

The following is my response to the Relevant Representation submitted by Horsham District Council.

Under Ecology Surveys and Assessments Ref no 5.3 in the PDF submission

I do not agree that 'sufficient information has been provided to assess the effects of development on biodiversity'

We have evidence of 'unimproved Lowland Meadow' habitat in the cable construction route approaching the substation site in Cowfold. This is rare habitat for Horsham District and is deemed BAP Priority. There are no surveys covering this area in the submission's National Vegetation classification Survey Report 6.4.22.4, except one which was at Gratwicke Stud Farm where they have ploughed and seeded grass only in 2020 (Baker and Talbot 1), and one in the flood plain of the Cowfold Stream (Baker and Talbot 2) which is not obvious quality meadow as it is often under water. The species rich meadows are all across the higher ground in between the two surveys and in the path of the cable and haul road. We have entered data into the biodiversity records covering the density of meadow plants here in 2023 and have an ecologist report confirming the quality of the habitat which will be submitted in the next stage.

There are also no surveys submitted covering reptiles in the cable route (slow-worms, grass snakes and adders are all present and been added to records in 2023), or toad migration (there is an established breeding site at 'Kings' pond with migration all down Kent Street and Moatfield Lane) and incomplete surveys of crested newts have been submitted. The bird surveys only registered 5 nightingales in the whole onshore construction, when our surveys have recorded 22 nesting sites specifically in the Cowfold cable section alone.

I refute that the Rampion project 'will not be removing irreplaceable habitat'. I suggest that HDC review the submitted maps for tree and hedge loss in the Cowfold area. There are 26 significant trees to be removed in the substation site alone, some with veteran features, there is a Green Lane and wildlife corridor which is marked for tree removal, some designated 'good quality' many with veteran features of fungi, hollows, dead lower limbs, all within the group G35 (Annex2: Arboricultural Impact Plan – inset 43). There are 22 trees in the construction corridor and 11 within the area marked for removal. With the tree loss critically also comes the loss of a well-used wildlife track, outlying badger setts, and double tree boundary landscape feature. Cratemans Farm on the same map loses trees in 3 different areas and not only is there species rich lowland meadow in between a lot of blackthorn scrub which inevitably will be lost as the open trench runs right through it. Even though the scrub maps submitted contradict this. It is not possible that the open trench, haul road and tree removal will leave undisturbed scrub. This thorny scrub (as championed by Knepp's 'Scrub heroes' project), is the nesting sites for the nightingale population and takes decades to reach the thickness and density needed for these and many other birds to breed. They do not require new wet scrub planting or woodland, but dense blackthorn scrub which takes many years to establish. It cannot be reinstated in any way that retains the continuity of the breeding sites

In point 5.13 in this document the Cowfold Stream is termed 'in bad ecological state' from desk study. As this is the heart of the concentrated nightingale population, cuckoos and turtle doves have been heard last year in the undisturbed areas either side and skylarks nest at the field edges adjacent to the Cowfold Stream at Cratemans Farm, enhancement cannot be considered without a proper assessment of what is currently here. A further contradiction to this statement about quality, is that every year Beautiful Demoiselles breed in the stream and can be seen on the hedges at the edge of the Crateman's most southerly field. I have many photos and entries have been made into the biodiversity records during 2023. These damselflies are not widespread because they require very specific stream locations to breed. These have high levels of oxygen and little sediment in the water. They also require very undisturbed stream sides with shady areas to cool the water, shelter from wind, and shrubs to mate in. This is not likely to indicate 'a bad ecological state' and careful surveys need to be completed now in order that it is not all lost in the present, for the hope that enhancement succeeds in the years after the construction ends.

We request that Horsham District Council make site visits in June to assess potential impacts on the ecology in the Moatfield lane, Dragons Lane and Kent Street areas of the Cowfold section, and that the results of surveys be added to the Wilder Horsham data. We are happy to accompany council representatives on a site visit.