

WASHINGTON PARISH COUNCIL



Clerk to the Council.
Ms Zoe Savill.
Washington Parish Council PO Box 2286
PULBOROUGH RH20 9BT
Tel: 0777 6771921
Email: clerk@washingtonparish.org.uk
Website: www.washingtonparish.org.uk

Email Letter to:

Mr Chris Tomlinson
Development & Stakeholder Manager
Rampion 2

28th November 2022

Dear Chris,

Rampion 2 – Second Statutory Consultation 2022

Response from Washington Parish Council

Thank you for consulting the Parish Council on the proposed modifications to the route of the Rampion 2 overland cable connector. We recognise that this second statutory consultation is concerned with the amendments to the route rather than the whole proposal. Nevertheless, given that these have not responded to the concerns and comments we have previously raised with you, we trust that you will accept and give consideration to the full range of points that we make below.

The Parish Council reiterates that it supports the principle of the Rampion 2 project but it does not believe that the delivery of national infrastructure need have an unacceptable impact on small communities. We expect Rampion to live up to its own commitment to be a “good neighbour to the Sussex community” and a considerate project developer in the way it engages with Washington.

We would welcome the opportunity to address these matters with you prior to the submission of the DCO application.

Main Cable Route Alternatives

In our response to the first statutory consultation (7th September 2021) we asked for a detailed explanation of why route A south of the village was no longer considered a feasible alternative and had been excluded from further consideration. We have not been provided with any further information to explain this decision, nor any evidence that Rampion has pro-actively reviewed the options. It is acknowledged that Rampion does not have to provide a detailed analysis of why it has ruled out every one of the multitude of possible routes for the cable. But it was Rampion which identified Route A as part of its initial assessment for the scheme and placed it in the public domain. Presumably this option was suggested for the very sensible reason that it avoided Washington village. In subsequently ruling out Route A, Rampion must have undertaken a detailed internal evaluation based on

evidence of what you refer to in the PEIR (Vol 3 Para 3.4.123) as the 'technical construction challenges'. We are not aware that any third-party objections to Route A raised issues that made it undeliverable, or that a modified version along a similar route would not have been achievable.

The DCO Examining Authority will expect to see the underlying evidence for that decision. We see no reason why this should not already have been shared with our community. It would demonstrate good faith on your part to provide greater transparency and openness on this very important decision.

In the absence of further information as to why it is genuinely not feasible, as opposed to less convenient or more expensive to deliver, the Parish Council restates its objection to the choice of Route B because of the issues it raises set out below. If Route B is sanctioned by the DCO process, we will expect all of these points set out below to have been given full consideration and a reasonable resolution.

In relation to the choice between the modifications to Route B, MR06, MR07 and MR08, and those originally consulted upon the Parish Council has no substantive observations and all of its comments below apply equally to the original or modified route. It should be noted however that whilst the underground route provided for by MR07 is almost identical, were it permitted it would not be acceptable for accommodation works to be established in closer proximity to the boundary of the Washington conservation area.

Proposed New Construction Access Routes

The proposed new construction routes AA11 and AA12 would be accessed from the A283 Washington Road adjacent to the operational Cemex Sandgate Quarry. They would also be in close proximity to the means of access to Clayton Kennels, the residential development at Milford Grange and public rights of way including Hampers Lane and Georges Lane, both of which are used for permitted vehicular access to residential property. Georges Lane also provides access to the National Trust car park at Warren Hill. In the report considering its response to your first round of consultation West Sussex County Council (WSCC) describes the A283 as "a very busy high speed rural road, which does not have a good accident record" (WSCC Report to Executive Member 'Proposed extension to Rampion Offshore Windfarm; Approval of Consultation Response' September 2021). As a consequence, WSCC asked Rampion to reduce the number of access point from the A283, not to increase the number as proposed.

We are also concerned that the visual impact of the proposed routes would be significant, and out of context with the surrounding countryside.

For these reasons we do not support the location of these access points and ask you to reconsider whether either or both are necessary. We will wish to be reassured from your engagement with WSCC that, should either eventually be permitted, there will be no detrimental impact on highway safety or traffic flows.

We also have significant concern regarding the proposed AA13 operations permanent route which is accessed via The Street. We understand from your representatives that you are seeking rights over this track solely to ensure that you can make occasional inspection and

maintenance visits in the future, using only light vehicles. We wish to be reassured that this will be the limit of those rights and that there is no possibility of its use being 'extended' or physical changes being made either during or after the construction phase. We object in the strongest possible terms to the use of this track for anything other than the most essential purposes by a car or light van.

Impact of Area Construction Compound(s) on Local Traffic and other Amenities

We understand that area construction compounds must be easily served by major routes, including the A283 and A24. However, the proximity of Washington village to these roads and the fact that our residents inevitably rely upon them for every day access gives rise to the possibility of conflict between construction traffic and local traffic. The construction timetable indicates that this will continue for several years, and whilst it can technically be described as 'temporary' our residents will have to live with the impact for a considerable period of time. Although the PEIR identifies the impacts of HGV movements as 'negligible', the day-to-day experience of road users is not always accurately reflected by desk top analysis.

WSCC has raised concerns with you regarding the suitability of siting an area construction compound at Rock Common Quarry citing, amongst other things, issues relating to existing traffic flows and sightlines. The possibility exists that further HGV traffic will be generated by activities at this site and this has not yet been taken into account in the evaluation of its operational suitability. The Parish Council therefore restates its objection to this option and asks that Rampion works with WSCC to find an alternative site for this compound. Neither of the other two locations adjacent to Washington village identified in the previous consultation should be considered feasible given that they would require HGV traffic to use the A283 to gain access.

In addition, your final proposals for the Construction Transport Management Plan (CTMP) contained in the DCO application should:

1. Ensure that no construction traffic (except those light vehicles necessary to undertake the installation of the cable as it runs through the village) enters the village. Washington village must not be used as short cut or means of access for construction traffic and reasonable steps should be taken to ensure that accidental misrouting (by drivers unfamiliar with local roads) does not take place.
2. Be based upon the 'real world' impact of additional traffic on the Washington roundabout carefully evaluated in discussion with WSCC and any works identified to accommodate that traffic should be funded by Rampion as necessary.
3. Consider the detailed access arrangements for any area construction compound and ensure that the mitigation measures required to meet highway safety standards prioritise the convenience and amenity of local road users rather than construction traffic. If this requires additional measures or costs over cheaper alternatives, then these should be agreed by Rampion.

4. In relation to Storrington, which is our nearest centre for many local services, address the importance of ensuring (as stated within the PEIR) that there will be no Rampion related HGV traffic passing through the town. The reality is that HGV drivers unfamiliar with the CTMP requirements, or willing to ignore them, can be a practical problem whatever the good intentions of routing plans. Rampion should discuss with Storrington and Sullington Parish Council and WSCC what measures are reasonably required to help ensure that this objective is achieved and fund these as requested.
5. Provide for place reasonable arrangements to ensure that the measures proposed to reduce the impact of construction traffic are fully and effectively enforced including those relating to hours of work, noise, incident reporting, site/community liaison and vehicle cleaning. The effectiveness of a CTMP often lies in the diligence with which it is operated. The establishment of a local liaison group would be a sensible measure.

We will look to WSCC to safeguard our interests in their detailed discussions with you on these and other matters, and we will be raising all of these points with them directly.

Cable Route through Washington Village

(Please note that these comments are provided by the Parish Council in its public capacity and not in its capacity as trustees of the Recreation Ground. They are without prejudice to any position taken by the Trustees).

We understand that once installed and remediated there will be very little visual impact on the village. We also accept at face value the evidence you have put forward regarding the long-term safety and environmental impacts of the cable itself. Responsibility for any shortcomings or inaccuracies in this evidence and any consequential impact lies only with Rampion.

However, the installation of the cable, particularly the drilled section, will have a short term impact which cannot be ignored. We will be raising these at the DCO Inquiry where we have not been provided with satisfactory detailed information and reassurances by Rampion.

Drilling Compounds

The Parish Council is concerned that very little information has been forthcoming regarding the scale and nature of the compounds necessary for the drilling operation, how these will be set up and operated and how they are to be kept safe at all times. This aspect of the installation will have the most direct and tangible impact on the village and it is essential that the Parish Council is fully and actively consulted on the details of this process. It is very much in the interests of the project to actively engage with us so that we can represent local residents and keep them informed of what to expect.

The Storrington, Sullington and Washington Neighbourhood Plan (September 2019) has a 'dark skies' policy which we would expect to be respected by any provision made for essential lighting to serve these compounds.

Noise

We are concerned that noise from the continuous drilling installation across the recreation ground will have a detrimental impact on local residents and the operation of the village hall. So far we have not been provided with any information regarding the amount or duration of noise that they will experience. Whilst this is temporary it is still extremely important that acceptable limits are identified and agreed, and that appropriate and necessary measures are taken to ensure that these are complied with. Rampion should offer to compensate for any direct loss arising from noise interfering with the operation of the Memorial Hall or the recreation ground and consider making ex gratia payments to residents who are unavoidably disturbed where this is justified.

Effect of Cable Easement on Future Plans

The presence of the cable may act as a constraint on the operation of the recreation ground in the future by restricting opportunities for the expansion or improvement of facilities the community may require. Whilst the land-ownership aspects of this issue are a matter for the Trustees of the Recreation Ground, the Parish Council wishes to be reassured that the reasonable needs of the Washington community will not be restricted by the cable easement and would ask for further information to be provided on what constraints the easement would create so that its route can be considered in detail.

Jockey's Meadow

The proposed drilling route would run in proximity to the veteran tree on Jockey's Meadow and it is important that this is not adversely affected during cable installation or by future maintenance requirements. The National Trust as owners of the site will no doubt take this up with you.

Costs

Rampion should reimburse all of the reasonable costs of a public or charitable body in dealing with legal issues arising from the installation. They should not be capped or limited such that any such body feels unable to obtain the advice or expertise it needs to ensure that it has covered all of the relevant issues. Rampion should indemnify that body against the costs arising from any challenge to its decision-making process (it is directly in the project's interest to provide such an indemnity).

Consultation Process

The volume of material that Rampion has produced during the two statutory consultations, means that we have found it difficult to navigate to the key points of concern to us from the multitude of documents. We appreciate that technical documents are not produced primarily for our benefit, but if communities are going to be properly consulted they must be able to find answers to the simple 'who, what, why, when, where' questions quickly and easily. Route and access plans in particular have been produced in such a way that it is difficult to identify the underlying map information. We hope that Rampion will bear this in mind during future community engagement and in preparing its DCO application.

In conclusion, we restate our strongly held belief that Rampion should reconsider a route for the overland cable which avoids the inevitable inconvenience and disturbance to Washington residents. This would 'future proof' against long term issues which might mean that disturbance being repeated for purposes of maintenance, inspection or the installation of new technology. Without prejudice that position, we expect Rampion to address all of the points that we have made to demonstrate to our community that if the proposed route is finally approved it will not have any avoidable impact on the village.

We are willing to engage in constructive dialogue prior to the DCO application being finalised.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Zoe Savill', written in a cursive style.

Zoe Savill
Clerk, for and on behalf of Washington Parish Council