

Response to Rule 6 Letter

I wish to comment on Annex C Initial assessment of Principal Issues

Point 6. Ecology Paragraph 4 on potential construction and operational effects on terrestrial species and habitats. I feel that the substation area and cable route approach to it at Cowfold require special attention for 5 reasons:

- that this is completely undisturbed flood plain and unploughed small fields, dense thorny scrub and tree boundaries (albeit with an extensive network of footpaths and bridlepaths) that did not feature in 'desk study' to date
- that it was only selected as the final route and substation site from July 2022 giving little time for local people to make the case
- it has not been included in a formal consultation, inviting local people to add biodiversity information
- that it does not have a habitat designation to date as other wildlife rich sites do
- the surveys from the applicant were only made available at submission to DCO late 2023, giving very little time for local people to commission surveys and data records.

We have evidence that there are areas of BAP priority habitat and have recorded red list and BAP priority species all through last year, but verification takes time and it takes time to raise money for surveys that are not already covered. We believe that this area requires special attention and consideration as large areas of meadow, thorny scrub habitat and whole sections of tree boundaries are marked to be lost in the construction process.

A further issue comes under a number of points. We believe the extensive flooding patterns in this River Adur catchment area should be a bigger consideration to construction than appears in this initial summary of Principle Issues. This will not only effect wildlife and habitat patterns, but trenchless crossing methods which use quantities of water in the process, loss of trees which draw up water, and construction of the access roads and large substation will inevitably change the movement of surface water dramatically, which is likely to adversely impact road access and adjacent properties.

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