Need for the Proposed Development and Alternatives

Reason for raising this. Specific Issue and to be raised at ISH1-under the heading: "Alternatives - Whether alternatives to the Proposed Development were adequately considered including the avoidance of the Climping Beach Site of Scientific Special Interest (SSSI), the route choice including its incursion into the South Downs National Park, and the choice of the onshore substation location."

Referenced document:

Rampion 2 Wind Farm

Category 6: Environmental Statement Volume 2, Chapter 3: Alternatives Date: August 2023 Revision A Ecodoc number: 004866025-01

The analysis of, and data provided to justify, the alternatives considered in the lead up to the application for the DCO was inadequate and in some cases superficial.

The sea route to the grid connection point at Dungeness was dismissed because of perceived, rather than evidence based, "complications" due to the closeness of the nuclear power stations being decommissioned and cost. The financial analysis was not stated, nor was it balanced with, and compared with, other option's substantiality criteria.

The three land options to connect to the substation at Bolney, which resulted in the applicant's preference for Oakendene, was not the best environmental option and probably not the most financially viable although financial evidence is hard to discover. It requires a longer cable route than the Wineham North option, and in terms of short and medium terms during construction, this option will be far more disruptive on the single track lane – Kent Street, and the inhabitants of the nearby hamlet on Kent Street Lane and the villages of Wineham and Cowfold. Additionally, the disruption on the A272 trunk road has not been adequately factored into the analysis and decision making process. The long term effects from adding unnecessary invasive infrastructure at the boundary of Cowfold village and the consequential impacts following commissioning and during operation are unnecessary and unacceptable when other less impactful alternatives are available. Anecdotally, it could be deduced that the decision in favour of a new substation at Oakendene was not based on objective evidence.

Reasons against Oakendene as the 'best option' and the unnecessary cable routes between Dragon's Lane/Crateman's Farm and Taintfield/Kent Street across the Cowfold Stream flood plain and adjacent environmentally and ecologically sensitive and important areas and pasture land, undisturbed for more than half a century, are well argued in representations put forward by others.

The removal of the Wineham Lane North onshore substation option, was stated in the PEIR SIR (RED, 2022) and presented in the second Statutory Consultation exercise, but the site selection process was not described as this report focused on new alternatives and modifications to the Rampion 2 onshore part of the original PEIR Assessment Boundary (RED, 2021.

The cable route to Oakendene crosses the flood plain of Cowfold Stream and the close by environmentally sensitive areas where numerous red listed birds and mammals have both year-round and migratory habitats.

By Rampion's own admissions the selection of building a new substation at Oakendene on a green field site rather than extending the existing substation site at Bolney where the impacts will be significantly less appears to have been subjectively decided. It was selected, as stated by RED "on balance" and due to a "marginal preference". See Ecodoc number: 004866025-01 sections 3.6.23 to 3.6.25.