

Rampion 2 – Statutory Consultation: Potential Alternative to Onshore Cable Route

Response from West Sussex County Council

March 2023

Introduction

1. West Sussex County Council (WSSCC) welcomes the opportunity to comment on the additional Section 42 consultation that Rampion Extension Development Limited (hereafter referred to as 'RED'), is undertaking for a targeted element of the Rampion 2 Offshore Wind Farm onshore cable route. This is understood to be in response to further design evolution, informed by consultation with landowners and the outcomes from environmental and engineering studies undertaken by RED.
2. 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 WSSCC on the technical feedback raised during previous rounds of statutory consultation held in 2021 and 2022, in response to the Preliminary Environmental Information Report (PEIR) and the Preliminary Environmental Information Report - Supplementary Information Report (PEIR SIR) respectively.
3. This consultation proposes a further cable route option (LACR-01d) of approximately 3km of underground cables between Myrtle Grove to the south and Sullington Hill to the north, within the South Downs National Park. LACR-01d is subdivided into LACR-01d (west), LACR-01d (east) and LACR-01d (north). At the closest points, LACR-01d is approximately 2.5km northwest of Findon and approximately 2.3km southwest of Washington. This new option is an alternative to LACR-01a-c (and alternative access routes) previously proposed within the 2022 statutory consultation. The exact location of the cable route within this corridor would be informed by feedback and further technical work. This option would require three associating temporary construction and/or permanent accesses (AA-33, AA-34, and AA-35).
4. WSSCC Officers have reviewed the Preliminary Environmental Information Report - Further Supplementary Information Report (PEIR FSIR) (LACR-01d), which was provided as technical documentation to support the consultation. The key areas raised in this response relate to the following topics:
 - Cultural Heritage;
 - Traffic and Transport;
 - Arboriculture;
 - Biodiversity; and
 - Public Rights of Way.

Cultural Heritage

5. As stated for previous rounds of consultation, the level of baseline assessment undertaken is insufficient to fully understand the significance of any heritage assets that might be present within the route corridor for LACR-01d. Therefore, the effect on the historic environment cannot be accurately assessed nor statements relating to the feasibility of mitigation by design substantiated.
6. However, based on the known historic environment of the route corridor and surrounding wider landscape, WSCC raises serious concerns about the risk of harm to nationally significant archaeology, which would constitute a major adverse effect (significant in Environmental Impact Assessment (EIA) terms) on the historic environment.

Archaeological context

7. LACR-01d crosses an area of the South Downs that forms part of an incredibly rich and complex multi-period prehistoric landscape of national significance. The Early Neolithic flint mining features, concentrated at Black Patch, Harrow Hill, Cissbury, Church Hill, constitute the earliest evidence of industrial activity in Britain, and are of at least national significance in their own right. The extent of the flint mining activity within the vicinity of LACR-01d is not fully understood.
8. Extensive evidence is documented within the route corridor and study area for Bronze Age funerary activity, including multiple barrows and barrow cemeteries. A number of nationally significant Bronze Age monuments are present, and a late Bronze Age farm at Blackpatch Hill. Multi-period activity, continuity of occupation and reuse of earlier industrial and funerary sites is documented at multiple locations within the landscape, such as the late Bronze Age univallate earthwork enclosure, which partially overlies the Neolithic flint mines on Harrow Hill. The landscape contains considerable evidence of later activity including extensive Iron Age field systems and settlements, as well as Romano-British field systems and a Romano-British farmstead at Harrow Hill.

Significance

9. Appendix G of the PEIR FSIR provides a useful and well-synthesised high-level summary of the known historic environment of the LACR-01d route corridor and its surroundings. However, the discussion of impacts and supporting information frequently under-assesses the potential significance of heritage assets (both known and as-yet undiscovered archaeological remains).
10. There is acknowledgement within the PEIR FSIR of the extremely high archaeological potential of LACR-01d; however, the tone and wording of the text serves to downplay the significance of the known archaeology in the vicinity to a concerning degree. For example, the Early Neolithic flint mining complex at Blackpatch Hill is of national significance. It comprises in the region of 100 flint mining shafts with additional shafts likely to extend beyond the scheduled area, as well as traces of working areas associated with the processing of the mined flint identified in the areas between and around the shafts. The site is radiocarbon dated to 4240-3630 cal BC (95% probability), placing it as one of, if not the earliest, flint mines in the country. The PEIR

FSIR refers to the site as merely 'Prehistoric mining activity is known within the vicinity of Blackpatch Hill' (para. 2.2.71).

11. Discussion of potential and significance within Appendix G is also frequently understated. The likely significance of potential Neolithic settlement, industrial and mortuary sites present within LACR-01d is correctly assessed within Table G1-5 as High. Even here, the assessment should go further and clearly highlight that, according to Historic England, 'all well-preserved examples [of Neolithic flint mines] are considered to be of national importance'. However, WSCC finds that the assessment downplays the potential significance of post-Neolithic and especially later prehistoric archaeology.
12. The assessment of potential significance does not appear to factor in the ability to contribute to research questions, potential association with/continuation of nearby scheduled remains, nor the evidence for multi-period activity/continuation or occupation/reuse sites at several known locations. There is no apparent consideration of this nationally significant prehistoric landscape as a wider whole, nor of how significance at the landscape level might interface with the significance of individual features within LACR-01d.
13. In general, assessments made within appendices and tables tend to more accurately reflect significance and impacts (with the above caveats). However, summary discussions overfocus on the known heritage assets recorded within and adjacent to the route corridor. This has the effect of diverting attention from the high potential for archaeological remains of high or national significance to be present, and the associated harm to those potential heritage assets.
14. For the above reasons, WSCC must conclude that the PEIR FSIR does not consistently make an accurate or proportionate assessment of the significance of archaeological remains potentially present within LACR-01d.

Survey work

15. In order to attempt to advance understanding of the significance of the archaeology potentially present within LACR-01d, an extensive suite of specialist field surveys would, at a minimum, be required.
16. Standard evaluation techniques, for example, geophysical survey followed by trial trench evaluation, are likely to be fairly effective at picking up many of the more commonly encountered feature types that the PEIR FSIR has identified as being potentially present within LACR-01d. Standard evaluation techniques (including magnetometer survey) would also be expected to identify Neolithic mine shafts even where no surface expression remains visible following ploughing.
17. However, certain feature types would not be detectable by means of standard evaluation techniques. This would apply to cremation burials dating from the Early Bronze Age and Saxon periods, which are recorded in a number of locations within the route corridor and Study Area. More concerningly, this would also include many of the more ephemeral Neolithic features that might be associated with the extraction activity. These might include evidence of on-site flint processing and associated activities and structures such as flint

working floors, surfaces or hollows, as well as hearths. Traces of Neolithic structures, if present, are likely to be extremely ephemeral and might only be represented in the spatial patterning and distribution of flint scatters. If present and surviving to a sufficient degree to contribute to relevant research questions, any such features would likely be assessed as of the highest significance.

18. Such evidence is likely to be incredibly difficult to identify within standard machine excavated trial trenches. Mechanical removal of overburden is likely to remove surviving trace evidence of flint scatters which might, due to ploughing activity, survive only within the plough soil or at the interface with the chalk bedrock. Even assuming extensive programmes of test pit evaluation, there remains the possibility that significant quantities of ephemeral evidence of earliest industry and associated activity would not be picked up during the evaluation stage.
19. Depending upon the exact route chosen, constraints posed by the topography of LACR-01d mean that standard fieldwork methods may be impractical and more time-consuming and costly than usual. For example, trial trench evaluation would require careful consideration and it is highly likely that a programme of trenching may not be able to sufficiently characterise significance; this is due to difficulties excavating trenches in the desired locations and in machining to the correct levels on steep hillslopes.
20. The topography of LACR-01d also means that there is the potential for considerable accumulation of colluvium/hillwash in the valley between the hills. If present at sufficient depth, these deposits could mask deeply buried earlier prehistoric/Neolithic features, potentially ensuring good preservation and protection from historic plough damage. Such features might also not be readily detectable via geophysical survey, depending on depths of overburden. In addition, buried soils or land surfaces might be preserved beneath deeply accumulated valley sediment, which would in turn result in high paleoenvironmental potential. Evaluation of LACR-01d must include provision for the presence of deeply stratified colluvial deposits and the associated potential for earlier archaeological features and deposits. Borehole and/or auger survey might also be required.
21. The above factors would make it highly challenging to successfully evaluate the archaeological potential of LACR-01d and may mean that even following evaluation, there is a chance that LACR-01d would not be archaeologically de-risked to a high degree of confidence.
22. Following evaluation stage, subsequent archaeological mitigation following DCO consent would likely be incredibly costly and time-consuming. In the event that archaeology of high significance associated with the known prehistoric industrial landscape is identified, full and comprehensive mitigation to the highest standard would be required. It is worth noting that, based on previous investigations of such features, researching any prehistoric mine would be problematic and time-consuming and likely to result in the recovery of extremely large volumes of archaeological finds. It has been suggested that a single mineshaft can produce upwards of 150,000 artefacts (Baczowski 2020).

23. Working on the current timescales reported for DCO submission, WSCC is concerned that there will not be suitable time to allow for the results of even the earliest stages of evaluation, namely the geophysical survey, to be ready in time to feed into the route selection.

Consideration of route options – known heritage assets

24. In addition to the above, there are a number of additional issues relating to the individual areas of the route:
- **LACR-01d (North)** - three barrows and part of a field system are identified within the route corridor. The inclusion of a wider than standard working corridor for this section of LACR-01d should not be taken as guarantee that harm to archaeology within this part of LACR-01d could necessarily be mitigated via micro-siting of the cable route. Further works will be required to confirm the location and survival and assess significance.
 - **LACR01-d (West)** - this area contains evidence of activity associated with the adjacent scheduled Bronze Age settlement site, as well as the site of a barrow, later prehistoric pits and other features. Further works will be required to confirm the location and survival and assess significance.
 - **LACRO-01d (East)** - previous archaeological investigations have recorded remains of a late Bronze Age farm (MWS2968). Although the earthworks have been ploughed out, below ground traces are likely to survive. Lidar features identified within the route corridor are potentially associated with Neolithic/prehistoric mining activity, in the form of working hollows. Further works will be required to confirm location and survival and assess significance, especially in regard to potential Neolithic industrial features.
 - **AA-33** - two sections of additional strips of land are included adjacent to the existing track should the existing track prove unsuitable. The section north of Longfurlong Farm is of particular concern, passing directly adjacent to the scheduled prehistoric flint mine and part of a round barrow cemetery at Blackpatch, 400m north east of Myrtle Grove Farm (1015880). The potential for additional Neolithic flint mining activity and prehistoric funerary monuments is high, and any such features would likely be considered to be associated with, and of equivalent significant to, the scheduled remains.

Assessment of effects in PEIR FSIR

25. Identified effects on designated heritage assets arising via a change in setting, are a cause for concern, despite being temporary in duration. Setting is likely to make a positive contribution to significance (and the ability to understand and appreciate that significance) for a number of the scheduled monuments located in prominent positions in the vicinity of LACR-01d, including Blackpatch (1015880; potentially significant effect identified) and Harrow hill (1015239). In the case of the scheduled Itford Hill style settlement on Cock Hill (1015881), a major adverse effect (significant) is identified in the PEIR FSIR (albeit during construction phase only). Further settings assessment work is required to refine assessments of significance of the affected assets and of the impacts of the proposals upon that significance.

26. WSCC do not concur with the summary of direct effects on heritage assets for LACR-01d and associated AAs (para. 2.2.84). In particular, the assessment that a low to medium magnitude of change is most likely. In the absence of detailed baseline data at this stage in the assessment process (such as significance, distribution and extent of features), a high magnitude of effect should be assumed for known and potential buried archaeological features present within the route corridor.
27. As previously stated, there are also concerns about the inclusion of embedded mitigation in calculations of magnitude of effect on receptors. As a minimum, further field surveys and assessment of significance is needed to confirm suitability of the proposed measures and the degree to which they might reduce the magnitude of harm.
28. The PEIR FSIR states that even in the event of the presence of archaeological features of high significance, a combination of “*embedded environmental measures ... together with the avoidance of areas of sensitivity (or heritage significance) (C-6), will seek to limit the magnitude and overall effect on archaeological assets to an acceptable level being low to medium adverse, which will be Not Significant in EIA terms*” (para. 2.2.84).
29. WSCC cannot agree with this position. The known archaeological context highlights that LACR-01d crosses a nationally significant Neolithic and prehistoric landscape, with known heritage assets including, but not limited to, the earliest industrial evidence, and likely amongst the earliest monuments, in the country. In the absence of detailed baseline survey data for LACR-01d, it is not possible to state that ‘avoidance of areas of sensitivity’ will be feasible. This is even more concerning when the constraints already discussed are factored in, such as the difficulty in identifying some features and sites via standard evaluation techniques, and the topography (and, it must be assumed, engineering challenges). Therefore, the statement that residual significance of effect will be low to medium (not significant) cannot be supported by WSCC on the basis of the available evidence.

Potential historic environment effects of LACR-01d

30. Substantial harm to heritage assets of national significance cannot be ruled out for LACR-01d on the basis of the available evidence. An extensive programme of evaluation (to include specialist strategies appropriate to the classes of archaeological feature which may be present) is required before the significance of affected heritage assets can be claimed to be understood.
31. Even with the implementation of such a programme of works, WSCC cannot have confidence that such work can accurately assess significance for the earliest periods.
32. The PEIR FSIR states that “*Further information is required to more accurately determine the nature, form and condition of archaeological remains that may be present within LACR-01d*” (para. 2.2.68). This is technically correct and serves to highlight that the proposed approach to mitigate by design and micro-siting is not appropriate.

33. WSCC finds that the above statement is inadequate and should, in fact, read *“the presence and significance of potential archaeological remains that may be present within LACR-01d cannot be fully and accurately assessed. On the basis of the available evidence, it is not currently possible to rule out the presence of nationally significant archaeological remains within LACR-01d. Indeed, the available evidence indicates a high likelihood that remains of high or national significance, in particular those associated with the known nationally significant early prehistoric industrial landscape within which LACR-01d is located, may be present.”*
34. WSCC is concerned that LACR-01d will result in unacceptably high residual adverse effects to the historic environment, potentially including archaeology of the highest significance. WSCC do not support the assertion that this harm can be mitigated to an acceptable degree via standard industry mitigation practises, and certainly not by reliance on design or route micro-siting.
35. In order to revise the above position, WSCC would need to be satisfied that LACR-01d would not be likely to result in unacceptably high adverse effects to the historic environment, and that any harm arising can likely be satisfactorily mitigated. This would require considerable additional survey work to be undertaken prior to the route being fixed for DCO. This should include:
- Further baseline assessment work on significance;
 - Geophysical survey;
 - Trial trench evaluation;
 - Specialist assessment of paleoenvironmental potential and, if appropriate, targeted environmental sampling of dry valley;
 - Test pit evaluation; and
 - Proposed mitigation strategy for accurately evaluating and assessing significance for the nationally significant prehistoric landscape that LACR01d crosses, factoring in the unique constraints posed by topography and likely feature types.
36. Surveys should include coverage of the entire LACR-01d corridor to ensure that the baseline evidence can support cable route changes if required.

Traffic and Transport

37. Direct access to the highway network remains via those accesses shown as part of the previous consultation (namely onto Longfurlong Lane (previously indicated as AA24, now AA33), Tolmare Farm (previously AA25, now AA35), and onto the A24 northbound (previously AA26, now AA34).
38. Although these junctions/accesses are existing, safety concerns remain about their suitability to accommodate construction related traffic. RED should note that the speed of traffic on the A280 Long Furlong and A24, as well as the alignment of these roads on the approaches to these existing junctions/accesses, may significantly restrict the opportunities to mitigate the use of these by construction traffic. In particular, Longfurlong Lane and the access track from the A24 are both single-track roads with limited passing

places of larger vehicles. It remains unclear how RED intends to manage the safety of traffic on these routes.

39. Once a decision has been made on the cable route, RED should enter into discussions with WSCC Highways at the earliest opportunity to discuss and agree how these accesses are to be managed.

Arboriculture

40. With regard to worst case scenarios for arboricultural considerations (inclusive to trees, woodlands and hedgerows), LACR-01d and the alternate accesses do not change the residual effects reported in previous statutory consultations (most of which remain classified as 'significant'). The impacts upon landscape effects are expected to be temporary due to the reinstatement of trees and hedgerows loss, immediately following construction completion.
41. LACR-01d (east) is preferred over LACR-01d (west) as no trees would be impacted, or worst case lost and replaced, where a tree line requires crossing (noted with potential bat roosts). Should the embedded environmental measure C-115 be suitable to cross the tree line without felling, and other protective tree measures adopted (as presented in industry good practice), then both route options should have negligible impact on trees and neither option is of preference over the other.
42. From an arboriculture point of view, no concern is raised for LACR-01d (north) or alternate accesses AA-33, AA-34, and AA-35, provided that embedded environmental measures are found to be suitable upon further detailed surveys and industry best practice are adopted to provide protective measures.
43. Opportunities are present to reinstate defunct hedgerows, plant new hedgerows and improved species diversity along LACR-01d and the access routes; these environmental enhancements would be welcomed.
44. The above comments are based on recent aerial imagery and the supplied documentation, the latter of which is not considered to be detailed enough to provide comprehensive arboricultural commentary. The consultations to date have not supplied baseline arboricultural survey data, which may indicate important and/or protected receptors that could have a strong influence on the proposal options presented, such as: high quality trees, important hedgerows, veteran or ancient trees, and potential ancient woodlands <2ha in size. The embedded environmental measures that consider the important receptors mentioned above, must continue to be a strong influence on the design and final option presented within the ES.
45. The explanatory notes for the refined embedded environmental measure C-115 is welcomed, as it takes good account of comments made in the previous statutory consultation by WSCC. The potential for hedgerow 'translocation', 'trenchless crossing' and 'notching' techniques has been acknowledged as a mitigation measure, which may not be suitable for all crossing locations.
46. The 'notched tree lines' technique mentioned in 3.1.21 of Appendix E of the PEIR FSIR, asserts that where tree lines require felling as a last resort of other less impactful techniques, "*restoration would require to use scrub/hedgerow*

species due to the need to avoid the planting of large deep rooted trees over or near to the cable ducts". Where felling is the only option and maintaining a higher tree structure is important for ecological or visual purposes, it is expected that suitable tree planting will be facilitated in the near vicinity and in addition to the scrub/hedgerow planting suggested as to compensate such loss.

47. Not all comments from previous consultations made by the WSCC Arboriculturist have been addressed by the supplied documentation within this consultation, though some have been appropriately responded to as a result of Expert Topic Group (ETG) meetings. An outstanding comment from previous consultation, which remains following this consultation, is the request for early viewing of arboricultural surveys/reports and an Outline Landscape and Ecology Management Plan in advance of the submission of the DCO application. This is to understand arboricultural impact and how any mitigation or compensation is proposed to be secured.

Biodiversity

48. Given the lack of detailed ecological and arboricultural surveys, it is difficult to accurately assess the merits of route LACR-01d.
49. Concern is raised about potential impacts of LACR-01d (east) and LACR-01d (north) on chalk grassland habitat on Blackpatch Hill. However, the ecological quality of this grassland is currently unknown. It may qualify as a 'Priority Habitat'. There may be potential to enhance the grassland's biodiversity interest through better management.
50. PEIR FSIR Section 2.2.50 states "*The land crossed by LACR-01d has the potential to support breeding birds (such as skylark) but has limited opportunities for other species.*" Although this may be true, checks should be made for notable species such as stone-curlew, lapwing, grey partridge and corn bunting.
51. It is noted that hedgerows deemed 'important' under The Hedgerows Regulations 1997 are mentioned in commitment C-115. However, there is little explanation of the method of trenchless installation of the cable ducts through hand digging. It is suggested that this warrants its own separate commitment.
52. PEIR FSIR Section 3.1.4 states that each hedgerow/tree line will be assigned to one of six categories. The first category is 'Retained hedgerows/tree lines (no loss proposed, any pruning in keeping with typical management)'.
53. As commented previously, it is recommended that separate categories are required to distinguish different types of 'retained' hedgerow:
- Retained hedgerows, not impacted;
 - Retained hedgerows where the cable has been laid by trenchless HDD; and
 - Retained hedgerows where the cable has been laid by trenchless tunnelling by hand digging.
54. In particular, the latter may suffer considerable root damage and, therefore, should be clearly identified to ensure they are monitored for adverse effects.

The Vegetation Retention Plan (VRP) should clearly show each of these separate categories of retained hedgerow.

55. It is recommended that the heading for Section 3.1.11 of The PEIR FSIR Appendix E is amended to: "Notched temporary displacement of hedgerows and hand tunnelling beneath 'important' hedgerows".
56. Some amendments are recommended to the PEIR FSIR Appendix E 'Graphic E-1 - Illustrative example of notched hedgerows'. It is proposed that the title of this graphic is changed to "Illustrative example of notched and hand tunnelled hedgerow crossings". The text within the graphic might be clearer by inserting: Option A: Typical hedgerow crossing. Option B: 'Important' hedgerow crossing. Dotted lines could be used to depict hedgerow sections where cable ducts are tunnelled beneath through hand digging trenchless installation (Option B).
57. It is recommended that the hedgerow reinstatement monitoring referred to in Section 3.1.16 of The PEIR FSIR Appendix E should cover a 10-year period, not five as suggested. Indeed, commitment C-115 refers to a 10-year monitoring period. It is assumed that all elements of the Landscape and Ecology Management Plan will be subject to a 10-year monitoring and aftercare period.
58. As mentioned in the previous consultation, in considering the merits of hedgerow notching, it would be helpful to have an indication of the number of hedgerows involved and, in particular, the number of 'important' hedgerows. WSCC would, therefore, request to see the Hedgerow Regulations Assessment survey (undertaken by RED in April-September 2021).
59. Attention is drawn to a Notable Road Verge (NRV) ([Nature-friendly road verges - West Sussex County Council](#)) on the south side of the A280 (Long Furlong) in the vicinity of Longfurlong Lane – see Appendix A. This road verge supports an outstanding range of butterflies. Twenty species of butterfly were recorded in August 2021, including two notable species, small blue and brown argus. It is noted that access would be required from the A280 (very close to this NRV) should AA-33 be used. Measures may be required to ensure that there is no potential for damage to the considerable wildlife interest of the verge. For example, construction traffic and materials must, on no account, be allowed onto the NRV.

Public Rights of Way

60. The area impacted by this new cable route option contains a number of Public Rights of Way (PRoW), including footpath, bridleways and a restricted byway (the South Downs Way). This area is a popular location for walkers, horse riders and cyclists and the impact on their ability to use the network could be considerable, especially considering the inclusion on the South Downs Way and the routes that lead to it. It will be important to consider how the cabling works would be delivered if this area is taken forward, due to the extensive network it impacts and the access challenges this will pose to lawful users.
61. All efforts need to be made to minimise the impact on local PRoW network users during further design phases. Closures of the PRoW network should be minimised where possible as part of any construction works and if they are

necessary, temporary diversions should be available to prevent access being severed for the duration of the works. These temporary diversions should be as minimal as possible, to prevent additional distance for users, and surfaces should be suitable for their legal status and structure-free where possible.

62. As part of the wider engagement on the Rampion 2 project, WSCC have requested a strategy setting out a general approach to PRoW, but also detailing specific route interventions to reduce the impact on users. WSCC again request that this is provided and discussed with stakeholders once the cable route is fixed, prior to DCO submission.

Conclusion

63. Although the Rampion 2 Offshore Wind Farm continues to be supported in principle, WSCC has serious concerns about cable route option (LACR-01d) because there is insufficient evidence to fully understand the significance of any heritage assets and there is the potential risk of harm to nationally significant archaeology. Other concerns are also raised about potential adverse impacts on highway safety, arboriculture, biodiversity, and public rights of way.
64. A clear demonstration of the least impactful onshore cable route needs to be made through the design evolution leading to a design fix for DCO. WSCC would like to see the refinement of the Maximum Design Scenario to reduce the potential impacts currently presented within the PEIR, PEIR SIR and now the PEIR FSIR. A clearer understanding is needed on the associated construction compounds required (over and above those stated at the first round of consultation in 2021) for the fixed route taken forward, as no commentary is provided on this within the latest consultation documents.
65. The onshore cable route presented in the PEIR FSIR, together with the alternatives and modifications presented in the PEIR SIR (RED, 2022), will need to be further refined through the development of the project. The refinement process must be informed by the evidence base, which for this option is currently very limited across a number of topics. RED must also outline to stakeholders and the local community how the design development undertaken going forward, will mitigate adverse impacts and provide benefits through wide-ranging enhancement measures that go above and beyond those required to mitigate the project.
66. WSCC will continue to engage with RED through the development of the project to enable the best possible outcomes for local communities and other sensitive receptors in West Sussex.

Appendix A: Notable Road Verge

Road Name and WSCC Code: W55 – A280 LONG FURLONG (west of Longfurlong Barn), near Clapham		Road Number and Section Number: A280
Grid Ref: TQ 092 075	Parish: PATCHING & CLAPHAM	Side of road: SOUTH
Interest: BUTTERFLIES & BOTANICAL	Length (m): 300m	Works Unit/Highways Area Team: ONE / WESTERN
Site Description:		
<p>This rural verge lies on the south side of a sharp bend of the A280 to the west of Longfurlong Barn. The verge is bisected by a field access track (opposite Longfurlong Lane). This verge comprises a flat area up to 20m wide backed by a steep chalky bank.</p> <p>The shallow, chalky soils support a herb-rich flora which includes a good diversity of chalk grassland species such as Bee Orchid, Kidney Vetch, Small Scabious, Devil’s-bit Scabious, Cowslip, Yellow-rattle, Harebell, Salad Burnet, Marjoram, Burnet-saxifrage and Wild Carrot. The grass sward is not very vigorous, hence benefitting a good diversity of wildflowers. It includes fine-leaved grasses such as Red Fescue, as well as Quaking Grass, a notable chalk grassland species.</p> <p>This verge supports an outstanding range of butterflies. 20 species of butterfly were recorded in August 2021, including two notable species, small blue and brown argus. An incredible count of over 100 small blues, plus 20 brown argus and over 220 common blues were found on this verge on 3 August 2021.</p> <p>A steep, chalky bank at the back of the verge also supports a good chalk grassland flora, though in parts this bank is becoming colonised by Old Man’s Beard and scrub, such as Dogwood.</p>		
Species of interest: Common Name		Species of interest: Scientific Name
BEE ORCHID KIDNEY VETCH DEVIL’S-BIT SCABIOUS SMALL SCABIOUS HAREBELL COWSLIP YELLOW-RATTLE MARJORAM BURNET SAXIFRAGE WILD CARROT QUAKING GRASS BUTTERFLIES SMALL BLUE BROWN ARGUS COMMON BLUE		<i>Ophrys apifera</i> <i>Anthyllis vulneraria</i> <i>Succisa pratensis</i> <i>Scabiosa columbaria</i> <i>Campanula rotundifolia</i> <i>Primula veris</i> <i>Rhinanthus minor</i> <i>Origanum vulgare</i> <i>Pimpinella saxifraga</i> <i>Daucus carota</i> <i>Briza media</i> <i>Cupido minimus</i>
Management Recommendations:		
LATE CUT ONLY (SEPTEMBER/OCTOBER), REMOVING LITTER FROM CUT IF POSSIBLE.		

