

2 June 2024

**Deadline 4 Submission from Cowfold Parish Council (20045197) to the Planning Inspectorate's Examining Authority regarding EN010117: Application by Rampion Extension Limited for the Rampion 2 Offshore Windfarm.**

Subsequent to the participation by members of Cowfold Parish Council in the Examining Authority's Open Forum (13<sup>th</sup> May 2024) and Open Hearing (15-16<sup>th</sup> May 2024) the Parish Council wishes to lay particular emphasis on a number of the points arising.

Cowfold Parish Council iterates these key concerns below:

**1. Communication:**

a) Restating the ongoing lack of specific communication alongside the poor levels of clarity and granularity of documentary evidence produced to date by the applicant.

**2. Project Delivery:**

a) The Parish Council remains uneasy with the lack of control documents to be applied to third party contractors. Perceiving that this may lead to a 'free style' interpretation of the project parameters by any such contractors.

**3. Habitat and BioDiversity Net Gain Aspects:**

a) Once again the Parish Council feels the need to reiterate their dissatisfaction with the ongoing poor quality of the extant desktop and out of season habitat surveys. Seeing no evidence of additional 'boots on the ground' assessments taking place or acknowledgement given to environmental material provided by local residents.

b) There appear to be a significant number of assumptions being made by the applicant in relation to reinstatement of, for example, hedgerows. The Parish Council seeks confirmation that, if approved by Parliament, the Management of Hedgerows (England) Regulations 2024's baseline hedgerow management practices will be upheld on what remains essentially agricultural land. Further, the Parish Council seeks clarification of not only the process, e.g. species disturbance, but also the maturity of the proposed replanted vegetation at the time of installation. This to include the native species suitability and sustainability, taking into account resident and migrant wildlife, given the current levels of climate change. The latter being particularly apparent with the increased levels of water retention at the Oakendene sites. This is a significant landscape aspect/impact for the area given that Rampion 2 estimates there will be hedgerow loss of 647 meters. Greater clarity in respect of Vegetation Retention Plans is also sought.

c) Clarification of the legal status of purchased reinstatement units. The Parish Council seeks a guarantee that the purchased reinstatement units will not be used outside the Parish. In essence confirmation from the applicant that this process has due legal status and can only relate to the aspect of the same location? In addition what recompense will the parish/landowners have if the purchaser(s) defaults or goes into receivership?

d) Greater granularity relating to the potential impact on ancient woodland, the established hedgerows which will be left in situ and scrub, e.g. loss of species food source vegetation. Also including the need for root protection and impacts on habitats affected by changing levels of light.

e) Provision of an enhanced protocol taking into account established, seasonal farming practices and county wide events:

- Consideration of farming activities, e.g. maintenance of hedge lines/rows along the A272 using the tractor and flag long arm attachment during the end of summer, after the bird nesting season, causing traffic delays for weeks during September/October.
- Crop harvesting and crop rotation in local farm land causing mud discharge to A272 along with increased number of large agricultural vehicles resulting in protracted slow moving traffic.
- Established motorcycle, bicycle and car events which travel through the area along the A272 bringing disruption to local businesses such as The Cafe, The Fold and Dennies' Café. Will these events be identified and addressed within the Rampion 2 project schedule(s) in respect of their supplementary impact on road traffic?

#### **4. Water Neutrality:**

a) Using Natural England's definition of water neutrality, 'for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development' (Water Neutrality Study: Part A – Individual Local Authority Areas), the parish council acknowledges that any project construction phase(s), e.g. the Oakendene Substation, are presently exempt from this regulation. However, as part of the Sussex North Water Resource Zone (SNWRZ) the parish council has significant concerns about the applicant's proposed management and use of water on the Oakendene site. These may be summarised as:

- a.1) Water provision: the already overburdened SNWRZ is not in a position to support significant water extraction to facilitate construction at the Oakendene site.
- a.2) Water discharge: in an area where the land is already subject to marked levels of water retention additional discharge will only exacerbate the problem. Also taking into account the potential for contaminated water being discharged into the local watercourse(s) and aquifers.
- a.3) The applicant originally indicated the likelihood that the supply will be met by the provision of water bowsers, the parish council assumes both for delivery and removal? If this is to be the case the additional HGV traffic will further enhance the vehicle (road traffic volume) management issues identified at serial 6 below.

The applicant subsequently informed the Examining Authority they had been advised that use of water during the construction phase was under the scope for Water Neutrality, see Serial 3 above, so would be able to use and discharge water from the mains supply without any additional consideration of the points raised at 4.a.1), 4.a.2) and 4. a.3).

b) Therefore, Cowfold Parish Council wishes to obtain a clear, precise and current understanding of the applicant's proposed water management strategy both in respect of habitat/waterway preservation, the repercussions on road usage and the accompanying safety aspects and impacts.

#### **5. Horizontal Direct Drilling (HDD) including Pollution Incident Response:**

a) A straightforward assessment, which can be shared with parish residents, in respect of the controls to be applied should any requirement arise that necessitate procedures 'in excess' of the documented process. Supplemented by an augmented Pollution Incident Response Plan specific to affected areas in Cowfold with appropriate reinstatement of any damaged land/vegetation.

#### **6. Enhanced Traffic Volume and Associated Pollution Levels within an Existent Air Quality Management Area:**

a) The incremental increase in traffic volume along the A272 towards the Cowfold Village junction of the A272/A281 has grown significantly since 2015 as demonstrated below.

**Horsham Transport Study (Santec December 2022)**

<b>Year(s)</b>	<b>% Increase</b>	<b>Traffic Numbers</b>
2015 - 2019	+ 4.6%	18,220
2020 - 2021	Covid	
2022	As at 2015 -2019	
2023	+6.7%	19,750
2024 First three months as compared with same period in 2023	+3.5%	—

b) These increases in traffic volume places the road network at critical capacity. Any additional flow, particularly along the unlit areas of the A272, can only heighten the foreseeability of decreased road safety levels both for motorists and within the village, pedestrians. Additionally the proposal for HGVs to first park up at the Oakendene vehicle compound, gaining access via the A62, and then be contacted by radio/mobile telephone to travel back to Kent Street, turning right across the flow of traffic, has the effect of doubling the HGV traffic in this already extremely congested area. Every turning vehicle effectively brings the A272 to a standstill at what is likely to be peak commuter traffic times. Hence the levels of risk are incrementally heightened when taking into consideration the junction(s) access/turning movements proximate to Kent Street which have not been included in any of the Rampion 2 Traffic Management or Modelling statistics provided to date. It is also worth noting that of the three hospitals which serve Cowfold in the event of emergencies (Royal Sussex County Hospital Brighton, Princess Royal Hospital Haywards Heath and Saint Richard’s Hospital Chichester) two are primarily accessed along the A272 Bolney Road whilst Saint Richard’s is reached via the A272 Station Road. Access and egress by emergency fire and police services are also predicated on the free movement of traffic traversing the A272/A281 Cowfold Village junctions.

To summarise Cowfold Parish Council does not believe that the applicant, Rampion 2, has provided sufficient evidence to reassure parish residents of the suitability of the nominated sites for the purposes outlined. Or indeed that the mandatory background research and documentation has been conducted and communicated in such a way as to offer a proactive inducement to support the project. On the contrary the lack of intelligible communication(s), evidence of local, visible investigations and applicable documentation/studies has resulted in the Parish Council, in support of residents, making their position quite clear. The environs of historic Cowfold parish are wholly unsuitable to sustain the Rampion 2 substation proposal with its associated aspects and impacts throughout, in particular, the construction phase.