

Rampion Objections 23rd April 2024

INTERESTED PARTY NUMBER 20045181

We strongly object to the Rampion II proposal.

We are residents living on Kent Street in Oaklands / Ridgeland.

I have sent written objections previously for all the deadlines and we are part of the Cowfold V Rampion group of local residents. We are an active community who will not let large business bulldoze through our area without due regard to local policy and local people and agree with our MP's view that this is the "wrong project in the wrong place"

We have read, contributed and endorse the latest Submission 3 deadline document by CowfoldvRampion. For ease of reference this document is attached below

An email was sent to the ExA regarding compensation on the 24/4/24. The ExA in their written questions to the applicant LR1.3 and LR1.2 have asked about updates on compensation.

I emailed [REDACTED] on the 29/11/22 requesting details on compensation and also on the phone early Sept 2023 and by email on the 4/9/23 asking about compensation but have received no answer to date. I also requested via email a meeting with [REDACTED] of RED with Lucy to discuss compensation on the 18/10/23 but I never received a reply. My disappointment in the lack of communication was reiterated by email on the 20/12/23 but Rampion have not replied regarding compensation since my initial emails. This would seem to be contrary to what Rampion are stating reference LR 1.3 and LR 1.2. as they are aware of my views since 2022.

As with many of the listed points in the latest CowfoldVRampion document the above yet again shows a lack of clarity, honesty and respect by the applicant in dealing with local people (see also [REDACTED] responses in REP2-028 and his treatment). They have constantly tried to mislead and positively spin responses as listed in our document.

ESO Report

The National Grid ESO have produced a comprehensive Beyond 2030 report about the grid which proposes a £58bn investment to make the grid carbon neutral by 2035.

<https://www.nationalgrideso.com/news/eso-publishes-beyond-2030-ps58bn-investment-plan-future-britains-energy-system>

This report analyses the current over production of wind farm electricity in Scotland and The North Sea and the wasteful current payments made to wind farm operators to not produce any electricity. It proposes off-shore cables to even out supply and demand over the UK to form a network so that energy is directed from where it is currently produced to areas where it is needed

Rampion should be evaluated in light of this new influential report

Accompanied Site Visit

We are pleased that we now have a site visit to Kent Street but would like the ExA to see the traffic flow at the Kent Street / A272 junction **during congestion periods of 7.30am-8.30am and at 4pm-5pm**. The traffic comes to a standstill at these times as traffic queues in and out of Cowfold and this is only with current traffic numbers.

We still feel that the detailed exhaustive ecology work undertaken by [REDACTED] is not being acknowledged properly during the site visit. The 'green lane' [REDACTED] refers to is not being visited, this area is rich in diversity and will be destroyed by the works. Can this be added to the site visit and also more time along Moatfield Lane

Daniel Ball would also like to accompany the site visit and attend the open floor hearing please

Traffic – Local issues and impacts A272/ Cowfold/ Kent Street

We feel that the lived experience of local residents in Cowfold is not in agreement with the findings of Rampion and their traffic data and this needs to be investigated. This has been flagged from the beginning, but Rampion have not expanded on their analysis

We would comment

- Many of the traffic figures supplied by Rampion are confusing and contradict findings between numbers and tables.
- Already over 18,500 vehicles go through Cowfold every day and this number is increasing (WSCC figs up) as more housing development occurs around local areas and villages
- Originally Rampion said 8040 HGVs, this is now over 20,000 but there will be more due to water tankering vehicles for water neutrality (they may arrive from A23 but leave via Cowfold). Also due to the flagged flooding issues at Oakendene many more hardcore deliveries will need to take place
- Rampion do not give reliable data but REP1-009 say around 70,000 LGVs and the 20,000 HGVs above between the two compounds, is this vehicle movements or vehicles??
- The unknown factor is the amount of sub-contractor vans arriving and leaving every day, this could be in the hundreds and all arriving at the same time around 8am and leaving around 4pm to coincide with current congestion mentioned above at this time through Cowfold and the current traffic jams at this time down to Kent Street
- Even now if a lorry leaves Cowfold and tries to turn right into Oakendene Industrial estate, if there is a lot of oncoming traffic coming along the A272 from the A23 then the lorry will cause a jam up to Cowfold in minutes. We are near to capacity at peak times
- Cowfold has 2 x congested mini roundabouts, these areas become blocked very quickly and are difficult to navigate in busy times with current traffic flow only.
- We need more clarification on exact numbers of vehicles entering and leaving the 2 Oakendene compounds every day
- When will Rampion publish a traffic management plan for access into Oakendene – we need this now to analyse traffic flows consequences in and out of Cowfold
- We believe there are too many access points along the A272 and along Kent Street, we need data to be analysed to show how all these new access points will function during the day
- Traffic lights must be used for safety reasons but with them the traffic jams will be too large to be functional, especially at peak rush hour times am and pm. This is the problem of having the substation placed so close to Cowfold Village. The junction from Kent Street to the A272 is extremely dangerous pulling out and heading to the A23. Many accidents have happened along this route and the local community are very worried that more will happen (a lady on the lane lost her son on this junction)
- Blockages on the mini roundabouts will have safety issues for elderly people in the village and for school children taken and picked up from the local school
- How can they prove they do not need a holding bay when this was such a positive effect in use for Rampion 1, Bolney Parish Council have raised this, and they were directly involved in Rampion 1 holding bay discussions?
- The added congestion will cause many more vehicles to use other side roads and quiet lanes which all have soft clay verges which will be destroyed.
- Rampion have not included traffic congestion and standing traffic effects around the 2 mini roundabouts in Cowfold and the effects on the AQMA – this needs to be addressed. Defra guidance states that there is a clear distinction between vehicle emissions split between moving and stationary traffic if congestion is an issue. I
- In REP2-022-point 8.16 Rampion are still saying there is no environmental effects from traffic in Cowfold and point 8.17 Rampion still state HGV traffic will avoid Cowfold WHERE possible – this is not good enough for the local community.
- In the same REP2-022 on traffic point 11.9 - With regard to traffic flows through Cowfold and the AQMA - Rampion still only saying that they will discourage construction traffic from coming through Cowfold, then give a worst case scenario of 25%, this is unacceptable as it is too vague
- Safety issues on Kent Street with walkers, dog walkers and horses using the lane (WSCC reiterate this issue)

We would like to have definite and easy to understand traffic surveys of Cowfold and the A272 so that surveys can be matched with residents lived experiences. Otherwise Cowfold Village will be gridlocked for hours every day.

Rampion are saying there will be no congestion issue and so no solution is needed. This will not be true, and more investigations need to take place asap to see how the local road network will be affected. Also, how standing traffic will affect safety in Cowfold and the impacts on pollution and businesses in the area.

Impact on the AONB

Rampion are not objecting to a battery site application to the South of the substation site (**Ref DC/24/0054**), even though the cable route and battery site plans overlap in places and the battery site will have no access for maintenance or emergency vehicles due to it being the other side of an open trench during Rampion construction

Horsham DC have stated that they believe the substation and the battery site must be seen in totality with regard to landscape effects and not individually as two applications, as the two sites are only a few hundred yards apart

Horsham DC commissioned Place Services to analyse the battery site and how it relates and responds to the landscape setting and context of the site on their behalf. The conclusion of the report is that it is not supportive on landscape grounds.

They say “we have concerns regarding the sensitivity of the site in terms of landscape character and visual amenity. The site is surrounded by a strong network of PRow and not only contains strong valued landscape features but also provides an area of sensitive vistas to the north toward the High Weald National Landscape (formally ANOB) and south toward the South Downs National Park.”

This report is online under reference DC/24/0054 and should be seen as relevant for the sub station site which is due north and has the same relevant receptor points due north and south

Please can the ExA liaise with HDC and Mathew Porter on this application and its relevance to the sub station site location

Flooding around Oakendene and the proposed sub station site

Flooding has been mentioned in many representations before, but Rampion have not updated any surveys or responses

The Applicant is still not taking our concerns on the flooding in the fields during Winter. Whether is it surface water or ground water flooding the photos over the Winter period show the amount of water on the site. With increased hard standing all this water will eventually end up in Cowfold stream and increase flood risk further down the Adur (see photos of A281 floods). WSCC are in agreement that there is both surface and ground water flooding at the site and this has not been resolved

The climate is changing, and the last three years have had very wet winters. We own fields locally and one cannot put machinery in fields from early Oct to May due to the rain and land being clay based. Rampion seem to think recent weather is exceptionally wet (they comment on a ‘notably wet Autumn’) but this is not the case.

Ecology

We were dismayed by Rampion’s response to the detailed Ecology report by Janine Creaye and are very pleased that the ExA has asked for further assessment by statutory consultees including natural England. We look forward to seeing more details at the next deadline.

Can the ExA also read our comments on the green lane mentioned in said report and please visit this on the accompanied site visit day

Water Neutrality

Reference REP2-022 point 9.21

Point 9.21 reference Water Neutrality - 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. 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 come through Cowfold Village and along the A272 or could turn left into Cowfold on leaving the compound

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 asap as traffic journeys will be very large and need to be added to Traffic Numbers in the Cowfold area

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 it would pale into significance compared to local projects. 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

ESO Report

As to the claims about CO2 reduction over its life, due diligence would suggest that, as Rampion 2 only offers 5 years of carbon emission reduction benefit (2030 to 2035), the calculation of all the imbedded co2 in Rampion 2 in the mining, processing, smelting, manufacture, construction, operation and maintenance would be helpful. That would help understand if greater or lesser CO2 emissions are imbedded than the 5 years savings (10 million tonnes at the assumed 2 million tonnes Co2 a year to 2035 (i.e., considering the quantum of rare earth and critical minerals mined and steel and concrete involved in turbines and the offshore and onshore works).

That is important again in due diligence on the Applicant's claim that Rampion 2 is essential to save nature and ecosystems by reducing carbon emissions, as in its promotional literature. There is a trade-off against the disruption and harm to ecosystems that construction and operation entails, where all adverse ecological impacts, marine and terrestrial, certainly cannot be mitigated as accepted in the NPS and PAD Statements

Rampion state the operational lifetime of the project is 30 years with the decommissioning to take the same amount of time as the construction. That would be 10 years to build and remove (probably more due to supply issues and usual infrastructure projects versus estimated timelines and only 30 years of generation coupled with all the corresponding damage to our environment and ecology loss - all feeding into a grid which is planned to be Zero Carbon by 2035.

We agree with CowfoldVRampion that the applicant is making no real attempts to answers valid local community questions but is simply reproducing standard template answers or even saying they have no comment.

Rampion want the local issues around Cowfold / Oakendene to be simply overlooked and forgotten amongst all the data for the whole project and know it is difficult for the ExA to keep track of all issues

REP2-028 – Table 2-8 – Applicant’s Response to Emily Ball (REP1-097)

We would like to comment on the applicant’s previous responses to our representation

All of our comments and points of interest and objections have only been answered by Rampion by reference to previous documentation. We have read the previous documentation by Rampion but our concerns are still outstanding. We have been answered by a plethora of copy and paste answers and no further details were forthcoming.

Summary

As the DCO process continues we see many examples where Rampion are not addressing any of the local issues around Cowfold and Kent Street and are just copying and pasting standard responses, this falls below the standard expected of such a large project.

Do the ExA realise the asymmetric nature of this DCO Application. Local residents are disparate and individuals all over the county fighting an organisation with large resources and large numbers of people. Local residents also have day jobs to pay their mortgages and are faced with a mutual billion pound organisation whose team all specialise in producing such schemes all over the world. It is daunting if not impossible for residents to plough through 900 page documents, this is not our speciality.

Our objections should be properly analysed and not answered with professional waffle. RED are trying to bulldoze through local policy because we need this scheme from a National perspective. We do not believe this ‘macro good’ argument is as strong as they state