

5 July 2024

Deadline 5 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.

Cowfold Parish Council notes the responses made by the applicant in respect of material communicated at Deadline 4. However, there remain a number of points on which the Parish Council requires yet further clarification.

1. Traffic Management Strategy:

a) With the approval by Mid Sussex District Council (21 June 2024) of the, contiguous to Kent Street, Wineham Battery Storage site housing housing 184 lithium ferrous phosphate batteries and 46 battery inverters the Parish Council seeks clarification in respect of traffic management relating to this site and any potential impacts, traffic ratio enhancement, which may alter the data provided by the applicant.

b) Cowfold Parish Council has made clear that any proposals of the scope envisaged must have a clear Traffic Management Plan based on unambiguous and complete data. However, the RED proposals are in conflict with themselves as shown by the following examples:
1.2.2 states that the TMP will minimise vehicle trips yet the proposals to include a vehicle holding location at Oakendene will have the effect of doubling vehicle trips. 1.2.2 also states that "Ensure effects and disruption on local communities is minimised..." yet by having Points A62 and A63 in close proximity this will act as a single point of congestion ensuring that disruption is maximised. 6.5.6 includes that there will be No Routing Restrictions on LGVs which is in complete discord with 2.3.9 which states that Traffic Route Enforcement will apply to all construction vehicles.

c) Table 5.3 and Table 6.3 indicate a total number of two-way vehicle movements for A62 and A63 at 17,216 HGV and 68,592 LGV, our understanding is that as these are two-way movements that the actual number of movements is double that at 34,432 HGVs and 137,184 LGVs giving a total of 205,776 movements. The project timescale is unclear as both 4 years and 4.5 years are given but based on 4.5 years, 50 weeks and 5 days/week this equates to 183 movements/day. This needs to be factored into the road capacity together with the actual data for existing movements/day for all the A272 junctions, whether private or highway, over the entire distance between Bolney and Cowfold.

d) It is well established that road capacity remains essentially unchanged despite any alteration in traffic speed, specifically reducing the speed limit from 60mph to 40mph will not increase the capacity of the road in question. However, it will have a beneficial effect on Road Safety provided it is not done in such a way as to increase the concertina effect of multiple speed limits. On this basis it is difficult to understand the reasons for the change in the 40mph zone from the entire 4km section from Bolney to Cowfold to a reduced 2.7km section as detailed in 8.2.6 and 8.2.16

e) 8.4.10, 8.4.12 and 8.4.22 provide details relating to working hours and shoulder hours. However, there is no supporting evidence as to the traffic flow profile with the result that the shoulder period of 07:00 to 08:00 appears to align with the period of maximum natural daily disruption and will exacerbate rather than minimise the effects and disruption for the local community.

In summary, the Traffic Management Plan is incomplete, ambiguous and relies on incomplete or inappropriate data. For this to have any meaning it must include detailed traffic flow measurements at all the A272 road junctions specifically noting the existing traffic flow in all possible directions at all road exits and entries and only then can the project traffic projections be overlaid to establish the

net effect. This will then allow a realistic judgement as to whether the proposed additional traffic movements can be accommodated and the level of detriment to both the local community and the through traffic. We specifically request that Deadline 5 will include a full report showing, with minimum time blocks of 30 minutes, the current traffic flow and journey time and the anticipated flow and journey time when the projected additional traffic movements are included.

2. Biodiversity Net Gain:

a) The Parish Council alongside residents has, as the Examining Authority is more than aware, repeatedly raised concerns over the applicant's proposed loss of grasslands, hedgerows, mature trees, habitat(s), associated species and the potential for water contamination on and around the Oakendene site(s).

b) To further support these misgivings the Parish Council wishes to quote directly from Natural England's Appendix J4b submission at Deadline 4, page 2, 'Natural England's Advice on Biodiversity Net Gain, dated 3 June 2024. "Natural England wishes to highlight a significant risk in that the (Rampion 2) Biodiversity Net Gain Appendix 22.15 does not refer to adhering to the mitigation hierarchy at the detailed design phase. It is important that all biodiversity losses are **avoided/reduced in the first instance**, only moving to mitigation once all avenues are exhausted. We recommend that the Appendix makes it clear that the mitigation hierarchy will be followed throughout detailed design stage to avoid biodiversity loss in the first instance".

At the risk of overstating the fact, Cowfold remains a primarily rural parish. The decision by Horsham District Council to agree the Cobwood Solar Farm (21 May 2024) on either side of the A272 (West) and Mid Sussex District Council's decision to support the Wineham Lane Battery Storage site sees Cowfold Parish and village sandwiched amidst green energy provider's substantial site footprints. Whilst the Parish Council upholds the need for ongoing green energy initiatives at both County and National levels it does question the seeming confluence of these developments in an area which already has clearly identified and significant traffic and air quality management issues. The addition of the proposed Rampion 2 imprint at two Oakendene sites it is believed will only add to these problems. Particularly in respect of the safety, wellbeing and ongoing viability of local residents and business owners within the wider community. These principles can be applied equally to the growing number of vehicle users, including home and business delivery providers, who already traverse the A272 and A281

As stated, Cowfold Parish Council does not oppose the generation of green energy but it questions the viable density of two agreed and in the context of this Examination, one proposed project, in remarkably close proximity and the likely long-term impacts on the community which will accompany their collective impact.