020 Response to WSCC:

16.3: We absolutely refute that our photographs *validate* their assessment of the flood risk at Oakendene; this is a twisting of the truth to suit their predetermined preference. At the ASI we are happy to show the ExA where the flooding was. The Applicant comments that it was a ‘notably wet Autumn’ as if this is exceptional; it is clear that this is no longer so. Moreover, the pictures are from 4 months throughout the winter, not just an isolated episode in November, as implied by the Applicant, unlike their site visit on 2nd February. Our February pictures were taken shortly afterwards, on 8th February, after just one night of rain. We are quite certain that the applicant would have found the ground to have been extremely boggy, with water very close to the surface on any attempt to dig, and we remind them of the comments of their own surveyors from October 2021, and the Enso Energy assessors whose vehicles had to be extracted from the adjacent field. We welcome photographs from Rampion of their site visit and ground assessments from the visit.

“The Applicant undertook a site visit to the onshore 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, late winter to early spring is when groundwater levels would be expected to be seasonally high. The watercourse was noted to be in-channel and no standing water was observed across the onshore substation site. The reduced water levels compared to the Cowfold vs Rampion photos (dated from November 2023 to February 2024) indicate that it is not a groundwater flooding issue and is instead a surface water flood risk issue.”

Reading of the accompanying text in our Water Environment Chapter by the Applicant would demonstrate to them that we make clear that the photos are of surface water flooding, although the pictures and videos of the tributary show clearly that the water has nowhere to go as the stream is full. There will remain a major issue during construction, requiring huge amounts of hard core, and potentially affecting the drainage from the at-risk properties to the north of the A272.

Whilst our pictures of the substation site are indeed of surface water flooding, we share WSCC concerns that there is *both* surface and groundwater flooding at the site and that our evidence of the current state of the fields, is consistent with this. In addition, the applicant does not address the clear difference between Oakendene and the Wineham site which our pictures, ground height and flood map evidence demonstrate.

It would seem the Applicant is attempting to argue, but not explain, how flood water can be got rid of but ground water might be difficult to deal with (but don't worry they will sort it later somehow—it's not a problem!). This is very similar to the "there will be no single file traffic lights on the A272" argument. In other words, it tries to reassure about something that is not the main issue, whilst ignoring the more important one.

However, the only place additional surface water can go, is into the Cowfold Stream. So by increasing the hard surfacing, removing so many trees and hedges and diverting all that unabsorbed surface water into the Cowfold Stream, this will result in worsening of the flooding downstream. All residents already live with this; it is more 'difficult to get rid of' water downstream in the River Adur, as the A281 flood photos graphically illustrate. In addition, as pointed out by Janine Creaye at the ISH, this will be further compounded by the compaction from the haul road and hedge and tree loss in the flood plain of the Cowfold Stream. The Applicant does not address that in any convincing way.

16.24: "Based on the discussions on 27 February 2024, a way forward has been agreed with WSCC and HDC which all three parties anticipate will allay WSCC concerns, to enable the PAD to be converted to Statements of Common Ground. These will be reported on in due course." We hope a rational assessment of the evidence will not bring either council to this position.

16.29 WSCC asks: "winter monitoring of groundwater levels at Oakendene substation should be carried out. For clarity, the existing watercourses around the site should be added to the Indicative SuDS Plan." The Applicant says this will only be done after consent is granted. This is too late.

Map showing photograph locations



The map above shows approximate locations of the photos listed below.

Group	Photo#	N	W
South	1	50.98490	0.24788
South	2	50.98488	0.24789
South	3	50.98489	0.24794
South	4	50.98474	0.24798
North	5	50.98714	0.24781
North	6	50.98708	0.24777
North	7	50.98720	0.24783
North	8	50.98721	0.24784
North	9	50.98721	0.24784
North	10	50.98722	0.24787
	11	50.98361	0.25008
	12	50.99112	0.24935



5



6



7



8



9



10



1



2



3



4



11



12

Appendix 3: Beyond 2030 response to PCS deadline 2 submission

In March this year Jake Rigg was heard on Radio 4. He is the corporate affairs director for the National Grid ESO and was talking about the Beyond 2030 Report, which was to be published the following day:

<https://www.nationalgrideso.com/document/304756/download>

There is to be a £58bn investment to 2035 to connect the offshore wind already in production, or in the pipeline from Scotland and the East Coast to the whole of the UK using a combination of both offshore and onshore connections. Scotland is already planned to have a 30 giga watt production capability, and even taking into account increased electricity usage, Scotland itself will only need 6 giga watts. So, unless this happens, we will be increasingly paying these companies **not** to produce, which is obviously sheer insanity.

The aim is to double the amount of offshore cabling, but there will need to be onshore pylons or underground cables to transport it to where it is needed, although he was mindful of the impacts on communities such as in Norfolk and Suffolk who have been high profile in their objections recently.

<https://www.suffolk.gov.uk/asset-library/sea-link-s42-response-letter-to-eso-regarding-coordinated-offshore-networks-151223-final-redacted.pdf>

Surely this is a 'hold on a minute' moment in the Rampion debate? It cannot be in the national interest to pay billions of pounds to Rampion to develop wind here whilst at the same time paying billions to companies already in the North Sea etc not to produce, because the system cannot cope with the electricity they generate. It makes much more sense to increase distribution, as is planned by 2035. Assuming there is no realistic chance of Rampion being up and running until 2030, there can only be a maximum of 5 years when it can be said to be contributing to the national endeavour to achieve decarbonisation of our energy supply. Only 5 years of contribution, as opposed to the lifetime of the windfarm, will be easily offset by the carbon costs of manufacture (probably reliant on fossil fuel), construction and eventual disposal (probably to landfill). Not to mention the opencast lignite mining carried out by RWE in Germany

This means they are in negative balance even before considering all the damage they will do to our county. It also means that Rampion's default claim, whenever damage to the environment, ecology, communities and the local economy are brought up, that it is acceptable as it is 'In the National Interest' is dramatically undermined and no longer tenable.

Protect Coastal Sussex have expanded on this and critiqued Rampion's response to the ExA to the question about the level of wind energy resources in the Channel (see REP2-064)

There is minimal linkage between Rampion, the south coast grid connection points and the rest of the country. Notwithstanding the weak arguments for any more turbines in the far less windy south, longer term strategic thinking would appear to make the Rampion 2 proposals shortly redundant and should be putting the high voltage connections out at sea. If the Morocco-UK cable can be designated a NSIP and progress via a DCO, then a UK offshore super grid can do the same.

Appendix 4: Traffic calculations- impact on Cowfold village centre

Introduction:

The following email, which was received from a local resident very ably summarises the key issues around the traffic on the A272 and why it is so important to understand them:

“A few years ago, I completed a development in London, and prior to permission being granted the building company had to provide information about the number of vehicles that would be used, how and when they were going to dispose of any excess soil and rubbish and their parking arrangements. That was a tiny development, but the information had to be clear and easily understood. I’ve found Rampion’s information ambiguous, contradictory and very difficult to understand what should be basic data. I think that this has been done deliberately to mislead the reader. It’s not complicated, but they appear to be making it unnecessarily so.

I was just wondering whether Rampion have provided the following:

1. Exact number of HGV & LGV & private vehicles to access Oakendene & Kent St. if so, would it be worth mentioning their original estimate of 8024 HGV? If they have provided this information, how does it compare with Rampion 1 numbers? Rampion’s 2 is some 30% bigger, has water neutrality to consider and will need substantial amounts of hardcore, because of the additional flooding considerations.
2. Last summer, at the Bolney meeting Rampion said that they would advise us of their traffic management plan for accessing Oakendene during the Cowfold meeting. Now they are saying they don’t need traffic lights? Instead of answering the question or submitting a solution that they know will cause chaos, it’s easier for them to say they don’t need it, so that they avoid having to answer further questions.
3. Holding bay. They know this is required given Rampion 1, but it’s easier to say they don’t need one and so do not need to answer any further questions
4. Would it be worth emphasising that Rampion 1, located along Wineham Lane did not require traffic control measures on the A272, and would be considerably less trouble if located there. The traffic from Cowfold village seldomly reaches back to Wineham Lane, but frequently passes Oakendene and extends towards Kent St.
5. Have Rampion disclosed numbers of vehicles during peak weeks and how many peak weeks there will be? This was asked by national highways, but insufficient answers given.

Given that they have completed these kinds of projects before, it seems unreasonable that they can’t give straight answers. These are diversionary and avoidance tactics, which I hope the PI will recognise.”

Below, we expand on some of these concerns, and attempt to look further into Rampion’s methodology.

1)Traffic assessment and assumptions made

Please also see additional discussion of REP2-014 and REP2-017 above

REP2-014 Applicant’s response to Parish Councils and MPs written Representations:

1.13 Bolney Parish Council “is concerned about the possible use of multiple traffic lights on the A272 for access to Kent Street for access A-64, for access A-63 to the Oakendene site and access A-62 to the construction compound adjacent the Oakendene Industrial Estate. Any temporary traffic lights on the A272 result in queues of traffic along the road which according to the last traffic count by the Department for Transport in 2022, has a daily traffic flow of 18,546. Even without the use of traffic lights, queuing traffic can sometimes back up from Cowfold to the junction with Wineham Lane in the Parish of Bolney. The resultant effect is that drivers use the unsuitable narrow rural back roads to avoid the queues which impacts on residents and local road users. “

Rampion reply:

“At peak construction activity, access A-62 (Oakendene Compound) will cater for 326 HGV two-way movements and 456 LGV two-way movements across a one-week period. This is the equivalent of 156 construction traffic two-way movements per day or 12-13 per hour (approximately 6 entering and 6 exiting the compound). At peak construction activity, access A-63 (Oakendene Substation) will cater for 326 HGV two-way movements and 564 LGV two-way movements across a one-week period. This is the equivalent of 178 construction traffic two-way movements per day or 14-15 per hour (approximately 7 entering and 7 exiting the access junction). On the basis of these peak construction traffic flows is not anticipated that traffic signals will be required at access A-63.

Whilst it is also not anticipated that traffic signals will be required at the A272 / Kent Street junction, any traffic measures will need to be agreed with West Sussex County Council as part of the detailed design stage. Should traffic signals be required (or any other form of traffic management) these will be applied in accordance with guidance and procedures contained in Section 14 of the Road Traffic Regulation Act 1984.”

We challenge the figures as a significant underestimation, as the Applicant’s figures for traffic at A62 and A63 give peak week daily HGV numbers of 120 at A62 and A63 combined (652 total weekly HGVs divided by 5.5 days) whereas the Rampion 1 traffic appendix (Doc Ref 6.3.29 from the Rampion 1 archives) shows daily HGV numbers of 124 (a then increase in traffic flow of 10.2%, based on 16132 vehicles per day when the Rampion 1 DCO was submitted) and worker vehicles of 274 a day, **none of which arrived via A272**, as they all came up from the south. Rampion 2 is a much bigger project, so it is not likely that the HGV numbers will be *less*, especially at peak week, *and* the background levels of traffic are significantly higher now, which will lead to congestion much more readily. In addition, there was no complicated ‘dance’ of traffic in and out of 3 close entry points, **all** worker vehicles will come along the A272 and Rampion 1 had no impact on the AQMA, being much further away.

Even though their HGV figures are likely to be significantly underestimated, they represent a huge increase from the 8040 over the whole project duration which Rampion were quoting throughout the Consultations.

Furthermore, Rampion’s LGV numbers do not include workers’ vehicles, as can be seen from Rampion’s response to Fred Turok below. **Nor do they include the many thousands of water tankers which will be needed to bring in water from outside the district** (see REP2-022, paras 9.21-23), or the lorries which will be required to bring in the vast amount of hardcore needed to make the compounds fit for any kind of use during the Autumn and winter months.

Even without the additional water tankers, LGV and worker vehicles, this represents a vehicle turning in or out of **each compound** every 3-4 minutes, even supposing they were actually evenly spaced. In addition, there will be construction vehicles coming back and forth from the Cowfold direction. The daily lived experience of Cowfold residents would very much ‘anticipate’ that there will most

certainly be a need for traffic lights. Rampion's 'anticipation' would appear to be without any foundation, rather, on wishful thinking.

How can they possibly have done accurate modelling when they don't have accurate numbers?

In addition, these figures do not really give a true picture of what will actually happen during the whole of the years of the construction phase. REP1-009 Table 6-7 provides total figures of 16338 LGVs coming in and out of A62 and 5778 HGVs, and 52254 LGVs and 11438 HGVs at A63. The figures given to Bolney would give the impression that the numbers at the two compounds are not hugely different, but this is clearly not the case. Even if these figures are to be believed as accurate, what does this mean in practical terms for the flow of traffic along the road, and road safety as vehicles turn in and out?

Table 2-5 response to Cowfold PC

1.10- In response to concerns about the impact of traffic on the village, Rampion reply:

"At A281 south of Cowfold (Receptor 23):

- *A heavy goods vehicle (HGV) peak week increase of 12 HGVs per day, equivalent to an increase of 7.5% and approximately one HGV per hour; and*
- *A total construction traffic peak week increase of one HGV per day and 71 light goods vehicles (LGVs) per day (5-6 per hour), equivalent to a 1.1% increase in total traffic flow.*

The A281 / A272 in the centre of Cowfold (Receptor 24):

- *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):

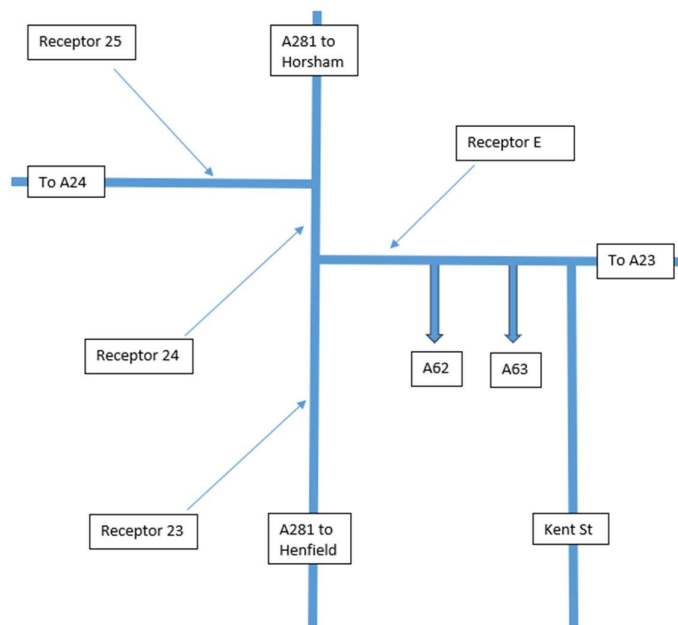
- *An HGV peak week increase of 39 HGVs, equivalent to an increase of 4.6% and 3-4 HGVs per hour; and*
- *A total construction traffic peak week increase of 19 HGVs and 154 LGVs (12-13 per hour), equivalent to a 0.9% increase in total traffic flow.*

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), 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."

Diagrammatic map of Cowfold Receptors:



This raises a series of fundamental questions:

- It is not clear what a '*total construction traffic peak week increase*' actually means. **Why are the numbers of HGVs different for 'peak week increase' and 'total peak week increase'?** Please could the applicant explain what is meant and restate this in simple terms?
- Why are the numbers of LGVs smaller for Receptor E than for 24 and 25? Surely, they should either at least be the same, or actually both HGV and LGV numbers should be *greater* than for the other receptors, as the numbers travelling from the compounds to receptor 23 and back must be added on? This is another example of Rampion producing a smart-looking piece of 'evidence' which is actually ill thought out and deceptive.
- These numbers of LGVs and HGVs coming from the village to the compounds and then *waiting to turn across the oncoming traffic*, will cause major congestion to back up into the village.
- These percentages do not take into account the impact of all these HGVs and LGVs passing through the two mini roundabouts in the village and assume that there will be simple percentage effects on flow, which is not the case (see AQMA section below) Both IEMA guidelines and Defra LAQM.TG (22) recognise this. **It is nonsensical to use this methodology for such a small stretch of road sandwiched between two congested mini roundabouts.**
- It should be noted that the figures given to Cowfold PC for Receptor E **do not appear to include** the vehicle numbers given to Bolney PC for the vehicles travelling between the A23 and compounds A62 and A63 ie 12-13 per hour at A62 and 14-15 per hour at A63. As these vehicles turn in and out of these two compounds which are so close together, again across the oncoming traffic, or indeed, wait for the ones coming back from the village to turn in, this will cause even more traffic to back up into the village centre.
- With regards to the IEMA guidelines quoted above, we know that these 'day to day fluctuations' **already do** cause major impacts on traffic flow.

Moreover, the EATM 2023 guidance also states in paragraph 2.17 that it **may not be appropriate to use this criterion for the assessment of air quality, noise, driver delay and road safety**. See para 1.2.8 of REP2-017 below. This confirms our contention that congestion is not a simple matter of traffic flow. The traffic in the centre of Cowfold is already at capacity. The 10% 'negligible' impact is only appropriate for a situation *not* at capacity.

In addition, the increase in traffic flow on Kent Street is vastly more than 10%. Why have they consistently failed to provide any assessment of this tiny lane?

REP2-028 Table 2-9 Response to Fred Turok:

2.9.10: *"At peak construction access A-62 and A-63 will serve approximately 600 two LGV movements per week (300 in and 300 out) or approximately 120 movements per day (60 in and 60 out). This is the total number of LGVs which includes delivery of equipment and materials that will be spread across the working day through use of the Delivery Management System (as noted in the Outline Construction Traffic Management Plan (CTMP) [REP1-010]). Whilst the Applicant accepts that there will be a peak in construction worker movements at the start and end of each day aligned with the proposed construction working hours it is not anticipated that these movements will be significant enough to require traffic signals."*

These LGV numbers are far smaller than the numbers given to Bolney PC in REP2-014 para 1.13 (456 for A62 and 564 for A63). How do Rampion explain this anomaly?

NB also, this appears to accept that construction worker vehicles are NOT included in the LGV numbers, and WILL peak at the beginning and end of the day. BUT they do not anticipate this will cause much of a problem. It WILL! We have been unable to find any passenger vehicle figures provided by the Applicant, but from Rampion 1, we 'anticipate' at least 350 passenger vehicles a day trying to cross the traffic to access or exit the compounds.

To complicate matters still further, it is unclear still how the Applicant has decided on the LGV and HGV weight limit classification. Currently, the HGV definition, in Table 4-4 of the Outline Construction Management Plan, is for 7.5T. Is this just an error in the table, or have HGV calculations been based on 7.5T and if so, this may then mean that HGV numbers have been grossly underestimated.

REP2-017 Review of IEMA guidelines:

Both GEART and IEMA guidelines use the following to assist assessment of environmental effects of traffic:

Rule 1: Include highway links where traffic flows will increase by more than 30% (or the total number of heavy good vehicles will increase by more than 30%).

Rule 2: Include highway links of high sensitivity where traffic flows have increased by 10% or more.

We know that Rampion's use of Kent Street will more than double the total traffic on the lane and that the HGV use will increase by 4000% from the current daily number of 0-2 (See ENSO energy survey data, being the only actual survey data available, albeit for a very short period).

We would also like to ask the Applicant if the Tables include delivery vehicles coming from other companies to the sites, including tankers delivering water to the drilling and compounds near the stream, or just the contractor's vehicles?

Para 3.1.2 and 3.1: we strongly object to Kent Street being assessed as Rule 2 as on all criteria it is clearly in Rule 1

We dispute the fear and intimidation findings for Cowfold (link F) as when large vehicles are crossing the mini roundabouts in the village, and especially turning, eg to go south down A281 or east to Oakendene, they often climb on to the pavements as they are too large. This is most definitely a cause of fear and concern for residents, especially the elderly, and parents of children walking to school, and has been the cause of accidents in the past.

Even more ludicrous is the 'negligible' conclusion for Kent Street, which has been downgraded from the 'moderate adverse' from GEART: "3.2.32 *The assessment using GEART 1993 Guidance within Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] concluded that the magnitude of change was Low and the significance of residual effect on fear and intimidation was Moderate Adverse (Significant). The assessment of fear and intimidation based on the EATM 2023 guidance therefore represents a change from the conclusions of the ES, with a removal of a significant effect for Kent Street.*" How convenient! But both are reliant in any case on a flawed estimate of current HGV numbers which have no basis in actual fact but are simple guesswork. The Hazard scores are also nonsensical for a small lane like Kent Street, as the assessment totally fails to take into account that pedestrians and animals which walk there are usually **in the middle of the road and that there is nowhere for them to go.**

Holding Bay:

Bolney PC very sensibly raise the concern that a holding bay must be included, again based on their actual experience. The applicant replies "*As the Proposed Development includes the Oakendene substation and compound that can be accessed directly from the A272, (which forms part of West Sussex County Councils' (WSCC's) lorry route network) it is not considered necessary to implement an HGV holding area.*"

Also, from **REP2-028, Table 2-13, 2.1.15:** The author reminds the Applicant that *the need for a holding bay as for Rampion 1 was to be considered.*

The applicant replies: "*Given that the Oakendene compound and substation can be accessed directly from the A272 (part of the West Sussex County Council's lorry route network and the conclusions of the ES, the Applicant does not consider it necessary to implement a holding area for HGVs as part of the Proposed Development.*"

This shows a continued lack of understanding of the traffic on this road, and the fact that, frequently *they will not be able to access the compounds* because of queueing traffic, and that getting in and out of the compounds will make this worse.

In response to Bolney PC, they indicate they will operate a booking system for deliveries to construction sites to spread deliveries throughout the day 'where feasible' [which of course, means nothing], but if there is no need for a holding bay or a booking system to arrive *at the compounds* in the first place, for either the delivery vehicles or any of their own vehicles, this will not prevent the congestion; the compounds cannot be used as holding bays as they are too close to the mini roundabouts, and where the traffic builds up daily.

Traffic lights:

The applicant says that there will be no need for traffic lights on the A272

REP2-028, Table 2-13, 2.1.16: The Applicant is asked about how traffic turning in and out of the compounds and Kent Street can be safely managed on the A272 if there are to be no traffic lights. We disagree with the conclusions drawn by the Applicant as the methodology on which it is based is flawed. This community knows from daily experience that even one or two vehicles waiting to turn can bring the road to a standstill.

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

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

In addition, drivers are not used to people turning on or off the road at this point and visibility is poor at A63 and Kent Street. This has been the cause of numerous accidents here over the years and is the reason the main entrance to Oakendene was moved years ago. Also, the residents living on the A272 near Oakendene will not be able to see past the queuing traffic waiting to turn and will leap out blind from their driveways, and from Kent Street, to turn right onto the busy road. This will prove extremely dangerous. Traffic lights *must* be used for safety reasons, but the queues will be worse. This is a fundamental problem of choosing this site for the substation.

From REP1-006, serious accident assessment:

A272 between A281 and A22 (NB this appears to be an error; it should say A23)

A-62 and A-63

*2.2.106 Ref. 471067793 – A serious accident occurred in 2021 on the A272. The incident occurred **when a car slowing down was hit by the car behind it.** The conditions at the time of this collision were daylight, with no high winds and dry roads.*

*2.2.107 Ref. 471148005 – A serious accident occurred in 2022 on the A272. The incident involved one car, travelling **round a right-hand bend**, over turned and left the carriageway into the central reservation, hitting a tree. The conditions at the time of the collision were daylight, with dry roads.*

*2.2.108 Ref. 471175915 – A serious accident occurred in 2022 on the A272. The accident involved a motorcycle travelling east, **overtaking a moving car offside** caused a collision whereby the motorcycle was hit at the front as the first point of impact. This occurred during daylight, with dry conditions.*

All of these instances illustrate very clearly why this stretch of the A272 is dangerous and traffic lights are needed; they show that the bend is dangerous, visibility is poor, and people do not expect vehicles to be slowing down to turn on this stretch of road. All these accidents took place in

daylight, and with good weather conditions. Many more, less serious, accidents do occur on this part of the A272, clustered at Kent Street, and the A63 and A62 compound entry points. The complicated traffic movements of the construction vehicles will make accidents far more likely to happen. Traffic lights **will** be needed.

2)Modelling Assumptions for Impact on Cowfold AQMA:

From REP2-028, Table 2-16, 2.15.11:

The author asks for details of how modelling has taken into account the impact on traffic flows and pollution at this point, *based on an understanding that the traffic is not free flowing through the village*. The Applicant attempts to deliver a seemingly convincing answer, but based only on a partial truth.

Rampion reply: *“The air quality modelling for Cowfold Air Quality Management Area (AQMA) was updated and provided in Chapter 32: ES Addendum, Volume 2 of the Environmental Statement [REP1-006]. The updated assessment modelled the second year of construction; the year with the highest development traffic according to the revised traffic data for the Proposed Development presented in Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006]. The AADT flows used take into account the heavy goods vehicle (HGV) routing through the Cowfold AQMA and have assumed queuing traffic is present in the key junction within Cowfold. The updated traffic data did not change the outcome of the assessment provided in Chapter 19: Air quality, Volume 2 of the ES [APP-060].”*

And in response to CowfoldvRampion in REP2-030 they say in paragraph 7.2.3: *“This statement is incorrect. The air quality model ADMS-Roads was configured with specific sections with reduced speeds to represent queues caused by turning movements and traffic lights in Cowfold. The traffic modelling methodology is described in Chapter 19: Air quality, Volume 2 of the ES [APP-060] and with the specific model links shown in Figure 19.2A in Chapter 19: Air quality - figures, Volume 4 of the ES [APP-104].”*

We challenge Rampion’s statements above that their air quality calculations take the congestion at the centre of Cowfold into account. It is completely misleading and based only on a partial truth:

Everything they have done about traffic impacts is based purely on traffic movements and percentage increases. There is no evidence in any of their documents that they have ever included the congestion effects in their calculations. How then can their Air Quality assessments have been based on anything other than this foundation?

Yes, the baseline pollution levels in the village *have* taken this into account as they are actual real-time readings from the pollution monitor there, which of course, do depend on congestion. But *then*, their evaluation of what will happen with the 25% increase in HGVs, not to mention their many other vehicles, is simply a percentage increase. This does not look at the multiplier effect of the increased numbers *at capacity, which is the case at the mini-roundabouts, and there, the effect is not linear, due to the reduced movements, the effect of congestion between the two roundabouts, traffic turbulence and dispersal, and the more polluting stop-start movements.*

The documents referenced by Rampion in REP2-028, Table 2-16, 2.15.11 and in REP2-030 paragraph 7.2.3 are:

REP1-006: This, including "Appendix B Cowfold AQMA", would appear to be focussed entirely on traffic numbers and percentage increases.

APP-060: Still only looks at traffic numbers, but with an 'adjustment factor' which is not explained or justified and appears to be a constant, rather than something which increases as the traffic numbers increase.

APP-060 refers to DEFRA advice. **From a detailed assessment of the document, it would appear that they have only partially used DEFRA's modelling and followed their advice.** They have used DEFRA's projected traffic growth figures, and then simply looked at percentage increases in traffic with additional construction vehicles.

Figure 19.2A in APP-104 is simply a map showing the position of Cowfold AQMA.

In their response to CowfoldvRampion in REP2-030, Rampion admit they have not used diurnal profiles in their AADT, but their reasoning for doing so in 7.2.9-11 is not sound. They say:

"The use of Annual Average Daily Traffic (AADT):

7.2.9 Traffic flow data from the strategic transport model are conventionally expressed as Annual Average Daily Traffic (AADT) for use in air quality models such as ADMS-Roads. When the AADT data are added as inputs to the model, the model allows the use of a diurnal profile to represent variations in flow during the day. As the Cowfold Residents impact statement notes:

'It should be noted that these figures are annual averages and that given that 14500 of the approximately 18500 vehicles travel along the A272 between 6 am and 6pm, the actual levels during daytime, i.e. exposure, hours will be much higher.'

7.2.10 Diurnal profiles were not applied to the AADT flows because the risk of exceedance of the short-term air quality objectives are unlikely as stated in paragraph 7.97 of Defra LAQM.TG (22) states: 'A study carried out on behalf of Defra and the Devolved Administrations identified that exceedances of the NO₂ 1-hour mean are unlikely to occur where the annual mean is below 60µg/m³.'

7.2.11 As all annual mean predicted NO₂ concentrations are below 60 µg/m³ there was no requirement to apply diurnal profiles to the AADT flows."

However, Paragraph 7.97 of Defra LAQM.TG (22), which they quote, is looking at a very specific and simplistic element of the assessment of pollution and does not take into account the impact of additional vehicles when the traffic is already at capacity at a given point. Indeed, the guideline goes on to say *"concentrations should be reviewed on a case-by-case basis where there is concern."*

Defra then develop their advice where situations are not so simplistic and linear, and their guidance is clear:

"7.105: makes a clear distinction between vehicle emissions split between moving and stationary traffic if congestion is a significant issue

7.266: As a minimum, the following information will be required for each link in order to estimate the associated pollutant emissions:

- Road type, i.e. whether motorway, urban or rural in nature;
- Traffic flows;
- Fleet composition (as a minimum split between HDV and non-HDV); and
- Vehicle speeds **and congestion**.

7.289: Average vehicle speeds during traffic congestion will fall, and **there is no simple factor** that can be applied to the average speed to calculate a speed applicable to congested periods. The preferred approach is to calculate the emission rate for the affected sections of each road for each hour of the day or week on the basis of the road speeds and traffic flows for each hour. The calculated emissions profile could then be used in the dispersion model.

7.292: And idling vehicles (in this case both at the mini-roundabouts and turning in or out of the compounds)

7.440 However, other model setups may be considered, such as varying certain links representing queues. For that purpose, estimates of the following would be required:

- Queue length;
- Traffic speed; and
- **Variability of congestion throughout the day.**

7.441 To represent the variability of congestion during the day, the method described above for overlapping links can also be used. Local authorities should be careful not to double count emissions of traffic when modelling queues and diurnal patterns. Both variable speeds and idling emissions could be used in some specific locations, for example for complex junctions.”

<https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

There is no evidence in Rampion’s documents (as referred to: REP1-006 and APP-060) that they have carried out anything other than an unsubstantiated estimate using a simple multiplication factor.

From REP2-022:

11.9 Horsham: HDC is modelling the AQMAs as part of the Action Plan updating process. To understand the contribution of all sources of emissions to exceedances of the air quality objectives within the AQMAs a source apportionment was carried at Cowfold worst-location (Cowfold 7n-DT37). Source Apportionment is the identification of ambient air pollution sources and the quantification of their contribution to pollution levels. A source apportionment considering 2019 traffic data shows that HGVs passing through the AQMA account for 22% of the local sources of NO₂. It is understood that even with the reroute of traffic proposed to avoid the AQMA, 25% of HGV will still travel through the AQMA, which could increase traffic queueing and air pollutant emissions aggravating the problem.

Rampion reply: “*Commitments C-157 and C-158 (Commitments Register [REP-1-015]) discourage construction traffic from routing through the Cowfold Air Quality Management Area (AQMA). Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-064] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] have assumed that as a worst case approximately 25% of heavy goods vehicle (HGV) traffic could 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 assumption was applied as a robust assessment of the maximum potential effects that may occur within Cowfold and is not a prediction of HGV construction traffic flows that will travel through the AQMA during the construction phase. As such, given the control mechanisms contained within the Outline Construction Traffic Management Plan [REP-1-010] and commitment C-158 (Commitments Register [REP1-015]) that requires HGVs to avoid routing through the Cowfold AQMA where possible, it is anticipated that HGV flows through the AQMA will be much lower than assessed. 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-174] with the assessment in Chapter 19: Air quality, Volume 2 of the ES [APP-060] concluding that there are no significant impacts confirmed by the Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] submitted at Deadline 1.”

Chapter 19(APP-060) and its Appendix 19.19APP-174) do not actually give details of how they came to the conclusions reached, beyond confirming they used the simplistic Defra modelling described above, just a list of modelling results.

Discouraging traffic from entering the village is meaningless; they won't. If delivery vehicles are faced with long detours, they will ignore them, or even worse, they will use the small side roads such as Picts Lane to avoid the centre of the village.

The commitment to avoid the AQMA 'where possible' is not likely to reduce the numbers significantly, and please note that it only includes those **entering or exiting construction accesses at Oakendene, Kent Street or Wineham Lane**. We agree that 'this is not a prediction of HGV construction traffic flows that will travel through the AQMA during the construction phase,' but not, as Rampion say, because 'it is anticipated that HGV flows through the AQMA will be much lower than assessed', but because deliveries directly to access points down the A281 will still go through the village. It also does not include LGVs or private vehicles belonging to construction staff, as we see from the response to Mr Turok above, which will all add to the congestion and disproportionately increase pollution therefore.

Rampion would have us believe that the 25% figure was a worst-case scenario. This is the scenario we in fact *must* work from. Rampion do not provide convincing evidence that the figures will be any better; indeed, the discrepancy between the figures given to Bolney PC and to Mr Turok above, suggest that their figures are inaccurate and changeable.

Conclusion:

Unlike some of the problems raised by the public and others, the traffic impacts around this particular part of the A272, with the two congested mini roundabouts and several turnings so close to this, to access the construction sites, is something they cannot easily engineer out of the proposals, so they try instead to ignore it, or by attempting to 'prove' it isn't an issue.

Cowfold is already at capacity. The 10% 'negligible' impact is only appropriate for a situation where the traffic is NOT at capacity. It is almost the worst possible point on the A272 where they could have chosen to site this.

If accepted, a detailed commitment on traffic numbers and management should, we believe, be in the DCO, otherwise any commitments made may not be binding.

The thing which everyone knows about Cowfold, apart from the fact that it is a pretty, sleepy little village, is just how bad the traffic is. Almost everyone in the county has been stuck in traffic on the A272 there at one time or another. It is a well-known congestion point and apt to tip into lengthy queues for the most apparently trivial reasons.

We currently have a situation where the lived experience of residents directly contradicts the 'findings' of the Rampion consultants. There must be a flaw in the arguments they are using as the two are polar opposites; they cannot both be right. We do not want to be proved correct only when the trucks roll in and the congestion on the A272 is unmanageable for both the public and Rampion construction vehicles themselves.

A local ecologist explained to us that he is often employed by companies such as Rampion to downplay the ecology at a site to find in their favour. The only traffic modelling so far has been done by people employed by Rampion. If we were to employ consultants ourselves, they could level the same charge of bias at us.

This would be avoided if an independent assessment were to be carried out, either for WSCC or for the Examining Authority themselves, of the detailed methodology Rampion have actually used and the assumptions made. It seems to us that they have not been adequate for a complex situation of this kind. However, it would only be meaningful if the consultant had full access to our comments and an understanding of the actual pattern of current traffic and the intended movements through the village and in both directions from the compounds, and clear numbers from Rampion of *all* traffic.

We believe we have provided robust evidence throughout the Examination to explain why the Rampion modelling is flawed. However, if the ExA is not minded to accept this, we would request that the ExA consider an independent assessment.

Appendix 5: Kent Street Consultation report by CowfoldvRampion.

The following photographs illustrate the true nature of this quiet, unspoilt and its usual users:



How will Rampion manage them?

Residents' views:

In anticipation of Rampion's promise to produce a traffic management proposal for Kent Street by Deadline 3, we have gathered together statements from deadline 2 and from our own resident surveys, to provide comments and observations from the people who actually know:

Amenity and current usage

- One Kent Street resident described where he has lived for over 30 years as 'a bit of magic'. This has mostly been unrecognised by wider authorities to date. We have been custodians of much wildlife, historic and characterful buildings and historic landscape. To turn this into a noisy industrial area without good justification is indefensible.
- It is an area the world has passed by. In the words of JRR Tolkien, it gives the visitor a 'heart-racking sense of the vanished past'; a journey back in time.
- Rampion underreports the true nature of Kent St by limiting its description to a rural road governed by the national speed limit. A more accurate description would damage Rampion's prospects. Kent St is a poorly-maintained single track country lane with no dedicated passing places and clay verges that become bottomless when wet. The speed limit is by default and not indicative of the status of the road.
- The area around Kent Street Lane is rural with walkers, foot paths, horse riders, bicycles etc and this rural setting will be destroyed and will take many years if ever to get it back
- We walk our dogs to get some peace and enjoy the visual view of open countryside! Not to walk there for rest and relaxation to have a huge substation in view!
- Kent Street is a restricted width, single track lane with only occasional parking spaces. Ditches close to the lane are hazardous for drivers without local knowledge - a loaded horse lorry ended on its side in a ditch when letting someone pass, fortunately no horses were killed. The lane has extremely high amenity value to dog walkers, cyclists and horse-riders given the low and slow traffic volumes, and qualifies for Quiet Lane status (with support confirmed from our Horsham District Councillor and Cowfold Parish Council). It is used as a connecting route between multiple footpaths and bridleways enjoyed by local residents and visitors. The proposed site access bellmouth on Kent Street will cause a long and permanent scarring of what is a beautiful lane edged with mature oak trees and blackthorn hedging, home to a number of owls and buzzards, regularly seen flying over the lane.

Traffic and traffic management proposals

- Kent street is a single-track country lane with soft verges and limited passing places, it is used by walkers, cyclists and horse riders. It is therefore totally unsuitable for heavy traffic and particularly HGVs.
- As far as Kent Street is concerned, I don't see how Rampion can come up with a Plan that is Practical. You don't need to be a transport consultant to see what is self-evident.

- At the moment the lane only just about functions with Farm Vehicles, Oil Deliveries and Rubbish collection. Every day I use a passing place and very often I need to reverse. There are always horses, cyclists and professional dog walkers.
- Kent street is described as a rural road subject to the national speed limit and they have only estimated and not surveyed usage. In reality, it is in most places a single lane road (very narrow in some places) with limited passing points and even those passing points struggle to allow two cars to pass, let alone more substantial construction vehicles. The road is also in frequent use of cyclists and horses and these feel entirely incompatible and unsafe to be road users alongside such a huge increase in industrial traffic. Also, the road probably only averages a 30-40mph speed limit.
- The very narrow single track country lane Kent Street is also going to be hugely impacted by the very large number of HGVs and LGVs planned to use this lane. This will cause an enormous amount of disruption to not only the residents of Kent Street but the residents of the adjoining cul-de-sac Kings Lane. Kent Street is not only used by residents but by large number of cyclists, horse riders and dog walkers. Kent Street is totally unsuitable for large number of HGVs but to my astonishment that is exactly what Rampion 2 plan to do
- The Lane is just too narrow to take any more HGV vehicles safely.
- Kent Street is a single-track country lane and would be completely unsuitable and unable to handle the predicted 400 HGV and LGV movements per week. The lane is unable to be widened due to ditches running along both sides of the lane and the passing points are unable to handle 2 HGVs trying to pass each other let along 50 vehicles a day
- The proposal to use Kent Street as a construction traffic access to the construction site and haul roads at access point A61 is not feasible because of the configuration of Kent Street - a single track lane, with no passing places, and already subject to subsidence because of its weak substructure and thin metalling. This subsidence has been exacerbated by the poor-quality reinstatement work carried out when the National Grid's fibre duct was installed in 2016, widening it is not an option because of the roadside ditches and close proximity of hedges and trees. Wineham Lane was reconstructed when the original Bolney substation was constructed in the 1970s. It is a therefore a purpose-built substation access road which served adequately the construction of Rampion1 substation. It is another argument why the existing industrial site at Boney should have been the preferred site for the Rampion2 on shore substation.
- Passing is not possible where verges and lane are close together
- Mud on lane dangerous as slippery and damages cars
- Verges dangerous cars and lorries fall into ditches
- Passing impossible and dangerous when attempted

- Anecdotally, the road already exceeds its design capacity. Rather than relying on estimates, Rampion should have supported its proposals with a traffic study and provided a more accurate description of the nature of the road itself.
- We also need to think about how you would deal with the other end where Kent Street joins with Wineham Lane which should be residents' access only for the duration of the construction

Safety

- Rampion may not use this as access to their site but with a build-up of traffic on the A272 inevitably people will look for a short cut adding further to the chaos.
- there will be significant increase in traffic from Wineham Lane down Kent Street as traffic tries to access A272 and residents causing dangerous hold ups as seen recently which will affect all residents of Kent Street. It will also meet Rampion traffic coming the other way.
- Many of the residents at the southern end use Wineham Lane, as the exit from Kent Street is dangerous onto A272
- they offer no plan at all to manage Kent Street despite forecasting an HGV every 10-12 minutes on this essentially domestic road which normally sees only pedestrians, cars and horseboxes. Rampion offer no plan to manage the intersections between Kent Street and the Oakendene estate onto the most dangerous stretch of the A272 which is already frequently subject to major congestion.
- The A272/Kent St junction is hazardous, especially when turning East; the sight lines are poor and the A272 traffic volumes high. Secondly, the current users are a mixed assortment normally associated with a country lane; in other words, conflict would arise not just from the volume of vehicle traffic but also the combination of cyclists, horse riders, walkers, horse boxes, farm traffic etc. Kent St links a number of public footpaths and bridleways enjoyed by local residents and visitors
- Access on to A272 from Kent Street lane difficult and dangerous
- The applicant says because the 2 x Kent Street access points are north of many dwellings there will be no traffic routing past these properties. This shows the complete ignorance of the applicant of the lane and how it works. All dwellings need to go north past these access points to get to the A272 to be able to leave towards to A23 or Cowfold,

Road construction

- What is the current road make up along Kent Street as it is not a robust a road as the previously improved Wineham Lane. We want to know if such a road can take the weight of the proposed lorry fully laden and what impact this will have over time. Also, the small culvert 200m into Kent Street is merely a concrete pipe with a thin layer of concrete and tarmac over it, this will not be able to withstand constant fully laden lorries.
- Water ditches / swales along both sides which are very deep in places (farmers pull out cars during the year

- Road surface deterioration pre and post Rampion
- Who will make good the verges and lane post Rampion and to what specification
- What is the weight bearing capacity of Kent Street and the culvert under the lane before access A61? This must be ascertained before any use of Kent Street can be agreed. The substrate is not likely to be designed to carry such a load. Any repairing would need to be done in an ongoing fashion to ensure residents can continue to travel to and from their homes, but the repair work will also cause major disruption in itself.
- Damaged lane and verges result in value reduction of houses (many of which are listed) and the area aesthetically and practically

General

- Air pollution and environment issues and local habitat destruction will affect all residents.
- No details are yet forthcoming on Kent Street, the applicant chose Oakendene without looking into Kent Street in any detail, indeed as mentioned in other reports The Rampion team came to my house and said Kent Street would not be used and all access was off the A272

Reports from Councils

From HDC LIR (REP1-044):

“12. The LVIA assesses ‘Transport Routes: Kent Street’ as having partially visibility of the substation to the west through small gaps in the trees and hedgerows for approximately 1km of the route due to the layers of intervening vegetation. To put it in context the approx. overall length of Kent Street is 2.5Km of winding road, which means that 1km is in fact a significant length for adverse effects to be experienced. It is also noted that no reference is made to the effects of using Kent Street during construction and the increase in construction traffic expected within the narrow rural lane, resulting in a significant increase in the level of activity in the countryside location.

13. The assessment gives the same ranking of sensitivity to Kent Street as transport routes A281 and A272. This blank approach is not appropriate and is disagreed with as it is not reflective of what is experienced in the ground. The sensitivity of Kent Street is much higher than the other two routes and this needs to be recognised as part of professional judgement. Whilst not identified as a scenic or designated tourist route, its narrow in nature, densely vegetated and overall, its intrinsic rural qualities are enjoyed by all of those that live and travel along it including walkers connecting to the public rights of way network within the area.”

This gives a reasonable overview of the reality of this lane, which is far smaller than Wineham Lane, but has been given equal status to it in all Rampion’s assessments until the ExA’s insistence that the Applicant reviews this and provide more information, and we welcome this. Horsham DC’s assessment is mirrored by the comments made by residents, shown above.

Shermanbury PC: REP1-068:

Kent Street is a very narrow, single-track lane with no passing places and drainage ditches on either side which would impede attempts at widening. The environmental impact and the rural nature of the area would also render any widening scheme impractical and unacceptable. At present the lane often suffers from blockages and severe traffic congestion, making access exceedingly difficult for farm vehicles, cyclists, equestrians, walkers, and the residents who use it regularly. This is further exacerbated by general traffic flow to and from the A272 which increases when there are incidents or hold-ups on the main road, turning Kent Street into a 'rat run'. The T junction at the northern end is very hazardous.

The absence of passing places alone would render the planned target of 1320 2-way HGV movements and 828 2-way LGV movements per week unattainable. Lorries meeting in the middle would have no way of passing and nowhere to turn around, with traffic backing up behind them. Reversing into a major 'A' road would also be impractical and dangerous. The use of Kent Street or the A272, on a daily basis, by this highly significant number of extra vehicles will require a logistics plan to ensure a free flow of traffic in both directions. No plan has, as yet been created, and from the experience of Rampion 1, a staging point for HGVs is essential to manage traffic flow.

The nature of Kent Street and its rural construction was not intended for constant, heavy traffic. We are concerned that over-use will severely damage the road surface, and the culverts, including one installed by the national grid, will be at risk of collapse. The road surface would need to be constantly monitored and maintained to ensure that local residents can use their cars and agricultural vehicles throughout the construction period.

There is no detail highlighting the proposed length of construction. Given the extreme duration of this development the project requires a logistics plan which includes all current road users as well as the proposed Rampion traffic. Given the high number of equestrian users along Kent Street and adjoining rural lanes priority in any plan must be given to ensure their safety.

Traffic numbers:

Baseline

From REP1-006:

*2.2.33 "Table 2-2 set out the average annual weekday flow (AADF) for the date of survey and the current baseline for the new receptor locations. Baseline traffic flows have been **estimated** at Receptor M and U due to the lack of available traffic data at the time of writing, as discussed in Paragraph 2.1.14. HGV10/weekday, total vehicles 100"*

The numbers for Kent Street have been made up, or as they say in REP1-009 Traffic Generation (tracked): "*estimated from onsite observations due to traffic data being unavailable*". They represent a gross exaggeration of current HGV numbers - see **actual** figures in the Enso Energy survey for the days when the A272 was not blocked. (See REP1-089 CowfoldvRampion Impact Statement Traffic addendum). The total vehicles, if one removes the HGVs from the total, are in probably the right order ie 80-90 per 24-hour period.

They also completely fail to account for the major users of the lane, which are pedestrians and animals.

The only real data we have for Kent Street is from Enso Energy (see Horsham District Council Planning Website, Doc Ref DC/24/0054), and that, apart from just three days, was for a period when the A272 was closed and the resulting traffic on Kent Street brought it to a standstill

Construction traffic

REP1-009 Table 6-7 gives figures of 828 LGVs entering and leaving A61, and 1320 HGVs, and 468 LGVs and 892 HGVs for A64. This is a total of 3508 vehicles.

We would like to see the basis on which their construction vehicle movements and frequencies are based. They are purely theoretical, and will change when contractors are appointed and they come up with their own construction plans and timetables, as was the case with Rampion1.

Do they include delivery vehicles from outside companies, or just their own vehicles? Do they include the tanker vehicles bringing water to the drilling sites and compound at the Cowfold Stream?

REP1-006 2.4.65 *“on Kent Street, construction traffic flows will be above 50 per day for only one week and HGV flows will remain above 40 HGVs per day for two weeks”*. Even any number of HGVs will put the percentage change many times over 10%. How can we have any confidence in these numbers?

Rampion tries to differentiate between HGVs and lighter traffic but *any* traffic in addition to the existing, including bicycles and equestrian users, adds to the conflicts that regularly occur. This is contrary to their perceived “no perceptible change in delay to drivers” statement. If there are “no perceptible delays”, this will only because equestrians will stop using the lane and cars will find alternatives causing knock on impacts elsewhere; as was the case when Wineham Lane was used for Rampion1. Drivers used alternatives such as Kent St.

Impacts:

Road users

REP1-006 Table 2-27 says: *“Kent Street at this location is a single lane road bordered by vegetation, meaning pedestrians will have to walk on the road. There are no footways or crossings. During the peak of the construction phase, it is **anticipated [NB we surely need soundly based figures, not guessed ones]** that one additional construction traffic vehicle every 12 minutes on the link to access A-64 and one additional construction traffic vehicle every 20 minutes between access A-61 and A64. Taking account of **the limited level of pedestrian demand** north of access A-64 and the lack of significant pedestrian desire lines and trip attractors the magnitude of change is considered to be Low. The significance of residual effect on pedestrian amenity, pedestrian delay and fear and intimidation is Moderate Adverse (Significant).”*

We strongly dispute the findings of limited pedestrian demand. Twenty minutes spent on the lane will show the observer just how very many people walk, walk their dogs or pass by on horseback or bicycle. Earlier this month, we walked with councillor Sarah Payne and a highways officer along this part of the lane. Every few minutes there were walkers, dog walkers or horse riders. They make up the majority of traffic on the lane, not vehicles. The verges at this time of year are not safe in places, as the ground is extremely boggy. Horses could not move to the side. Usual etiquette on country lanes in any case is for vehicles to give way to horses and to give them considerable clearance, not the other way around. Indeed, the Highway Code requires drivers, when passing horses, to drive at

less than 10 mph and to allow at least 2m of space. As the road is less than 3m wide at some points, the HGVs will be in the ditch.

Worse still, REP2-017, Review of IEMA guidelines, now **downgrades the impact on Kent Street to 'negligible'**.

But Geart and IEMA assessments by Rampion are reliant in any case on a flawed estimate of current HGV numbers which have no basis in actual fact but are simple guesswork. The Hazard scores are nonsensical for a small lane like Kent Street as this totally fails to take into account that pedestrians and animals which walk there are usually **in the middle of the road and that there is nowhere for them to go**.

Both GEART and IEMA guidelines use the following to assist assessment of environmental effects of traffic:

Rule 1: Include highway links where traffic flows will increase by more than 30% (or the total number of heavy good vehicles will increase by more than 30%).

Rule 2: Include highway links of high sensitivity where traffic flows have increased by 10% or more.

We know that Rampion's use of Kent Street will more than double the total traffic on the lane and that the HGV use will increase by 4000% from the current daily number of 0-2(See ENSO energy survey data).

Para 3.1.2 and 3.1: we strongly object to Kent Street being assessed as Rule 2 as on all criteria it is clearly in Rule1

*From Table 2-27, "The percentage change in total traffic and HGVs on this highway link is **greater than 100%** for the HGV peak week at both access A-61 and A-64."* This is surely a breathtaking understatement. They have guessed at 10 HGV movements on the lane per day. The actual number, from the Enso Energy survey was 0-2 on normal days, giving a percentage change of **2000-4000%**; just a little greater than 100%! They mock the GEART guidelines and make no genuine attempt to understand the situation and its impacts

The applicant actually suggests that because there will be on average one HGV every 12 minutes, (although it will be more as this is based on a 12-hour day) and the length of Kent Street to access point A-64 can be walked in 2.5 minutes, people can time their walks to avoid the traffic and so they won't be affected by it! In any case the HGVs won't all be neatly timed to arrive in an 'average' manner. Nor does it take into account the rest of the 700m of the lane they will be using, just the first 200m to A64.

2.4.60-61 There will be multiple peak weeks, each of approximately 2 weeks duration over the course of the at least 38 weeks for which Kent Street will be affected. During which time at least 3-5 HGVs per hour will travel on the lane **plus numerous LGVs**.

2.4.62 We do not agree with the statement that there will be insignificant impact. No credible traffic management strategy has yet been proposed.

REP1-006 2-27 is another case of making the argument suit the desired outcome rather than use real data to fully evaluate the impact and propose alternatives and/or mitigations. They make predictions but the fact they state "*the baseline traffic data has been estimated because traffic survey data is not available*" destroys any technical credibility the statement might have had. A significant admission indeed.

Accidents:

Table 2-3 Accident data:

Kent Street between A272 and Wineham Lane: Length 2.60 km, annual traffic flow 311345 (**based on flows on Wineham Lane**)

On what possible basis have they based flows on Wineham Lane? Even their made-up numbers, and certainly the Enso figures, show that the actual flow is at least ten times less than on Wineham Lane, and the size and therefore impacts on the two roads are totally different (Kent Street is less than 3m wide, Wineham Lane *"is a rural road (width could enable two cars to pass)"* (REP1-006, para 2.2.30)

We know from WSCC highways department that on small rural lanes a few as 1 in 15 accidents are ever reported. It is clear from the testimony above that accidents *do* happen, but that local farmers pull vehicles out of ditches etc

Access to properties:

From REP2-029, table 2-40 Response to Sue Davies *"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 is simply incorrect. The DCO boundary goes further south than this along the lane. Even without that fact, however, there *are* several properties on that part of the road, including Southlands, Oaklands and around five properties down the small lane to Eastridge farm. Access to their homes must be allowed at all times. For Rampion to say that the rest of the lane doesn't matter so far as traffic disruption is concerned, is to totally misunderstand the use of the lane.

The lane is at most 3m wide and has a 6'6" width restriction on it. Any traffic management plan must take this into account

Questions still unanswered:



How will Rampion prevent situations such as this?

Do Rampion have actual figures for the current usage, including pedestrians and animals?

How have construction vehicle movements been calculated?

What is the weight bearing capacity of Kent Street and the culvert under the road before A-61? Has there been any assessment of whether the road can actually take this traffic?

Do HGV numbers include vehicles of 3.5-7.5T or just those over 7.5T? Rampion still have not clarified this.

Have Rampion done a full survey of the road to look at where any passing places might be constructed? The current ones are there by grace and favour of the land owners and are not a right of way. They are just compacted hard core and full of potholes.

The side verges are just muddy clay with deep ditches on both sides, into which drivers unused to the lane fall.

How will they deal safely with the difficulty of HGVs and other construction vehicles pulling out into the A272 during busy periods

What management plans will be put in place to deconflict traffic meeting on a single-track lane with no passing places?

What escalation arrangements will be put in place to avoid the unacceptable delays that occurred on Wineham Lane during Rampion 1 construction work at Bolney?

What reinstatement of Kent Street will take place after the extra heavy traffic has destroyed the running surface and verges?

How will this be monitored?

How are they going to ensure access to properties on the lane which are situated within the DCO boundary between the A272 and access A61?

Questions from REP1-009 Traffic Generation (tracked):

5.5.4: "Generally, onshore substation construction will take place during daylight hours" How is this consistent with core working hours of 8am to 6pm? Day light ends around 3pm in midwinter.

Table 6-7: There will be a total of 3508 vehicles in Kent Street during the 38 weeks or so of estimated construction time. It is not clear if outside delivery vehicles or staff vehicles are included in this or in addition, or *where any of these vehicles will park* in the haul roads.

5.5.6: "It is anticipated that heavy goods vehicles (HGVs) will be required during the enabling and construction phases of the development."

- Are the HGV figures we have been quoted for the construction phase only?
- What will the numbers be for the enabling phase?
- How long might it be expected to last?

- What are the implications for disruption to the A272 in particular by the creation of the access point, and the re-routing of the UKPN cable?
- How will traffic be managed in that time?

Conclusion:

Most of the current traffic is pedestrians, dogs and horses. How will Rampion manage them? Their current plans, such as they are, take no account of the lane's main users; pedestrians and animals.

In an email to a Kent Street resident, in December 2022, [REDACTED] said *"As a developer, we also do not wish our lorries getting stuck on Kent Street and we will be mindful of the condition of Kent Street when finalising our construction routes, which we are in the process of doing now."* Nearly a year and a half later, there is no evidence that they have made any progress on this. Instead, they have sought to use misleading language during much of the consultation saying that *substation* construction traffic would not use Kent Street, but in such a way as to give the impression, at meetings, that construction traffic would not use Kent Street *at all*. It is clear from one of the residents' comments above, that this has either succeeded, or perhaps that at times, Rampion have not even been attempting to mislead by their language, but have simply not always told the truth.

The road must be repaired as necessary rather than at the end, but this will cause major disruption to both residents and site traffic as it will need to be done frequently in all probability. Description of Kent Street in the same terms as the A272 and A281 as a 'highway' may have led them to overlook this. The northern end of Wineham Lane was strengthened and widened in the 1960s to take the main substation construction traffic. It is ready made and served the Rampion 1 construction perfectly well. This should have been taken into account when considering the alternatives.

Strengthening and widening of Kent Street were *not* in the consultation, should not be considered now. Such a change in the character of this tiny lane is totally inappropriate, and an alternative exists.

They have already 'kicked the can down the road' twice because they know they cannot provide an acceptable way to manage this impact. It is not credible that they will suddenly do so. No traffic monitoring appears to have been done, despite requested to do so by the ExA. They absolutely must not be allowed to leave this to be sorted out only once consent is granted.