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If Calling Please ask for: Matthew Porter  
Date: 25th May 2023

Dear Sir/Madam,

## **Proposals for an offshore wind farm off the coast of West Sussex (known as Rampion 2)**

### **Notice pursuant to Section 42 of the Planning Act 2008.**

Thank you for your invitation of 26<sup>th</sup> April 2023 to Horsham District Council (HDC) as a statutory consultee, to your statutory consultation and notification pursuant to Section 42 of the Planning Act 2008 on the proposed extension to and new infrastructure at the existing Bolney substation.

### **Summary**

Horsham District Council raise **No Objection** with the expansion of the substation (both options).

### **Introduction**

As set out in your notification, the purpose of this letter is to consult HDC on the proposed extension and new infrastructure at the existing Bolney substation. The infrastructure and equipment within this extension would be required to connect the power from the Rampion 2 windfarm into the National Grid.

The extension to the existing National Grid site, and the infrastructure installed, would be permanent. The fenced site will be extended by up to 0.65ha, and the proposed location is on the south-eastern edge of the existing site, near an area of woodland as shown on the consultation materials. Within this area there are two design options for the substation extension.

The technology options for the connection use either Air Insulated Switchgear, where the main electrical equipment would be visible outside and would require a larger area, or Gas Insulated Switchgear (GIS), which would be housed within a building but require a smaller area.

It is proposed that an AIS connection would look like most of the existing Bolney substation, with electrical equipment up to 12 metres (m) high. Existing busbars (used to transmit electricity) within the National Grid site would be extended eastwards into the new area. This option uses a larger area of land, up to 0.65ha, increasing the substation area by 6%.

For GIS it is proposed that an enclosed building for switchgear would be created. A building with maximum dimensions of 35m x 20m, and 12m tall is expected. This would be like other large buildings on the existing National Grid site. Existing busbars (used to transmit electricity) within the

National Grid site would be extended up to the new building. This option would use less land, around 0.35ha, only increasing the substation footprint by 3%.

Only one of options (AIS or GIS) will be required in the final Proposed Development. The final choice of infrastructure and its design will be determined by National Grid.

In both cases, the new buried cables bringing power from our Oakendene substation would be connected to the proposed National Grid extension on the east side. The substation perimeter fence would then need to be extended securely around this infrastructure to create a single site.

### *Construction and Operational Phases*

A temporary access for construction and construction compound will also be required.

It is proposed construction would take a maximum of 12 months and would be subject to the same normal working hours as the rest of our project (07:00-19:00 Monday to Friday and 08:00-13:00 on Saturdays). A construction compound would be set up nearby, likely just to the north of the existing substation on National Grid land currently used as hardstanding.

Construction vehicles would use the existing access to the National Grid Bolney substation, and drive around the existing site to reach the works. Construction traffic would reach Bolney substation from the main road network via the A272 and Wineham Lane.

Monthly inspections and any future maintenance (annually) would be from within the National Grid Bolney site.

### *The Land Affected*

The land to which the changes in this current consultation relates is close to Wineham village and located in the Parish of Twineham, within the District Authority of Mid-Sussex.

## **Summary and Recommendations**

I confirm that this letter forms Horsham District Council's consultation in response to your statutory consultation and notification pursuant to Section 42 of the Planning Act 2008.

Horsham District Council is in broad agreement with the methodologies and assessments set out and detailed in the Preliminary Environmental Information – Bolney Substation Extension Works for its areas of interest, subject to resolution on the response comments set out below.

## **The Council's Response**

The Council's Consultation response has been informed by the materials viewed from the project website. The Council's response focuses on topic areas principally within the Preliminary Environmental Information – Bolney Substation Extension Works (PEI). This details the preliminary assessment of the environmental effects of the proposed change that are considered by the Council to be the key issues within its district authority remit within its local authority area.

The Council's response has referred back to its responses to the Preliminary Environmental Information Report (PEIR) and Non-Technical Summary (NTS) to the PEIR (issued as part of the formal statutory consultation in July 2021); Supplementary Information Report (SIR) to the PEIR (issued as part of the onshore cable route consultation in October 2022); and Further Supplementary Report (FSIR) to the PEIR (issued as part of the supplemental onshore cable route consultation in February 2023).

The Council's response to this consultation is as follows.

The Council is in broad agreement with the methodologies and assessments set out and detailed in the PEI on the following crosscutting environmental aspects; Socioeconomics; Soils and agriculture; Terrestrial ecology and nature conservation; Water environment; Major accidents and disasters; and Greenhouse gas assessment.

### *Landscape and Visual Impact*

It is noted the PEI findings identifies no additional landscape or visual receptors for either construction or operational phases of the Bolney substation extension works and will not change the outcome and conclusions of the landscape assessment provided within Chapter 19 of the PEIR (RED, 2021). It is also noted both AIS/GIS options would be partially visible through intervening vegetation during winter months. Finally, it is noted in total the Bolney substation extension (including the temporary construction compound and the temporary construction access, which is the same for both options) crosses up to four field / land use boundaries and comes close to other existing field boundaries which include hedgerows, trees, and woodland. All of these will be subject to embedded environmental measures to reduce loss of vegetation/habitat.

Horsham District Council considers the proposals, as an extension to the existing substation, will not be an unfamiliar development feature to the receiving landscape. The proposals do not give rise to adverse effects on the character of the area over and above those already experienced and/or identified in the outcome and conclusions of PEIR (RED,2021). As indicated in the photomontages, views are likely to be available from the nearby public footpath 34Bo and therefore enhancement planting to the existing vegetation should be secured to mitigate these views. Views are also likely to be available along Bob Lane. Planting to continue and connect the tree belt to the west with the woodland block to the east should be secured. It is not clear from the submitted information if partial removal of the internal existing tree belt is required to facilitate development but any loss should be compensated through the additional planting required.

These concerns could be addressed in the one addition to the embedded environmental measures (C-254) has been made as a result of the PEI, as described in Section 3, Table 3-1, which is supported. The commitment is a detailed landscape plan for the screening of the extensions, in accordance with the principals and indicative landscape design included in the Design and Access Statement of the Development Consent Order.

### *Transport*

Horsham District Council do not disagree with the PEI finding that no new transport receptors have been identified as a result of the Bolney substation extension works, however it will result in a change to construction traffic generation.

It is noted the transport assessment within Chapter 24: Transport, Volume 2 of the PEIR (RED, 2021) did not include construction traffic associated with the Bolney substation extension works.

Expected construction traffic HGV movements associated with the Bolney substation extension works, for both AIS and GIS options, will generate two additional two-way HGV movements per day for the 12-month construction period, the AIS option will require the larger amount of construction traffic (Table 2-1 of the PEI). The Assessment assumptions are approximately 8,000 LGV construction traffic movements (two-way) (both options) and approximately 550 HGV construction traffic movements (two-way) (AIS options) and 500 movements (GIS options).

The PEI finding is the additional HGV movements constitute a negligible change to the transport assessment and assessment conclusions provided in the PEIR (RED, 2021), and PEIR SIR (RED, 2022), and that construction traffic generation impacts associated with the Bolney substation extension works for either option are expected to be no greater than those provided in the revised

maximum design scenario in the PEIR SIR (RED, 2022). As such, the significance of residual effects remains Not Significant in EIA terms.

Horsham District Council is not the Highway Authority for the area and reverts to West Sussex County Council in its capacity to fulfil its duties in that regard. However, HDC highlights to RED the public's concerns expressed to HDC Officers and Members of the potential impact on the local highway network, particularly the A272. It is not clear if the two additional two-way HGV movements per day is averaged across the 12 months, for instance. There is no averaged figure provided for LGV movements, which is assessed as a much higher figure, or clearly evidenced that the combined HGV and LGV figures taken together would constitute change to transport assessment and assessment conclusions beyond negligible.

Horsham District would advocate RED to work closely with the Local Highway Authority to explore an additional embedded environmental measure to align construction phases of the implementation of the Bolney substation extension works with the new substation, to reduce the traffic impact during construction phases. This should involve timing of HGV deliveries to both sites.

To seek to address these concerns, it is important, as noted in the PEI, that construction traffic trip generation data will be further updated in detail in the ES, and that updated traffic flows associated with the proposed Bolney substation extension will be assessed as part of the ES. It is noted a fully detailed transport environmental assessment will be completed at the ES stage considering the final Proposed Development.

Horsham District Council do not disagree with the PEI finding that new additional PRow's have been identified for consideration as part of the Bolney substation extension works, for either option, that have not already been considered in the PEIR (RED, 2021) or PEIR SIR (RED, 2022).

#### *Air Quality*

The finding in the PEI that no new air quality receptors have been identified as a result of the Bolney substation extension works is noted, however it will result in a change to construction traffic generation.

Regarding the PEI finding that this change will not change the assessment conclusions in the PEIR (RED, 2021), it is noted that for virtually all the modelled human receptors, the impacts due to construction traffic have been assessed as negligible. Assuming that worst-case receptors in the Cowfold AQMA have been included and the results have all shown a negligible impact, we would still require the applicant to draw up an air quality mitigation plan, to be in compliance with the Air Quality and Emissions Mitigation Guidance for Sussex (2021), which encourages the use of low emission technologies. Please note that although the guidance was written in the context of operational impacts it de facto applies to impacts lasting a number of years. As such it still applies to construction activities that take a number of years to complete.

It is noted that the assessment conclusions in the PEIR (RED, 2021) included Commitment C-24 for an Air Quality Management Plan to be included within the Code of Construction Practice as Mitigation. This Commitment requires the applicant to ensure that drafts of these documents, demonstrating the minimum measures relied upon as mitigation, are submitted with the ES and appropriately secured.

#### *Historic Environment*

HDC is satisfied the proposal for an extension to the Bolney substation will have a neutral impact within the setting of the neighbouring heritage assets (Listed Buildings) in Horsham District.

#### *Ground Conditions*

No additional ground condition sources of contamination or receptors for land contamination or minerals safeguarding sites have been identified for the Bolney substation extension works.

#### *Noise and vibration*

Horsham District Council do not disagree with the PEI finding that the Bolney substation extension would change the construction traffic flows however this change does not introduce any additional noise sensitive receptors and does not change the assessment conclusions in the PEIR (RED, 2021).

The Bolney substation extension will only include noise generating equipment associated with the switchgear, and noise emissions are limited to a 'click' noise during the switching process. The switching process occurs infrequently and is unlikely to be audible outside of the existing Bolney substation.

Horsham District Council do not disagree with the PEI finding that due to the nature of the operational ('click') noise generated, the limited geographical extent, and the frequency it is unlikely to increase the existing operational noise level of the existing Bolney substation, it considered negligible which is Not Significant in EIA terms for both options.

#### **Summary**

Horsham District Council raise **No Objection** with the expansion of the substation (both options).

The Council is in broad agreement with the findings of the PEI that, in considering the implementation of embedded environmental measures (PEIR and PEIR SIR Appendix F (RED, 2021; 2022)), no new significant residual effects have been identified that alter the assessment outcomes and conclusions presented in the PEIR (RED, 2021).

It is recommended that enhancement planting is secured as mitigation measure for users of the prowl 34Bo and Bob Lane to the south. This could be addressed in the one addition to the embedded environmental measures (C-254) has been made as a result of this PEI, as described in Section 3, Table 3-1, which is supported.

It is also recommended RED work closely with the Local Highway Authority to explore an additional embedded environmental measure to align construction phases of the implementation of the Bolney substation extension works with the new substation, to reduce the traffic impact during construction phases.

It is noted the AIS option will involve greater land take and the larger amount of construction traffic.

Yours faithfully



Emma Parkes  
Head of Development and Building Control