

## Rampion June Deadline 4

Please also see detailed comments in CowfoldVRampion documentation

### Summary

The Applicant is still not taking local resident's concerns properly, representations are only answered by reference to already submitted documents. We have read these documents and are asking questions about them, just referring to them again does not answer our questions. Throughout this process we are tired of generic answers and deserve the respect of being heard and having our local Cowfold concerns addressed properly. The sub station choice so close to Cowfold will be a disaster for the village and will cause traffic mayhem in the village on the over-capacity roundabouts (HDC Traffic Survey), A272 and Kent Street

The Open Hearings on the 13<sup>th</sup> April in the evening all had a similar theme from Parish Councils, to farmers to residents all talking about a lack of communication and constructive consultation and a 'bullying' technique being applied by the applicant

I spoke at these hearings and have attached my speech below for reference. I would like answers to my questions in my speech please

Rampion and RED are not a charity, they are submitting this application to make a vast amount of money and to satisfy their required return on investment. It is not fair that these returns come at the expense of other affected parties who lose money because of the application. Many peoples' lives will be badly affected from the farmer who spoke so poignantly, to Parish Councils and local residents especially around the Cowfold area – this is not fair, and it is not right.

### Traffic issues – Kent Street and Cowfold

I would like to confirm and have some clarity from the applicant by clarifying something about the accompanied site visit on Tuesday. I did mention this on the Hearings on the 16<sup>th</sup> May in Brighton under Section 7A but the client did not answer categorically

A59 – access – the Rampion representative said it was not an access off Kent Street when the ExA walked south down there –the ExA were indeed correct- it is on the plan – there is currently no existing gate so an access would need to be opened - hedgerow loss and impact on character and landscape of the lane

Where we stood on Kent Street near the large tree and where we separated - the applicant said this was an access – it is not – this is the access point for the Enso battery storage site which the applicant has said is not related to them, but it is according to Companies House. It cannot be an access as due to the odd shape of the DCO land in this area as a sliver with non DCO land inside it, they have not included it here

I then said the access point A61 is further north down the lane – but the applicant said it could be **anywhere** from the mapped A61 to where we were standing with the ExA – is this not fixed then, why not? Please confirm position of A61. We do not see the need for so many access points off Kent Street as discussed later in our representation.

Rampion should have identified the problems with Kent Street and the A272 junction along with Cowfold traffic issues years ago. How can such a significant part of the construction phase have been left until Deadline 3

The ExA had asked for traffic surveys for this area initially at ISH1(EV3-001) then for Deadline 2, the applicant then pushed this to Deadline 3. Instead of doing them for this deadline they used traffic data from a nearby application by Enso Energy battery storage (DC/24/0054) to be able to submit for the Deadline 3 date

This Enso survey seems to be flawed with regard to vehicle classification, most of the vehicles recorded were listed as ARX class 1 and 2. This is for two wheelers such as motor bikes and motor cars. This is impossible as the A272 was closed for 3-4 days during the survey period (many photos have already been sent in regarding the lorries / coaches / large vehicles trapped on Kent Street and ruining the soft clay verges) – only a few days of data – not enough for such a large DCO application.

Only now in May 2024 are they doing traffic count surveys on Kent Street, the road tubes were laid on the night of the 7/MAY/24.

This shows a lack of due diligence and reinforces our belief that not enough original investigations were completed in choosing the substation site as has been mentioned by many local residents and Parish Councils in previous representations. Rampion only went down the road of least resistance hoping for little opposition from concerned locals with an incomplete consultation process around the Cowfold area.

We will now have to wait for the current surveys to be completed so that we can comment at a later date.

Please see below the comment from 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. It is also noteworthy that Horsham District Council has undertaken a Horsham Transport Study (Stantec December 2022) as part of its Local Plan Review. This found that when the local plan scenario outputs were modelled, the junction capacity analysis showed at least one arm of the A272/A281 roundabout north of Cowfold junction AM Peak and one arm of the A272/A281 roundabout south of Cowfold junction PM Peak would be over capacity (meaning increases in delays experienced by travellers as flows increase), even with the embedded highway mitigation to be provided elsewhere on the district’s highway network in the draft local plan.”***  
***This Report by Stantec shows 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 7<sup>th</sup> worst in the whole district.***

These 2 roundabouts in Cowfold are already over capacity but the Applicant still states in document 8.54 (page 67) with reference to Cowfold and question AQ 1.2 by the ExA about the AQMA area in Cowfold village

*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 Oakdene, 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. These commitments are also reflected in Table 5-1 of the **Outline Construction Traffic Management Plan [REP1-010]** which has been updated at the Deadline 3 submission and is secured via Requirement 24 of the **Draft Development Consent Order [REP2-002]**. The **Outline Construction Traffic Management Plan [REP1-010]** confirms the prescribed local HGV access routes for all sections of the onshore cable corridor and Table 5-2 details specific local constraints and proposed management of construction traffic routes.*

The Applicant is still just saying that Cowfold will not be an issue, so no need to investigate – we disagree as does the Cowfold Parish Council and HDCC. This is before one adds in all the sub-contractor vans which are not counted for in the Management Plan

This is exactly the experiences of residents and previous representations made, and why the additional vehicles from Rampion WILL make a significant 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

The applicant has now inserted The Kent Street Traffic Plan into the Outline Construction Traffic Management Plan at the end of a 267-page document,

This new plan is as listed below with **our comments in red**

● 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; **The current passing places are in private ownership and so could be coned off if the landowners wanted too, also they are currently just compacted earth and mud and full of potholes. One landowner has already placed a large skip on one of the places and others could do the same. Passing place 4 will not be large / long enough for an HGV and has a water ditch up against it. The places are not long enough to take long lorries or multiple cars**

waiting. If a car is travelling along the A272 west towards Cowfold and wants to turn right into Kent Street, it will have to wait on the A272 until the entrance to Kent Street is clear. Also, if they then enter into Kent Street and suddenly see a lorry coming towards them there is nowhere to go except to reverse back towards the A272, this is highly dangerous. Also, vehicles and horse boxes do park in these laybys and walk / ride around the area so they may well be blocked at times causing problems for the traffic strategy – again the Applicant has not been listening to us

- 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; **Please explain how this will happen if there are no holding bays and a HGV is coming along the A272 turning right into Kent Street – it cannot wait as it would block the A272 and the passing places may be full with cars or horses**
- HGV entry and exit will be controlled by banksman *along Kent Street*, up to and including accesses A-61 and A-64; This will involve a banksman walking into the A272 to stop traffic, this is highly dangerous whether traffic is coming at 40 or 60mph. **Also, banksman are usually a temporary measure (for days or weeks) and not for years of construction. The Applicant will have to investigate the H&S measures of using banksmen on such a fast road which often sees cars travelling over 60 mph.**
- **General traffic will also be controlled by banksman whilst HGVs are entering or existing access A-61 or A-64; for how long?? Banksmen are only to be used as a temporary measure not for weeks and up to a year**
- A temporary speed limit reduction from the current national speed limit to 40mph along the A272, between east of Cowfold to Bolney, a distance of 4km. **A speed limit change from 60mph to 40mph is significant – not temporary as many years of construction works. WSCC will have to advise on the implications of this reduction on the 2 x roundabouts in Cowfold and also junctions onto the A23. It should also be noted that traffic leaving Bolney at 40mph would see no reason for it once a mile past Bolney and due to the flat straight road cars would speed up as they reach Kent Street which will be dangerous for cars and banksmen**

Typically, a speed limit reduction would need to be supported by survey data demonstrating that the 85th percentile speed is lower, or the provision of a suitable traffic calming scheme or similar which changes the environment and therefore the behaviour of drivers. A measure such as average speed checks should be considered to enforce the temporary speed limit. Why are there no details about this, drivers would slow down after Bolney but then see no reason for the speed change and so speed up just as it becomes important to slow down for all the access points and turning places near Kent Street.

**If some of the HGV lorries need a banksman to turn on the A272 as it takes up both sides of the carriageway – how will the same lorry turn on Kent Street which is much narrower with soft clay verges either side?**

Why have detailed designs for access A61 and A64 not been provided to date and only to be completed post decision. These access points will greatly affect the lane and views onto the countryside and change the countryside nature of the lane, there will be visual impacts from these 2 new junctions

The applicant says that pedestrians will be told of traffic by a banksman to “allow them to adjust their positioning”. What does this mean as people, horses / dogs walk along the road, the verges are too vegetated in Summer for movement and too wet in Winter to allow change – please explain what this means?

The Applicant then gives full of the Traffic Management Strategy for A61 and A64 at the end of the document in Appendix D (page 222 of 267)

For The Kent Street Traffic proposal, we would also like to add to our comments

- 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, and how will they turn round for the return journey once on the haul road? 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.

- **How will the large vehicles and tankers get in and out of Kent Street access points A61 and A64 – no swept path analysis for these entrances, narrower road than A272 – show swept path analysis for these 2 x junctions**
- Is the bridge over the culvert wide enough to take them, the road is only 2.85m over this culvert – the same width as the proposed lorries and tankers. Rampion have not even surveyed this narrow culvert and seen the bad state of the road and soft verges. May be impossible for the largest lorries to pass. Also, as per previous representations WSCC need to comment on weight of traffic allowed to pass over this simple culvert
- Can people reasonably be asked to move off the road when HGVs come along on Kent Street (pedestrians and animals)?
- Kent Street has drainage filled ditches either side of the road so road widening is not possible
- No comment by the applicant on whether Kent Street is wide enough or strong enough to take all this extra traffic
- The fact the new Kent Street traffic survey will not be available until July is totally unacceptable for such an important part of the traffic in the area
- Can 2 HGVs pass each other in the passing places – the lane is not wide enough – the passing place neat the culvert is too small and cannot be expanded, the passing place nearest to the A272 (large skip been there for months) is blind from the road, hence only 2 x places of use.
- Further details of the Kent Street widening should be provided including a minimum carriageway width to determine whether two large vehicles can pass

### **Survey requested**

We think it is imperative for the Applicant to have a survey of non-motorised usage of the lane, from horses to pedestrians to cyclists to dog walkers, the lane is mostly used by these people and animals and no survey or implications have been looked at to date - this is unacceptable

Large agricultural vehicles use the lane alot due to the number of farms and equestrian farms on the lane. These vehicles often tow trailers and machinery behind them – it is very hard for these vehicles to reverse easily, management of the lane will be impossible with the above categories and a strategy needs to be explained for all users of the road before we have an accident on the lane







(Meeting a large agricultural vehicle and trailer near A272 – May 2024)

(See photo below of 1 x large lorry destroying soft verge – only 1 x journey caused this - May 2024)







Regarding the receptors identified as potentially requiring assessment we note that cyclists have not been included as a receptor on any links (including the Cowfold links 23, 24, and 25) despite being identified in table 23-10 as a receptor. Given the rural nature of the site there is potential for cyclists to use the carriageway for leisure purposes and consideration should be given to the impact the construction movements would have on them.

In addition, we note the existing playground adjacent to the A272 at the Cowfold recreation ground, which would represent a high sensitivity receptor together with the wider recreation ground, though 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.

### **Monitoring Report**

If the DCO is approved, we would request a traffic monitoring report to be produced at least every 6 months so that consultees (especially Parish Councils and WSCC) can see progress and that traffic is moving as per modelling with sanctions in place for non-compliance

In addition, we note that there appears to be no enforcement measures in place should the Construction Management Plan not be adhered to for a prolonged period of time. The enforcement section limits RED to monitoring and implementing corrective measures to “*resolve, redress and enhance service performance, which is in breach of the standard within the Outline CTMP*”<sup>44</sup> and that RED will require

that the appointed contractor includes the commitments set out within the commitment register. We would suggest that continual (and evidenced) disregard for the commitments made within the CTMP should result in a fine or similar.

### **Request for information on traffic numbers**

The vehicle traffic numbers seem low compared to the vehicle numbers for Rampion 1 even though Rampion 2 is many times bigger.

Rampion 2 traffic figures relate back to the Bill of Quantities, but we have not seen any details on this Bill and it has not been scrutinised. This Bill could dramatically favour the applicant without outside bodies looking into its details.

Only local villages and local people will be the ones to suffer from an increased number of vehicles if this Bill underestimates the amount of journeys.

### **Cratemans Farm – Ecology Report**

CowfoldvRampion have instructed an ecology survey on the land around Cratemans farm which will be presented for Deadline 4.

The report believes that Rampion have played down the important ecological significance in this area as they have on other parts of the DCO land. The 'Green Lane' as visited by the ExA is also analysed as highly significant.

Please see submission by CowfoldvRampion for more details

### **Hearings 16<sup>th</sup> May Brighton**

#### **Applicant's response to issues regarding item 7A Kent Street Traffic Plan**

Chris Williams for the Applicant mentioned in the hearings that all traffic for the Kent Street access points would firstly go to the Oakendene compound, turn around and then wait for radio permission to leave and travel to Kent Street. This new strategy was mentioned in the Deadline 3 document but was not part of the Kent Street Traffic Plan submitted at deadline 3 by the applicant, it was in another different document – very hard for residents to track items as discussed by the ExA. Why has this only now been added at such a late date. This will effectively double traffic flow counts for cutting across the A272, firstly to enter the compound, then leave and then drive to A272 / Kent Street junction and cut across again. Also as per questions asked on the day by the ExA we need more granular information of how can this work with radios (or other communication device as mentioned by Mr Williams) and the time lag for permission from the compound to entering Kent Street when other non-Rampion vehicles could have entered or be waiting for entry into Kent Street. This plan will not work

We agree with questions asked by the ExA regarding Kent Street

- Current state of the road is not able to withstand such traffic and heavy traffic, how can this road be reinstated without closure. How can the road widening / passing places be constructed without closing the road – items not thought about from the Applicant
- No consideration by the Applicant of how pedestrians / cyclists / dog walkers / horse riders can use the lane. The applicant only said that they would be warned a large vehicle was coming and it was up to individuals to assess the risk. Not sure how this would work and where would horses go. There is a dog walking business on the lane and many equestrian businesses
- No details or swept path analysis for Access A61 or A64 – seems impossible due to width of Kent Street and only a single carriageway, OR increased widening on access point which would result in more hedge loss and also a dramatic effect of the setting and landscape along Kent Street which is currently a quiet rural country lane

## **Applicant's response to written questions – 8.54 - REP3-051**

### **Reference LR 1.3 (page 45)**

Applicant states there are 3 properties currently marketing a property affected by the Applicant's proposal, ours is one of them  
The applicant has not engaged with us on our issues and does not give an answer to our concerns.

Our property has been marketed 'off market' for over 9 months and has been on the open market with agents since Feb 2024, with no firm offers to date. We would like to discuss with the Applicant the loss of value we are experiencing but the applicant has never engaged with us on this matter

### **Reference LR 1.8 Question b (page 48)**

The Applicant is still stating that there is a strong and compelling case in the Public interest for the Proposed Development to be delivered.

We still question this, as per our Deadline 3 submission, the **National Grid ESO report Beyond 2030** on the future of the National Grid and its planned £58bn investment to make the grid carbon neutral by 2035. The Applicant's proposal will only be contributing to the Public interest for a short time but the losses to individuals and to ecology will be for ever – the balancing act is not proportionate at this time

**REP3-009 Land Rights tracker** – see info, yet again just Rampion trying to put a positive spin on our grave concerns as submitted at all deadlines to date but no movement forward and intermittent communication as per our previous representations

## **Open Hearings Speech 13<sup>th</sup> April 2024 PM Brighton**

I'd like to speak with reference to written questions **LR 1.2 and LR 1.3** to The Applicant regarding the funding statement and the Book of Reference

ESPECIALLY TO LR 1.2 where the ExA state "the effect of construction or operation of the proposed development on property values.....

We are a family who own Ridgeland House, later called Oaklands which is one of the nearest properties to the Oakdene site and also very close to Access A61.

We have been extremely concerned about Rampion since the beginning and have been members of the CowfoldVRampion group and made representations throughout the examination

The project will have the largest detrimental effect for the homes around the substation site and most inconvenience for homes along Kent Street – we belong to both these groups - but Rampion have not been listening.

Rampion only submitted the Kent Street traffic plan on deadline 3 which shows how much significance they place on it. The applicant has not engaged with us on our issues and does not give an answer to our concerns.

In answer to this direct ExA question the applicant has answered in document REP3-051 / 8.54 on page 45 - and mentions our property but the facts are not correct and there is no real answer to the question posed by the ExA...



1. *The Applicant understands that one property has been advertised on the open market since February 2024 so it not yet apparent that the only interest that has been received is at a price substantially lower than that for which it might reasonably have been expected to sell had the land not been included for compulsory acquisition in the Order.*

Our property has been marketed 'off market' for over 9 months and has been on the open market with two high profile agents since Feb 2024, over 4 months, with no firm offers to date. The Chilling effect of Rampion is definitely being felt along Kent Street. Many buyers do not want to view any properties near the sub station

We will have to reduce our price further to try and stimulate interest but so far, we not even have any offers to be able to see what capital loss we will have

The same has happened to another home further down Kent Street .....

Residents around the substation construction site will be the most affected during construction and afterwards during operation, and we would appreciate it if the ExA would ask the Applicant to engage with us and our issues...they are severe for us as a family - as submitted in emails to the ExA and to the Applicant over many years with no response

We believe Kent Street and the two access points and the substation location is the wrong project in the wrong place – as highlighted by Andrew Griffith our local MP. The whole area will be destroyed by a project which will not achieve it macro environmental aims as stated at the onset and I hope the ExA will look into all the representations submitted from local residents around Cowfold

Hopefully the ExA will see this for themselves as they walk around the lane and Oaken Dene tomorrow

**THANK YOU FOR LISTENING AND FOR YOUR TIME**