

Comments on Relevant Representations by IP Number 20045098

Traffic:

HDC (RR-148) para 9.12(mitigations):

“co-ordinated traffic flows limit, duration limits, time periods limits (e.g. limits on all vehicular traffic movements and measures to adhere to these limits; confirmation of the size of vehicles to access each part of the construction route network; restriction on movements between temporary compounds to outside the peak hours; requirement upon the applicant to secure agreement on the number of vehicles that can access the temporary compounds during peak hours; provide for HGV timing restrictions to be implemented where access routes coincide with access to school routes and to...”

To suggest that movements in and out of the substation site, related compounds and the adjacent route through Kent Street can be restricted to outside peak hours or can be reasonably managed by traffic lights etc is to misunderstand the traffic situation at this point on the A272. This is an extremely busy road, with approximately 18000 vehicles per day. At peak times, which in practice means from 7.30 to 9.30 am and 4.00 to 6.30 pm there is standing traffic from Cowfold to beyond these construction sites. Avoidance of peak time movements would bring the Rampion construction works to a halt for several hours each day. Yet to allow them to continue, including their arrival at these compounds at the beginning of the day and then carry out the complex movements in and out of these compounds will surely make travel on this road intolerable for residents and workmen alike. The impracticality of allowing this site to be put forward simply has not been thought out. So far no credible means of addressing this issue has been put forward by the applicant or accepted by WSCC. The fundamental problem with this location, as opposed to traffic turning on and off the road at Wineham lane is that here, because of the effects of the nearby mini roundabouts in Cowfold, the road traffic is at or near capacity much of the time.

Similarly, any traffic management, such as traffic lights, on Kent Street will be impossible as the road is far too narrow. Once through the lights, the traffic will have nowhere to go as it will simply encounter the queue waiting on the other side.

Alternatives:

There appears to be widespread agreement in the Relevant Representations, across communities and organisations impacted by the Rampion 2 proposals, that the standard of engagement with consultees has been very poor, often inadequate, with misleading statements and failure to provide important information. In this instance I wish to draw attention to the lack of due consideration of alternatives, again highlighted across the DCO area

- Arun DC (RR-033), many coastal residents: the inadequacy of consideration of alternatives to landfall at Climping
- SDNPA (RR-358): failure to provide adequate justification for the cable route across the SDNP

WSCC (RR-418), CowfoldvRampion (RR-084), many Cowfold residents: Inadequate evidence for the choice of the substation site or consideration of the alternatives.

This consistent failure by Rampion must be subject to careful scrutiny during the examination. I do not believe they have met their obligations in this respect.

Ecology:

Natural England (RR-265):

Natural England's Relevant Representation is extensive, but comments only on designated habitats and SSSIs. It deals with species of importance, but does not comment on the area around Oakendene or the northern end of the cable route.

It is quite clear that since scoping was done with Natural England about the level of investigation needed and where, that far more has come to light about the ecological sensitivity of the habitats around Oakendene and the northern cable route, so agreements made (see 6.2.22) are now inadequate. Also, when many of the conference calls were done in 2021 with ecology groups (p30) most of the studies for Oakendene and Cowfold stream area had not been done, and as we have previously shown, little existed on databases, so again, the picture was inadequate. What Rampion do mention is highly selective e.g. there is no mention of the ecological concerns raised by Janine Creaye in 2021 (see Consultation reports Appendix Doc Ref 5.5.1) although residents' concerns about ancient woodland and hedges at Wineham are mentioned in detail.

Almost all surveys were carried out after the decision to choose Oakendene was made, or not at all - too many areas are scoped out or described as not accessible.

Natural England in 2020 encouraged Rampion to listen to local knowledge as not infrequently, as indeed in this case, biodiversity records may not be up to date. They did not do this.

In the hope of encouraging Natural England to follow the ecological evidence from the Cowfold Residents Action Group (CowfoldvRampion) as it is published, I would therefore like to highlight to Natural England the biodiversity at the substation site and associated cable route, by including a letter written by a local resident to Natural England in an email in July 2023, and to which she had no response:

Dear Natural England

I understand from a drop in event in Cowfold for Rampion 2 Windfarm substation proposal that they are finally releasing their biodiversity surveys including the approach to the substation, but only to statutory consultees not the locally impacted residents, who know the area. We have asked for these surveys and what mitigation may be offered over the last two years but received nothing.

As residents we have gathered much knowledge of the biodiversity that is here over years but are finding that Rampion are taking little notice. Particular red list species information given to Rampion in 2021 has not been acted on, so we have been making our own assessments, which include breeding nightingale numbers and sky larks (red list species); adders (now considered likely to become extinct in the next twenty years), grass snakes and slow worms, badgers which have active setts right in the cable route, a toad migration (UK Biodiversity Action Plan Priority). Unusual plant species and those that denote ancient hedgerow. All these records have been submitted this year through iRecord but not all have been verified yet.

Rampion now say that they do not consider breeding bird species separately (see attached Rampion 2 response) yet the habitat for these can be very specific and rare. We have made two surveys of the nightingales and also noted the spread of breeding sites in the whole of this section of the cable route, during April – mid June (see map attached). There is a very significant population which nest low down in the blackthorn scrub absolutely where all the construction takes out hedging and the cable channel will be left open

potentially for years before reinstatement. The hedges have grown over decades so are 5 metres thick in places where the cable cuts directly through. Skylarks which nest on the ground in field edges also are found every year throughout the middle section of this 'approach to Oakendene' cable route, where there is a materials depot as well as cable construction marked on the proposal. We have entered the location grid references into iRecord and have sound recordings for each location. These red list birds and the habitat they require, surely must be assessed in detail?

We have significant testimony and photographic evidence of adders, grass snakes and slow worms all around the Dragons Lane and Moatfield area, and adders very particularly have been noted around Crateman's farm for years. They hibernate in the same places every year and the loss of this continuity of safe habitat is one of the elements cited as reason for their decline in numbers. Yet despite having been made aware of this information, Rampion do not believe that they have to consider reptiles in the cable route (see letter attached). They rely on desk study, but where land has been undisturbed and retained in the same family for many decades little would be found on record to date.

The toad migration to Kings' pond on Kent Street also met with a dismissal of need to survey from Rampion and the comment that the hedges would help where the toads migrate is incorrect as toads come out onto roads to travel the distances required to return to breeding ponds. The cable crosses Kings Lane and involves Kent Street right in their path. Yet Rampion dismiss the need for surveys (see letter).

We do not believe that a proper assessment has been made of veteran tree losses that would be incurred for cable and substation construction. The property Oakfield farm has 3 oaks at around 200 years old (4m girth) which are in the path of the cable and another 3 mature oaks to the side of the field with a row of mixed horse chestnut and other trees all in the path of the cable, but Rampion will not confirm which, if any, would be retained.

There is a green lane located between Wilcocks and Moatfield Farm which has potentially 25 veteran field maple and oak trees that would be lost (as the letter attached implies). All trees are twisted, with cracks and hollows that are so good for wildlife, there are oaks that measured to be 150 and 200 years old. There is a bank to one side and an animal path in the middle of this which dates back at least to 1870s, coming off a track which dates at least from 1649 (Buckhatch Lane). We will continue to research this green lane.

There is a very active main badger sett to one side of the green lane and an outlying active badger sett in the middle of the cable route here. We had a Badger Survey completed in May which notes this sett, and activity has increased at that location since. The records have been submitted to Sussex Records Office. This surely cannot be ignored by the Rampion project, and only considered when construction starts. We keep being told by them that badgers move to other sites but if wildlife corridors have been used for many decades and by many species why should that pattern be so unnecessarily destroyed? The offer of net gain will not put any of this back and anything equal would take many decades. This should not be dismissed as necessary loss, for the temporary gain of power for a windfarm's lifespan, especially when this loss could be avoided.

The final point is: has there been a botanical assessment of this section of the cable route? This is all undisturbed hedgerow and flood meadow because it is all catchment area for the River Adur. There are reeds in many of the fields and spectacular meadows which include tufted vetch, birds foot trefoil, knapweed and clover. There are early purple orchids on Kings Lane in the cable route, wood anemones on Moatfield Lane and the Green Lane and greater and lesser stitchwort grow in the cable route. Wild service trees grow on Dragons Lane and Buckhatch lane. Spindle grows at the edge of Cratemans field where the cable comes through. These suggest that there is valuable age and biodiversity to all of

these hedgerows and meadows, which should be assessed.
Please take this in to consideration when judging the adequacy of biodiversity surveys that Rampion are putting forward for the Development Consent Order.