From: William Davies [redacted]
Sent: 10 January 2025 11:37
To: Rampion2; secretary.state@energysecurity.gov.uk; [redacted]@energysecurity.gov.uk; spads.office@energysecurity.gov.uk; energyinfrastructureplanning@energysecurity.gov.uk
Subject: Rampion 2. PI 20045105

Dear Sirs or Madam

Re: Rampion 2. PI 20045105

Please find below my concerns regarding the proposed construction of a substation at Oakendene, Cowfold. This site lies on a floodplain and possesses unique environmental characteristics. Building on this location would not only risk power outages but also place a significant economic burden on the local business community and the 18,500 commuters who rely on this busy stretch of the A272 daily.

A far more suitable alternative site is available on Wineham Lane in Bolney.

Thank you for taking the points into consideration.

Regards

William Davies

Comparison of two Potential Substation Sites

National Planning Policy statements (NPPS) – EN1 & EN3 (Section 5.8 Flooding).
For ease of reference, these are noted below.

It is crucial to comply with the NPPS and associated guidelines within EN1 & EN3, as they serve key purposes:preventing inappropriate development in flood-prone areas, and directing developments away from areas at high risk of flooding. These measures ensure sustainable land use practices that minimises flood risks, such as preserving natural floodplains and wetlands capable of absorbingfloodwaters. By doing so, flood hazards are reduced, infrastructure is protected from economic and social impacts of flooding, and downstream communities are safeguarded.

The increasing risk posed by climate change, including long-term risks due to heightened storm intensity, are widely recognised, with supporting evidence from the Met Office. Building on a floodplain should, therefore, be avoidedwhenever possible. In this case, it is entirely avoidable. The alternative site on Wineham Lane is situated on higher ground, far from rivers

or streams, and drains effectively even during prolonged rainfall as shown in the photos below.

Inaccurate Flood Risk Assessment by Rampion

Rampion relied on out of date Environment Agency (EA) flood maps for their desk top assessment. Despite being informed by local residents about significant flooding concerns, and flooding of local properties, they chose to ignore this information and downplayed the risks. R*ampion's flood risk assessment (FRA) is critically flawed. It relied on outdated EA maps, fails to address future flood scenarios and grossly underestimates the ecological value of the site – a concern corroborated by Natural England.*

According to the latest Environment Agency reports, flood risks have been understated and the situation is getting progressively worse, *resulting in more flood risks downstream.*

Unique environmental habitat

The Oakendene and Crateman's area is an untouched habitat that has remained undisturbed for several decades. There is no need for rewilding here as it is a rich biodiverse unique haven. It is home to numerous protected species or wildlife and flora. Rampion's assessment of Crateman's as "poor" is contradicted by Natural England, which recognise the area as a unique and significant environmental habitat. Rampion have once again understated the importance of this area to suite their objectives.

Traffic Disruption

Rampion was warned about the severe congestion on the A272, a road used by over 18,500 fast -moving vehicles daily. Local residents highlighted that traffic frequently backs up to Kent St during rush hours, creating significant problems for the community. Initially, Rampion promised traffic control measures to allow their large lorries to safely navigate the twolanes of high-speed traffic. However, they later dismissed the need for such measures, a decision that appears illogical and aimed at avoiding further scrutiny.

The proposal to build the substation at Oakendene, located just one mile from Cowfold village, will cause severe disruption and chaos for all 18,500 daily road users. This road serves as the primary link between East and West Sussex. Furthermore, single- track surrounding lanes, will become "rat runs" as drivers seek to avoid the inevitable congestion.

In contrast, when Rampion 1 was constructed on WinehamLane, no such traffic congestion occurred. This site was located two miles from Cowfold village, avoiding the issues now anticipated with the Oakendene proposal.

Economic Implications

The proposed development at Oakendene would have severe economic repercussions for the local community. Over a hundred businesses currently operate or use storage facilitiesat the Oakendene Business Park, alongside an additional 40-50 businesses in Cowfold. These enterprises will be directly impacted by years of significant traffic

disruption, creating an untenable burden for many. As a result, numerous businesses may face closure, exacerbating economic hardship in the region.

In comparison, the alternative site on Wineham Lane would affect only six businesses in the vicinity. This stark contrast highlights the disproportionate economic, environmental and social impact of proceeding with the Oakendene proposal versus

Conclusion

The proposal to build the substation at Oakendene is fraught with significant avoidable risks and challenges that must not be overlooked. Developing on a floodplain, introduces severe vulnerabilities, including the heightened risk of floodingnearby properties, due to increasingly frequent extreme weather events. The Cowfold stream, a tributary of the RiverAdur, already experiences regular flooding, rendering bridges impassable and negatively impacting downstream communities.

A substation located in a flood-prone area is highly susceptible to water damage, which could lead to system failures and widespread power outages during heavy rainfall or flood events. Such disruptions would affect not just local communities but also the broader energy network, causing economic, social, and safety repercussions. This risk is entirely avoidable by utilizing the alternative site at WinehamLane, which is on higher ground, well-drained, and far from any rivers or streams.

Additionally, the Oakendene development threatens unique environmental habitats, imposes severe economic burdens on local businesses, and creates substantial traffic disruption on an already congested A272. In contrast, the Wineham Lane site offers a far more viable and sustainable option, minimizing environmental, economic, and social impacts.

For the sake of flood prevention, environmental preservation, and community safety, the Oakendene site should be rejected in favour of the more suitable and less hazardous WinehamLane location. Ensuring the resilience of critical infrastructure like the substation is paramount, and building on a floodplain introduces unnecessary and unacceptable risks.

National Planning Policy Statements

EN1, Section 5.8 on Flooding:

5.8.6. "The aims of planning policy on development and flood risk are to ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and **to steer new development to areas with the lowest risk of flooding."**

5.8.7 "Where new energy infrastructure is, exceptionally, necessary in flood risk areas **(for example where there are no reasonably available sites in areas at lower risk),** policy aims to make it safe for its lifetime **without increasing flood risk elsewhere** and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood."

The EA floor risk maps for Oakendene are based on out- of- date historical information, which Rampion used in their desk top studies. There is significant increased risk of making the flooding worse at Oakendene, which will dramatically worsen the already critical flooding downstream at Mock Bridge and other villages downstream.

Clearly there is a more suitable alternative site at WinehamLane.

5.8.10 "The Exception Test 215 is only appropriate for use **where the Sequential Test alone cannot deliver an acceptable site.** It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified."

5.8.12 "**Development should be designed to ensure there is no increase in flood risk elsewhere, *accounting for the predicted impacts of climate change throughout the lifetime of the development."***

5.8.21 "The Sequential Test225 ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas."

5.8.23 "Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3 above. All projects should apply the Sequential Test to locating development within the site."
Flooded Cowfold Stream and Bridge at Oakendene -5.2.2025
Flooding like this at Oakendene occurs relatively frequently during periods of heavy rain. Additional photos and videos documenting previous flooding events have also been submitted.

The accompanying photographs illustrate the Cowfold stream at Oakendene bursting its banks , rendering all three bridges impassable and flooding the surrounding fields after just one day of rain. This flooding is primarily caused by surface water runoff. Such events are not uncommon but appear to be increasing in frequency and severity over recent years.

The Cowfold stream is a tributary of the River Adur, which flows through several villages in West Sussex. During periods of heavy rainfall and flooding, own-stream villages are also severely impacted. This has been observed at locations such as Mock Bridge and Amberley, where bridges become impassable, effectively isolating the surrounding communities.

Moreover, the proposed substation at Oakendene poses an additional risk of pollution entering the watercourse. This would exacerbate existing pollution issues for several downstream villages, further compounding the environmental and public health concerns.

Flooding at Oakendene – Proposed substation site

The first eight photos highlight extensive flooding in the fields at Oakendene, Cowfold, the proposed site for the substation. Heavy rainfall on the 4th/5th of February 2025 caused the fields to flood due to surface water runoff and the Cowfold Stream bursting its banks.

Under normal circumstances, the flooding at this site would have been far worse than shown in these photos. Surface water from north of the A272 is typically directed towards these fields. However, on this occasion, blocked culverts prevented some of the surface water from reaching Oakendene, instead causing flooding in fields north of the A272.

The local council has committed to clearing the culverts, which will read to more surface water from north of the A272 flowing directly into the Oakenedene site. The situation will likely deteriorate further when hundreds of trees and over 600m of hedgerows are removed, and the site is replaced with a concrete and steel base.

It is concerning that this flooding is not reflected in the outdated Environmental Agency flood maps used by Rampion. The Met Office has warned of worsening storms and prolonged rainfall due to climate change, which will exacerbate flooding risks in the area.

The flooding extends far beyond the end of the bridge and into the next field. The bridge was too dangerous to use.

The large oak trees in the centre of the photo is usually on dry land with the stream running to its left. However, all theentire area, including the trees in the foreground and to the right, is now flooded.

The alternative site on Wineham Lane is situated on higher ground, with well-draining soil that is not prone to flooding. The photos below were taken on the same afternoon as those taken

at Oakendene (showne above) on 5.2.2025. Despite being only a mile apart, the two sites exhibit stark differences: Oakendene experiences severe flooding, whereas WinehamLane drains exceptionally well.

Heavy footprints are seen in the grass, but the field is not saturated or waterlogged.

There were only a couple of minor puddles at the entrance of the field at Wineham Lane, Bolney, which was nothing like the flooding seen a mile away at Oakendene in CowfoldTI

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