

Rampion 2 Offshore Wind Farm – Statutory Consultation: Bolney National Grid Substation Enabling Works

Response from West Sussex County Council

May 2023

Introduction

1. West Sussex County Council (WSCC) welcomes the opportunity to comment on the additional Section 42 consultation that Rampion Extension Development Limited (hereafter referred to as 'RED'), is undertaking with regards to the enabling works required at Bolney National Grid Substation.
2. It is understood that National Grid have confirmed the Bolney National Grid Substation needs to be extended by up to 0.65ha (about 1.6 acres), to enable the Rampion 2 Offshore Wind Farm to connect into, representing up to a 6% increase to the existing National Grid site area. The extension to the site and the installed infrastructure would be permanent. RED are consulting on extending the fenced site into land already owned by National Grid. The proposed location would be on the south-eastern edge of the existing site, near an area of woodland.
3. This response is not on behalf of other Districts and Boroughs within the County or the South Downs National Park Authority (SDNPA), and only addresses the elements of the project that are subject to the statutory consultation. Continued dialogue will be sought by WSCC on the technical feedback raised during previous rounds of statutory consultation held in 2021, 2022 and 2023 through the DCO process.

General Comments

4. The need for enabling works at Bolney Substation to facilitate the Rampion 2 connection point, were stated in the Preliminary Environmental Information Report (PEIR) (RED, 2021). At that time, it was envisaged by RED that the works would require a separate planning application. Detailed information on the required development has not been available to date, and it was proposed that if the development details were available prior to Development Consent Order (DCO) submission, it would be included within the cumulative effects assessment only and not as part of the main assessment. RED has since taken the decision to include the Bolney Substation enabling works within the DCO application itself. This approach is welcomed by WSCC as it gives stakeholders and the local community clarity regarding the proposals and ensures a full assessment of likely effects and required mitigation, all of which would be secured through the DCO.
5. WSCC also welcomes the updates to the proposed DCO limits, which has removed part of the original PEIR Assessment Boundary to the north of the Rampion 1 Substation and the access from Bob Lane, the use of which has been a concern to residents during the construction of Rampion 1.

6. WSCC Officers have reviewed the Preliminary Environmental Information (PEI), provided as technical documentation to support the consultation. The key areas raised in this response relate to the following topics:
- Fire and Rescue (Major Accidents and Disasters);
 - Historic Environment;
 - Arboriculture/Landscape; and
 - Biodiversity.

Fire and Rescue (Major Accidents and Disasters)

7. Emergency access must be maintained to ensure the safety of the Bolney National Grid Substation during construction and operation of the enabling works. As with previous responses on the wider project, the extension's design must adequately account for fire service vehicles and equipment to access all areas, including the consideration of minimum safe approach distances.
8. Although understanding the allowance for flexibility in the proposals at this stage, clarification of whether Gas Insulated Switchgear (GIS) or Air Insulated Switchgear (AIS) technology will be taken forward as the chosen design will be required prior to detailed design. West Sussex Fire and Rescue will need to be consulted on the requirement for fire detection, including within any enclosed environments.
9. Although details regarding the provision of emergency water supplies for the extension area have not been included within the PEI, they must be considered as part of the proposals going forward and within the Environmental Impact Assessment (EIA), with regards water run-off and potential containment.

Historic Environment

10. WSCC broadly agrees with the conclusion of the Historic Environment section of the PEI, which states that *"No new receptors or changes to magnitude of effects on known receptors have been identified, and the residual effects are comparable to those identified in the PEIR"*.
11. There is an identified potential for harm to as-yet unidentified archaeological features located within the footprint of the substation extension (both for AIS and GIS). However, WSCC agrees that the impacts would be no greater than those already assessed at PEIR. The geophysical survey report indicates that no anomalies of archaeological origin were identified within the footprint of the substation extension. WSCC notes that the results of the geophysics have yet to be 'ground-truthed' by trial trench evaluation in this area, so the accuracy of the geophysics results cannot yet be confirmed. In the event that significant archaeological features are identified within the footprint of the substation extension, the larger footprint of the AIS design option might potentially result in a greater degree of harm. The location of the construction compound on an area of existing hardstanding is welcomed as this will significantly reduce impacts to buried archaeological features and reduce the requirement for investigation and/or mitigation.

12. The PEIR assessed that there would be no likely significant effects to nearby designated heritage assets associated with construction or operation of the project substation and enabling works at Bolney Substation. Nearby Grade II listed Twineham Court Farmhouse (1025579) was assessed at PEIR as being subject to a possible minor adverse effect (not significant) during both construction and operation phases. WSCC concurs that the consulted design and construction parameters associated with both AIS and GIS options are unlikely to materially alter these predicted effects. However, WSCC notes that the exact effects of proposals upon heritage assets arising from changes within settings cannot be fully assessed at this stage, in the absence of detailed baseline settings assessments of significance (including contribution made by setting) for the scoped-in heritage assets.

Arboriculture/Landscape

13. Although the Bolney Substation extension proposals are moderately small in size, the proposal would result in increased impacts on arboricultural receptors within the site, which provide a link between existing woodlands.
14. The PEI considers arboricultural receptors in the form of visual landscape barriers that provide screening of the substation from surrounding vistas including Bob Lane and Public Rights of Way; in addition, such receptors are considered for the temporary construction access.
15. Bolney Substation is situated within agricultural field systems once separated by multiple connecting hedgerows. Three woodland compartments recorded as ancient semi-natural woodland (referred as 'ancient woodland' henceforth) are within c.360m of the proposed extension and were once well-connected through hedgerow corridors. The creation of Bolney Substation severed many internal hedgerows though remaining well-connected on the external of the site boundary. The extension of the substation required for Rampion 1 disconnected a hedgerow running on the eastern border of the site, further separating the ancient woodland compartments to both the north and south of the site. It also fragmented a woodland to the east, known through historical mapping as Twineham Court. The current proposal would likely result in further disconnections through tree and vegetation loss, assets that are of unknown quality due to lack of arboricultural findings.
16. To ensure the additional landscape planting for the enabling works is secured, a new commitment (C-254) has been proposed and this will be included within the DCO application. Therefore, WSCC requests that these landscaping plans (which are required to mitigate, screen and enhance) should look to incorporate existing surrounding woodlands and hedgerow features, including those mentioned above.

Biodiversity

17. The proposed extension to the existing Bolney Substation lies within semi-improved grassland, broadleaved woodland and scattered scrub and would sever habitat connectivity between two areas of broadleaved woodland. As presented in the PEIR (RED, 2021), the area around the existing Bolney Substation (including the AIS / GIS extension area) supports legally-protected species, notably great crested newts, reptiles and badgers. There may also be

potential for impacts on hazel dormice. It is understood that within the Environmental Statement (ES), further survey information will be available on which to base a full assessment, mitigation, and any protected species licence requirements. All habitat loss and severance of connecting habitats will require appropriate compensation. Landscaping plans should seek to address habitat fragmentation, notably through re-connecting woodlands and hedgerows across the surrounding landscape.

18. The enabling works to prepare the site ahead of construction, including vegetation clearance, access road construction, installation of drainage systems and installation of a temporary construction compound, will all require ecological assessment and detailed mitigation, compensation and enhancement measures. Since the temporary construction compound will be located on an area of existing hardstanding, and the current access to the substation will be utilised, there are unlikely to be any major ecological concerns. Construction phase measures, such as the prevention of fuel spillages, will need to be satisfactorily addressed through the Code of Construction Practice (CoCP).

Conclusion

19. Although the Rampion 2 Offshore Wind Farm continues to be supported in principle, a clear demonstration of the least impactful design needs to be made through the design evolution, including detailed design, if consent is granted. RED also needs to ensure the EIA and all relevant control documents proposed to be secured through the DCO, are updated to include these enabling works.
20. Considering the implementation of embedded environmental mitigation measures, WSCC agrees that the extension of the Bolney Substation, as proposed, would not result in any additional receptors or likely significant environmental effects beyond those already assessed.