

27 Feb 2024

EN010117: Application by Rampion Extension Limited for the Rampion 2 Offshore Windfarm – Letter of Representation by Cowfold Parish Council (20045197) Post the Open Floor Hearing (6-8 February 2024) and Associated Action Points

1. Cowfold Parish Council fully upholds renewable energy projects in principle and recognises their importance to our environment. However, this support is predicated on the fact that any such projects are sited in an appropriate location and include suitable mitigations so as to minimise any impact during the construction, operational and reinstatement phases.

2. Further to the initial Letter of Representation (20045197) made by Cowfold Parish Council to the Planning Inspectorate's Examining Authority and having acted as an Observer during the Open Forum (6-8 February 2024) there are a number of points which the Parish Council believes need to be given particular emphasis on behalf of residents within the parish. These highlight the shortcomings of the management and process delivery of this Project which leads the Parish Council to object to the Planning Application.

3. Many of these have been identified and vocalised by residents in manuscript form, at the Open Forum and subsequently identified in the Examining Authority's Action Points Arising in which the Applicant has been tasked to clarify/resolve by Deadline 2 (20 March 2024).

4. However, the Parish Council feels that they need to publicly iterate a number of the specific concerns which they believe will have a direct impact on the lives and livelihoods of those residents and businesses situated in this primarily rural parish for not only the immediate (construction phase) time frame but potentially decades ahead. Also the loss of species rich habitat, historic woodland and listed buildings, most of which have been extant since the seventeenth and eighteenth centuries and earlier. An example is the proposed use of a number of nominated haul and (future) operational routes by the Applicant, crossing historic access ways such as Dragons Lane (identified as a point of concern by the Examining Authority at Serial 19 of the Action Points Arising). This will have a profound impact on long established domestic residences ('Dragons' and 'Cratemans' first being noted in Parish Records in 1632), Public Footpaths and associated agricultural land. Cowfold remains proud of its cultural ecology and the community has evolved in a manner in which the social, environmental and biological aspects of the parish have achieved an established equilibrium with the landscape, species and associated habitats. These features provide the defining characteristics of the area as both a place(s) of multi-generational residence and employment.

5. The Parish Council does not believe that Rampion 2 has fully upheld or demonstrated the ethos encapsulated in the governance of the Institute of Environmental Management and Assessment (IEMA), the Competent body in the UK for eco-management, of integrity, transparency, inclusivity and stewardship. Or, as outlined in Historic England's guidance produced in 2022 'Strategically Assessing the Historic Landscape's Sensitivity and Capacity in Relation to Change: a discussion document to inform preparation of advice' (author Peter Herring), where it is stated that "it is important to consider collective, public and personal perceptions of landscape alongside more expert views" (p.20). This study requires consideration of four crucial aspects:

* **Critical Consideration of the Change Scenario** – its range of predictable effects and impacts, positive as well as negative.

* **Assessment of the Vulnerabilities and Potentialities** – in relation to the scenario and its impacts and effects, to develop an understanding or measure of sensitivity to the change scenario.

* **Assessment of the significance of that sensitivity** – to society by the consideration of heritage values and attributes in relation to the effects of the change scenario. Developing an understanding of the capacity of the historic landscape character type or place to accommodate the change.

* **Drawing together the three assessments** of Impact, Vulnerability and Significance alongside present sensitivity and capacity presented in the form of maps and associated commentary, including recommendations.

The importance of recognising these criteria are clearly illustrated in the Cowfold Residents' Impact Statement on Rampion 2 provided by Cowfold v Rampion which has been submitted to the Examining Authority.

6. The Historic England report, see p.3, “underscores the need for change, including the need for new development (renewable energy is cited at p.6), **to make a positive contribution to local distinctiveness**, and through that increase senses of personal and community identity, sense of place, and wellbeing, and thus **deliver substantial public benefit**” The Applicant will cite the benefits of additional green energy contributions to the National Grid. However, the Parish Council has neither seen or received any evidence that the Project will deliver enhanced visual “local distinctiveness” or “substantial public benefit” to the local community.

7. In addition to the overarching cultural ecology of the wider parish, the proposed Oakendene site and associated areas, the Parish Council wishes to reiterate and expand upon concerns identified in the initial Letter of Representation. Focussing on the paucity of detailed material in respect of:

7.a. Inadequate biodiversity studies; in particular lack of field work during each representative breeding seasons and failure to communicate with and include local knowledge of the affected areas. A detailed, illustrated study of the ‘Biodiversity Threat’, including the presence of Red Listed species, has been submitted to the Examining Authority by local resident Janine Creaye (20045132). The content of which is supported and upheld by the Parish Council.

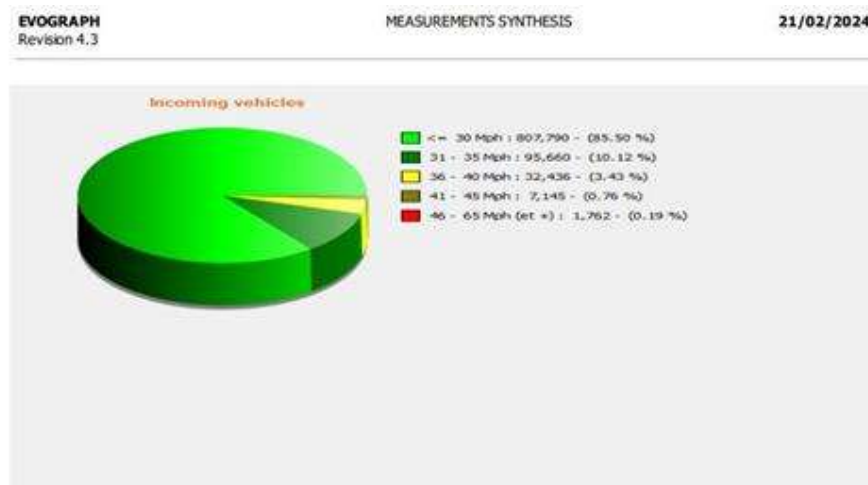
7.b. A perceived disregard of aspects of the visual and heritage features of extant ancient landscapes, woodlands, trees and hedgerows. From 12 February 2024 a 10% Biodiversity net gain (BNG) has become mandatory. Given the concerns cited here the Parish Council would wish to see the Applicant provide a detailed, updated schedule of how this might be effectively and sustainably delivered across the whole of the proposed site(s) within the parish. Also addressing the evolving landscape challenges as flooding becomes an annual, as opposed to occasional, condition of the site(s).

7.c. Parish residents have significant concerns over of all types of increased vehicular traffic, both proximate & adjacent to the site. Access/egress concerns have also been highlighted by Horsham District Council. These include questions about the suitability and safety of the nominated routes, i.e. works traffic access via single lane narrow country roads with no defined passing places and the physical means by which the site can be accessed. Fears voiced by residents about enhanced traffic volume along the already heavily used A272 with associated air quality and road safety impacts on Cowfold village have been identified in the Examining Authority’s Action Plan for the Applicant. Cowfold Parish Council wishes to reiterate the need for representative, accurate and transparent information which it believes, to date, has not been fully documented. The potential for diminished quality of life for those living in the parish is of significant concern to residents particularly in respect of Air Quality Management, traffic congestion and road safety as illustrated by these photographs.



As a result of these extant road safety considerations the Parish Council is currently in discussion with West Sussex County Council Highways in regard to the installation of a traffic crossing point on the Bolney Road within the village (the Mercers Mead/Huntscroft Gardens aspect, What3Words location - ///prevents.afflicted.deflated). The addition of significant further levels of traffic, including supplementary Heavy Goods Vehicles, can only be detrimental.

7.d. Road traffic data from the A272 Bolney Road Speed Sign (What3Words location - ///vessel.campers.hoaxes) incoming from the direction of Bolney, collected and held by the Parish Council between August 2023 – February 2024 shows that 4.38% of vehicles passing along this route currently exceed the 30 mph speed limit (metric used, vehicles in excess of 36mph, i.e. the threshold speed for police road safety cautions). This represents **41,343** detected motor vehicles thus enhancing the likelihood and foreseeability of a significant accident or incident. Considerable additional road traffic usage can only compound an already over-burdened highway.



8. Using the University of Oxford's definition of accessible communication (that which is clear, direct, easy to understand and can be made available in multiple formats so that all users have equal access) the Parish Council believes that the Applicant has demonstrated considerable failings in their communication strategy and engagement practices. In parallel to residents frequently voiced misgivings the Parish Council wishes to restate the ongoing, significant lack of clarity of information provided. For example, Cowfold Parish Council has previously asked the Applicant to provide more digestible information packs which can be circulated to those within parish who, whilst seemingly not directly affected, will be exposed to the wider impacts of the Project. Low engagement levels by the Applicant have fostered the view that relative geographical distance from the proposed sites will mean little or no direct impact, thus minimising the likelihood that residents would take the time to peruse and digest the voluminous, complex data displayed online and make their feelings known at local, District and County levels.

9. In January 2018 the Government published 'A Green Future: Our 25 Year Plan to Improve the Environment' in which ten environmental goals were laid out.

- Goal 1: Thriving plants and wildlife

- Goal 2: Clean air
- Goal 3: Clean and plentiful water
- Goal 4: Managing exposure to chemicals and pesticides
- Goal 5: Maximise our resources, minimise our waste
- Goal 6: Using resources from nature sustainably
- Goal 7: Mitigating and adapting to climate change
- Goal 8: Reduced risk of harm from environmental hazards
- Goal 9: Enhancing biosecurity
- Goal 10: Enhanced beauty, heritage, and engagement with the natural environment.

As stipulated in the original Plan every five years it is to be refreshed, a commitment set into law in the Environment Act 2021. The initial refresh to the Plan took place in 2023. Currently, the infrastructure within Cowfold Parish is failing to comprehensively meet the first four goals. Excessive renewable development, albeit projected as being for the greater good, is likely to see our Parish also failing to meet goals 6, 9 and 10 in the future.

9. Cowfold Parish Council appreciates, acknowledges and upholds the vital place that green energy has in providing sustainable solutions for the future. The overarching question which the Parish Council presents to the Examining Authority at this stage of the evaluation process is the suitability of this Project in the proposed setting? Should the Sub Station and associated aspects go ahead, there will be lasting and potentially irreparable damage to both the community and the landscape in which it has co-existed for hundreds of years.