COMMENTS ON ANY FURTHER INFORMATION / SUBMISSIONS RECEIVED BY DEADLINE 3

Cowfold Residents' Comments at Deadline 4

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Comments on Rampion documents:

The following is a selective, not comprehensive, comment on the submissions received in deadline 3.

REP3-004 Draft DCO tracked:

Speed limits

16.—"*(1) Subject to the provisions of this article and the consent (such consent not to be unreasonably withheld) of the relevant traffic authority, which consent may be subject to reasonable conditions, the undertaker may, in so far as may be expedient or necessary for the purposes of or in connection with the construction, operation or maintenance of the authorised project, impose a temporary speed limit either at all times or at times, on days or during such periods, and on such highways as may be specified by the undertaker."*

They cannot be intermittent on a road as dangerous as A272 or it will confuse people and there will be accidents. 'Unreasonable' is vague and makes it difficult for WSCC to refuse. Any speed limit alteration must be subject to careful modelling and analysis regarding the implications for road safety and traffic flow

Detailed design approval onshore substation:

8(4) To the extent comprised in Work No. 16—

(a) there must be no more than 12 buildings;

(b) the height of the main operational ~~buildings~~ building and other infrastructure must be no more than ~~12.5~~28.75 metres in height above ~~finished ground level~~ ordnance datum;

(c) the maximum main building length must be no more than 70 metres;

(d) the maximum main building width must be no more than 20 metres;

(e) lightning protection masts must be no more than a height of ~~18~~ 34.25 metres above ~~finished ground level~~ ordnance datum; and (f) the maximum height of any fire walls must be no more than 10 metres.

(5) For the purposes of paragraph (4)— (a) 'finished ground level' will be defined in accordance with the design and access statement; and(b) the term 'building' excludes electrical infrastructure installations.

How does this compare to the current ground levels? We were consistently told during the consultation that the substation would be no more than 12m high and could potentially be lowered as had been done at Rampion 1. It must be clarified whether this now represents an increase in the actual finished height above current ground level. Topographical mapping shows at Oakendene, the north end by the A272 is 22m above sea level, midway down is 18m and the actual Substation site to the south is 17m, the lake just 14m. (CowfoldvRampion Impact Statement REP1-089 page 223). This means that at the southern end the substation **may be nearly 14.5m, well above the heights used in the viewpoint images, and the substation at the midpoint will have to be sunk into the ground, or be hugely more visible than suggested, which is never going to work with the flooding issues.** How will Rampion answer this?

By contrast, the Wineham Lane North site is 21-25m above sea level, Rampion1 is about 27m and the main substation about 31m. There would be no need for this lack of transparency about the finished height.

In addition, what restrictions are there on sizes of other buildings, and what defines a main building?

Construction Communication Plan

There is proposed: *"(a) A range of communication methods and materials designed to reach communities local to the construction works in an open, regular and transparent way (b) An accessible enquiry and complaints procedure*"

This sounds good but lacks any substance and therefore means nothing.

Kings Lane/Moatfield Lane are still down as bridleway and public footpath scheduled for closure

There is still no mention of UKPN and the high voltage cable, only SSE, **nor in REP3-006, Section 9.25** (status of discussion between the parties). We believe this issue is being persistently ignored by Rampion.

REP3-009 Land rights tracker tracked:

Very little progress has actually been made, despite the Applicant's exaggerated claims, eg 036: The Affected Party -denies the level of engagement claimed. This is also a common theme brought up at the CAHs

REP3-014 Design and Access Statement Tracked:

1.2.7: "*The early progression of onshore site preparation works including advance planting for landscape and ecological mitigation will seek to maximise the benefits of such works."* This is meaningless: they have been asked repeatedly how they can carry out effective early planting when the whole northern part of the site is to be a compound for the duration, a UKPN cable impacts on planting etc and they **have no answer**

Table 2-2:

AS1 *The main GIS building at the onshore substation may extend up to the maximum level of 28.75m AOD,* ***with an expected building height of 12.5m above finished ground level*** *and will be up to 70m in length by 20m in width. Oakendene*". Is this consistent with the statement in REP3-004 above? **What, therefore, ARE their drainage and flood plans; they MUST have them in order for this to mean anything.**

AS2 *Ancillary buildings at the onshore substation (buildings other than the main GIS building) are* ***expected*** *to be single storey height to house ancillary systems and equipment.*

'Expected' is no commitment to single storey at all and should be altered to 'must be'.

Table 3-1:

LV3: "*the Oakendene substation will be screened by existing retained vegetation and proposed landscape planting from the majority of views into the site, from the surrounding landscape, and in* ***most cases*** *will have limited or no visibility."* We strongly dispute this statement; nothing has changed to make this anything other than highly visible from most directions, especially A272 and the AONB. In fact, we do not agree with any of the claims about how effective screening will be. The Applicant also continues to fail to take into account effect of deciduous trees and vegetation in winter.

LV13: In reality we know that very little pre-planting can take place on the northern side because of the visibility splay, the fact that the area is to be used as a compound, the need to move the UKPN and most recently, the need to create a 35m visibility splay at the entrance to Kent Street and remove a large area of vegetation as a turning arc to enable access to Kent Street. Also, native

parkland trees will take DECADES to screen effectively from the manor house. **The Design Plans show that in fact most of the area to the north will remain wide open until the end as it cannot be planted up and allow construction to take place around it.**

TE3: At last, they are now recognising the extraordinary wealth of species in this small area, but they cannot therefore have followed the principles of the mitigation hierarchy, the first of which is to AVOID

FR5: "*The onshore substation footprint will be sited outside of the 0.1% Annual Exceedance AEP flood extent* ***associated with the southern watercourse*** *(defined by the Environment Risk of Surface Water mapping).*"

They may be outside the 0.1% AEP zone on the southern boundary but this is NOT the case for other parts of the substation footprint: Figure 26.2.6a clearly shows 0-1-1% risk within the substation footprint, in the centre of the substation site and along the eastern part. **The latter is in fact where our photographs were taken from, and clearly floods significantly**

REP3-020 BNG tracked:

We remain of the opinion that Rampion seek to downplay the baseline, and numerous other RRs and WRs would appear to be of the same opinion. How can you adequately assess the BNG requirements without a true picture of the baseline; their approach is just smoke and mirrors. There are now at least three examples of clear evidence that Rampion's from separate Interested Parties that ecology surveys downplay the quality of the baseline ecology; see REP3-051 below.

REP3-022 Traffic generation Tech note tracked

Please see Appendix 1 Traffic methodology assessment

REP3-024 Operational Drainage plan tracked

Regarding the filter drain in the SuDs indicative plan, its current purpose is to connect to drain/culvert under the road (A272), which carries water from the opposite side of the road. It must therefore be reconnected. There has been flooding in previous years to properties on the north side. In addition, the culvert carries water away from parts of Picts Lane and the AONB

REP3-026 Outline COCP tracked

C22-shoulder hours still include loading and unloading. And now, at the ISH we learn that they are intending to use these hours to go to sites such as the cable route down Kent Street. This is unacceptable disturbance to residents who may need to get to work or school.

The hedgerow and tree retention plans in the end of document continue to show significant anomalies.

- In figures 7.2.1j and k, how can W557b and HS 1405 be retained, and others, if a haul road goes through them, and also, this and all the notching affects connectivity to a major degree. H520 will **not be** retained as shown due to the Kent Street visibility splay-more inconsistency. and many others: scrub, vegetation, grassland, and combined retention plans
- In 7.2.9h the representation of W791 is inaccurate and misleading. as now, according to REP3-055, has a 20m visibility splay cut into it to allow access for enormous vehicles to A64.
- We do not believe W713 (a nightingale hot spot and very close to Taintfield wood) can be retained if access is to be created for large vehicles to come in and out of A64. An accurate swept path analysis must be carried out and presented, showing that there is enough room

for both the path of the huge vehicles in and out of Kent Street northwards and for the cable trenches.

- In the scrub retention plan, 7.2.3j it is simply impossible for HS1405, HS5801, HS1410, HS19 and probably HS688 to be retained if a haul road has to pass through. How are Rampion proposing to achieve this?

All of this is no doubt repeated in other plans and **is a demonstration of how little effort has been made to achieve accuracy in the BNG baseline, as highlighted by SDNPA at the hearings**

REP3-030 Outline CTMP tracked:

Please see Appendix 2 below

REP3-032 Outline construction workforce travel plan (tracked):

Table 5-2; "*Advise those driving to the site of recommended routes to avoid the use of narrow unclassified rural roads, where possible."* This is meaningless; of course they won't; they will use lanes like Picts Lane and Bulls Lane as rat runs to avoid the Rampion congestion

Why has monitoring been reduced from quarterly to every 6 months?

REP3-036: onshore written scheme of investigation tracked:

We dispute the low archaeological significance assigned to much of the northern end of the cable route given the mediaeval layout of the fields, the antiquity of many of the farmsteads, the green lane and the link to ancient Buck Hatch Lane and the finding of Henry vii coins around the Cowfold stream and green lane.

REP3-038 Landscape and ecological management plan tracked;

The Oakendene advanced planting plan is not possible as the North East corner of the substation plot is to be removed under the Kent Street CTMP, also published at this deadline, which requires the removal of a large area of hedge, trees and scrub at this point to create a huge turning arc. This is another example of lack of joined up thinking between Rampion documents

It makes no sense to choose such an ecologically diverse site for this substation. Surely better than all the biodiversity net gain would be to leave nature alone. 30 years cannot replace the ancient trees lost or mature hedgerows and the habitats they create.

In Annex A the notching diagrams show the terrible extent of permanent vegetation loss and connectivity on the haul road either side of the Cowfold Stream. The hedges, scrub and tree density in this area are so great currently. This means that the special habitats can never be reinstated, and perhaps explains why so little BNG is planned where it is most lost-ie here. NB the UKPN underground cable has similar planting constraints around it. It needs to be demonstrated that this will not conflict with their planned replanting and screening scheme.

REP3-050 commitments register tracked:

C-292: commitment to "*During detailed design the mitigation hierarchy will be applied to avoid losses of key habitats (e.g. woodland, hedgerows, scrub, watercourses and semi-improved grassland)"*

Why then have they failed at the first hurdle "to avoid", by routing this cable through an area so dense in all of these things?

REP3-051 Applicant's response to ExA first written questions:

LR1.12 *Approach to reimbursement of expenses*. The applicant's approach of only reimbursing fees if an agreement is signed is unacceptable

LR1.13: local landowners report a chaotic approach to considering alternatives, with different members of the team agreeing different things with APs and offering false reassurance

AQ1.2: *"In relation to Cowfold, whilst commitments C-157 and C-158 (Commitments Register [REP-1-015]) discourage traffic from routeing through the Cowfold AQMA, it is a necessary part of the construction traffic route for the northern part of the onshore cable corridor. For robustness within Chapter 23:Transport, Volume 2 of the ES [APP-064] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006],* ***it has been assumed that approximately 25% of HGV traffic will route through Cowfold from the A24 and A272 east of the village centre when entering or exiting construction accesses at Oakendene, Kent Street or Wineham Lane****. This accounts for the potential delivery of material or equipment to / from locations directly west of Cowfold or use of the Strategic Road Network and provides a robust assessment of effects within Cowfold. "*

This is not much of an avoidance! Not much of a commitment to avoid. See also Appendix 1 below for more detail.

TA1.4: Kent Street. Please see separate comments about the Applicant's response in Appendix 2 below. It is our belief that the ENSO survey mentioned by the applicant is flawed with regards to its provision of vehicle classification data as explained in Appendix 2 and even then, only had relevant data for just 4 days.

TA1.5: the applicant has simply repeated what was previously stated

TA 1.6 Dragons Lane: The applicant has forgotten that one of the issues was the very narrow pinch point at part of the lane, between two buildings. Their response does not address this.

Also, we would like to know why, if Rampion do not intend to use this access for HGVs, they have approached residents on the lane to purchase parts of their gardens.

TA1.12: Oakendene industrial estate access. We disagree with the applicant's statement that "*there is not a significant history of accidents at this junction*". This junction can clearly be seen as a cluster point for accidents on WSCC accident data, it was recognised as a danger point by WSCC in their initial report and there are double white lines indicating it to be a risky corner. The 14 vehicles every hour will cause significant disruption, and does not take into account the large number of private cars which will arrive at the site each day:

- *"In the total construction peak week, there will be 173 daily vehicle movements, of which 51 will be HGVs. This is the equivalent of approximately 14 vehicles per hour (7 entering and 7 exiting) In the HGV construction peak week, there will be 65 daily HGVs (only for 1 week), which is 5-6 movements per hour (2-3 entering and 2-3 exiting); and*
- *The average total construction vehicle movements will be 21, of which there will be an average of 5 daily HGV movements."*

NB This is higher than the figures they gave to Bolney PC in REP2-014; there is no consistency. Even if the difference is due to traffic coming from the Cowfold direction, it doesn't fit with 25%

of HGVs coming from A24 etc in REP3-051 above. Each department seems to have no idea what the other is saying. If it was indeed all worked out from a detailed plan, there would be consistency

TA1.13: the applicant appears to be undermining the purpose of the shoulder hours and seeking to use them as a means of extending the delivery period to the sites

TE1.1:

"In August 2021, hay had been recently cut, prompting the second visit. The following species were recorded in the field at Cratemans Farm marked as Field B by Ms Creaye [REP1-106], meadow foxtail, crested dogs-tail, Yorkshire fog, smooth meadow grass, white clover, dovesfoot cranesbill, birdsfoot trefoil, fleabane, common vetch, creeping thistle, creeping buttercup, creeping cinqfoil, silverweed and common knapweed. In Field A, the species recorded were Perenial ryegrass, Yorkshire fog, field scabious, dovesfoot cranesbill, field woodrush and soft rush. The list of species is not dissimilar to that submitted by Ms Creaye [REP1-106]. Surveys were undertaken by and at the time of the first survey, was an assistant consultant with Wood PLC (latterly acquired by WSP) with 2 years and 2 months experience. At the time of the second survey, was a consultant ecologist with 3 years and 1 month experience. He is currently a Biodiversity Officer with Oxfordshire County Council. At the time of the survey, was a principal consultant with Wood PLC with 9 years of consultancy experience. She is currently a principal ecologist at Logika Consultants. Duration of the survey on any given day is unknown (i.e. how much time in each field was spent on a given day, as this is not a typical parameter to record for this methodology). National Vegetation Classification surveys (following NVC Users Handbook, 2006) were undertaken in two areas close to Fields A and B as they were in the flood zone and therefore potentially could be placed in the category of coastal and floodplain grazing marsh. Surveys in these locations were undertaken on 14 June 2022 by [redacted] *BSc, MSc, ACIEEM, an ecological consultant with Wood Plc that at the point of survey had 5 years and 3 months of ecological consultancy experience (currently a Principal Ecologist with WSP). Further information on survey methods and results can be found in Appendix 22.3: Extended Phase 1 habitat survey report, Volume 4 of the ES [APP-181], Appendix 22.4: National Vegetation Classification survey report, Volume 4 of the ES [APP-182] and Appendix 22.5: Hedgerow survey report, Volume 4 of the ES [APP-183]."*

App-181 is quite clear that the Cratemans fields surveyed were Talbot and Baker 1 and 2 and are *not* the fields referred to by Janine Creaye in REP1-106. **There is no evidence that they did in fact survey the fields mentioned by Janine Creaye, and which the ExA visited during the ASI.** Indeed, Rampion actually say this in a previous submission, that the surveyors walked past the fields as being uninteresting.

Janine provides a survey completed in May 2024 by Arborweald (See Janine Creaye Deadline 4 submission) which shows that the quality of the meadowland which 'did not pique the interest' of the Rampion surveyor in June 2022 is of the highest quality, and indeed is more species rich than an SSSI which was surveyed at the same time. **This lends support to our belief that this area, far from being destroyed in the manner proposed, should be designated an SSSI** and protected

With this survey, and others at Sweethill Farm and Collegewood Farm, there is now hard evidence of at least three instances where the baseline value of the ecology and habitats has been significantly downplayed by the Applicant. Please also see REP2-112. **This, along with the ExA assessment of the green lane at the ASI, therefore throws the validity of ALL Rampion's surveys into disrepute, probably not just ecology but traffic assessments also.**

We are puzzled by the comment "visited *in August 2021 but found the field mown for hay.*" We have looked further and can find no evidence that the fields were surveyed in August 21. The landowner's agent confirms that if surveys were indeed done in June 22, their access licence had run out so they were either trespassing, or the surveys were done from the footpaths, in which case they could not have been done properly.

All this suggests they were not seriously considering it until June 22 and by June 2022 the decision had already been made suggesting this was a last minute 'tick the box' exercise.

With regards to the fauna surveys, the Applicant does not deal specifically with the survey failings we highlighted, instead they provide a general overview of what was done. In addition, the Applicant knew from early on in the consultation about Ms Creaye's evidence and did not act upon it to use it to inform their surveys

TE1.5: we believe that the Applicant downplays the significance of the meadowland value at Cratemans and the sheer diversity of habitats and species (eg badgers, dormice, nightingales, skylarks, reptiles, plants, important hedges and ancient trees) in such a small area, which gives it its special value.

TE1.13: This response is outrageous and shows no understanding of the nature of this particular area. It is, as can be seen on a map, away from road disturbance, or extremely little disturbance, many of the fields, especially at Cratemans, are not mown until late in the year, there are no quad bikes etc. We have already commented at deadline 3 about the military training grounds at Lodge hill etc. This is a totally misleading reply

WE1.1 Tankering:

- There will be approximately 4000 tankers of 19000 litre size or 2,500 30,000L tankers, across the DCO area, but they don't give figures for Oakendene. However, we assume that most of these will be coming to Oakendene, so we do not agree that it will not make much difference to traffic numbers.
- They do not say, so we assume these figures are in addition to the HGV numbers already quoted.
- They do not give figures for Kent Street either. Or say whether they are included in the Plan they have only just produced for Kent Street so, again, we presume not?
- How many will come and go through the AQMA, presumably also not included in previous figures, or even those given at this same deadline in response to other questions.
- The tanker in the picture is enormous, and it doesn't say if that's a picture of the smaller tanker or the bigger one
- wheel washing of hundreds of vehicles every day, will all go down into the Cowfold stream at the A62 compound and the tributary at A63, with implications for the Cowfold Stream and Adur downstream, and in winter, when flooding or saturated, where will all these thousands of cubic metres go?

Appendix E Oakendene flood risk:

Annex D "*It is acknowledged that these meeting minutes were missing from the ES as an errata. Although they predominantly relate to the Bolney Extension site (and not Oakendene substation site)*

they have been included for completeness and will be reissued as part of the Flood Risk Assessment [APP-216] of the ES at a future Examination deadline." They DO NOT primarily relate to the Bolney Extension site, this is disingenuous; at the time of this meeting, no decision had been made as to location of the substation. The minutes show the time was spent discussing the two alternatives, but without Horsham DC's presence. Concerns were raised about the Oakendene site:

"*RC noted that this site presents more challenges from a water environment perspective than the Wineham Lane North option site".* This included surface water run-on from the north and the intersection of the site by two ditches "*KM noted that the existing ditches are likely to be only taking water off the fields, but this would need to be ascertained. KM advised that it is preferred to avoid filling in ditches, on the basis that insufficient consideration of their function has proven 'costly' in the past".* Indeed, it could here, as the north -south ditch carries water from a wide area of the AONB to the north to the Cowfold Stream tributary. The flood risk from the tributary was also discussed.

REP3-052 Response to Deadline 2 submissions

Table 5-1 response to Stuart Dench:

2.2.6: "*For Cowfold, this means that HGVs will only route through the village centre for trips related to accesses A-56 or A-57 or where use of locally sourced materials / equipment make its avoidance impracticable"* This is directly at odds with 25% of HGVs coming to A63, A62, Kent Street and Wineham Lane as REP1-006 (see REP3-051 AQ1.2 above)

Response to REP2-051 REP2-058 REP2-061:

"*The Applicant notes that baseline traffic data Kent Street (Highway Link U) have been estimated based from on-site observations due to traffic survey data being unavailable (Table 3.4 within the Traffic Generation Technical Note [REP1-008] updated at Deadline 3).* ***Traffic surveys for Kent Street are programmed for completion by the Applicant in May 2024.*** *In addition, the Applicant is aware of traffic surveys completed on Kent Street in 2023 in support of the Enso Energy battery storage system Construction Traffic Management Plan (planning application DM/23/0769). This data and traffic surveys will be used to confirm baseline traffic flows on Kent Street within the Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES [REP1-008] (updated at Deadline 3), and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] which will be updated and submitted at Deadline 4."*

Why aren't these traffic surveys programmed for completion in May referenced at all in the Kent Street document Appendix D of REP3-030? And in fact, we now learn that they will not be available until deadline 5, which is unacceptable.

REP2-056 REP2-057 Concern regarding the impact upon Nightingales:

We dispute Rampion's assertions that our evidence is explained away by "*Although there are more records shown on the maps supplied by CowfoldvRampion, this is likely because the process of assigning these to individual territories has not taken place in the same way as is typical for a territory mapping style survey…The approach is based on the premise that individual sightings or aural registrations of birds do not equate to an individual territory*." Our maps were produced not only by Janine Creaye, but with the assistance of an experienced ornithologist, and show quite separately nightingale sightings and territories, and the information is verified by the SxBRC.

REP3-054 noise and vibration management plan:

Good Practice Measures

3.2.6 and 7: this is fanciful in the extreme; it is highly unlikely that measures such as "avoidance of unnecessary engine revving;" will be adhered to! Similarly, regarding: "*plan deliveries and vehicle movements so that vehicles are not waiting or queuing on the public highway. If waiting or queuing is unavoidable, then engines should be turned off*;" it is highly unlikely that the thousands of drivers coming to the site from numerous sources will be briefed in this way

5.4.2" *Bored, or hydraulic piling is not predicted to be significant at any receptor, so if either of these piling techniques is employed,* ***monitoring would only be instigated on receipt of complaints*****."** This is unacceptable

REP3-055 Construction access update:

A56 and A57: "*Temporary speed limit reduction (40mph). Banksman may be required to support specific movements. Highway width constraints within Cowfold will require articulated HGVs and low loaders to access junction from the south via A281, A2037 and A283"* ie through the narrow high street of Henfield and the less than 90-degree bend at the roundabout in Upper Beeding. Given the size of these vehicles, **Rampion need to provide evidence that they can actually pass through these points.** It is also inconsistent with commitment C157 regarding "only access to A56 and A57 will come through Cowfold". The whole thing is a further example of inconsistency and muddle.

(REP3-030 para 5.4.4: "*routing through Cowfold will only be for access A-56 and or A-57 or where use of locally sourced materials / equipment makes its avoidance impracticable*.") (commitment C157)

REP3-055 shows additional hedge losses at A57(20m), A61(20m), A62(15m), A63 (25m) and A64(10m). This should not have been 'unforeseen' if they had remotely thought out their plans to manage traffic on Kent Street, the Oakendene Industrial Estate, the A272 or A281 **before** submitting the DCO.

- Where is the evidence that these will be sufficient? Previously they said 'existing access no alterations needed'. No swept path analysis of A-61 and A64 was included with the Kent Street CTMP. We cannot rely on Rampion's unevidenced statements on this.
- Many are described as 'with trees', but there is no real clarification of the size of any of these trees. We believe the size of some of these trees to be substantial.
- The Applicant needs to clarify whether these figures are the total width, or *in each direction,* in which case the *total* additional loss is double what is stated here.
- There will be almost a continuous removal of hedgerow and trees from east of Kent Street to Oakendene manor in order to create the necessary visibility splays. There will be nothing left of Kent Street and A272 by time they have removed all these hedges and trees.
- It will all have a massive impact visually on the whole landscape; it will be utterly devastating. The whole area will be bereft of trees. How can they possibly claim this will make no difference?
- They do not appear to have included the newly proposed Kent Street visibility splay on to the A272: another 35m, presumably in each direction, and probably on other small lanes where have had to widen access to roads elsewhere.
- There is no inclusion of the big corner they want to cut off the NE corner of the Oakendene fields to allow the low loaders to turn in and out of Kent Street as shown in their Kent Street CTMP (which by the way is conflictingly included in the design and access plan for replanting after year one-how can that be possible??)
- Have they thought about whether more trees and hedges will have to be removed to allow these huge vehicles to turn round again on the 3 haul roads (2 accessed from Kent Street and

one off A281 to Cratemans)? The applicant said yes at the hearing but where is the evidence?

- Can the applicant clarify if they are intending to create a new access to A62, or whether they propose to use the existing access to the Oakendene industrial estate? If so, safety concerns will need to be addressed.
- Indeed, all of these splay sizes are based on assumptions that you will accept the 30mph average speed in derestricted Kent Street for the splay calculation and that they will be allowed to reduce the speed limit on A272 and A281 to 40mph, otherwise there will be even more devastation
- At the ASI [redacted] told us that the actual access point for A64 was not yet fixed, so how can they really have any idea about the size of splays and how can we judge impacts?

REP3-056 Air quality Management plan

Table 2-2 dust risk assessment

We dispute the negligible ecological impact at TCCs. There will be an enormous impact from vehicles on the haul road, generator noise, and so on, particularly to the noise and vibration sensitive species such as nightingales, reptiles, insects and bats

Why only medium risk at A63? We dispute the "N/A" ecology impacts at A63 and A62: there will be significant impact on the lake, on the workers at Oakendene Industrial Estate and on the people living opposite and at the industrial estate entrance

2.2.4 what is the justification for these risk evaluations, why so low?

"Use water -assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use" This cannot be a serious suggestion that these sweepers will be continually employed on the A272.

"Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).”" Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits." This is not credible as an awful lot of wheel washing will be needed. The phrase 'where reasonably practical' suggests that in practice it probably won't happen. Why do they put these meaningless points in other than to *appear* to be being considerate and reasonable.

"*Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned*." Again, this is hardly practical and will have a significant impact on the ecology on the haul road and the water levels

2.4.2 "*Areas such as windows, window sills and private vehicles can be indicative areas of dust settlement and cleaning should be provided if necessary".* Again, more unlikely window dressing!

Comments on Submissions by Statutory Consultees

REP3-069 HDC response to Written Questions:

AQ1.3: We agree with HDC that" 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." The applicant's response is unconvincing that this is now suddenly a worst-case scenario: there is no evidence to back up this change.

TE 1.2 we do not agree with HDC that there are no remaining concerns with the ecological studies at Oakendene and the northern cable route. We urge them to look at the concerns raised by NE, the SDNPA and even the French government, which mirror our views.

TE1.5 We are disappointed by HDCs view on this that ". Following this, some areas of grassland 'could be' classed as 'MG-5' (lowland meadow)." This means that in HDC's view, the area is not significant. The ecologist performed the study in October, and was scrupulously honest in his view that he could not be absolutely certain of the species given the time of year. He is in the process of repeating the study at a more appropriate time and **we urge HDC to read the report in Janine Creaye's Deadline 4 submission, which favourably compares the site to a nearby SSSI.**

We contrast HDC's view with the SDNPA concerns which almost exactly mirror our own:

REP3-071 SDNPA response to Written Questions:

DCO 1.19: prioritisation for local delivery of biodiversity units; we agree with this sentiment and are of the opinion that it must apply to the northern cable route and Oakendene also.

BD 1.2: we agree that the mitigation hierarchy has not been adequately followed; as we have said, the same is true at Oakendene and the northern cable route, and this view from SDNPA reinforces the strength of our arguments regarding the whole Cratemans, Cowfold Stream and Oakendene area

SLV 1.1,2.3.9 The SDNPA disagrees strongly with Rampion about the views and impacts on the SDNPA, the cumulative impacts of Rampion 1, and the dark skies. Please also see REP3-105 below.

TE1.10: The SDNPA are of the opinion, as are we, that there has been insufficient coverage regarding hazel dormice

TE 1.11: They also agree that there has been insufficient coverage re bats. Both are really similar to our complaints. Again, how can you mitigate adequately if you dramatically down play the baseline? This supports our arguments about the inadequacy of the surveys at Oakendene and the cable route

TE 1.3, TE 1.10 TE 1.11 concerns are almost identical to ours regarding the adequacy of surveys, particularly dormouse and bats

TE1.28: Given the diversity and density of species and habitats around the Cowfold Stream area, we would argue that the same seasonal restrictions should apply to this area too

TE1.31: We agree with SDNPA's comments and evidence regarding the best bat habitats; these are exactly like the current hedges and trees to be lost at Oakendene. This is a major loss which has not yet been given sufficient importance and Rampion seek too readily to brush off as easily mitigable. In reality the mature trees will not be reinstated in the lifetime of the substation.

Appendix C: SDNPA remain of opinion that the cable route should not be in the SDNP and that it would harm the statutory purpose of the park. We agree with this view.

REP3-072 WSCC cover letter:

2.17 We agree with the comments made by WSCC regarding Rampion's statements on the economic impacts and refer the reader back to the Economic Section of our Impact Statement, REP1-089, and to the views expressed by Protect Coastal Sussex.

We believe that the economic impact in Cowfold alone will be devastating, and that the economic impacts across the county have repercussions for the economy of the whole nation.

2.34 *"WSCC remain concerned that the RVAA underestimates the visual impacts on individual residential properties and the objectivity of overall conclusions is unclear (in particular for Oakendene Manor where permanent visual impacts would occur)."* We agree with this.

2.35 *Regarding the Applicant's response to 9.30, WSCC remain concerned over consideration given to the landscape and visual impacts of required visibility splays (be that for new or upgraded side access points), and that Vegetation Retention Plans (VRPs) in Appendix B of the OCoCP (PEPD-033) do not accurately reflect a worst-case scenario (whereby up to large lengths of vegetated roadside boundaries for 69 access points could be impacted).*

We agree with this, particularly with reference to the ever-increasing vegetation loss on Kent Street and the A272.

2.40 *Details of existing and proposed site levels at the substation remain unclear. The Applicant's response to 9.70 provides little, if any, clarity on the matter. As previously noted, given a slope is present on the site and that all maximum heights for plant/structures are based on 'finished' ground levels, it is crucial to understand the extent of any cut and fill operations and likely final site levels. Any substantive change in site levels could result in significant changes to landscape and visual impacts.*

We agree with this, and see REP3-004 above.

2.45 *For operational noise arising from the Oakendene substation, the Applicant seemingly suggests that significant night-time noise impacts at residential receptors as being only those with the potential for health effects due to sleep disturbance. This is a high bar, may not be considered to accord with recognised standards and discounts the potential for adverse noise impacts below this level, which is of some concern.* 2.46 *WSCC remain of the opinion that proposed threshold rating levels at sensitive receptors proximate to the substation should be set closer to existing background levels to minimise the potential for adverse impacts.* We agree with both, and believe that the Applicant seeks to downplay the impacts of noise and disturbance to residents.

2.96 Given the ever more extensive tree and hedge loss which Rampion are requiring, and the potential raising of overall height due to ground level alterations, particularly at the southern end, which will be most visible from the manor, we disagree with the statement that "*the balance of evidence currently available suggests substantial harm is unlikely to arise."*

2.98 We disagree that it is appropriate to monitor the winter water levels post consent, and believe that this remains a significant part of the assessment of the scheme: how can they be sure of final ground height until AFTER this monitoring and therefore of landscape and visual impacts, and impacts on the Manor unless this is certain?

REP3-073 WSCC response to Written Questions:

TA 1.14 We do not agree that "*the number of HGVs accessing Kent Street, the Oakendene compound and the substation during network peak times will be low,* " . In any case, this is to miss the points that the peak times for this part of the road are far longer than the times Rampion consider (see WSCC Elan Cite traffic report), and they do not take into account the additional affect of LGVs and LVs arriving or of the fact that the three access points are so close together.

TE1.28: "c) *There are particular ecological sensitivities along the northern end of the cable corridor, such as around Crateman's Farm, including the presence of breeding nightingale which may warrant seasonal restriction of work. i.e. Avoid March-July. Whilst this is already partly addressed by Commitment C-21, which states that vegetation removal will be scheduled over the winter period to avoid the bird breeding season, avoiding or minimising disturbance in these sensitive areas during March-July would be beneficial. Works within floodplains should avoid the period October-February inclusive to prevent disturbance to waterfowl. Whilst Commitment C-117 addresses this issue in Flood Zones 2 and 3 it may also be beneficial to apply this measure to flooded grassland along the Cowfold Stream."*

Whilst we agree with this; it does mean that the only time work can be carried out on the haul route is between August and September as it is not possible to get to the stream without passing through the nightingale territories on either side! **Rampion need to explain how they will overcome this issue.**

REP3-084 NE 's advice on protected species:

Natural England is largely in agreement with us as to the adequacy of surveys, and reservations about cable route and Oakendene

Criticism of methodology of ecology:

The Forestry Commission on connectivity, SDNPA on bats and dormice, the French government, Winkworth Sherwood for the Fischels at Sweethill Farm, all completely support the arguments made by Janine Creaye and CowfoldvRampion in their criticisms of the ecology surveys and data. It is highly likely therefore that what we say is correct, and these endorsements lend credence to our criticisms. It also makes it highly likely therefore that the methodology of the traffic 'evidence' provided by Rampion is similarly flawed and inadequate

REP3-086:NE response to Written Questions:

"*Hazel Dormouse Dormice hibernate at ground level in hibernation nests, typically between November and March inclusive. Whilst hibernating, dormice are 22 particularly vulnerable to trampling or machinery within dormouse suitable habitat. Where there is suspected / confirmed dormouse presence, great care must be taken and habitats should be avoided where possible. Where it is not possible to avoid these habitats during hibernation, suitable mitigation must be in place. We advise that any single stage clearance permitted during the hibernation season would be subject to strict measures**, such as the entire area to be cleared needing to undergo hand searches for any hibernation nests immediately prior to clearance.** We advise that a suitable hibernaculum could include brash/log piles."*

This is hardly feasible across the whole of Oakendene. Damage to hibernating Dormice is exactly as we raised in our Impact Statement (REP1-089)

TE 1.7: *It is noted that detail on where translocated reptiles will be moved to, i.e. where the receptor site(s) will be, has not been discussed in the documents reviewed.*

That is no surprise, we do not believe they can move them to a suitable safe location nearby given the extent of the disturbance around Cratemans Farm.

REP3-088 Natural England response to further submissions by deadline 2:

Their views are essentially unchanged.

2. Hedges-there are a large number of errata underestimating hedges and trees to be removed, "*The assessment has not acknowledged the importance of hedgerows as critical linear priority connecting habitats "*

5. [REP1- 021] Document 8.25.2 Appendix 2 - Further information for Action Point 4 – Wineham Lane North. We believe, given the wording which follows, that this is a misprint and should refer to the substation at Oakendene. It is interesting that even Natural England should be making the mistake that the substation was to be at Wineham Lane North.

Natural England expect the choice of substation to follow the requirements of the Mitigation Hierarchy. It appears that the Oakendene substation land contains Priority Habitat (Deciduous Woodland) and is bounded by Ancient Woodland. Commitment C-126 of the Commitments Register [APP254] provided at Deadline 1 submission states "All ancient woodland will be retained. A standoff of a minimum of 25m from any surface construction works will be maintained in all locations from cable installation works." Natural England require confirmation as to what the strategy is to protect this Ancient Woodland and how the decision was made to cross directly next to the Ancient Woodland at Taintfield Wood. Natural England require confirmation of the 25m buffer zone for Ancient Woodland at Taintfield Wood, Oakendene.

Comments on non-statutory responses

REP3-101 Elizabeth Morogna:

"*In summary, the evidence that the Applicant's assessments have severely downgraded the significance of likely adverse effect such as permanent habitat loss to 'minor', casting doubt on the integrity of the reports commissioned by the Applicant."* We totally endorse this view.

REP3-103 Forestry Commission:

TE1.30: "*Connectivity; We have previously raised concerns regarding the impacts of habitat fragmentation and loss of connectivity from the project. The ES states that impacts relating to habitat fragmentation are 'negligible'. However, the extent of hedgerow/linear habitat loss or disruption does not appear to have been fully quantified in the supporting documentation.* ***It is therefore unclear how a negligible effect has been established*** *with enough confidence especially given the multiple areas of woodland that are being reduced in extent or severed, and the cumulative impact this could have on the wider network of habitats.*

We advise that in order to comply with the mitigation hierarchy, ***connectivity should be retained as far as possible*** *and that any residual loss of connectivity is compensated with significant and targeted habitat creation and enhancement to improve connectivity between new and existing woodland habitat."*

We agree that the loss of connectivity is not negligible. Indeed, in this particular area, with the large number of trees, hedges, scrub, the green lane and small field pattern, plus the haul road, the loss of connectivity will be particularly severe. There is no attempt to compensate on site.

In considering this application the government must also comply with its own habitat regulations. We are one of the most nature depleted countries in the world. 19% of species have vanished since the 1970s. Perhaps an insufficiently robust protection of ecology in precisely applications such as this, is part of the reason why.

REP3-104 Transboundary consultation response from France:

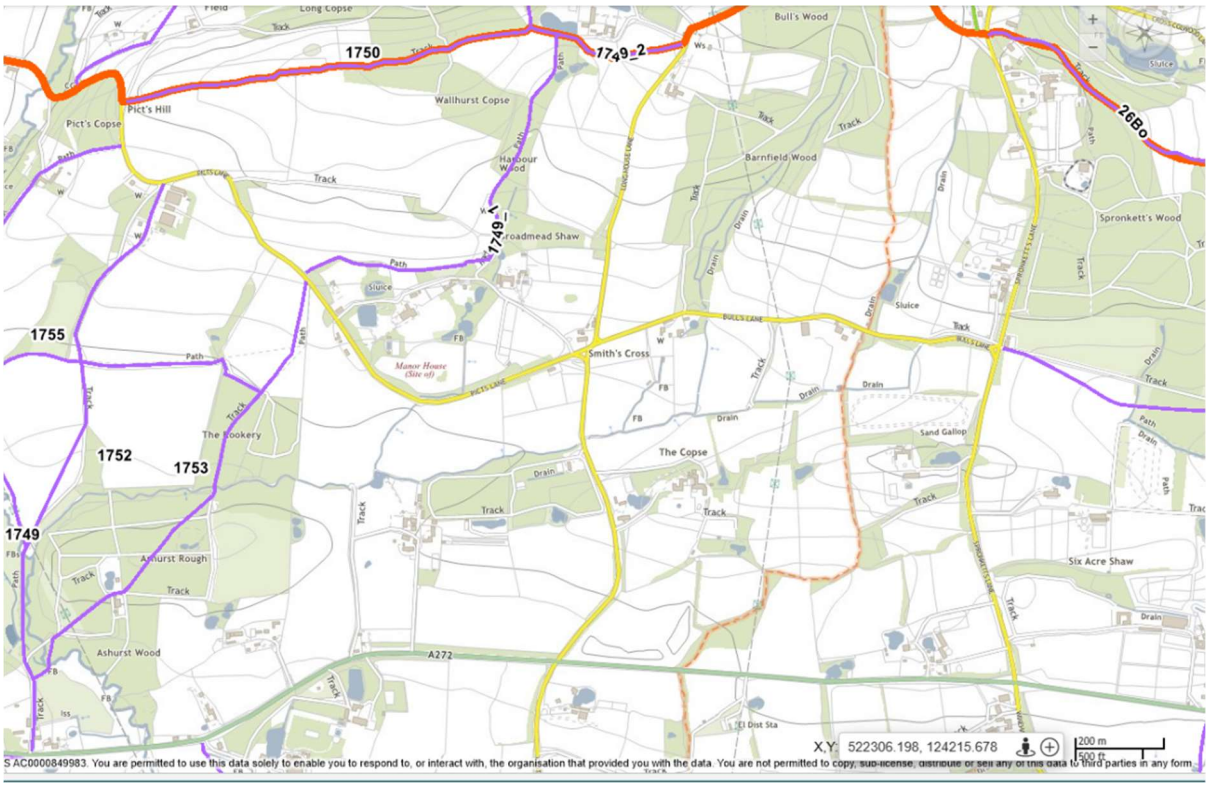
They raise a number of concerns about the rigour of how the environmental studies have been carried out and what needs to be analysed. Several examples of where they have fallen short are given.

REP3-105 Francis Rodney brown:

We are appalled by the extent to which the windfarm lights would actually be visible from the High Weald AONB (6.3.15 figure15.62 Bolney viewpoint 47). We would ask the Applicant what height of turbine has been assumed for this diagram as it is not clear? If they can be seen from this distance, there will be dark skies impacts on the whole county.

6.3.18 part 5 of 6 fig 18.57 Viewpoint M is approximately 5km away from the substation location. It is representative of Rampion's aim to deceive rather than inform that they chose this for the substation viewpoint rather than one 300m away directly north of the substation. Indeed, they make some attempt to look nearer but then exclude the viewpoint:

From 6.3.18, part 5/6"*Viewpoint SA6: PRoW 1750 north of Aglands This viewpoint has been omitted from the LVIA as there is no visibility of the onshore substation and onshore cable corridor."* However, please note that the PRoW 1750 runs from Picts Lane to Longhouse Lane. **The lowest point on this footpath is due north of Aglands, at approx. 52 m above sea level** the highest is **directly north of the substation**, **behind Walhurst manor at 72m.**



What is the justification for choosing the lowest point rather than the highest, especially as the latter is open to the south and would have had a far better view down to Oakendene than either viewpoint M or Viewpoint SA6?

NB neither viewpoint appears to take into account the large number of tall mature trees and other vegetation to be removed from the Oakendene site and edge of the A272

REP3-112 Janine Creaye:

We agree with all the comments made in this submission regarding Rampion's failure to recognise the importance of the evidence she has submitted, and the fact that this evidence and the detail of it is *not* included in the CowfoldvRampion submissions. We are grateful to the ExA for appreciating the significance of this.

There is further evidence of Rampion's downplaying of the ecological significance of habitats:

From APP-181 Extended Phase 1 habitat survey report:

Figure 22.3.1k shows Cratemans as Improved and Semi improved grassland

Figure 22.3 1 l shows Oakendene land as **arable**, improved and semi improved

3.2 *"Arable 3.2.1 This habitat type was the most prevalent recorded within the Study Area. A total of 368 hectares (ha) of this habitat was recorded across the Study Area. A total of 12.58ha or 3.4% of this habitat type could not be accessed for survey and notes were made from adjacent accessible land including Public Rights of Way. This habitat type was recorded throughout the proposed DCO Order Limits from the southernmost extent at Climping to Hammerpot; between stands of woodland at Michelgrove. From Wiston and Ashurst north to Bolney arable land uses were recorded occasionally with a few larger fields noted to the east* ***of Oakendene Industrial Estate at the northern limit."***

The author of this section has lived here for 37 years, and never seen this land farmed in this way. It is an attempt to devalue the ecological importance of the land to lower the apparent importance of what they are destroying

The Defra definition of:

- arable land is horticultural crops, such as field vegetables as
- temporary grassland; that is, land that has been in grass or other herbaceous forage for 5 years or less

Wildlife Trusts definition: Arable land is cultivated to provide annual crops such as wheat, sugar beet, potatoes and beans.

Basic Payment Scheme definition permanent grassland definition:
"Land used to grow grasses or other herbaceous forage naturally (self-seed) or through cultivation (sown) and that has not been included in the crop rotation for five years or more…"

The manager of Oakendene confirms: "*No crops just re-seeded with grass, for at least as long as I have been there, which is 20 years and before then I believe it was cattle. Our records show it was last ploughed and re-seeded in September 2015* "

REP3-132 Susie Fischel:

We agree with all comments made in this submission regarding:

- the land rights tracker, REP2-008; they highlight the same concerns we have raised about the over egging of the degree of engagement
- the unnecessarily wide bits of land they wish to claim for the cable route with no justification
- the inadequate surveys
- the behaviour of the Applicant towards landowners and the fact that compulsory purchase powers do not absolve an applicant of continued engagement.

The comments they have made regarding the Applicant's Response to Janine Creaye's Written Representations [REP1-106 to REP1-114] (table 2-15 of REP2-029): *"5.2. The Fischels agree with the comments made by in relation to flood patterns that drive biodiversity, grassland habitat of unimproved lowland meadow, the Green Lane wildlife corridor and tree boundary, and tree and scrub loss."*

REP3-124 Paul Lightburn

This concerns Kent Street and Cowfold traffic. We endorse the comments made in this submission about the lack of attempt by Rampion to provide alternative access plan to Kent Street, Moatfield Lane and Partridge Green to avoid the AQMA

The submission includes an unofficial traffic survey of Kings/Moatfield Lane:

On 25th April 2024 an unofficial vehicle count between 08:00 and 16:25, estimated in excess of 50 vehicle movement on King's Lane/Moatfield Lane, passing crossing point 50a and 50b. About 75% went on to pass crossing point 48a and 28b. These movements maxed at about 12 an hour and averaged approximately 6 per hour. Anecdotally from observations these were

seen to be due to school trips, shopping, postal, parcel and grocery deliveries, contractors attending properties and residents attending medical appointments. **A vehicle movement every 10 minutes would be very disruptive to Rampion's' operations if HDD is not used where the cables are proposed to cross King's Lane.**

This shows very well just how unrealistic and ill thought out the proposals of Rampion to allow 'reasonable access' to this lane are.

Issue Specific Hearing 2:

2 Onshore ecology:

2c: **The applicant made the extraordinary statement regarding commitment C-292** that the public were more disruptive than Rampion would be by commencing work in March. The public are already there and this is additional disruption. The species are used to the public and the public form part of the background level.

2d: We agree with comments made by SDNPA at the hearing that without knowing what is present to begin with, what is the scale of disruption, and the scale of severance, **how can you assess consent based on the benefits versus the damage done.?** The assessment of the post consent licence is surely a lot further down the line.

We agree with SDNPA that with regards to the OLEMP, no certainty is given as to how the laudable and necessary objectives stated are actually going to be achieved. It is far too light in detail for this stage of the examination.

[redacted] (Cowfold Parish Council) made the pertinent observation that they have not accounted for the timescale of some of these reinstatements eg easily 20 years for nightingale scrub to be restored, mature trees not in the lifetime of the substation.

They did not answer [redacted] question about advanced planting, but said, as for everything else, it 'would be addressed'. They are unable to explain how this can be achieved if the site is to be a vast compound for the duration.

3a and b: the applicant appeared to have no adequate response to the questions posed. The lack of baseline information makes it impossible to judge the true negative impacts.

4. Applicant to update the ExA on progress to or latest position on:

4b: We learned on the ASI that the location of A61 is not even fixed yet. **How can we assess the suitability and the impacts of this access if we don't know where, including exactly how much hedge will need to be removed?**

We look forward to an adequate response at Deadline 4 from Rampion to the ExA question about why it is necessary to clear scrub at Cratemans to such an extent. The applicant indicated it was to do with TCC compounds, in which case where is the evidence to show they carried out a proper initial assessment of whether this site was the most appropriate route in the first place?

We are also pleased to hear the ExA assessment of the green lane (W110), and await Rampion's explanation for how they categorised it, what importance they gave to it, and their justification for the removal of a significant part of this ancient feature.

7. Traffic and Access

7a: It is disappointing that Rampion's traffic count on Kent Street has not yet been completed, and indeed, it appears, will not be available until Deadline 5. We welcome the ExA's searching questions on the Kent Street plans and look forward to clear answers at the next deadline

7e: Rampion's statement about using HDC allowance and scoping out water neutrality is spurious. It cannot be assumed this will occur. It will be at the expense of the ability of the Horsham District to plan its own housing needs. We await the outcome of further discussions with HDC

We dispute that these tanker figures can already be included in their vehicle numbers as they were not in the original plans, as they were not understood to be necessary at that time. Certainly not the additional movements to the holding compound for the Kent Street CTMP as they have only just thought of this

From Water Direct, a company supplying both 19,000 and 30,000 litre tankers, we see that the larger tanker has a turning circle of 27m and is "*30,000-litre articulated vehicles are ideal for supplying larger volumes of water. At approximately 15m in length, however, they are not suitable for sites with access or weight restrictions; "* Yet this is precisely where Rampion are proposing to take them; down small lanes such as Kent Street and the haul roads.

7f): Rampion said, in response to CowfoldvRampion, that they DO include the passenger vehicles and LGVs in their traffic modelling. They give us numbers, it is true for LGVs, but if one looks at the statement made in response to [redacted] it is clear that they do NOT include private vehicles arriving in the morning, only LVs transporting passengers to their work sites from the compounds. If one looks at the percentage increases, they appear only to include HGVs in their traffic modelling and air quality modelling. If they genuinely have done otherwise, please can we see the evidence; a statement on this is not acceptable without evidence.

The applicant ducked our question about a possible new access to A62 and said it would give details at an unspecified later date. Again, how can safety and access implications for the industrial estate be assessed?

Compulsory Acquisition Hearing 21st May:

The lawyer for the Wiston estate explained very clearly that representation from 40 landowners demonstrated there has been a lack of engagement by the applicant, no willingness to negotiate, no consideration of reasonable alternatives presented to them. Rampion have shown bullying behaviour and intimidation in their approach to landowners, have been on land without owners' permission (Just like Cratemans and the ecology surveys) and when you analyse their superficially reasonable-seeming data, it is not correct.

She also spoke of Rampion's recurring tendency to reply to questions by saying there won't be any impacts but with no proof from data to back this up.

All of these are themes we see repeated across the DCO area, and which we have highlighted in respect of Cowfold in particular.

The lawyer representing the Fischels of Sweethill farm made the point that Rampion say they have engaged with sixty percent of landowners but this is just not true – they may have visited them but there has been little engagement. What is being represented to the ExA does not tally with the real world.
The lawyer said she has worked on DCOs for ten years and has never seen one with so many unresolved issues at this time with reference to the land rights tracker document .

Overall, there are so many unresolved issues, so many complicated twists and turns, caused by 'unforeseen problems'. In reality these are not unforeseen but are the result of lack of engagement with the public and landowners, and represent the result of the Applicant's determination to push this through at all costs. Alternative, less damaging, options on the coast, across the SDNP and with regards to the substation site have been disregarded in the name of keeping costs down and perceived ease of execution. In reality, by creating additional issues, they are far from easy after all.

Appendices

Appendix 1: Traffic Methodology Review

Cowfold PC submission at Deadline 3:

"*The proposed development is predicated on taking an already heavily utilised road network (specifically but not exclusively the A272, Bolney Road) to even more unacceptable levels of use*."

We agree with this. At the Issue Specific Hearing 2, and previously, Rampion representatives have made a number of unsubstantiated statements when questioned about the traffic methodology:

- Q: Have you looked at the effect of slowing and turning at the Oakendene compounds on traffic flow or just percentage increases in vehicle numbers? A: "*we have looked at the impact of the turning traffic"*
- Q: Have you assessed the effect of the congestion point at the A272/A281 junction on traffic flow? A: "*Yes*"
- Q: Does the assessment of air quality impacts in the village centre take into account that the traffic is not flowing freely through the village and that your passenger and LGVs will affect flow also? A: "*Yes*"
- Q: Are LGVs included in your assessment of road traffic flows and EIA? A:" *Yes*"
- Q: Are private passenger vehicles included in your assessment of traffic flows and EIA? A: "Yes"
- Q: Have you considered the cumulative impacts of the three access points so close together on traffic flows and road safety? A: "We *have, and it won't impact*"
- Q: Have you factored in the additional movements of tankers, the additional movements of vehicles going to and from Kent Street? A: "*We have"*
- Q: Have you considered the impacts of the proposed 40mph speed limit? A:" we have"

From REP3-029 outline CTMP:

6 LGV access

6.1.1: It is clear from this paragraph that staff arriving at or leaving the compounds at the beginning and end of the day are **not** included in the LGV numbers as they are classed as Light Vehicles (LVs). Table 6-1 is for the staff being ferried to various locations *having arrived for the day* at the compounds, and 21% are shown crossing Cowfold to and from the A24, but no numbers are given.

6.5.6: It is clear from this that none of the staff vehicles, whether LGVs or LVs, will have any routing restrictions placed on them. "*As this LGV construction staff traffic is travelling to and from TCCs and the onshore substation site, no routing restrictions will be applied to these trips"*. They will contribute enormously to the huge traffic congestion in the AQMA and, when they discover how bad this is, they will use lanes such as Thornden in the village centre, Picts Lane and Bulls Lane as rat runs to escape it. This cannot be permitted. It also means that they **cannot have been included in traffic calculations** as they cannot know how they will travel around.

6.5.2 tells us *"The detailed methodology and construction traffic calculations undertaken to inform this output are presented Chapter 23: Transport, Volume 2 of the ES (Document Reference: 6.2.23) and Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES (Document Reference: 6.4.23.2). Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES (Document Reference: 6.4.23.2)* ***sets out the detailed construction traffic generation methodology, assumptions, materials required and other matters that have informed the construction traffic generation output****."*

We have carried out a review of these documents but are unable to find anything which supports these claims and **leads us to the conclusion that the documents to not provide this evidence as suggested**:

Review of 6.2.23 Transport (APP-064) and 6.4.23.2(REP3-022)

6.2.23:

Table 23-8 Highways link 27 is A272 west of A23 ie **considered as all one road,** not in sections

23.5.2 METHODOLOGY FOR BASELINE DATA

The Cowfold area is part of study area 1. The baseline data was collected from Desk Top studies initially.

No ATC was done at all for Kent Street. The rest were done in April and May 2022

Can we be sure therefore, that Kent Street was actually assessed at all at this point, including crucially, the access to Kent Street from the A272?

The first site survey done Oct 2020 and a second site survey was conducted in March 2023, covering points of access, PRoWs, and 'the substation area'.

Table 23-15:

In Oct 2020 site surveys included amongst others:

- all roads and junctions that form part of Study Area 1; We would like confirmation from the applicant that this included the Cowfold Mini roundabout area and the Kent Street/A272 junction, and what evidence was gathered concerning these?
- all proposed site accesses; Did this include A57, A61, A62, A63 and A64? And what were the findings?
- a visit to all potential temporary construction compound locations; What was the evidence discovered from these visits?
- observations were made of key sensitive locations and pinch points identified as part of the desk study; What therefore were the observations made about the Cowfold A272/A281 junction as a key pinch point?
- confirmation of suitability of roads for HGV traffic. What steps did they undertake to confirm the suitability of Kent Street for HGVs at this time?

In March 2023 site surveys included:

- all roads and junctions that form part of Study Area 1; Again, were Kent Street /A272 and A272/A281 surveyed and what was the result?

- all proposed site accesses; Did this include A57, A61, A62, A63 and A64? And what were the findings?
- the PRoW affected by the onshore elements of the Proposed Development; and confirmation of suitability of roads for HGV traffic. What steps did they undertake to confirm the suitability of Kent Street for HGVs at this time?

Kent Street 23.6.30

"Kent Street is a single carriageway rural road which routes between the A272 and Wineham Lane and is subject to the national speed limit. There are no pedestrian footways on this rural road."

Wineham Lane 23.6.31

"Wineham Lane is a single carriageway rural road which connects the village of Wineham to the A272 to the north and the B2116 to the south. Wineham Lane is subject to the national speed limit for all sections outside Wineham. Throughout Wineham, Wineham Lane is subject to a 40mph speed limit and residential / rural properties and driveways front onto the road."

Again, we see equating of Wineham Lane and Kent Street as singe carriageway rural roads, although in fact Kent Street is a single-**track** lane. The (purely desk top?) evaluation as Kent Street as having the national speed limit as opposed to Wineham Lane's 40mph. might lead to the conclusion that it was *more* suitable than Wineham Lane. Wineham Lane is nearly as wide as the A272.

Also, up until paragraph 23.6.30 there is no reference to Kent Street at all in the data presented. It is as if this paragraph has been added later and causes us to wonder exactly when and to what extent it was assessed when the decision was made to use it. In the early parts of the consultation, we see Kent Street described as a 'single track lane unsuitable for HGVs'

Table 23-18 2021 baseline traffic data (AADF) – Study Area 1

Highways Link	Historic Traffic Data			2021 Base		
	Total Vehicles	HGVs	Year of Data	Total Vehicles	HGVs	HGV%
23	6081	141	2019	6267	142	2.3%
24	22389	991	2019	23074	998	4.3%
25	16904	745	2019	17421	751	4.3%
26	853	16	2019	879	16	1.8%
27	16889	724	2019	17406	729	4.2%

The important link here is link 24 as this is the affected congestion point between the two mini roundabouts and is affected by traffic entering it from all directions, and being able to leave it again only if traffic is freely flowing eastwards on the A272

Table 23-19 considers accident data for the A272 from Cowfold to A23 **as a whole only.**

23.6.71 *A comparison of the highway links in Table 23-19 and the accident rate per million vehicle km for the links and the national accident rate and this sets out that only 11 links have an annual accident rate higher than the national average*

This includes A272 between A281 and A23 – "*0.22 compared to 0.11 for a Rural A Road;"* but again, looks at the road **as a whole only**

Then follows the statement: 23.6.73 "The *accidents on this link are mostly spread evenly along the 5.4km section of road, with clusters at the A272 junctions with Wineham Lane, Foxhole Lane, and the A23."*

There is no comment however, on the clusters at Kent Street, opposite A-63 and at the Oakendene Industrial Estate Why Not?

Later, Table 23-20 does in fact list accidents at A63 and A62, 500m either side.

Why were these not included in the clusters on the A272? Perhaps because the location was not under serious consideration when the statement in Paragraph 23.6.73 was made?

Table 23-23:

There is no mention of abnormal loads except to the substation compound for transformers. What about the loads now proposed for Kent Street?

23.7.3 "*The construction traffic flow estimations have been based on the following elements of the Construction phase for the onshore elements of the Proposed Development:"* no mention of tankers

23.7.4 *Construction traffic generation of all of these elements has been predicted across the proposed four-year construction schedule. This has resulted in vehicle movement predictions per vehicle type on a weekly basis per access point, split into heavy goods vehicles (HGV) and light vehicles, with the latter being further split into staff vehicles and construction Light Goods Vehicles (LGVs) such as vans and pick-up trucks.*

23.7.5 *The detailed methodology and traffic calculations undertaken to inform this output are presented in Appendix 23.2: Traffic Generation Technical Note of the ES (Document Reference 6.4.23.2)). This appendix sets out the detailed construction methodology, assumptions, materials required and other matters that have informed the traffic generation output.* **See below, lack of clarity on any of this.**

Traffic distribution

23.7.11 *To inform the assessment of peak traffic at each identified receptor, traffic distribution is required for the light vehicles and HGVs.*

23.7.12 *There are two types of light vehicles (LGV) required on the Proposed Development: LGVs between temporary construction compound locations and temporary construction works sites, and construction staff traffic.*

This would suggest that staff vehicles **are** included in the numbers, but:

23.7.21 *With a fixed set of temporary construction accesses (Table 4.1 of the Outline CTMP (Document Reference: 7.6), predictions of traffic generation across the construction phase and distribution for HGV and light vehicle traffic (including* ***staff and temporary construction compound to work site LGVs****) have been undertaken using the peak week of traffic for the network overall, based on the sum of HGVs and LGVs during each week of the construction programme.*

The implication here is that traffic generation is based on **in-work** staff and LGV movements only

23.7.22 *The construction traffic has been converted to a daily traffic flow by using a five-day working in line with working hours detailed in Section 23.40. The resultant traffic generation is presented on a network plot as Figure 23.19, Volume 3 of the ES (Document Reference 6.3.23) Receptor (users of road or location), while locations of the highways links are presented on Figure 23.22, Volume of the ES (Document Reference 6.3.23) Receptor (users of road or location).*

23.7.38 *The calculations indicate that the peak week of the construction of the onshore substation will result in a peak traffic week that comprises:*

- *76 two-way HGV movements during temporary compound construction;*
- *36 two-way LGV movements during temporary compound construction;*
- *2 onshore substation two-way HGV movements;*
- *120 onshore substation two-way HGV movements; and*
- *Total two-way vehicle movements: 196 HGV and 38 LGV per week*

23.7.39 *This will result in the following daily traffic which as informed the assessment in this chapter:*

- *39 two-way HGVs; and*
- *8 two-way LGVs.*

These numbers seem very small, especially in comparison with Rampion 1 and cannot possibly include staff arriving for work. They *talk* about staff traffic getting to work, but they do not appear to be included in these figures

It is also totally misleading when compared to the total daily movements of staff TO THE COMPOUNDS as seen in Table 23-26 : if A63/A62 are to be used as main parking hubs, how **can** private vehicles be included in such low percentages as are shown for A272 west and east?

ES methodology:

23.8.4 *To assess the impact at its peak, the likely percentage increase in traffic is determined by comparing estimates of traffic generated by the Proposed Development with future predicted baseline traffic flows on the road links in both Study Areas 1 and 2.*

23.8.6 *Firstly, a realistic worst case peak week of construction traffic has been identified. This is calculated as the week with the greatest sum of vehicle movements generated by all accesses across the network. The daily traffic flows per highways link thus presented gives a snapshot of the busiest week overall.*

23.8.10 *GEART (IEA, 1993) provides two rules that are used to establish whether an environmental assessment of traffic effects should be carried out on receptors:*

- *Rule 1: Include roads where traffic flows are predicted to increase by more than 30% (or where the number of HGVs is predicted to increase by more than 30%); and*
- *Rule 2: Include any specifically 'sensitive' areas where traffic flows are predicted to increase by 10% or more.*

23.8.11 *It should be noted that, according to GEART (IEA, 1993), predicted traffic flow increases below 10% are generally not considered to be significant as daily variations in background traffic flow may fluctuate by this amount.* ***Changes in traffic flows below this level are, therefore, assumed not to result in significant environmental effects and have therefore not been assessed further as part of this study.***

23.8.12 *Details of the GEART threshold applied to each highways link is set out in Section 23.9 and Table 23-29 provides details of the highways links and the nature of the receptors within the vicinity of each of them for Study Area 1 and Table 23-30 for Study Area 2.*

23.8.13 *In terms of transport and access impacts, the receptors are the users of the roads within the study area and the locations (towns/villages/AQMAs) through which those roads pass.*

None of the above suggests an assessment beyond simple assumptions about flows or percentage increases. There is **no** assessment based on the more complex traffic behaviour when at or beyond capacity as required by Paragraph 2.17 of the IEMA Environmental Assessment of Traffic and Movement (2023)

Table 23-36 only looks at % increases and HGVs

24: 106 extra vehicles peak week, 18 are HGVs. THIS will cause congestion way beyond their simple traffic numbers as between two mini roundabouts

27: 156 extra vehicles /day peak week and 48 HGVs. This does not look at the complex movements in and out of the compounds or the 40mph speed limit

Table 23-37 show s even more vehicles on link 27 for a different peak week. THEY DON'T easily show how many peak weeks or % time >50 % etc

None of the further tables cover anything other than % increase HGVs and total vehicles. Remains unclear if this includes staff arriving. Indeed, how **can** they have included if also say can't control how they get there?

In addition, we note that there appears to be some errors within the flow diagrams which are appended to the ES Chapter. Three examples are shown below from 6.3.23 part 3 of 4 fig 23.19 flow diagram:

- 43 movements approach the southern Cowfold roundabout, but only 5 LGV movements are recorded at the roundabout.
- 22 movements approach the A283 southbound on the A2037 and become 33 movements at the next junction, and 18 ahead movements at the Steyning junction become 11
- whilst there are commitments for HGVs to avoid Cowfold they do not seem to have been allowed for in the flow diagrams.

This supports our view of inconsistencies and lack of ability to take any of Rampion's figures at face value

6.4.23.2 Traffic Generation Technical note (Now REP3-022):

The version of TEMPro used is now out of date as version 8 was released in February 2023 (circa 14 months before the revision date of this document). No information is provided relating to the selection criteria used to obtain growth rates.

Table 3-4

It is not clear from this table what is the difference between Link C and Link E. We assume E, opposite Oakfield Road is the A272 immediately to the east of the mini roundabouts in Cowfold

This table shows how traffic numbers have increased to a far greater extent than suggested in REP3-030 para 3.2.6 which gives projected figures for 2026/27 of*18,933*

Future highways network changes (construction and decommissioning phases)

3.2.31 WSCC has planned improvement works at the A23/A272 junction This is a major access point for the construction traffic going to and from A63 and A62. This would be of major concern if the two projects were to overlap

Based on the flawed Enso traffic survey, Rampion give the following figures for Kent Street:

Total traffic 96/day, HGVs 25

What they have listed as HGV are in fact ARX class 2 vehicles from the Enso data i.e. cars with trailers, so most likely horse boxes, not HGVs

Whilst we await the results of Rampion's own traffic survey, let us consider Paul Lightburn's traffic survey for Moatfield Lane (REP3-124): "On 25th April 2024 an unofficial [manual traffic count] vehicle count between 08:00 and 16:25, estimated in excess of 50 [combined count for both directions] vehicle movements on King's Lane/Moatfield Lane, passing crossing point 50a and 50b. About 75% went on to pass crossing point 48a and 28b. These movements maxed at about 12 an hour and averaged approximately 6 per hour. Anecdotally from observations these were seen to be due to school trips, shopping, postal, parcel and grocery deliveries, contractors attending properties and residents attending medical appointments." **This is very much against 25% of all vehicle movement being HGV s and suggests there is indeed something wrong with the ENSO data collection.**

4.1.13: The proposed working hours will span from 07:00-19:00 Monday to Friday. In most building projects, construction traffic would typically be restricted to avoid the network peak hours. ie construction deliveries to be restricted to between 09:00 and 17:00 as a minimum. However, we draw your attention to the Elan Cite data showing that the traffic numbers are similar for much of the day. **Fundamentally the applicant should be demonstrating that they won't have an impact on users of the road if there is a pre-existing congestion and delay problem, as there is here.**

5.5.8-9: For clarity, this should read '*20 two-way movements from ten abnormal loads.'*

6.1.6 and 6.1.7: the total traffic has been determined by the nature of the works required and each site and the latest bill of quantities. The construction activities in 5.7 is however too high level to understand whether they have factored in tankering.

Table 6-1 gives total HGV movements for the project as 68,202, and LGV movements as 184,374

Table 6-2 shows approximately 50% of all traffic using the A23 but does not break this down into how many come to compounds A62 and A63. **It is unclear how the distribution percentages set out within Table 6-2 have been determined and detail further detail should be provided so that the assumptions made can be checked.**

However, Table 6-3 shows routes 12-15 using the A272

- What is the total number of all vehicle movements on the A272?
- Presumably these movements cannot include the movements to the A62 compound for the newly devised Kent Street traffic management plan?

Table 6-4 shows route 3 traffic still including A-51 and A52. How are these access points to be reached if not through the Cowfold AQMA? This is a document which has been updated for deadline 3, and yet contradicts another updated document (the commitments register) which says that Cowfold will only be used for access to A56 and A57.This is yet another example of conflicting statements from one document to another

LGVs and LVs are not included in any routing plans

6.3.8 *"LGV construction traffic has been distributed onto the network using the following two methods:*

- *LGV traffic (staff and other deliveries) – This comprises staff driving from home to work at the Temporary Construction Compounds (TCC's), as well as occasional deliveries by LGV to the TCC's. In both cases the spatial distribution has been calculated using the 2011 journey to work census data for three local areas associated with the three sections of the onshore cable corridor of the Proposed Development as seen in Table 6-5.* **Further details should be provided, setting out what assumptions have been made when routing traffic. We would hope to see route diagrams and a table showing out how the Census data has been analysed to determine the distribution identified.**
- *LGV traffic by Multi-Occupancy Vehicle (MOV) (5 staff) – LGV construction traffic then uses a circular route to drop off staff/materials between the TCC's and the proposed works sites via the access points along the onshore cable corridor. Given there are three compounds there are three circular routes as seen in Table 6-6.*

6.3.9 On this basis, ***LGVs (staff and deliveries) can use any routes to travel from their home to/from the compounds, there are no prescribed routes****. However, three circular routes have been devised to transport staff/deliveries between the compounds and work sites in shared multi-occupancy vehicles."*

Table 6-5 LGV construction staff traffic distribution, therefore, **looks only at the in-work movements of staff and LGVs on the 3 circular routes**

Table 6-7 Total two-way construction movements by access: this shows total two-way movements at A62 LGVs 16338 and HGVs 5778

A63 LGVs 52254 and HGVs 11438

Presumably the A61 and A64 vehicles will now need to be added?

This totals 68592 LGVs and 17216 HGVs, which is over 25% of *all* the HGVs in table 6-1 and over 37% of all the LGVs. And what has become of the 8040 total HGVs on the A272 we were quoted throughout the consultation?

6.4.4: Assumptions:

- Two movements will occur due to the plant and equipment (arrival and departure), this seems low should there be a need for more than one item of plant to access the temporary construction sites;
- LGV movements to construction sites are based on up to five workers per vehicle who are all assumed to arrive at the construction compounds in single occupancy vehicles. This latter point is robust and represents a worst-case scenario, however the first point is not robust unless this is controlled through their Travel Plan

- It is unclear how many construction workers will be on each site during each of its peak, or how many sites will be active at any one time. Further details should be provided so that the traffic generation can be reviewed. For example, for each gateway we should see that there is a predicted *X* tonnes of material needed to be transported and that this would be done using lorries with a capacity of *Y* tonnes resulting in *Z* movements. Similarly, we would expect to see that *X* metres of cable were required and that each vehicle would be able to bring *Y* metres of cable resulting in *Z* movements.

Table 6-9:

Peak week traffic for Kent Street shows 55 HGVs per day

Annex C gives an estimate of the time traffic is 90%, 75% and 50% of peak week numbers. This does not give a true picture of the impact this will have on the traffic flow on the A272 because of the thee access points so close together A63, A62 and Kent street and the hundreds of HGVs a day doing a complex 'dance ' in and out, along with the LGVs and private cars.

Conclusion:

This review shows that, contrary to the claims made at the ISH, there is **no evidence** that

- they have looked at the impact of turning traffic, the cumulative impacts of the three access points so close together or of the congestion point at the A272/A281 junction in Cowfold on traffic flow.
- when assessing air quality impacts, they have taken account of the fact that the traffic is not flowing freely through the village and that Rampion passenger and LGVs will affect flow also.
- The numbers of LGVs and LVs are included in traffic flows, that tankers and the additional movements created by the Kent Street plan are included, or that the new 40mph proposal has been taken into account in any way

Please also see our previous submissions REP1-089, (Traffic and Air Quality chapters) and REP3-099 Appendix 4 which reach similar conclusions from a review of other Rampion 'evidence'

HDC Stantec Report:

In Dec 22 HDC commissioned a report from Stantec. It showed that the traffic at the mini roundabouts is beyond capacity during peak hours, defined in the report as 08.00-0900 and 1700-1800. In the morning, the congestion is the 7th worst in the whole district.

5.2.15 of the Stantec report says "The measure used to assess this is the volume to capacity ratio or V/C. This effectively indicates how arms on junctions are performing based on the flows predicted in the model and the modelled capacity of each arm at a junction. When a junction goes over capacity, there will be increases in delays experienced by travellers as flows increase. Therefore, if Local Plan development increases the flows, this will exacerbate any existing issues or lead to new issues of excessive delays at a junction. "

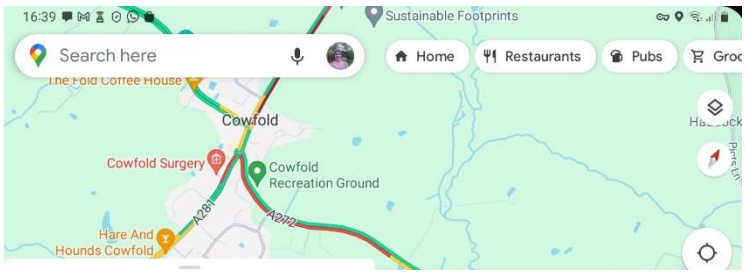
This confirms the modelling arguments in traffic and air quality chapters of the CowfoldvRampion Impact Statement (REP1-089) and appendix 4 in deadline 3 submission REP3-099
And that every vehicle makes a difference.

It is also of note (figure 5-1 of the report) that the traffic at Buck Barn (junction between A272 and A24) is also beyond capacity at these times.

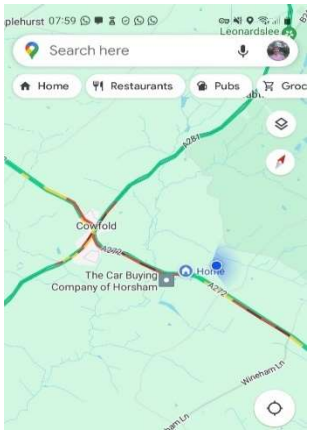
The ElanCite traffic camera data produced for WSCC for the period Jan-Mar 2023 at the A272 approach from the east in the Cowfold village centre shows that **the traffic peaks for this point in fact begin around 6.30-7am and continue until 9.30 am and in the evening 3pm until 6.30-7pm. Of note is the fact that the figures are only slightly lower than this throughout the whole of the day between the peaks, explaining why it takes very little to tip the traffic into major congestion on this road.**

This is evidenced by the following screenshots, taken since the beginning of March, which show numerous instances of the traffic at a standstill on the A272 outside of peak times. Please note that these are representative only and do not include **all** such episodes.

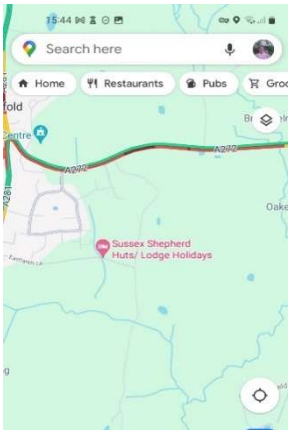
8 Mar 2024 16:39



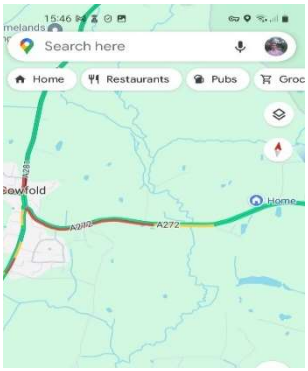
3 Mar 2024 7:59



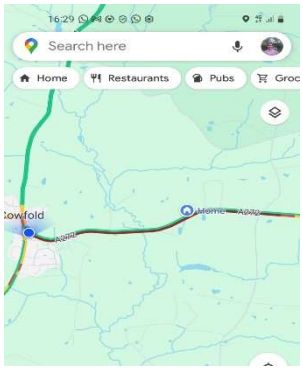
28 Mar 2024 15:44



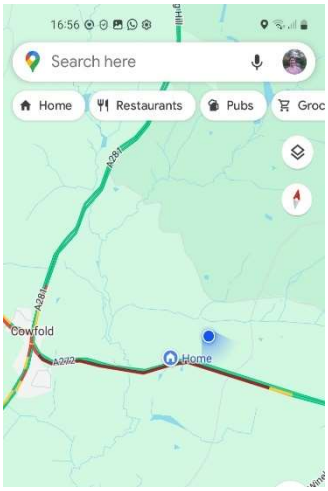
28 Mar 2024 15:46



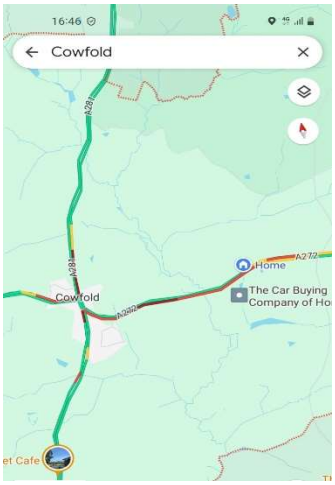
18 Apr 2024 16:29



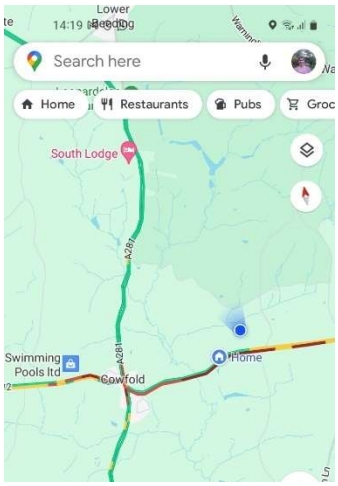
18 Apr 2024 16:56



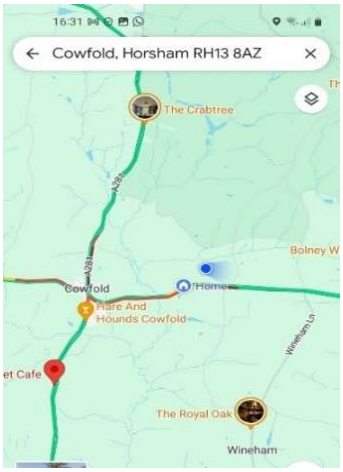
9 May 2024 16:46



10 May 2024 14.19



10 May 2024 16:31



This is exactly as experienced by residents and why the additional vehicles from Rampion WILL make a difference, as will the congestion caused by the vehicles turning on and off into the compounds, causing the traffic to back up into the AQMA

Paragraph 2.17 of the IEMA Environmental Assessment of Traffic and Movement (2023) states

"It should be noted that the Rule 1 and Rule 2 'criteria' process may not be appropriate for some impacts, and it is generally accepted by regulators and practitioners that it should not be applied to assessments of air quality, noise, road safety and driver delay. For these impacts, a separate study area and assessment criteria should be agreed with the relevant stakeholders. See data requirements below and Section 4 for factor specific advice. " **This must apply to the complex Cowfold junction and the nearby Compounds, as we discussed in our Deadline 3 submission, REP3-099 appendix 4. It is not appropriate simply to consider percentage increase in vehicle numbers at this complex junction**

Temporary 40mph limit:

Four and a half years is not very temporary. It would have to be continuous during that time otherwise people will get confused and that would increase the danger.

On the plus side, it would mean that, if permanent, the visibility splay at Oakendene A-63 could be much reduced, but

- We need modelling to understand whether it would just create a backlog on A272. Normally reducing the speed limit just reduces the gaps, but when the area is continuous with a pinch point, such as the two mini roundabouts, surely it will just increase the congestion?
- There is a continuous flow of traffic coming from the village as the queue into Cowfold from the west is released onto the eastern side. Reducing the speed limit will cause traffic to back up into the village as traffic can't speed up. particularly as banksmen are going to keep holding up the traffic.
- It just seems to be part of a rather hair-brained scheme to avoid traffic lights, and to squeeze massive vehicles in and out of Kent Street. It needs to be looked at in the context of the whole of their traffic management plans, because of the proximity of the other access points.
- Will this increase the accident rate on the already terrible western side of Cowfold on the A272, and between Kent Street and Bolney as frustrated drivers put their foot down on a derestricted bit of road?

Oakendene Industrial Estate

There is no assessment of the current traffic using the Oakendene Industrial Estate access road. We learned at the ASI that there is to be a new access to A62 adjacent to the Oakendene Industrial Estate access. This will mean crossing the path of vehicles coming out of the Industrial Estate who may assume they are turning into there as usual and collide with them

There has been no assessment of how many vehicles, or what types, currently go in and out of the Industrial Estate. **How can the impact of the new access to A-62 or the safety and turning impacts of A-62 be assessed without this?**

Rampion's total refusal to accept there will be any traffic issues is going to have dire consequences for not just centre of village and A272, but side roads, as people, including construction workers, try to avoid the chaos. Even Kent Street might face this on top of all the cable route HGVs. Yet the above shows that we cannot rely on the figures given by Rampion for traffic generation and movements and therefore the impacts cannot be assumed to be as they say. All these studies are essentially desk-top and therefore do not take in the daily reality of what local residents actually *know* will happen. When compared to the traffic generation for the much smaller Rampion 1, the numbers are just not credible.

Appendix 2: CowfoldvRampion assessment of latest Rampion CTMP (REP3-030)

We believe the following shows that Rampion's plans for traffic management in Kent Street and the Cowfold area are ill-conceived and have not been thought out until the eleventh hour, in the belief that they do not matter.

1.2.5: Why have they removed the HGV plan for the AQMA in Cowfold?

Table 2-1WSCC LIR:

3.6.1 and 3.6.3: WSCC ask the Applicant to clarify whether the *minimum* duration of construction will be 4 or 4.5 years. Without any justification the applicant now says this is a *worst-case* figure. Where is the evidence that would make this claim believable? This is just wishful thinking.

Why should we believe them? Just because they say this, it doesn't make it happen. They need to provide credible evidence of how they can justify this claim. R1 was supposed to take 2 years yet took 6! This claim is in direct contradiction of their insistence on having 7 years in which to start, because of concerns about procuring materials. How will it work with their promise not to work in the breeding bird season, or when it is very wet or flooding? Surely these things will *prolong* the construction period, not shorten it?

5.4.4: The Applicant says that "*routing through Cowfold will only be for access A-56 and or A-57 or where use of locally sourced materials / equipment makes its avoidance impracticable*." However, this is only in respect of HGVs, and is directly contradicted by Table 5-3 on page 60 which shows A52 and A53 also being accessed from the Oakendene compounds. **There is no other way to get there other than through Cowfold except by an extraordinarily circuitous route.** It is also contradicted by the figures in 'Table 5-1 local access routes' below, the figures in which have not changed for Cowfold since this additional commitment was made.

Therefore, in either case, the commitment doesn't actually change the numbers at all, they will all have to pass through Cowfold just the same, so it a meaningless commitment which they cannot fulfil.

Table 1b: Road Safety Audit Requirements: It is not acceptable for the access designs to the compounds, or safety audits for these accesses to only be developed '*prior to the end of the examination'*. **There are so many so close together around Oakendene, and this is so fundamental to the traffic, congestion and safety issues here that the proposals need to be examined in a timely manner**

3.6 Construction phase

3.6.5: There is still loading and unloading activity in the shoulder hours; which was *not* part of the original intention when suggested by Bolney Parish Council

3.8 Decommissioning

Unless a detailed plan is available now, how can the true environmental impact be assessed? We agree with [redacted] (REP3-101) that" without *a decommissioning plan submitted before consent, the DCO is an assessment of only half, or even less of the works and therefore effects of the proposed development. Natural England also highlights this as a concern, to which I lend my weight."*

4 Proposed access strategy

4.1.5 and table 4-1: It would be helpful if 'light operational' could also be clarified e.g. for A58 which is not to be used by HGVs, yet Rampion are now not committing to this restriction (see REP3-051 TA1.6 above)

Table 4-3 access visibility splays: This table appears to be somewhat chaotic. Why has A62 been reduced to a requirement for only 43m based on *"**MfS visibility splay to be based upon 85th percentile traffic speed of 30 mph recorded on Kent Street as part of the Enso Battery Storage System CTMP."* There appears to be no logical link between the two; A62 is on the A272. And if indeed, this is deemed acceptable, to use the recorded average speed limit for Kent Street, why aren't A59, 60 and 61 included, all of which are on Kent Street?

Also, this appears to take no notice of the plan they produce lower down the document for Kent Street, which proposes a 40mph speed limit on A272; all of which suggests they have not bothered to consider the consequences of using Kent Street until forced to do so by the ExA.

4.7.1 appears to be clear that HGVs are vehicles over 3.5T. Why then, does Table 4-4 still not list 'all vehicles over 3.5T' under HGVs. For absolute clarity, please could this be amended?

5.4 HGV access strategy

Table 5-1 local access routes: nothing has altered in this tracked version, so the figures given to Cowfold Parish Council and others at Deadline 2 have not changed (REP2-014, Table 2-5) despite the firmer commitment to avoid the AQMA were possible, and only route A56 and A57 traffic through the AQMA. Routes 13 and 15 both include the A24, and therefore *must* pass through Cowfold.

In addition, as already mentioned, for Table 5-3 Construction Traffic Distribution, there is an inconsistency between this and 5.4.4 above:

Table 5-2:

Issue No.1: The initial paragraph should be amended to "The HGV Access Strategy and selection of temporary construction accesses, complemented with onsite haul roads so that several key settlements will be avoided by construction HGV traffic *where possible".* It is clear that they do not completely avoid these areas, as, for instance, A-52 and A-53 are accessed through Henfield (routes 10 and 11, table 5-1)

All these continued errors show how ill thought out the details of the CTMP are **and why the traffic numbers given to various parties at different times cannot be relied upon to be accurate; they are produced to suit the moment, without justification, and plenty of smoke and mirrors.**

6 LGV access

6.1.1: It is clear from this paragraph that staff arriving at or leaving the compounds at the beginning and end of the day are **not** included in the LGV numbers as they are classed as Light Vehicles (LVs). Table 6-1 is for the staff being ferried to various locations *having arrived for the day* at the compounds, and 21% are shown crossing Cowfold to and from the A24, but no numbers are given.

6.5.6: It is clear from this that none of the staff vehicles, whether LGVs or LVs, will have any routing restrictions placed on them. "*As this LGV construction staff traffic is travelling to and from TCCs and the onshore substation site, no routing restrictions will be applied to these trips"*. They will contribute enormously to the huge traffic congestion in the AQMA and, when they discover how bad this is, they will use lanes such as Thornden in the village centre, Picts Lane and Bulls Lane as rat runs

to escape it. This cannot be permitted. It also means that they **cannot have been included in traffic calculations** as they cannot know how they will travel around.

There should be clarification of exactly what is meant by LGVs and LVs, as the flow diagrams only refer to LGVs. The Applicant must make clear exactly what is included in their calculations and make them much more transparent.

8.26 Kent Street mitigations: see below

Location Specific HGV Restrictions

8.4.18 "*In order to avoid the traffic sensitive areas during the network peak hours, HGVs travelling to / from access A-56 and/ A-57 through Cowfold will be subject to the following limits:*

- *During the weekday morning peak hour / school opening period (08:00 to 09:00), school closing period (15:00 to 16:00) and evening peak hour (17:00 to 18:00) HGV deliveries to:*
  A-56 will be limited to 1 HGV delivery; and
  A-57 will be limited to 2 HGV deliveries;

Why limit only those HGVs? **There is a playground adjacent to the eastern A272 at the Cowfold recreation ground, and a scout hut.** There are pavements and crossing places on the A272 east of Cowfold to enable children and parents with pushchairs to cross to these places. They together would represent a high sensitivity receptor yet we note **no receptor is located in its vicinity**. A receptor in this location would pick up vehicular movements through both receptor 24 (south of Cowfold) and Receptor 25 (the centre of Cowfold) travelling towards the Compound.

8.4.17 These peak hour limits will be applied to all HGV movements (including waste) from the wider highway network arriving at/departing from the sites and will be monitored via the Delivery Management System (DMS) as set out in Paragraphs 8.4.30 to 8.4.36.

8.4.19 The DMS will control bookings of HGV deliveries to / from sites accessed via A-33, A-35, A-56 and A-57 as well as track HGVs to monitor compliance with the HGV routes to/from the sites. Peak hour HGV movements to these locations will be controlled by the provision of limited HGV delivery slots within the DMS."

All this will do is to push the problem to other times of the day. Moreover, as the West Sussex Traffic data shows, (see Appendix 1) there is little difference between the numbers of vehicles passing through the village for much of the day, so it takes very little to tip this congested point into major queues. Also, it doesn't include the many, some not so light, LGVs, or LVs.

8.4.30: the delivery management system proposed is, like 8.4.19 above, yet more wishful thinking. Recording details is one thing, but to time it all so that it has no impact, including the coming and going of all the construction vehicles too is totally unrealistic would require programming skills beyond what is credible.

Appendix A:

There remain a number of significant inconsistencies with this document:

- Many of the Access points are shown as 'No accommodation works required – existing access.' Yet REP3-055 Construction Access Update Summary shows large sections of hedge which need to be removed for the same access points as they have only just thought about

getting their big vehicles in and out of small lanes e.g. A57, A61, A62. A63 is still referred to as a '*temporary* construction access'.

- Wineham Lane is the only road for which the temporary speed limit is mentioned *"Temporary 40mph speed limit to be applied on Wineham Lane whilst construction access is in use."* Yet they are proposing further down in the document to reduce the speed limit on A272 to 40mph also, and to construct accesses on Kent Street based on a 30mph average speed. Why are these not mentioned? Perhaps because there is no joined up thinking yet again?
- We note that the photograph for A-63 has been taken from due north of the substation, apparently without the photographer being run over. We would like to suggest Rampion could now provide far better visual representations of the substation, or at the very least, if they are worried about safety, use the photograph shown, but with all necessary vegetation removed.

The photographs for A-68 and A69 show the reality of just how industrialised the landscape at Oakendene will become, as these pictures are taken almost 60 years after the construction of the substation in the photographs

Appendix B figures:

7.6.1c and 7.6.2c: Please could the applicant clarify whether or not there is to be a compound at Cratemans Farm? The owner himself feels he has received no certainty about this, and it doesn't appear to be in the figures in the DCO submissions.

7.6.6c still shows continuous routes for HGVs and LGVs coming from A24 through Cowfold and up and down A281.

7.6.7c: presumably a super output area reflects where most of the staff will be coming from. In which case, **virtually all staff will have to pass through Cowfold** to reach the substation compounds, as they will either come via A24 or A281.

7.6.9e: All LVs will have to go through Cowfold to access the Access points A52-57. Numbers are unknown.

7.6.13c: There is no restriction on LGVs travelling through Cowfold, or indeed Henfield

Appendix C RSA requirements:

We object to the comments regarding A-61 and A-64 that no RSA is required because "It is generally considered that any safety related aspects can be resolved through the detailed design and stage specific construction management plans." This is inconsistent with the ExA's request to come up with specific management plan *details* for Kent Street. It is more 'kicking the can down the road'

Kent Street

Appendix D part 3. A272 / Kent Street – Accesses A61 and A64:

Please also see previous comments submitted at Deadline 3: REP3-099, Appendix 5.

At the ISH last week, the WSCC highways officer said that "at first glance the proposals seem reasonable". This is exactly what Rampion intended. However, as was rapidly very clear from the ExA's interrogation of Rampion representatives at the hearing, a second look quickly establishes that it is ill thought out and full of significant problems.

Firstly, we consider it inappropriate that this whole Appendix is tacked on to a larger document, out of sight, when it was specifically asked for by the ExA after the first hearings.

3.2.5: correction- the days were 18th, 19th, *23rd and 24th* October, not 24th and 25th as stated. We are disappointed that Rampion have simply chosen to reproduce a 4day partial survey from another company (albeit a company under the same financial umbrella as Rampion and therefore should be included in the DCO application). This was available at the time of the hearing and mentioned by CowfoldvRampion. If that had been considered adequate, we believe the ExA would have made that clear.

"*AM and PM peak hours summarised in Table 3-1 show the busiest recorded hour between 8-9am and 3-4pm*." Yet Table 3-1 gives evening peak as 4-5pm. **Which is it?**

Furthermore, the use of peak hours is totally misleading as it implies the rest of the day is much quieter. Looking at the Enso Energy figures, and Paul Lightburn's survey, **it is clear that there is no real morning and early evening peak but that the vehicles continue in similar numbers throughout the main part of the day; if anything, there is a peak in the middle of the day.**

3.2.6: "*Traffic flows along the A272, as reported for 'Highways Link C' within Chapter 32: ES Addendum, Volume 2 of the Environmental Statement [REP1-006] are in the region of 16,904 Average Annual Daily Flow (AADF) including 745 HGVs, recorded in 2019. These flows, respectively, are anticipated to rise to 18,933 and 820 in the future year baseline (2026/27).*"

We strongly disagree with these figures; Rampion 1 traffic documents, as well as WSCC AADT data show these AADF numbers were already over 16000 in 2012, and far from '*anticipating a rise*' to 18933 and 820 by 2026/27 WSCC data shows that we are already at these numbers and rising. (WSCC AADT data: Using April 2022 as an example, the 5-day average was 18,582). From rREP3-020 table 3-4 it can be seen that in 2023 at link E, the Cowfold to Oakendene part of the A272, the numbers were already 19786, a further rise of 1200.Nor does it take into account the huge and sustained increase in LGV numbers since the pandemic

Table 3-2: the sheer size of these vehicles should be noted, and their alarming passage down tiny Kent Street past walkers, cyclists and the many horses and other animals imagined. How can these vehicles wait on the small passing places envisaged, [although 3.4.6 below suggests it is the public who will be forced to wait in these spaces, not the HGVs] and how will they turn round for the return journey once on the haul road?

The diameter of the turning circle, based on Wheel base/Tan T where T is the turning angle of the vehicle, is **approximately 73m,** based on the figures given for the low loader in the diagram in appendix D of the CTMP

- Where is the evidence that these massive vehicles will be able to turn around at the Cowfold stream when travelling the haul road either from Kent Street or the A281,
- where is the evidence they can turn around on the high voltage cable route from A64? The other end of the route is for Light construction access only
- It is not enough to simply look at the width of the DCO boundary on the cable route, because half of it will be a trench to take the cables so cannot be driven over, and at

Cratemans, there is what appears to be a wide area to the south of the stream, accessible from the A281 access, but in fact it is wide because there is an ecologically sensitive feature in the middle.

This whole Kent Street proposal is ill thought out and cobbled together to appear plausible, but takes no real account of what the reality actually is.

Is the bridge over the culvert actually wide enough to take them? Is it strong enough? Our measurements show the width is 2.85m, almost exactly the width of the wheel base of the HGVs and low loaders, which are 2.5 to 2.85m wide. The photographs show how poor the surface of the road is and how flimsy the culvert, even at considerably less than the necessary width:

A-61 is immediately to the south of this bridge. Nowhere in the plan is anything showing how they will get in and out of A-61 and A-64 with these enormous vehicles, particularly at A61 which is immediately to the south of the bridge restriction, and therefore turning is limited by it. The low loader has a maximum steering angle of 30deg. If it is so complex to get onto the much wider A272 how will this be possible? This is a half-baked plan, designed to look plausible. At the hearing

Rampion's representative said that they vehicles **would** be able to get in and out of these access points but gave no evidence to back this up. No doubt this will require yet more 'unforeseen' removal of hedges and trees from this stretch of the road.

The CTMP still says of A-64*: "No accommodation works required – existing access*" yet the construction access update REP3-055 submitted at the same time now admits that an extra 10m of hedge will be required (? Either side) to gain access. Where will it end? Where is the evidence that there is any joined up thinking across the different documents?

Table 3-2: Whether there are banksmen or traffic lights, the principle is the same; the traffic will need to be stopped! and from tables 3-4 and 3-5 this would appear to be 2-3 times an hour. We are not told how heavy the traffic will be for the none peak weeks but perhaps it is similar to the Kent Street traffic numbers outside peak times i.e. very little different! (See REP3-022 in Appendix 1 above). 'It is anticipated' actually tells us nothing. Annex C of REP3-022 suggests up to 30 weeks of greater than 50% of peak week numbers.

There is a dip in the road to the east and a bend, meaning that drivers will come upon the banksmen unexpectedly, NB Safety assessment on the A272 must also take into account the fact that many of these vehicles will be arriving from the two Oakendene compounds just close by and so will be in effect turning through 360 degrees on the A272. From the point of view of oncoming traffic, drivers will NOT be expecting this and it will be dangerous. **Entry and exit at Kent Street cannot therefore be seen in isolation**

<u>Traffic management strategy principles:</u>

3.4.2 "*The traffic management strategy for accesses A-61 and A-64 is based upon the following principles:*

- *To facilitate access along Kent Street by construction traffic up to four passing places will be installed to provide adequate highway width for two-way traffic;*
- *HGV entry will be controlled via the Oakendene temporary construction compound at access A-62;*
- *HGV and LGV exit will be coordinated to ensure that they do not occur at the same time as HGVs entering Kent Street;*
- *HGV entry and exit will be controlled by banksman* ***along Kent Street,*** *up to and including accesses A-61 and A-64;*
- ***General traffic will also be controlled by banksman*** *whilst HGVs are entering or existing access A-61 or A-64; "*

Banksmen are more usually employed for a few days or weeks. Surely this is the purpose of traffic lights? This is not a realistic proposal for four and a half years. Yet they are trying desperately to avoid traffic lights because they know there were complaints on Wineham Lane from Rampion 1 when traffic lights were left working all the time, even when no traffic was there, so they were ignored. Also, they know Bolney PC are against traffic lights on the A272 because of the queues. This scheme will not stop the queues, and Rampion appear to be prepared to put the lives of these banksmen and the public in their vehicles at risk

A temporary speed limit reduction from the current national speed limit to 40mph is proposed along the A272, between east of Cowfold to Bolney, a distance of approximately 4km. 4 and a half years is

not very temporary. It would have to be continuous during that time otherwise people will get confused and that is dangerous

On the plus side, it would mean that, if permanent, the visibility splay at Oakendene A-63 could be much reduced, but

- We need modelling to understand whether it would just create a backlog on A272. Normally reducing the speed limit just reduces the gaps, but when the area is continuous with a pinch point, such as the two mini roundabouts, surely it will just increase the congestion?
- There is a continuous flow of traffic coming from the village as the queue into Cowfold from the west is released onto the eastern side. Reducing the speed limit will cause traffic to back up into the village as traffic can't speed up. particularly as banksmen are going to keep holding up the traffic.
- It just seems to be part of a rather hair-brained scheme to avoid traffic lights, and to squeeze massive vehicles in and out of Kent Street. It needs to be looked at in the context of the whole of their traffic management plans, because of the proximity of the other access points.
- Will this increase the accident rate on the already terrible western side of Cowfold on the A272, and between Kent Street and Bolney as frustrated drivers put their foot down on a derestricted bit of road?

3.4.3" *Detailed designs for Access A-61 and A-64 will be completed as part of the post consent detailed design process and stage specific Construction Traffic Management Plans as agreed with West Sussex County Council and referenced in Appendix C of the Outline Construction Traffic Management Plan [REP1-010] submitted at Deadline 3."* This must mean Appendix C of REP3-030 as there is no Appendix C in REP1-010 at all. Yet in Appendix C there is nothing there other than to say A64 access exists and NO ALTERATION NEEDED.

<u>Kent Street passing places</u>

3.4.5 "*Up to* four passing places are proposed." This means they haven't really assessed the suitability of this idea yet.

3.4.6 "*Provision of these passing bays along Kent Street will facilitate the passing of cars and LGVs during the construction phase whilst also providing for emergency vehicles or other unforeseen circumstances."* What about pedestrians and animals who may not have been able to see an HGV before they left the previous passing place?

NB these so called 'passing places' are also used as parking for walkers, dog walkers, horse boxes. This is essential as there is nowhere else to park. (see photos below) People must be allowed to continue to do this. How will Rampion manage them?

Tractors and large horse boxes are included in the current traffic on the lane. They cannot be regulated in the same way as Rampion's own vehicles. The plans seem to only be considering passing places for cars and small vehicles. No minimum width is provided for the passing places. Further details of the widening should be provided including a minimum carriageway width and passing place length to determine whether two "large vehicles" can pass. However, this will have further, unacceptable visual impacts on the lane, and implications for wildlife connectivity. We do not believe that the passing places are long enough or wide enough to be used safely, particularly those restricted by the proximity of the bridge, culverts and ditches.

3.4.8: This only mentions the stopping of traffic **on Kent Street**, but people will be stopped from going up **or down** Kent Street whist a vehicle is coming in or out. Where will those people wait safely on the A272? The prospect of stopping your car for 'up to 2 minutes', without any obvious reason in

the eyes of arriving traffic, is absolutely terrifying. What is more, if the journey from the compound takes 5 mins, traffic will be waiting on the A272 all that time, probably much longer, as the traffic will have to be ready by the time the vehicle comes out of the compound. This whole proposal is ridiculous-traffic lights would be far more sensible, even with the dire queues which will build up. Ordinary members of the public will not be able to be 'timetabled' to enter Kent Street. During the 5-10 minutes vehicles will have to wait on the A272, the traffic will have backed up into the AQMA and up to Bolney, meaning that people **will use the single-track side roads, similar in size to Kent Street, such as Spronketts, Bulls Lane and Picts Lane as rat runs, potentially in both directions at once, causing utter mayhem.**

With potentially 2-3 HGVs/hr, this is completely unworkable.

We would also like to remind the applicant that the A272 is a major route for emergency services who need access along it at all times. Agricultural machinery, which commonly uses the lane by necessity, is often wide and is not as manoeuvrable as a car and cannot easily reverse back if the huge rampion vehicles find themselves unable to get past.

The following photographs were taken by a resident entering Kent Street from the A272 who found himself confronted by a tractor and trailer.

The driver tried to reverse, but it was too dangerous to do so onto the A272, so the tractor eventually managed to reverse into a corner to let him pass. The tractor is too wide for the road otherwise, but is used to this sort of situation. Imagine the 'fear and intimidation' to be felt by a driver, if instead of the tractor, he had met an enormous articulated vehicle which was unable to reverse or had nowhere to go. This is a very real scenario, as the banksmen cannot police every single vehicle on A272, nor can they control the movements out of the several properties on Kent Street to the north of access A61

3.4.10 "Prior *to HGV arrival along Kent Street, banksmen will also inform pedestrians of these incoming vehicles to allow them time to adjust their positioning. The same strategy will be adopted for HGVs exiting accesses A-61 and A-64."* This is completely ludicrous and shows no understanding of how this road is used. How are ponies led on foot to 'adjust their positioning' in time?

As ably set out in the OFH by [redacted] there are approximately 13 equestrian premises on or accessed from the Lane who need to use Kent Street on a daily basis to exercise their horses; any plan must be shown to be workable for them. Walkers, dogwalkers, equestrians and animals are being ignored in this plan. There are few alternative routes, and even they are bridleways scheduled for closure during the project.

In response to a direct question from Mr Lightburn, at the ISH, Rampion said that banksmen and *drivers of all vehicles* accessing the lane would receive training in how to behave when there were horses and animals on the road. We do not find this credible as many of the vehicles will be deliveries from other companies. Also, experienced riders from the area tell us that "***Rampion propose to utilise vehicles that even the most well-trained equine will baulk at****, walkers will also be forced off the lane (to where?) by the sheer size of the vehicles."*

3.4.11: This widening will remove mature trees scrub and hedge and must be included on the assessment of biodiversity loss, in addition to hugely altering the visual impact of the substation on the approach from the east.

There are numerous additional dangers which are immediately apparent to residents and those who are familiar with the road, and many questions still left unanswered:

- People waiting to turn in from the A272 will not know there is a vehicle coming up Kent Street. They cannot reverse back on to the A272 or safely sit there waiting as people will run in to the back of them
- Kent Street is perilously close to A-63 where similar slow manoeuvres will be taking place onto the A272. Traffic lights along the whole stretch of road would be a lot safer, but would result in even longer queues.
- Picts Lane is directly opposite Kent Street on the A272. It will be even more dangerous to turn in and out than it currently is.
- The access road to Coopers Farm, Applecross and Wealden Barn also dangerously close. They and vehicles coming out of the several other access lanes on the north side of the A272 risk being trapped in this section of the A272 and facing the oncoming large vehicle. When the traffic is backed up, they will also be unable to see past the queue as to whether it is safe to pull out of their driveways.

- The cumulative visual impact of the splays at A-63 and Kent Street, and cumulative traffic management dangers must be taken into account. **The two are just 100m apart**
- The plan will require not one but numerous banksmen on Kent Street and several on main road, not just at the junction, as people will need to stop some distance away to allow these huge vehicles to turn, to some extent on the wrong side of the road. Traffic lights would be far safer. People **cannot reverse** if caught out.
- Unless agreed by highways or the police, the banksmen will have no legal authority to manage the traffic as proposed.
- No 40mph speed limit (or indeed traffic lights) was needed on the A272 for Rampion 1. They did not need banksmen. The whole scheme will cause chaos to the 18000 users a day in each direction, including Rampion's own traffic. And yet the whole reason in deciding on this alternative was that it was supposed to allow better access and make it easier for Rampion construction traffic. All because they didn't consult and find out what the reality would be before choosing the site. An alternative exists at Wineham Lane which would be far less disruptive.

- The turning circle of the low loader shown turning right into Kent Street has wheels in the verge on the north side of the A272. **If this requires widening of the road at this point this is not consistent with the commitment to protect tree and hedge roots on the north side of the road.** It appears as though the OS mapping is missing the northern kerb giving a false width of the A272.

- There is no proof that these vehicles have the manoeuvrability to turn on or off Kent Street into A-61 and A-64. **We would suggest swept path analysis to be provided for all access locations, and** to demonstrate that:

  The access proposed is of sufficient width to accommodate the vehicles proposed;

  The impact of the proposed access and visibility splays on the surrounding vegetation;

  The secure line was sufficiently set back to enable delivery vehicles to stop outside of the public highway where appropriate to not block the free flow of traffic.

- There will be considerable backing up into the AQMA as traffic waits to turn in and out of the 2 compounds and Kent Street and can only travel at 40mph. Already, because of the queues approaching the mini roundabouts from the west on A272(see HDC traffic report) we see a continuous flow of traffic coming from the village as the queue into Cowfold from the west is released onto the eastern side. This makes it very difficult to turn onto the A272 near Oakendene and Kent Street. Reducing the speed limit will cause traffic to back up into the village as traffic can't speed up. particularly as banksmen are going to keep holding up the traffic.
- There has been no attempt to survey the condition of the road and whether it can take vehicles of this weight and size
- Not including LGVs in this 'management' is not acceptable as cars already have to back when the few LGVs which come along at present are on the road.
- We have no evidence to support the current claim of 4.5 years as worst case instead of minimum now, or of the traffic numbers on Kent Street
- There has been no attempt to assess the traffic implications for making the necessary alterations to passing places, visibility splays and any road or bridge strengthening which may be necessary. Or the making good of the road as needed and at the end.

- It should be remembered that there is a planned A23/A272 junction improvement. This will add to the chaos if it occurs at the same time.
- IF this is allowed to go ahead an urgent and responsive phone number MUST be available on the A272 at all times
- **The swept path assessment is desk top only.** This is particularly dangerous when it can be seen how close to the hedge on the northern side of the A272 the wheels of the low loaders will need to go. What is the accuracy of maps used, especially as there has been no need for such detailed surveys of the road before?

We have put more consideration into Kent Street than they have; instead, they treat it as an annoyance to be got out of the way with a tick box exercise. How on earth can this work? It cannot be viewed in isolation, but must be considered in the context of 1000s of huge vehicles turning in and out just 100m away. The scheme is avoiding traffic lights in name only, and without the safety benefits of traffic lights.

Currently Rampion are basing their traffic baseline on a survey carried out by Enso Energy for their Battery Storage Farm application. Enso submitted an ATC survey in their outline construction management plan. It would appear that this evidence may be flawed in that almost all vehicles captured (including for the 3 days when the A272 was closed) were recorded as ARX (the ATC classification system) vehicle classification 1 and 2. This means that they were all either two wheelers, motor cars or simple trailers.

This is obviously nonsense, as when the A272 was closed, huge lorries and coaches were jammed in the lane. Yet the algorithm has somehow come up with 17-25% HGVs, which doesn't fit the ARX data.

Rampion have started their own automatic data count on Kent Street today. It remains to be seen whether this is any more fit for purpose. We have no idea, but one imagines that when horses, pedestrians, vehicles close together, etc on a lane with such a low traffic count, there is plenty of scope for misinterpretation by automated systems more used to main roads. Can a system be calibrated to be accurate at both extremes, ie both bicycles and huge lorries at the same time?

A responsible applicant would have done the survey 3 years ago when thought might need to use Kent Street. Leaving it to the eleventh hour is not acceptable and is a demonstration of the contempt they have shown for the process throughout. The survey will need to be done for long enough to be meaningful at low counts, and outliers discarded. We await the results to see whether this is the case. Sadly, Rampion consider it acceptable to only produce the results at Deadline 5, which is far too late.

We would like to ask Rampion to do a properly conducted survey of the non-motorised users of Kent Street, such as pedestrians, cyclists, runners, dog walkers and equestrians. Without this, they can have no real idea how their traffic management plan will work, and the CTMP can have no real meaning

On the ASI a number of concerning errors were made by Rampion showing how little understanding of the actual situation or even their own proposals they actually have:

- we were taken to a point on the lane south of Moatfield Lane and initially told that it was A61. They did later accept that it was in fact the site of A59, a point earmarked for

operational access only. If this is indeed the site of A59, further clarification is needed, as the CTMP shows this as an existing access, yet there was no break in the hedge where we were.

- next we entered a gate which, we were told, was A61. In fact, this was incorrect; A61 is much further to the north, directly south of the Substation site. Interestingly and perhaps tellingly, the access we were taken through is the proposed access to the ENSO Energy battery storage application, again suggesting a link between the applicant and Enso.
- We learned on the ASI that the position ofA61 is not even fixed yet. How can we assess the suitability and impacts of the access if we don't know where it is, including exactly how much hedge will need to be removed? How can Rampion be giving such information with any kind of accuracy?

At the issue specific hearing Rampion defended their decision to use the lane by saying there was no weight restriction on the lane. This is ludicrous; it is a lane, previously of such little usage, that there has been no *need* to put such a restriction on it. A low loader with 10 axles as shown in the CTMP can carry up to 50 tons, more with specific permission. This is vastly different from the usual standard HGV traffic of home deliveries and horse boxes which currently use the lane. Why would such a lane have been constructed to take traffic such as is proposed? It is true that there is no weight restriction, **but there is a width restriction** of 6'6" (1.98m) which would **automatically have excluded enormous vehicles such as these.**

In 7b, [redacted] ably explained how Rampion's proposals would change the nature of Tolmare Lane forever. We believe the same would be true for Kent Street and that it would be equally inappropriate and unforgiveable. We also believe his concerns, that the recreational use of A26 and A28 have not been adequately considered, apply equally to Kent Street

We were astonished at the comment from Chris Williams that the main aim of the CTMP was to avoid the need for two HGVs to pass each other. The true aim is surely come up with a plan which can allow residents and users to live their lives during the time the construction traffic uses the lane.

They also said that the access to A63 and the widening of Kent Street would be reinstated afterwards. This seems unlikely.

Confusingly, [redacted] said that there should not be a need for people to use the passing places, but the CTMP says that they are precisely for that purpose and not for the HGVs. Which is it?

Alarmingly he said they were intending to allow movements in the shoulder hours of these huge lorries into Kent Street. How is this compatible with REP2-014: "*The activities permitted during the shoulder hours include staff arrivals and departures, briefings and toolbox talks, deliveries to site and unloading, and activities including site and safety inspections and plant maintenance. Such activities shall not include use of heavy plant…".*

We feel these enormous vehicles should not be all classified as HGVs; many are in fact abnormal loads, and should be separately categorised as such, especially for Kent Street and indeed Michelgrove /Tolmare Farm.

From the ISH it is clear they do not yet know:

- Who owns the verges
- Whether the road or bridge can take the traffic
- How they would carry out any necessary reinforcement work without disrupting the lives of residents. Indeed, the rather dismissive response was that 'site works will be covered under article 9'. That does not tell us *how* they will do this, and suggests they do not care.

- How they were going to manage the crossing places and access points
- How they would actually manage the traffic: they were unable to talk through the journey of an HGV in a convincing way. “We will communicate by radio” was all they were able to say!
- Whether vehicles could enter the access points from such a narrow lane, or turn around in the cable routes. They said they could, but then why is there no evidence to back this up
- How they will cope with the equestrian and other animal users; [redacted] rather feebly said ”I *would think they could be held too*”. We remind the Applicant of the terrible incident recently in London, where a horse (possibly one of the most highly trained in the country) was spooked by a loud noise with devastating consequences. Horses, riders and banksmen will all be put at risk.
- What impact the additional removal of hedges, trees and scrub on Kent Street, the access arc and visibility splay on to the A272 will have on their ability to screen the substation from Kent Street and the A272. We know this plan is not consistent with the advanced pre-planting scheme which includes this area for advanced planting. Further inconsistency occurs in the COCP (REP3-026 figure 7.2.1k) which shows hedge H520 as being retained, when in fact it will have to be largely removed to accommodate the turning arc
- What the impacts of the 40mph proposals might have on their traffic modelling on the A272 and A281(which also leads into the Cowfold AQMA)

7f) Rampion’s response to whether they had considered the cumulative impacts of the 3 access points so close together on traffic flows and safety, or the increased movements in and out of Oakendene caused by the Kent Street CTMP was simply ‘we have and it won’t’ without a shred of evidence to support this. Indeed, this was the sort of response to far too many of the questions they were asked. And was similar to the concerns raised by the lawyers for the Wiston Estate and for Sweethill Farm at the CAH

Conclusion

We would remind the reader that all the hoops Rampion find themselves having to jump through to try to make this work would be unnecessary at the alternative site of Wineham Lane North; most users of the A272 were unaware of the construction traffic during the work carried out for Rampion1. Yes, there were difficult issues on Wineham Lane, but they affected far fewer people. Wineham Lane is only slightly narrower than the A272 and so it is unrealistic to suppose that the same problems with traffic which they experienced won’t affect this major east west road. It will be worse in fact as the project is larger, and the road **much** more congested.

The woolly thinking, inconsistencies and lack of attention to detail apparent in Rampion’s approach to this application are bad enough in this small microcosm of Cowfold and the Oakendene area, but they are representative of the problems across the whole DCO. This is evident from the many representations in writing and at the Hearings.