

Rampion 2 windfarm proposal EN010117
Written Representation by Janine Creaye IP no 20045132

SUMMARY

The subject of this report is the biodiversity under threat from the Rampion Windfarm project if the substation is located at Oakendene. The report covers the undisturbed River Adur catchment area around the Cowfold Stream, tributaries and flood meadows between A281 in Shermanbury and A272 in Cowfold, where the cable construction and haul roads would cause irreparable damage, as well as covering ecology under threat from the substation construction itself.

This document provides photographic evidence, recorded data, and personal testimony. It includes tables of the 230 entries made in iRecord in 2023, and added to Sussex Biodiversity Records. These are broken down into species groups as appropriate.

Sections by subject:

- 1) Flood patterns that drive this biodiversity. Photographs and testimony.
- 2) Nightingales and other red list birds under threat. Including iRecord entries and 2 nightingale surveys made with a Sussex Ornithological Society surveyor in April and May 2023.
- 3) Grassland habitat of Unimproved Lowland Meadow at Crateman's Farm. This has not been surveyed in the Rampion submission. This report includes an initial professional ecologist survey and photographic evidence of meadow plant species, pollenating insects, lichens etc.
- 4) Ecology of Kings/Moatfield Lane and Kent Street verges. Including photographic and data record evidence of toad migration, ancient woodland indicator species, glow worm presence, crested newt presence, owls and moths.
- 5) Green Lane wildlife corridor and tree boundary. This includes evidence of history, badger presence, wildlife use, oak tree assessment for veteran features and age.
- 6) Badger networks threatened by cable construction. This includes an independent professional Badger Survey undertaken in May 2023.
- 7) Adders, grass snakes and slow worms. Photographic and data record evidence as well as testimony.
- 8) Tree and scrub loss from this location. Assessments of numbers, visual impact and veteran features in photographs and tables.

The report ends with a summary of the psychological impact caused by anticipation of disturbance, actual construction process, and by the long-term closure of footpaths in the area, as well as the wider impact of such projects on biodiversity in this country when the options are not thought through.

This is to be read in conjunction with Cowfold v Rampion Local Impact report

THIS REPORT INCLUDES SENSITIVE INFORMATION ABOUT BADGER SETT LOCATIONS AND ADDER
BREEDING SITES WHICH WILL NEED REDACTING FROM PUBLIC VIEW

4 Film clips will follow

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Biodiversity under threat - Incurred by locating the substation at Oakendene
Photos and data gathered – entered into iRecord and Sussex Wildlife Trust Biodiversity Records during 2023/24

We believe that the option of the Wineham Lane North site was not fully explored or compared to Oakendene. The selection has been deemed as ‘a marginal preference for Oakendene’ in the DCO submission with no convincing reasons as to why it went ahead. The ecological damage caused by the haul road and cable construction from Gratwicke on the A281 through to a substation at Oakendene, then on again to join Bolney Substation, will far outweigh the benefits of choosing this option.

This is currently an undisturbed section of the River Adur catchment area. It is a patchwork of small fields, flood meadows, dense lichen covered hedges, and mature oak trees. The alternative substation site as an expansion to the existing Bolney substation does not involve this mosaic of unfarmed flood meadow round the Cowfold Stream and tributaries, but covers territory which has already been disrupted by Rampion 1.

We can see that the surveys submitted have omitted to show priority habitat in this area approaching the substation, failed to survey BAP priority species, and red-list bird species have either not been surveyed in the cable route or have been greatly underrepresented. The scale of tree and scrub loss in this 5km longer option is underplayed and unnecessary. No biodiversity data was released in advance of the DCO making it impossible for wildlife organisations and local people to assess evidence accurately. We saw surveys being undertaken just before the DCO submission (and are dated as such in the submission) so they could not possibly have been assessed against the alternatives. There is no detailed survey data for the Wineham alternative given to compare the two.

Most residents of Cowfold did not know that a substation was planned to be built at Oakendene until the last consultation October/November 2022 which is clearly demonstrated by the amount of opposition that has arisen since then. This was three months after the option had been chosen (July 2022), therefore there has been no consultation with local people that includes the choice of substation site. We have not been consulted when the impact on this area is so great. Local people including landowners have not been directly consulted on the biodiversity and people surveying have not been allowed to engage in dialogue with local people. There are many comments in the survey data submitted about land being ‘inaccessible’ yet few landowners were asked, and those that were have told us that they gave permission, yet the surveyors stuck to the limited access of public footpaths.

I have lived in [REDACTED] working as a visual artist from my garden studio and in that time have been photographing and noting the ecology and wildlife around me as it is part of how I work as a sculptor. All the photos in this document are a result of that, except those which were supplied by other residents and are marked by name. This single track, privately maintained, dead end lane is crossed twice by the cable construction if the proposed Oakendene substation goes ahead, and the area will lose unimproved lowland meadow, masses of thorny scrub, obvious wildlife corridors and many mature oak trees from around the fields. This is an irreplaceable well established wildlife habitat, the loss of which would be felt by all who live, walk, work and exercise dogs and horses around these lanes for more decades to come than the turbines last.

It is undisturbed because the flooding has prevented much human activity like farming and road building. This then means that there has been little wildlife recording to show up in ‘desk study’, because it is largely

in private hands, albeit crossed with well-used public footpaths.

The bigger picture is that this country has lost more of its diversity (according to the 2023 State of Nature Report) than most others in Europe, so if we do not defend these valuable havens we unnecessarily lose so much more. There is a River Adur Landscape Recovery project which has received funding from Defra, is spearheaded by Knepp Estate's Wildland Foundation, and is supported by the Wilder Horsham District policy. That project aims to improve the flood areas of the river, join up wildlife corridors and increase biodiversity along and around the tributaries. This Eastern branch of the very same river has much of the same dense habitat which supports similar endangered wildlife (nightingales, skylarks, turtle doves, grass snakes and adders, beautiful demoiselles, brown hairstreak butterflies, crested newts, amphibians, etc) yet has had so little attention to date. It all has an influence on carbon storage and stabilising climate change. It must not be sacrificed when it is not necessary to do so. Just because this has not been designated in the past for its wildlife value does not prove that there are no irreplaceable habitats here. Habitat Regulations list 'possible Special Areas of Conservation' for consideration. This needs independent assessment now from both local authorities and through this planning process, not dismissal.

I have been trying to communicate with Rampion on the biodiversity value and habitat threats since I found out by word of mouth about the windfarm proposal from the landowner at Crateman's Farm, Dragons Lane, Cowfold in late July 2021. This property is on my daily walk around the flood meadows opposite my property. I have sent RWE photos, film recordings, data, responded to formal Consultations, met with Carter Jonas and RWE representatives on site, corresponded by letter, but find little reference in the submission that any of my points have been taken into consideration in any decisions made (a note on the bottom of 2 tables in Document 22.2 "A local resident living in the vicinity of the Cowfold Stream provided records of breeding nightingale in areas of scrub adjacent to the watercourse and within the wider flood zone." And "In addition, a local resident provided field observations for the Cowfold Stream and surrounding area when within and close to the proposed DCO Order Limits."). No effective mitigation has been proposed as a result.

The responses to my letters (see final section below) detail that the cable route is not counted as an issue by RWE regardless of the threat to priority habitat, red list and Biodiversity Action Plan species. The damage is all considered temporary, but at 4 years construction minimum and at least two before reinstatement, with extensive tree and scrub loss, flood disruption, light pollution, soil destruction (for both haul road and trench), vibration and noise this cannot be considered temporary to ecology, especially where much is already on the verge of extinction in this country.

I finally received some replies to my letters but each time only when I had attended drop-in Rampion events and drawn attention to the unanswered letters. Each reply has come from a different person. The statements received have been dismissive and pointed out that toads, reptiles and separate breeding bird species - red list or otherwise, do not need to be surveyed in the cable route. My repeated requests for copies of the Rampion surveys always met with promises, then silence, then finally that they would not be released until DCO submission.

Please read the following in conjunction with Cowfold v Rampion Local Impact Report's annotated responses to the DCO. This Report is to provide recorded data, photographic evidence and personal testimony. I have made 230 entries into iRecord in 2023, some are retrospective sightings of endangered species. All but a few insects have now been verified. Two nightingale surveys, a professional badger survey and a grassland classification survey from a professional ecologist are included.

1) Flood Patterns – cable route from A281/Gratwicke to Oakendene

A key to this site is the River Adur flood meadows. I wrote in the consultation of 2021:

‘The cable route would go through small fields that regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more obvious flood meadow. These are used by herons and grey lag geese and many wild meadow plants and reeds grow across the wetter areas. I have even found a fish (perch) in a field where the Cowfold Stream has flooded and then retreated. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can still use it. ‘

I sent photos of floods including these 4 below yet this does not seem to have been taken into consideration when choosing the substation option, and the substation location has only had flooding swales added to the plans on submission. These were not present on the plans shown to the public at the Cowfold meeting in July 2023.



Field floods, catchment of river Adur near Cowfold Stream, at Gratwicke stud farm in cable route



Field floods at Cratemans farm in the cable construction route, near Cowfold stream, January 2021



Cowfold Stream in flood, cable route at Moatfield farm, January 2014



Cowfold Stream in flood, cable route, Moatfield farm November 2022

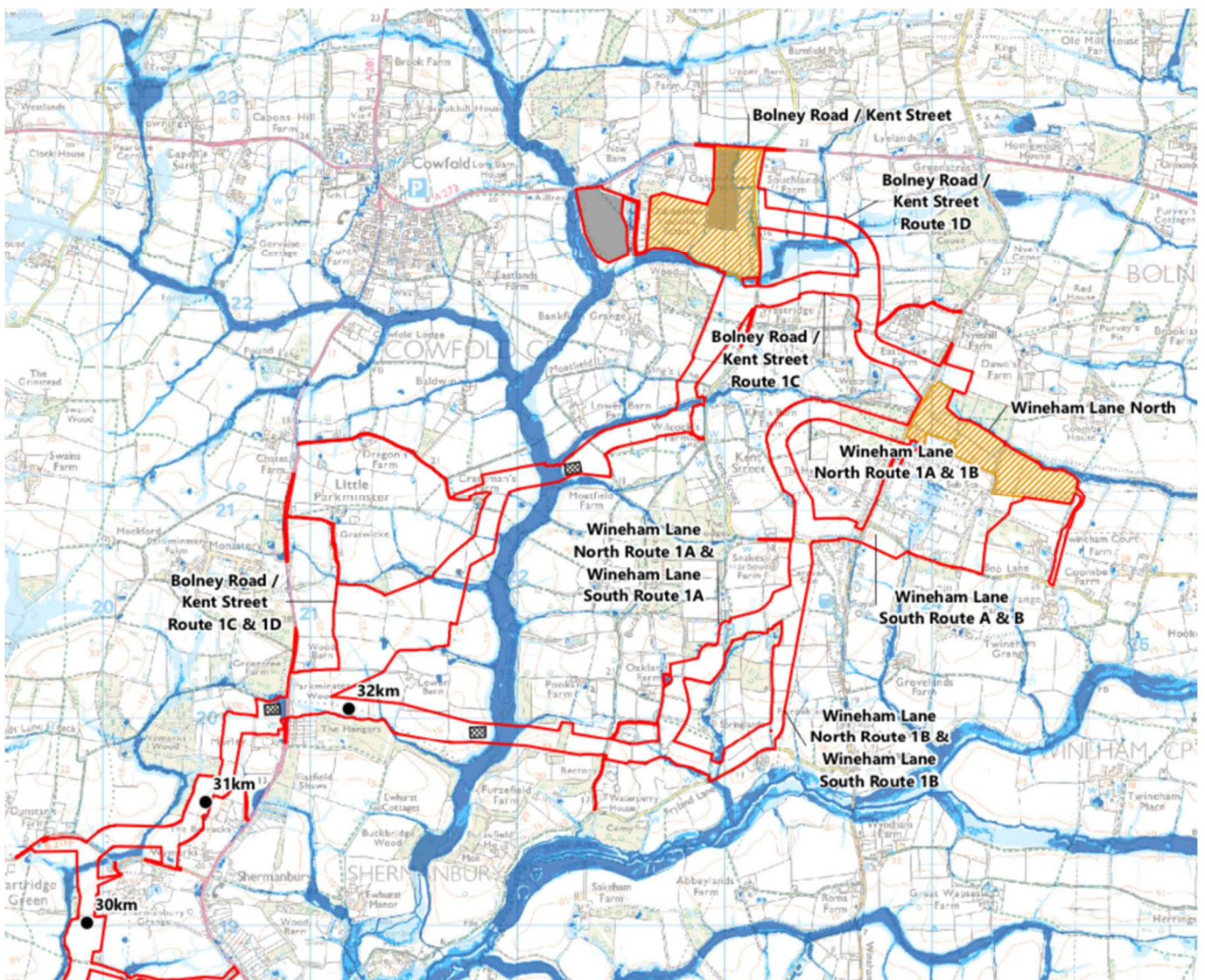


Water table at Oakendene substation site in December 2023 photo Daniel Ball

The map in Rampion's own Peir report makes very clear that the flood pattern will be far more of a problem to construction works and substation site in this option than the Wineham Lane North option which remained under consideration until July 2022. There is a tributary which is the site of a toad migration and a whole section which runs within the flood areas of the Cowfold stream as well as the obvious flooding all round where the substation is sited. The flooding is increasing with the change in weather patterns and we believe records on this may need updating.

The flood water drives the biodiversity for so many reasons. It prevents productive farming, it prevents development of houses and barns, it means no made-up roads and little air pollution, it only allows muddy footpaths and bridle paths which limit access (especially as the footbridges are regularly underwater even sometimes in the height of summer), it allows scrub to establish in very dense thickets over decades, which is critical to provide red list species safe breeding sites. If the flooding means that construction cannot happen in winter (as suggested in DCO) the frog and toad migrations happen in February – April the nightingales, cuckoos, sky larks breed from April through summer, the meadows are alive with breeding insects and many plants are spreading wildflower seed into August and beyond, so there is little time to construct which is not going to devastate the ecology. To establish haul roads, as there are no other roads, the field structure will be destroyed by alien material added to stop vehicles sinking as the water table remains high.

From Rampion 2 Peir report - Wineham Lane option not in the flood meadows of the Cowfold Stream as the Oakendene option obviously is



Cowfold Stream Floods in normal pattern 5th January 2024



Highest point mid photo is the footbridge across the Cowfold Stream, lower two thirds is all field



Stream flowing through field, facing site where trenchless crossing emerges in Moatfield Farm



Cowfold stream is to extreme left, view north across field



Cratemans Farm lower field completely flooded next to trenchless crossing compound



Cratemans Farm lower field, looking through by site of trenchless crossing compound

This flood pattern is common in winter including many times already this season (ie 4thDecember, 5th January, 9th and 18th February) where the foot bridges over the stream are blocked by fast moving flood water.



Moatfield Farm, western end, flood water into the distance 9th February 2024



Moatfield Farm, regular flood level 9th February 2024, Cowfold Stream half way up on left.
[Tree group G1124, Inset 43 Arboricultural Plans]

The images above show where the trenchless crossing would emerge after drilling under the Cowfold Stream. The whole section between Cratemans Farm and Moatfield Farm is underwater as in the photos above. This is a normal flood, but it will be much more extreme at times. We will endeavour to obtain further images.



5th January 2024

The photo above shows the river Adur flooding the A281 at Mockbridge near Henfield which causes the road to be closed a number of times each year between Cowfold and Henfield. Climate change is already increasing this issue. Where will the water go if the substation is built right in the catchment area and the cable construction process leaves trenches of 1m deep (however quickly back filled in until reinstatement), with the fields compacted by extensive haul roads and unrestored for years? The extensive loss of trees and hedge in the floodplain will also remove the stabilizing influence of how these take up flood water (we estimate nearly 100 mature trees will be lost in this cable section to Oakendene, see below for detail). Houses and businesses will be newly flooded where they weren't before, many plants will die underwater and habitats will change, displacing much wildlife. The risk of flooding to homes and roads is incalculable, and unnecessary.

2) NIGHTINGALES IN THE CABLE ROUTE



Photograph by the Cowfold Stream 2017

A BTO Red Listed species which has declined in numbers by 92% since 1970's in the UK.

Sussex Ornithological society state that Sussex has 13% of the national breeding nightingales. This site is very special to that population.

22 separate territories have been recorded in 2023, directly within this section of the cable route. (Knepp Castle Wilding Project recorded 44 territories in 3500 acres, most of those round the Cowfold Stream are concentrated in less than 50 acres.

51 iRecord nightingale entries were added and verified in 2023, each is backed by film recordings, 36 recordings were made this year and 15 were added from previous years. These records are added to the Sussex Biodiversity Records Office database.

Two surveys were made with an experienced bird recorder for Sussex Ornithological Society, Geoff Hunt. Surveys were 30th April and 29th May 2023, all in the cable route field edges or directly in the construction path. There are many private sections of the cable route that were not included in these recordings, so the actual numbers are significantly higher.

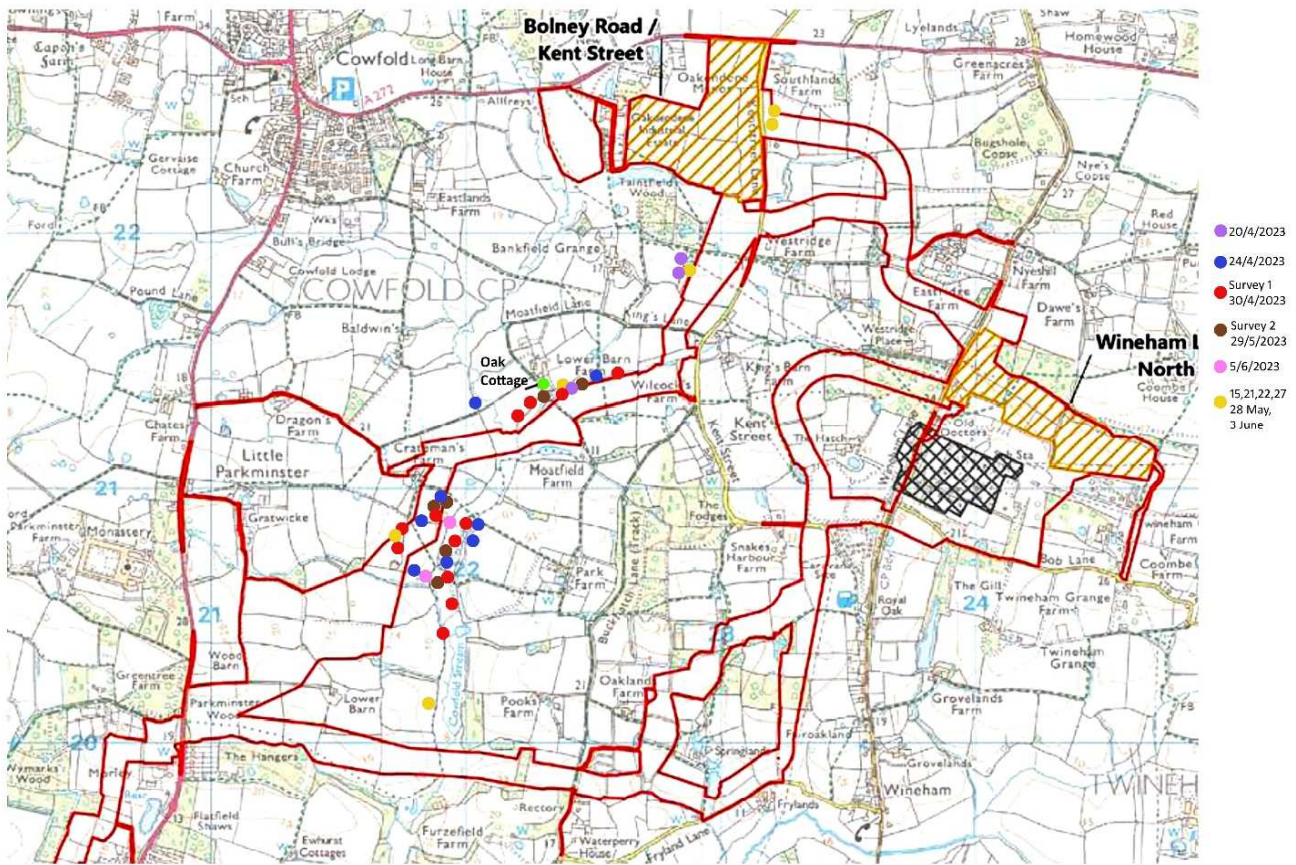
In the DCO there were only 5 nightingales listed in the Environmental Statement, Volume 4, Appendix 22.13 Breeding Bird Survey for the whole onshore route. This does not reflect the situation. As Chris Tomlinsons of Rampion has replied to my letter that all breeding birds are simply grouped together in their assessments of the cable route regardless of priority listing, this is not an adequate picture.

Below are survey and territory maps for nightingales in 2023, and one for territories in 2021/2022. Nesting sites are fairly consistent from year to year in my experience, until the thorny scrub is removed by new landowners – then they will not return to these sites. I sent RWE and Carter Jonas territory maps in 2021 before the choice was made (see below).

Nightingale recordings in the Rampion 2 cable route Approach to Oakendene area, Cowfold/Shermanbury 2023

● Oak Cottage

Coloured spots mark locations of nightingale sightings and short sound recordings April - mid June 2023, all verified in iRecord database

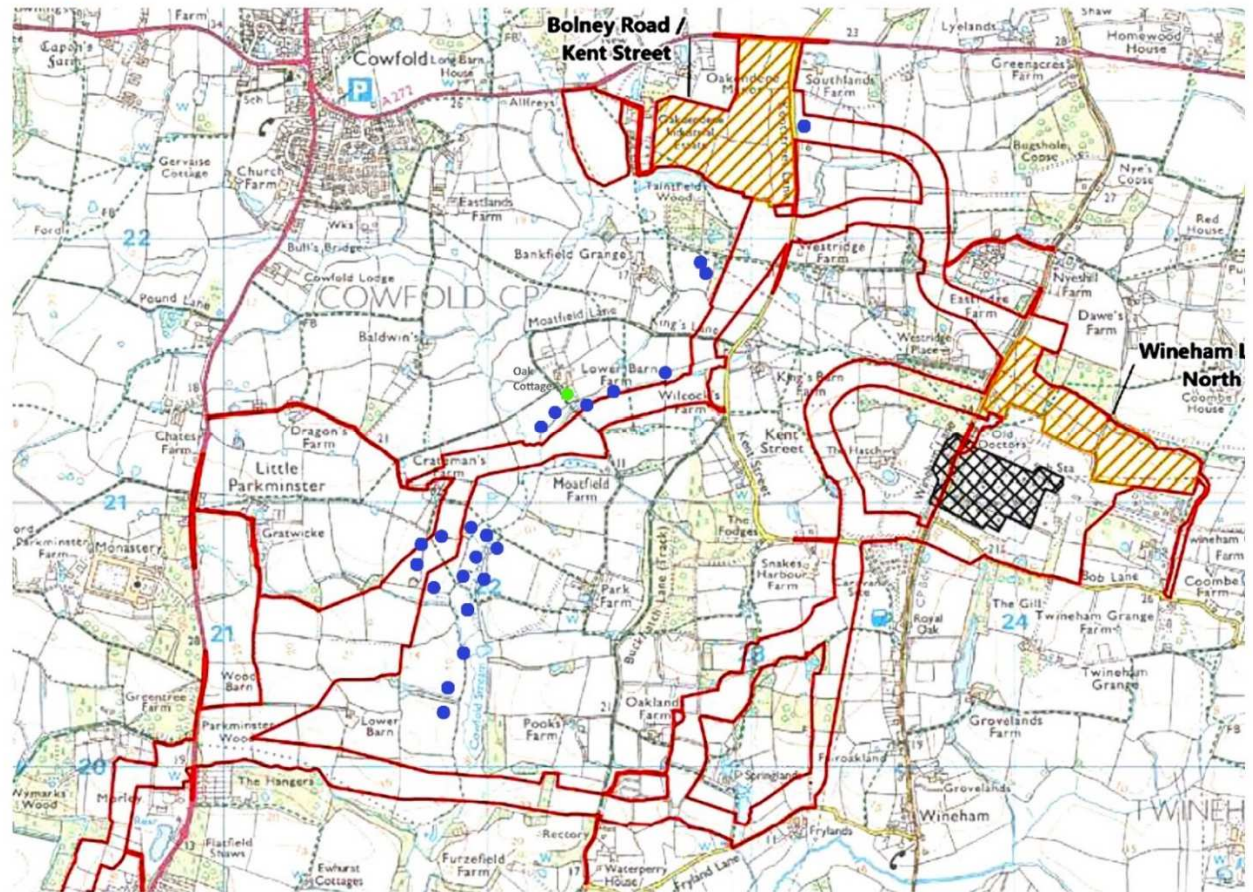


Rampion 2 proposed cable routes in red

Janine Creaye

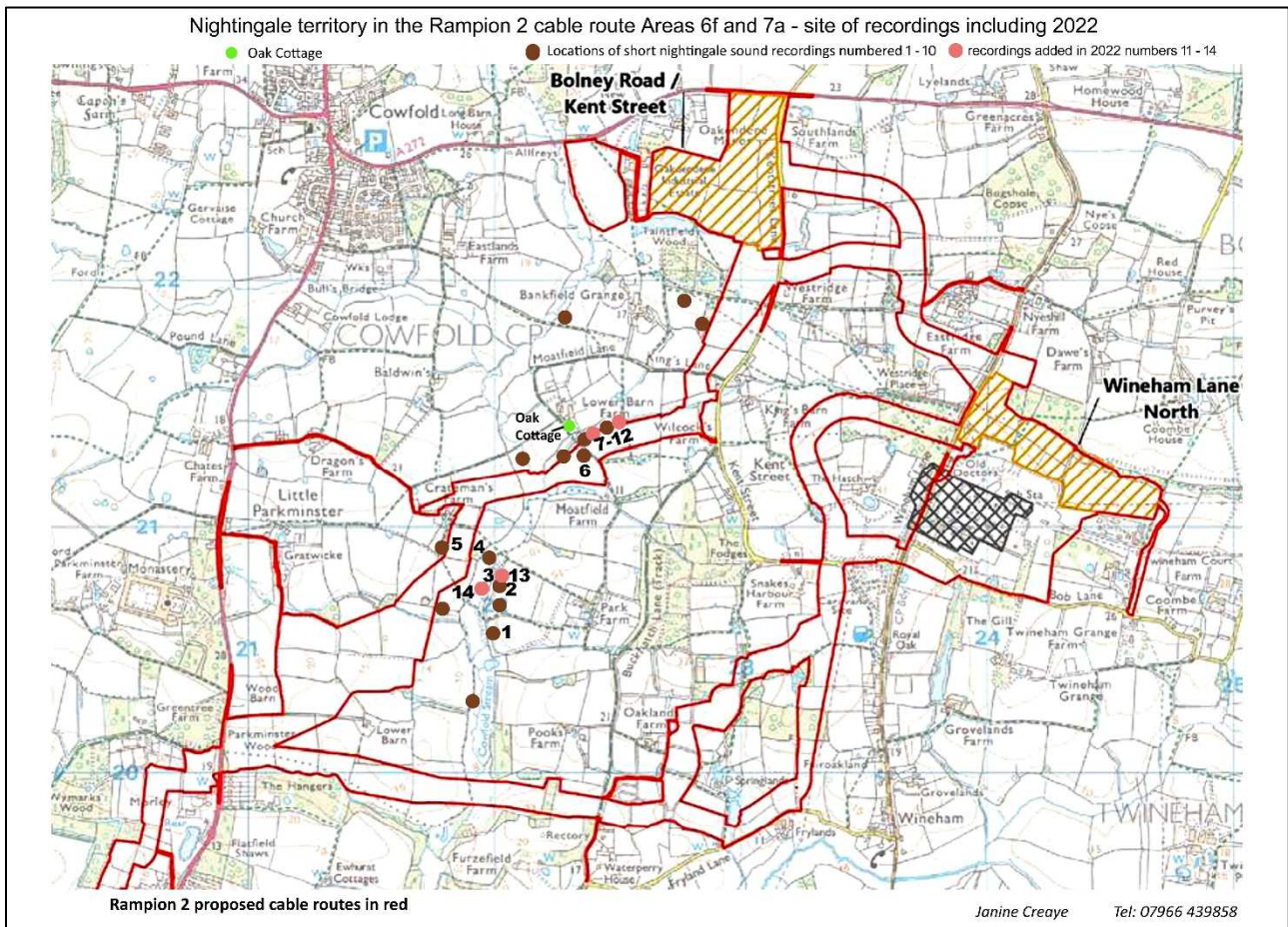
22 Individual nightingale territories in the Rampion 2 cable route Approach to Oakendene area, Cowfold/Shermanbury 2023

● Spots mark locations of nightingale territories (heard/recorded several times in the same spot 20/4/2023 - 10/6/2023) Including Survey 1, 30/4/2023 & Survey 2, 29/5/2023



Rampion 2 proposed cable routes in red

Janine Creaye



The habitat currently here is very specific for nightingales: undisturbed, unpolluted, very dense thorny scrub (they nest around 30cm off the ground). It takes many years to establish. Whole sections of this are marked to be taken out in the process of cable construction around Cratemans Farm, disturbed by HDD equipment through Gratwicke and Moatfield Farm and disturbed by tree and hedge removal at the boundary field between Moatfield Lane and Wilcocks Farm.

Losses

There are contradictions in submitted documents from Rampion as the same area marked for tree loss at Crateman's Farm (G265) is marked as scrub retained (HS688), yet it is in the middle of the cable trench. This hardly seems believable, so we are taking it that the scrub is lost in the process of cabling and tree removal as the disruption would have the same impact. Some of this is 6 – 8m across and cut straight through.

Other nesting sites are marked to be notched or cleared ie HS1388a and HS1388b.

The tree, hedge and scrub maps are marked as being made in July 2023 so these cannot have been compared with alternatives, as this was decided by July 2022.

The Rampion 2 Category 5: Reports Design and Access Statement in the DCO documents (Date: August 2023 Revision A) paragraph 3.5.4) advises that at Oakendene:

"Compensatory habitat is proposed from woodland and scrub features lost in the locality and this will provide breeding habitat for nightingale as a species of interest in areas associated with the Cowfold Stream catchment' and further in the document 'habitats created following construction will provide suitable habitat for many of the notable species known to be present in the area, including breeding nightingale (through provision of **damp scrub and woodland for nesting and foraging**)"

I answered this point to Chris Tomlinson when he wrote almost the same words to me by letter which shows a misunderstanding of the habitat and appropriate requirements for these birds. No notice has been taken to follow through with mitigation.

What is required is not the 'woodland' or any 'damp scrub' Rampion talk of providing. It is dense thorny scrub which is several metres thick and dense right to the ground.

Isabella Tree Of Knepp Wilding Project has written in her 2018 'Wilding' book of why nightingales have been attracted to breed at Knepp in such numbers: The majority (86 per cent) of the birds had taken up sites in **overgrown hedgerows, twenty-five to forty-five feet deep, where there is around 60 per cent blackthorn with thorny cover extending right to the ground....fringed with brambles, nettles and long grasses...**where the cavernous, cathedral-like structure of the thicket's interior offers a safe haven for adults and their fledgling chicks to peck about for insects in the leaf- litter. '**So a nightingale – Knepp reveals – is not a woodland bird.** Trees need not play a part in the picture at all' she goes on to talk of the favoured territory as 'open - grown thorny scrub, thickly vegetated banks and double hedgerows replete with insects'.

If left undisturbed for decades the blackthorn scrub renews itself without extensive management (as I have seen suggested). Over decades if undisturbed it continually runs forwards and sideways ever colonising new ground and generating the necessary fresh growth to stay dense to the ground. This is how it comes to be so thick, not just by forced management of rotational cutting which loses continuity of breeding. This stability is what the nightingales are thriving on here. The reinstatement of small boundary hedges for Rampion 1 has failed in many places and even basic single hedge plants are not succeeding to establish out of their plastic tubes, 7 years on. This will not provide compensatory habitat let alone the net gain proposed. We can have no faith that any reinstatement will be followed up on the evidence of Rampion 1.

Sussex wildlife Trust have suggested in their earlier consultation response that a normal hedge takes 15 years to restore, so how long to reinstate territory that is at least 25 feet thick as Knepp suggests is required for this population? None of this appears to be taken into consideration by Rampion 2 and the population will inevitably be decimated in the decades of no habitat. The turbines only last 25 year.

A further point to the threat of how easy it is to lose nightingale territory and how under threat they are in the River Adur catchment area is that In 2005 when we moved into this location the biggest concentration of nightingales was in the scrub that grew around the clearings within Taintfield Wood, next to the substation site, however where the ground was cleared of scrub by the landowner (leaving the trees intact) approximately 10- 15 years ago, the nightingales have never returned, despite some ground cover naturally coming back. Trees alone are not suitable. Nightingales however are still breeding in the untouched hedgerow/scrub just to the south of Taintfield wood where a battery storage installation has been proposed. Gratwicke Stud Farm removed all hedgerow from the Cowfold Stream and ploughed up the fields to plant grass in September 2020. Nightingales also have not returned to those cleared sites on the north bank of the Cowfold Stream as there is no cover and the bank is collapsing because of the removal of roots. The fields are often still underwater with floods (see above). This has compressed nightingale territory further to concentrate in blackthorn scrub around Crateman's fields and along the tributary that tracks across Moatfield Lane below Oak Cottage garden, and on to King's pond on Kent Street. The cable construction follows so exactly all of this remaining territory. See maps above for distribution at surveys.

The Bolney North option had only 4 singing males on record for 2012 and nothing recorded since. Allowing for a lack of recording, it still does not have the obvious rich habitat that is held by the flood meadows around the Cowfold Stream and tributaries in this part of the River Adur catchment.

IRecord entries which follow do not include the numbers recorded per site but gives a summary of the data.

iRecord Entries - Birds, Nightingales only

| ID | Species | Common name | Species group | Location | Map ref. | Vice county | Date | Recorder | Determiner |
|----------|-----------------------|-------------|---------------|---------------------------|------------|-------------|------------|----------------|-------------|
| 31036881 | Luscinia megarhynchos | Nightingale | bird | off Dragons Lane, Cowfold | TQ21962091 | West Sussex | 10/06/2023 | Creaye, Janine | |
| 31036861 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21962074 | West Sussex | 10/06/2023 | Creaye, Janine | |
| 31036837 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ22042090 | West Sussex | 10/06/2023 | Creaye, Janine | |
| 30696069 | Luscinia megarhynchos | Nightingale | bird | off Dragons Lane, Cowfold | TQ21952090 | West Sussex | 05/06/2023 | Creaye, Janine | |
| 30696058 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21872067 | West Sussex | 02/06/2023 | Creaye, Janine | |
| 30696043 | Luscinia megarhynchos | Nightingale | bird | Kent Street end, Cowfold | TQ23162253 | West Sussex | 03/06/2023 | Creaye, Janine | |
| 30633679 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22352137 | West Sussex | 01/06/2023 | Creaye, Janine | Geoff Hunt |
| 30633565 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22352137 | West Sussex | 29/05/2023 | Creaye, Janine | Geoff Hunt |
| 30633478 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21942044 | West Sussex | 29/05/2023 | Creaye, Janine | Geoff Hunt |
| 30633438 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21892069 | West Sussex | 29/05/2023 | Creaye, Janine | Geoff Hunt |
| 30633406 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21982081 | West Sussex | 29/05/2023 | Creaye, Janine | Geoff Hunt |
| 30633397 | Luscinia megarhynchos | Nightingale | bird | off Dragons Lane, Cowfold | TQ21912088 | West Sussex | 29/05/2023 | Creaye, Janine | Geoff Hunt |
| 30633359 | Luscinia megarhynchos | Nightingale | bird | Kent Street end, Cowfold | TQ23162253 | West Sussex | 24/05/2023 | Creaye, Janine | |
| 30474815 | Luscinia megarhynchos | Nightingale | bird | Kent Street end, Cowfold | TQ23162251 | West Sussex | 22/05/2023 | Creaye, Janine | |
| 30474589 | Luscinia megarhynchos | Nightingale | bird | Kent Street, Cowfold | TQ23162252 | West Sussex | 21/05/2023 | Creaye, Janine | |
| 30474537 | Luscinia megarhynchos | Nightingale | bird | Taintfield wood, Cowfold | TQ228221 | West Sussex | 20/05/2023 | Janine Creaye | Clare Baker |
| 30386750 | Luscinia megarhynchos | Nightingale | bird | Gratwicke, Cowfold | TQ21902024 | West Sussex | 15/05/2023 | Creaye, Janine | |
| 30386673 | Luscinia megarhynchos | Nightingale | bird | off Dragons Lane, Cowfold | TQ21762085 | West Sussex | 15/05/2023 | Creaye, Janine | |
| 30386618 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22332137 | West Sussex | 11/05/2023 | Creaye, Janine | |
| 30201514 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22412139 | West Sussex | 30/04/2023 | Creaye, Janine | Geoff Hunt |
| 30201491 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21982082 | West Sussex | 30/04/2023 | Creaye, Janine | Geoff Hunt |
| 30201437 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21932045 | West Sussex | 30/04/2023 | Creaye, Janine | Geoff Hunt |
| 30201395 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21882068 | West Sussex | 30/04/2023 | Creaye, Janine | Geoff Hunt |
| 30201328 | Luscinia megarhynchos | Nightingale | bird | off Dragons Lane, Cowfold | TQ21762080 | West Sussex | 30/04/2023 | Creaye, Janine | Geoff Hunt |
| 30201322 | Luscinia megarhynchos | Nightingale | bird | off Dragons Lane, Cowfold | TQ21812087 | West Sussex | 30/04/2023 | Creaye, Janine | Geoff Hunt |
| 30174633 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22342136 | West Sussex | 28/04/2023 | Creaye, Janine | |
| 30174618 | Luscinia megarhynchos | Nightingale | bird | Taintfield wood, Cowfold | TQ22882191 | West Sussex | 28/04/2023 | Creaye, Janine | |
| 30174592 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22352136 | West Sussex | 26/04/2023 | Creaye, Janine | |
| 30174522 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22342137 | West Sussex | 24/04/2023 | Creaye, Janine | |
| 30174515 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21927078 | West Sussex | 24/04/2023 | Creaye, Janine | |
| 30174494 | Luscinia megarhynchos | Nightingale | bird | off dragons lane, Cowfold | TQ21782067 | West Sussex | 24/04/2023 | Creaye, Janine | |
| 30174413 | Luscinia megarhynchos | Nightingale | bird | off dragons lane, Cowfold | TQ21912093 | West Sussex | 24/04/2023 | Creaye, Janine | |
| 30174386 | Luscinia megarhynchos | Nightingale | bird | Taintfield wood, Cowfold | TQ22042134 | West Sussex | 24/04/2023 | Creaye, Janine | |
| 30174378 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22882191 | West Sussex | 20/04/2023 | Creaye, Janine | |
| 30001572 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22362137 | West Sussex | 15/04/2023 | Creaye, Janine | |
| 30001749 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22222118 | West Sussex | 14/04/2023 | Creaye, Janine | |
| 29635174 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21922070 | West Sussex | 05/06/2022 | Creaye, Janine | |
| 29635163 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21992081 | West Sussex | 31/05/2022 | Creaye, Janine | |
| 29635143 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22352139 | West Sussex | 07/05/2022 | Creaye, Janine | |
| 29635135 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22352137 | West Sussex | 17/04/2022 | Creaye, Janine | |
| 29635067 | Luscinia megarhynchos | Nightingale | bird | off Dragons Lane, Cowfold | TQ21772090 | West Sussex | 29/06/2021 | Creaye, Janine | |
| 29635128 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22372137 | West Sussex | 26/04/2021 | Creaye, Janine | |
| 29635124 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22352137 | West Sussex | 29/04/2021 | Creaye, Janine | |
| 29635050 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ22012084 | West Sussex | 26/04/2021 | Creaye, Janine | |
| 29635077 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21972092 | West Sussex | 01/06/2020 | Creaye, Janine | |
| 29635014 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ21932065 | West Sussex | 23/04/2020 | Creaye, Janine | |
| 29635108 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22312135 | West Sussex | 16/04/2020 | Creaye, Janine | |
| 29635115 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22342136 | West Sussex | 12/04/2020 | Creaye, Janine | |
| 29635092 | Luscinia megarhynchos | Nightingale | bird | Moatfield Lane, Cowfold | TQ22362134 | West Sussex | 05/05/2019 | Creaye, Janine | |
| 29635052 | Luscinia megarhynchos | Nightingale | bird | cowfold stream | TQ22022085 | West Sussex | 05/05/2019 | Creaye, Janine | |
| 29590826 | Luscinia megarhynchos | Nightingale | bird | Cowfold Stream | TQ21952054 | West Sussex | 25/04/2016 | Creaye, Janine | |

OTHER THREATENED BIRD SPECIES (see iRecord entries for detail)

From Rampion's breeding bird surveys: 'There was a notable increase in both density and diversity of the breeding bird assemblage within the northern section of the proposed DCO Order Limits, centred around the large woodland/scrub and hedgerow mosaics, and within the River Adur and Cowfold Stream floodplains: in areas of suitable breeding habitat' **Yet there is no explanation as to why this was then the chosen option.** One of the justifications I received by letter was that it was chosen for biodiversity reasons, which is directly contradicted here.

Skylarks (BTO Red listed, recent dramatic decline) nest on the ground in the Crateman's fields where Rampion materials are meant to be stored for the years of construction work and where vehicles will come and go. We have made sound recordings and have 6 verified records added to iRecord last year. The first was recorded singing over the fields this year 11/2/2024

Cuckoos are in dramatic decline, they are BTO Red listed and not heard at all in many areas now, but still call each year along the edge of the Crateman's field. We added 2 records last year. **Turtle doves** are in the records for this area and have been heard last year. We see many **barn owls** along Moatfield Lane at night and one nests in a Crateman's Farm barn regularly, 4 records have been entered in 2023. We are surrounded by **tawny owls** on Moatfield Lane, around Taintfield wood and across the fields, these are in long-term decline and have been given Amber list status. We have entered 5 records in 2023 but hear them most nights in October - December. **House martins** (Red list, 37% decline between 1995 – 2020 most severe in SE England) have been recorded as skimming on masse over the cable route off Moatfield Lane as it joins Wilcocks Farm. **Swallows** have been seen each year on Kings Lane and added to the records last year. We have entered records for **fieldfares** seen over Crateman's field when the ecologist Perry Hockin undertook his survey.

Grey lag geese are often seen in the fields and very often at Oakendene by the lake, these are Amber listed.

Great white egrets have been seen at Oakendene and off Moatfield lane (Amber listed), **Green woodpeckers** are a common sight in the garden at Oak Cottage adjacent to the cable route, chiffchaffs and **Yellow hammers** (Red list) have been heard by the cowfold stream and have been entered into the records last year. **Song thrushes** are Amber listed and can be heard and seen in many places in this area. We recorded one at Taintfield Wood by the substation site in 2023. Buzzards and **Red Kites** are a common sight over Kings Lane and Oakendene. I feed many dunnocks and house sparrows at my feeders daily, **house sparrows** are now on the Red list because of significant decline, **dunnocks** are Amber listed.



Flocks of House martins within the cable route skimming the Polo field between Moatfield Lane and Wilcocks Farm

iRecord Entries - Birds

| Birds | | ID | Species | Common name | Species grc | Location | Map ref. | Vice county | Date | Recorder | Determiner |
|--------------------------------|--|----------|------------------------|--------------------------|-------------|---------------------------|------------|-------------|------------|----------------|-------------------------|
| Accepted as considered correct | | 33649261 | Strix aluco | Tawny Owl | bird | Moatfield Lane, Cowfold | TQ22272142 | West Sussex | 26/10/2023 | Creaye, Janine | |
| Accepted as considered correct | | 33649070 | Turdus pilaris | Fieldfare | bird | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist |
| Accepted as considered correct | | 33649182 | Strix aluco | Tawny Owl | bird | Moatfield Lane, Cowfold | TQ22282140 | West Sussex | 05/10/2023 | Creaye, Janine | |
| Accepted as considered correct | | 33234439 | Strix aluco | Tawny Owl | bird | Kent Street, Cowfold | TQ23032171 | West Sussex | 25/09/2023 | Creaye, Janine | |
| Accepted as considered correct | | 32957569 | Strix aluco | Tawny Owl | bird | Moatfield Lane, Cowfold | TQ22272142 | West Sussex | 07/09/2023 | Creaye, Janine | |
| Accepted as considered correct | | 32726084 | Strix aluco | Tawny Owl | bird | Moatfield Lane, Cowfold | TQ22272142 | West Sussex | 22/08/2023 | Creaye, Janine | |
| Accepted as considered correct | | 32396858 | Ardea alba | Great White Egret | bird | Kings end, Cowfold | TQ22352063 | West Sussex | 08/08/2023 | Creaye, Janine | Angela Lightburn |
| Accepted as considered correct | | 32396825 | Ardea alba | Great White Egret | bird | Moatfield Lane, Cowfold | TQ22242151 | West Sussex | 06/08/2023 | Creaye, Janine | Andrew Porter |
| Accepted as considered correct | | 32396798 | Ardea alba | Great White Egret | bird | Kings end, Cowfold | TQ22362063 | West Sussex | 01/08/2023 | Creaye, Janine | Angela Lightburn |
| Accepted as considered correct | | 32399186 | Delichon urbicum | House Martin | bird | Moatfield Lane, Cowfold | TQ22532135 | West Sussex | 31/07/2023 | Creaye, Janine | |
| Accepted as considered correct | | 31946154 | Emberiza citrinella | Yellowhammer | bird | Moatfield Lane, Cowfold | TQ22152137 | West Sussex | 24/07/2023 | Creaye, Janine | |
| Accepted as considered correct | | 31037604 | Dendrocygna major | Great Spotted Woodpecker | bird | Moatfield Lane, Cowfold | TQ22282142 | West Sussex | 22/06/2023 | Creaye, Janine | |
| Accepted as considered correct | | 31037059 | Alauda arvensis | Skylark | bird | cowfold stream | TQ21832076 | West Sussex | 21/06/2023 | Creaye, Janine | |
| Accepted as considered correct | | 31037512 | Picus viridis | Green Woodpecker | bird | Moatfield Lane, Cowfold | TQ22302141 | West Sussex | 01/06/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30695996 | Picus viridis | Green Woodpecker | bird | Moatfield Lane, Cowfold | TQ22292141 | West Sussex | 30/05/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30474538 | Tyto alba | Barn Owl | bird | Taintfield wood, Cowfold | TQ2228221 | West Sussex | 20/05/2023 | Janine creaye | Clare Baker |
| Accepted as considered correct | | 30474536 | Anser anser | Greylag Goose | bird | Taintfield wood, Cowfold | TQ228221 | West Sussex | 01/06/2023 | Janine creaye | Clare Baker |
| Accepted as considered correct | | 30474535 | Turdus philomelos | Song Thrush | bird | Taintfield wood, Cowfold | TQ228221 | West Sussex | 20/05/2023 | Janine creaye | Clare Baker |
| Accepted as considered correct | | 30474413 | Tyto alba | Barn Owl | bird | Taintfield wood, Cowfold | TQ22742190 | West Sussex | 20/05/2023 | Creaye, Janine | Clare Baker |
| Accepted as considered correct | | 30295243 | Buteo buteo | Buzzard | bird | Kent Street, Cowfold | TQ23022101 | West Sussex | 11/05/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30295239 | Cuculus canorus | Cuckoo | bird | Moatfield Lane, Cowfold | TQ22252131 | West Sussex | 10/05/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30386254 | Phylloscopus collybita | Chiffchaff | bird | Moatfield Lane, Cowfold | TQ22272142 | West Sussex | 07/05/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30201197 | Alauda arvensis | Skylark | bird | off Dragons Lane, Cowfold | TQ21812124 | West Sussex | 30/04/2023 | Creaye, Janine | Geoff Hunt |
| Accepted as considered correct | | 30174599 | Buteo buteo | Buzzard | bird | Moatfield Lane, Cowfold | TQ22372169 | West Sussex | 28/04/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30174586 | Milvus milvus | Red Kite | bird | Moatfield Lane, Cowfold | TQ22382135 | West Sussex | 24/04/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30001655 | Tyto alba | Barn Owl | bird | Kent Street, Cowfold | TQ23062175 | West Sussex | 17/04/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30001532 | Alauda arvensis | Skylark | bird | off Dragons Lane | TQ2171212 | West Sussex | 16/04/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30001547 | Alauda arvensis | Skylark | bird | Gratwicke, Cowfold | TQ21892063 | West Sussex | 15/04/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30001710 | Tyto alba | Barn Owl | bird | moatfield lane, Cowfold | TQ22412047 | West Sussex | 27/03/2023 | Creaye, Janine | |
| Accepted as considered correct | | 30001541 | Alauda arvensis | Skylark | bird | off Dragons Lane | TQ21782134 | West Sussex | 20/03/2023 | Creaye, Janine | |
| Accepted as considered correct | | 29629616 | Dendrocygna major | Great Spotted Woodpecker | bird | Moatfield Lane, Cowfold | TQ22292143 | West Sussex | 07/05/2022 | Creaye, Janine | |
| Accepted as considered correct | | 29595278 | Picus viridis | Green Woodpecker | bird | Moatfield Lane, Cowfold | TQ22302141 | West Sussex | 30/07/2021 | Creaye, Janine | |
| Accepted as considered correct | | 29595366 | Cuculus canorus | Cuckoo | bird | cowfold stream | TQ21892069 | West Sussex | 09/05/2021 | Creaye, Janine | |
| Accepted as considered correct | | 29595339 | Alauda arvensis | Skylark | bird | off Dragons Lane, Cowfold | TQ21792124 | West Sussex | 22/03/2021 | Creaye, Janine | |
| Accepted as considered correct | | 29595327 | Hirundo rustica | Swallow | bird | Kings Lane, Cowfold | TQ22392063 | West Sussex | 29/04/2020 | Creaye, Janine | |
| Accepted as considered correct | | 29595404 | Milvus milvus | Red Kite | bird | Moatfield Lane, Cowfold | TQ22542136 | West Sussex | 14/07/2017 | Creaye, Janine | |
| Accepted as considered correct | | 29595271 | Dendrocygna major | Great Spotted Woodpecker | bird | Moatfield Lane, Cowfold | TQ22292143 | West Sussex | 03/08/2016 | Creaye, Janine | |
| Accepted as considered correct | | 29590798 | Athene noctua | Little Owl | bird | Moatfield Lane, Cowfold | TQ22462129 | West Sussex | 28/07/2010 | Creaye, Janine | |



Tawny owl on Moatfield Lane photo Steve Mansell



Yellowhammer off Moatfield Lane by Cowfold Stream



Nightingale by the Cowfold Stream

Little owl hunting in the cable route off Moatfield Lane



Chiffchaff

Juvenile Greater Spotted Woodpecker in Moatfield garden most days



Green woodpecker in a garden at Moatfield Lane, adjacent to cable route



3) PRIORITY HABITAT OF UNIMPROVED LOWLAND MEADOWS AT CRATEMANS FARM

We believe that there is priority habitat at Cratemans Farm and just because it has not been designated as such to date, should not be marked for destruction without proper assessment.

The UK has lost 97% of flower meadows since 1950s

Ecologist, Perry Hockin of Aborweald has described the whole habitat as 'irreplaceable'. The

Landowner's agent has described the meadows as 'species rich grassland' (see letter below).

Yet there are no surveys of these flower meadows in the DCO submission. The only Rampion survey of Cratemans meadows is labelled 'Talbot and Baker 2' and is detailed as being on the edge of the Cowfold Stream ie the most severe flood area. The survey labelled Talbot and Baker 1 is in Gratwicke stud farm where the dense scrub was grubbed out along the Cowfold Stream edge and the ground was turned over for grass planting in 2020 destroying most of the habitat that would support the range of biodiversity. We have gathered good evidence of MG5 Priority habitat Unimproved Lowland Meadow indicator species. However the DCO submission states that there is no priority habitat in the area. We do not believe this to be true if the necessary surveys were made in the summer months.

The historic context of this habitat site is described in the DCO submission:

"2.84.2 The asset is located within the extent of Crateman's Farm Historic Farmstead (MWS9939), characterised by the Historic Farms and Landscape Character in West Sussex Project (Forum Heritage 2000) as a 17th century three-sided L-Plan loose courtyard farmstead with additional detached elements to the main plan... Mature trees are present to the northeast and west, flanking the lane in this direction but views are largely open to the arable fields beyond in every direction. The setting of the asset is chiefly associated with its farm location and rural surroundings. 2.84.4 The asset's historic interests comprise its associations with the past, its illustration of historical developments in the area and through contributions made by its setting... The setting contributes to the historic interest of the asset through illustrative qualities relating to its place within the associated farmstead."

The construction phase at this farm includes a trenchless crossing equipment compound in the middle of the most flower and insect rich meadow, a separate haul road destroying an adjacent meadow and then breaking through by taking out a section of tree and scrub boundary, open trench cutting through a drainage ditch and dense scrub of over 6 m thick and the loss of further tree and scrub on the way to another Horizontal Direct Drilling compound near to the Cowfold Stream. There is a further HDD compound near the Cowfold Stream causing more pollution and meadow loss. There is an access and area marked for materials compound off Dragons lane just North of the Farmhouse itself and very close to a snake breeding site. This is in the same field as the HDD compound. There is disruption from every angle.

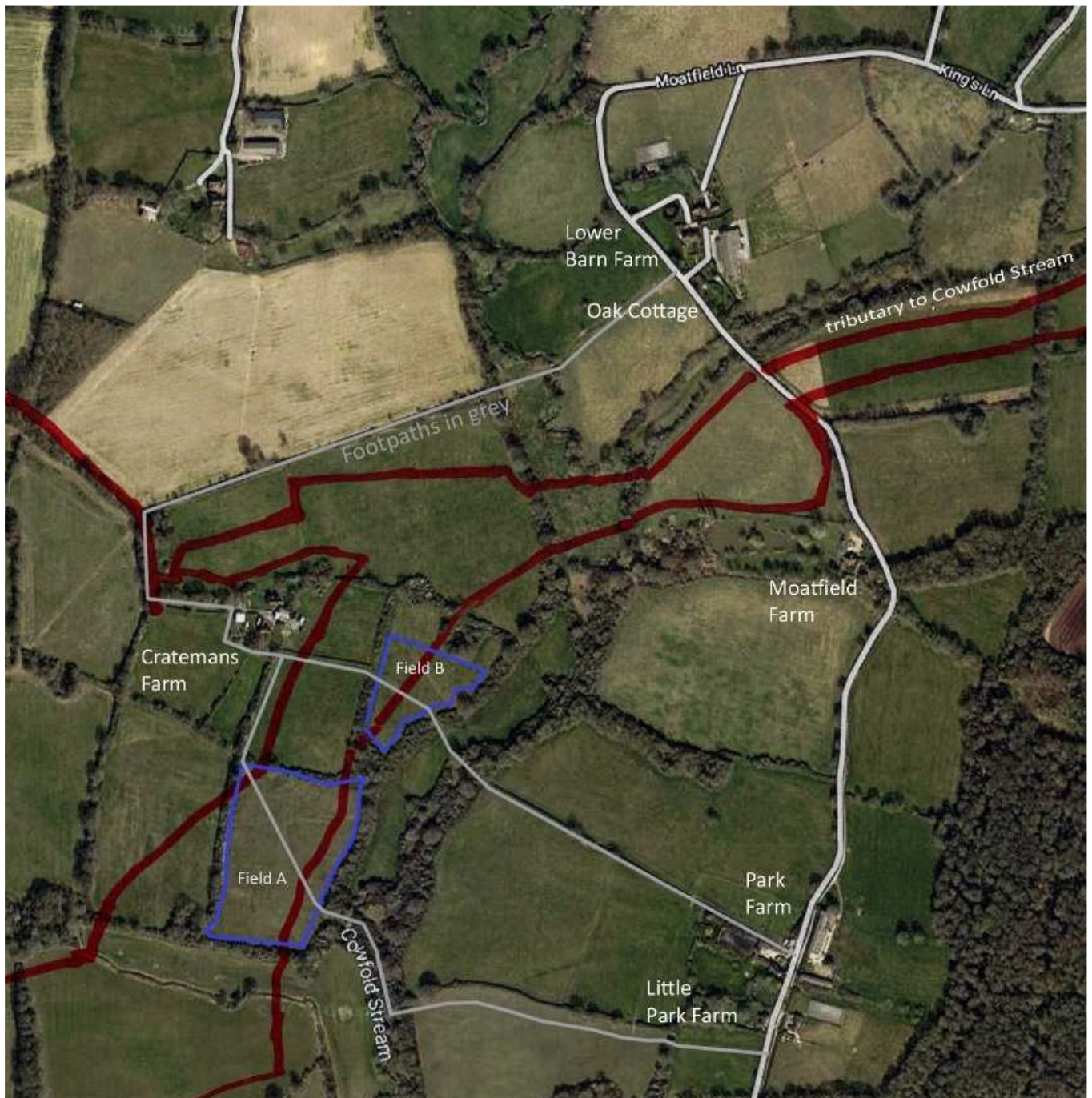
The quality of surveys undertaken by Rampion for the meadows at Crateman's farm totally underplays what will be lost by the haul route, cable trenching and temporary compound here with inevitable access along Dragons Lane (this access is denied in some statements yet clearly marked on the maps).

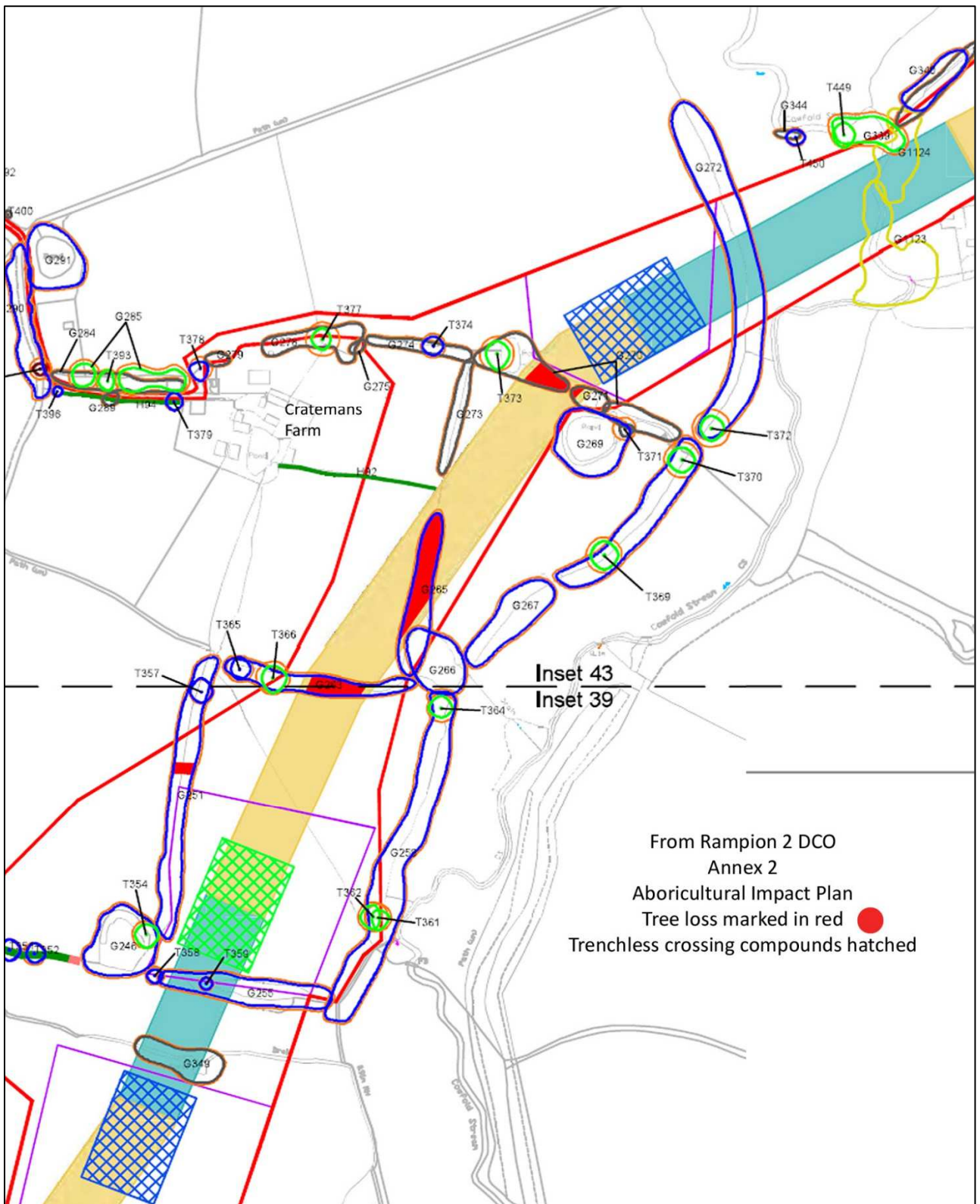
These fields have not been ploughed for 65 years according to the landowner and I have witnessed that they have only been sheep grazed some years in the last 18. Fertiliser and pesticides have not been used for over 60 years, which is very rare in this area of Sussex where fields are used for horse grazing and thistles and ragwort are endemic. The wildlife has freely established nests on the ground, in the blackthorn scrub and in the trees. The feeding and breeding sites have been used consistently over decades and this cannot be simply reinstated or offset by net gain elsewhere. The water table remains at ground level if not above in the lower areas of these fields for most of the winter, and they can flood temporarily any time of year. Soft rush, march woundwort and fleabane grow in the fields nearer the stream. The best quality wildflower meadow is all across the higher areas of fields. It is a rare habitat for many insects, mammals and birds. There are two well used footpaths across these meadows which local people have enjoyed using for years

(especially during Covid lockdowns) and which will be closed for the construction and the soil structure destroyed permanently by additions for the haul road and trenchless crossing compounds.

I have been working with Geoff Hunt to record plant life in two specific fields at Crateman's this year. Despite asking from 2021 onwards we were not provided with Rampion surveys to compare to our records, and, as mentioned, we now know that the Rampion surveys did not cover the meadows anyway. Finding this only at the submission stage did not give us adequate time to commission our own professional reports at the correct time, however we finally put together funds to employ an ecologist to summarise and add to our assessments in October 2023, which although out of season still showed the indicator species of priority habitat: Unimproved Lowland Meadows.

To add to this assessment, I have been photographing these fields for years





Field A Survey recorded July/August 2023 noting what we could identify

Tufted vetch, Common Bird's-foot-trefoil, common fleabane, knapweed, creeping thistle, meadow buttercup, soft rush, red clover, meadow brown butterfly, numerous meadow grasshoppers (film recordings made), migrant hawker dragonfly,

Extras to the above added by ecologist 20th October 2023 are yarrow, chickweed, black medick, pignut, cinquefoil, sweet vernal grass, crested dog's-tail grass, self-heal, spindle tree (field edge). Entered into iRecord

Perry Hockin, ecologist Arbor Weald site visit 20th October 2023

'The grassland is overall dominated by grass species comprising perennial rye grass, Yorkshire fog, creeping bent, cocksfoot, annual meadow grass, rough stalked meadow grass, and red fescue. Wavy hair grass, sweet vernal grass, timothy, crested dogtail, were also recorded in abundance.

19 other species were recorded, they comprised chickweed, meadow vetchling, tufted vetch, common sorrel, cuckoo flower, red clover, sheep sorrel, creeping cinquefoil, creeping buttercup, self-heal, black medick, yarrow, greater knapweed, wood dock, meadow buttercup, pignut, fleabane, soft rush, ground ivy, Springy turf moss *Rhytidiadelphus squarrosus* was recorded throughout the site, **indicating excellent grassland health and complex soil conditions.'**



Field A showing: meadow buttercup, red clover, tufted vetch, crested dogtail grass, foxtail grass, common knapweed, yorkshire fog grass etc

Cratemans Farm Meadows

Top of field A June 2015



June 2006

Field B August 2023



Top of field A June 2015

August 2023



Cratemans meadows Field A Survey 31st July, extras 25th August 2023



Tufted vetch



Meadow buttercup



knapweed



selfheal



female migrant hawker



Cats tail grass



Soft rush

Meadow vetchling



Red clover



birds foot trefoil



common fleabane



meadow grasshopper



Field B Survey 10th August 2023

Agrimony, Silverweed, Common Bird's-foot-trefoil, knapweed, lesser stitchwort, red bartsia, red clover, yarrow, marsh ragwort, creeping thistle, meadow vetchling, ground ivy and numerous meadow grasshoppers.

Cratemans Farm, Field B survey 10th August 2023



ground ivy

Red clover



yarrow



agrimony



grasses id

creeping thistle



Cratemans Farm, Field B survey 10th August 2023



meadow grasses - very little rye



marsh ragwort



birds foot trefoil



lesser stitchwort



meadow grasshopper



silverweed and red clover



red bartisia



knapweed



From Perry Hockin's 20th October 2023 Phase 1 Habitat Survey report (see below for full report):

'Some areas of the grassland towards the top of the hill away from the Cowfold stream could be classed as 'MG-5' grassland, which is of a particularly high quality. Further surveying will be required to ascertain whether indicator species are present during the summer months.

Surveying by local residents has revealed species in addition to those recorded in October 2023, including indicators of 'MG-5' grassland, and the land owner's agent has expanded on Rampion's designation of 'Semi-improved grassland' with the addition of the 'Species rich' tag which could potentially also apply to areas of unimproved grassland.'....

It is my professional opinion that the grassland on site with surrounding habitats comprising scrub, hedgerows and scattered trees, as well as the riparian habitat within the Cowfold Stream has produced a complex ecosystem strongly networked with the habitats in the wider landscape.

The proposed development of the site in its current form would result in a substantial and irrevocable loss to biodiversity that cannot be compensated, specifically by the usage of traditional cut and cover techniques which will affect the delicate soil conditions for hundreds of years to come, and by the usage of Field A as a HDD operational depot.

Further surveying at the ideal time of year will be required to ascertain the full extent of species present within the fields and hedgerows, including the protected species that utilise them. It is my professional opinion that as crossing the Cowfold Stream will require Horizontal Directional Drilling (HDD) that this section be extended to cover as much of the areas around Fields A and B as possible. Furthermore, the route should be adjusted to affect the less diverse areas of heavily grazed horse pasture in the immediate wider landscape. '

Natural England Technical Information Note TIN147 National Vegetation classification: MG5 grassland

In the first paragraph lists English crested dogstail grass and common knapweed as the basis of MG5 meadow, which are both abundant in field A and B, it goes on to list 'Characteristic herbs include: common knapweed, ox-eye daisy, birds foot trefoil, lady's bedstraw, common sorrel, meadow vetchling, meadow buttercup, ribwort plantain, cowslip and common cat's ear'. The only ones of this list that I haven't seen here are ox-eye daisy, lady's bedstraw, cowslip, and common cat's ear. However I am not a botanist and I just may not recognise all these plants. I use photographs for all my iRecord entries if I do not have an ecologist with me to identify species. The photos do not show in the iRecord summaries but I have included a round-up of some of these images here.

Other species listed in this noted as indicators of 'long continuity of 'traditional management' (ie no phase of land use change such as ploughing..) are wood anemone and pignut which are present here. 'Species normally associated with woodlands that are sometimes found in MG5 grasslands include:' wood anemone and native bluebells which are here and along Moatfield Lane.

Bird species which are listed as using MG5 for breeding and/or foraging include skylark, yellowhammer, starling, fieldfare and rook, all of which are seen on these meadows and skylark, yellowhammer and fieldfare have been entered into the records in 2023. Damper forms of MG5 can include Rushes, meadowsweet and cuckoo flower all of which grow on the Cowfold Stream edge of the field or just the other side of the scrub.

iRecord Entries - Flowering Plants

| Flowering Plants | | Common name | Species | Common name | Species group | Location | Map ref. | Vice county | Date | Recorder | Determiner |
|--------------------------------|----------|----------------------------|----------------------------|---------------------------|---------------|-----------------|------------|----------------|-------------------------|----------|------------|
| Accepted as considered correct | 33649069 | Vicia cracca | tufted vetch | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649068 | Lathyrus pratensis | meadow vetchling | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649067 | Cirsium arvense | creeping thistle | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649066 | Juncus effusus | soft-rush | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649065 | Trifolium pratense | red clover | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649064 | Ranunculus acris | meadow buttercup | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Ruth Eastwood | | |
| Accepted as considered correct | 33649063 | Centaurea nigra sens. lat. | = Common Knapweed | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649062 | Pulicaria dysenterica | Common Fleabane | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649061 | Lotus corniculatus | Common Bird's-foot-trefoil | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Ruth Eastwood | | |
| Accepted as correct | 33649060 | Achillea millefolium | Yarrow | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Not reviewed | 33649059 | Potentilla | Cinquefoil | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649058 | Stellaria media | Common Chickweed | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as correct | 33649057 | Conopodium majus | Pignut | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Accepted as considered correct | 33649056 | Medicago lupulina | Black Medick | off Dragons Lane, Cowfold | TQ21862082 | West Sussex | 20/10/2023 | Creaye, Janine | Hockin, Perry ecologist | | |
| Not reviewed | 32725866 | Phleum bertolonii | Smaller Cat's-tail | off Dragons Lane, Cowfold | TQ21882082 | West Sussex | 27/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32725865 | Prunella vulgaris | Selfheal | off Dragons Lane, Cowfold | TQ21882082 | West Sussex | 27/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as considered correct | 32724401 | Lathyrus pratense | meadow vetchling | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32724400 | Cirsium arvense | creeping thistle | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 32724399 | Jacobaea aquatica | marsh ragwort | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32724398 | Achillea millefolium | Yarrow | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32724397 | Trifolium pratense | red clover | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32724396 | Odontites vernus | red bartsia | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 32724395 | Stellaria graminea | lesser stitchwort | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32724394 | Centaurea nigra sens. lat. | = Common Knapweed | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Ruth Eastwood | | |
| Accepted as correct | 32724393 | Lotus corniculatus | Common Bird's-foot-trefoil | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32724392 | Potentilla anserina | silverweed | off Dragons Lane, Cowfold | TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as considered correct | 32398174 | Trifolium pratense | red clover | off Dragons Lane, Cowfold | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32398170 | Juncus effusus | soft-rush | off Dragons Lane, Cowfold | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32398169 | Ranunculus acris | meadow buttercup | off Dragons Lane, Cowfold | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32398168 | Cirsium arvense | creeping thistle | off Dragons Lane, Cowfold | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32398167 | Centaurea nigra sens. lat. | = Common Knapweed | off Dragons Lane, Cowfold | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Ruth Eastwood | | |
| Accepted as correct | 32398166 | Pulicaria dysenterica | Common Fleabane | off Dragons Lane, Cowfold | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32398164 | Vicia cracca | tufted vetch | off Dragons Lane, Cowfold | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32398163 | Lathyrus pratensis | meadow vetchling | off Dragons Lane, Cowfold | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 32726027 | Stachys palustris | marsh woundwort | Moatfield Lane, Cowfold | TQ21862123 | West Sussex | 27/06/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 31037540 | Stellaria graminea | lesser stitchwort | Moatfield Lane, Cowfold | TQ22462139 | West Sussex | 15/06/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29629580 | Sorbus torminalis | wild service-tree | Dragons Lane, Cowfold | TQ21652113 | West Sussex | 26/07/2021 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct; Sensitive | 29595139 | Hyacinthoides non-scripta | bluebell | off Dragons Lane, Cowfold | TQ22 | West Sussex E | 05/05/2021 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29595167 | Anemone nemorosa | wood anemone | Kings Lane, Cowfold | TQ22302038 | West Sussex | 26/04/2021 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29590868 | Vicia cracca | tufted vetch | Cowfold meadows | TQ21842079 | West Sussex | 22/06/2017 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29590856 | Sorbus torminalis | wild service-tree | Kings Lane, Cowfold | TQ22282047 | West Sussex | 28/04/2017 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29629610 | Euonymus europaeus | spindle | off Dragons Lane, Cowfold | TQ21882069 | West Sussex | 11/11/2016 | Creaye, Janine | Creaye, Janine | | |

Further indications of the ecosystem in these fields are the number of other species recorded here, particularly insects. The grasshoppers were so numerous this year that every step across the diagonal footpath in Field A would startle many. The slow-motion film on an iPhone showed them catapulting in all directions, flying into the air and spinning over as they went. The cumulative sound of the meadow in July was incredible. As the meadow grasshoppers cannot actually fly and just jump, they were easier than ever before to photograph, because once landed again they rely on staying very still to avoid predators. Some of these photos are below.

Meadow grasshoppers
July 2023 Cratemans



More indications of the quality of these fields are the insects which I have been photographing and entering into records last year all from the Cratemans farm land.

Marbled whites were common last year, peacocks, meadow browns are always numerous, gatekeepers and large skipper were all photographed at Cratemans, many in the field edge where the Rampion access is marked north of the farmhouse. The number of butterfly species although not rare individually, is indicative of the quality of the grassland and scrub here that they rely on to feed. The following photos and data entries are from species that were seen on bramble, nettle, thistle and grasses particularly. Field A and B had many marbled whites, gatekeepers and meadow browns which can be seen as indicative of the unimproved status of these fields.



Butterflies June/July2023 around Crateman's Farm



Ringlet

Comma



Peacock butterfly and caterpillar

Meadow brown



Brimstone



Gatekeeper

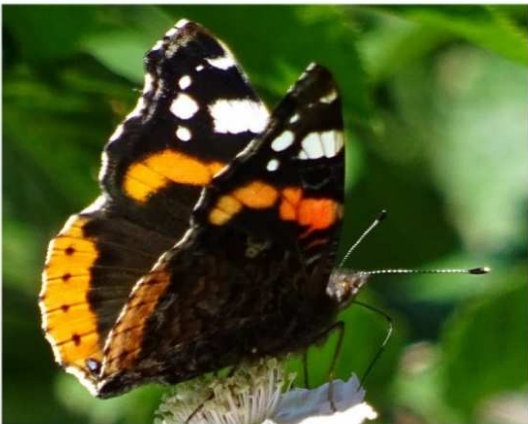
Large skipper



Red admiral



Marbled whites



iRecord Entries - Butterflies and Moths

Butterflies

| ID | Species | Common name | Species group | Location | Map ref. | Vice county | Date | Recorder | Determiner |
|---------------------|-----------------------------------|-------------------|--------------------|----------------------|------------|-------------|------------|----------------|-----------------------------|
| Accepted a 32398171 | <i>Maniola jurtina</i> | Meadow Brown | insect - butterfly | off Dragons Lane, Co | TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31945522 | <i>Aglais io</i> | Peacock | insect - butterfly | cowfold stream | TQ21952037 | West Sussex | 20/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31945521 | <i>Vanessa atalanta</i> | Red Admiral | insect - butterfly | cowfold stream | TQ21952037 | West Sussex | 20/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31945520 | <i>Pyronia tithonus</i> | Gatekeeper | insect - butterfly | cowfold stream | TQ21952037 | West Sussex | 20/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31945519 | <i>Aphantopus hyperantus</i> | Ringlet | insect - butterfly | cowfold stream | TQ21952037 | West Sussex | 20/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31945518 | <i>Maniola jurtina</i> | Meadow Brown | insect - butterfly | cowfold stream | TQ21952037 | West Sussex | 20/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31945517 | <i>Ochlodes sylvanus</i> | Large Skipper | insect - butterfly | cowfold stream | TQ21952037 | West Sussex | 20/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31945516 | <i>Polygonia c-album</i> | Comma | insect - butterfly | cowfold stream | TQ21952037 | West Sussex | 20/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31945515 | <i>Gonepteryx rhamni</i> | Brimstone | insect - butterfly | cowfold stream | TQ21952037 | West Sussex | 20/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652349 | <i>Favonius quercus</i> | Purple Hairstreak | insect - butterfly | Moatfield Lane, Cow | TQ22292140 | West Sussex | 07/07/2023 | Creaye, Janine | originally by Chris Skinner |
| Accepted a 31652162 | <i>Gonepteryx rhamni rhamni</i> | Brimstone | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 10/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652161 | <i>Maniola jurtina</i> | Meadow Brown | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 10/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652160 | <i>Aglais io</i> | Peacock | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 10/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652159 | <i>Melanargia galathea</i> | Marbled White | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 10/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652158 | <i>Polygonia c-album</i> | Comma | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 10/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652025 | <i>Vanessa atalanta</i> | Red Admiral | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 07/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652024 | <i>Maniola jurtina</i> | Meadow Brown | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 07/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652023 | <i>Pyronia tithonus</i> | Gatekeeper | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 07/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652022 | <i>Polygonia c-album</i> | Comma | insect - butterfly | cowfold stream | TQ21962036 | West Sussex | 07/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31651774 | <i>Melanargia galathea</i> | Marbled White | insect - butterfly | off Dragons Lane, Co | TQ21672109 | West Sussex | 02/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 29629638 | <i>Melanargia galathea serena</i> | Marbled White | insect - butterfly | Moatfield Lane, Cow | TQ22642127 | West Sussex | 01/07/2022 | Creaye, Janine | Creaye, Janine |
| Accepted a 31282692 | <i>Melanargia galathea</i> | Marbled White | insect - butterfly | off Dragons Lane, Co | TQ21662111 | West Sussex | 30/06/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31162098 | <i>Aglais io</i> | Peacock | insect - butterfly | off Dragons Lane, Co | TQ21772102 | West Sussex | 27/06/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31037620 | <i>Maniola jurtina jurtina</i> | Meadow Brown | insect - butterfly | Moatfield Lane, Cow | TQ22072132 | West Sussex | 21/06/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 29629491 | <i>Pyronia tithonus</i> | Gatekeeper | insect - butterfly | Moatfield Lane, Cow | TQ22432126 | West Sussex | 28/07/2021 | Creaye, Janine | Creaye, Janine |
| Accepted a 29595414 | <i>Pararge aegeria</i> | Speckled Wood | insect - butterfly | Moatfield Lane, Cow | TQ22312141 | West Sussex | 03/09/2013 | Creaye, Janine | Creaye, Janine |
| Accepted a 29595428 | <i>Limenitis camilla</i> | White Admiral | insect - butterfly | Moatfield Lane, Cow | TQ22632118 | West Sussex | 19/07/2010 | Creaye, Janine | Creaye, Janine |

Moths

| | | | | | | | | | |
|---------------------|-----------------------------------|------------------------|---------------|----------------------|------------|-------------|------------|----------------|-----------------|
| Accepted a 33649119 | <i>Macroglossum stellatarum</i> | Humming-bird Hawk-moth | insect - moth | Kings Lane, Cowfold | TQ22372068 | West Sussex | 20/10/2023 | Creaye, Janine | Clare Christian |
| Accepted a 32726128 | <i>Mormo maura</i> | Old Lady | insect - moth | Moatfield Lane, Cow | TQ22282143 | West Sussex | 22/08/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 32399256 | <i>Autographa gamma</i> | Silver Y | insect - moth | Moatfield Lane, Cow | TQ22302142 | West Sussex | 23/07/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 31652775 | <i>Amphipyra pyramidea agg.</i> | Copper Underwing agg. | insect - moth | Moatfield Lane, Cow | TQ22282143 | West Sussex | 16/07/2023 | Creaye, Janine | Colin Pratt |
| Accepted a 31037496 | <i>Lasiocampa quercus quercus</i> | Oak Eggar | insect - moth | off Dragons Lane, Co | TQ217210 | West Sussex | 15/06/2023 | Creaye, Janine | Creaye, Janine |
| Accepted a 29590835 | <i>Saturnia pavonia</i> | Emperor Moth | insect - moth | Moatfield Lane, Cow | TQ22282142 | West Sussex | 27/03/2022 | Creaye, Janine | Creaye, Janine |
| Accepted a 29595421 | <i>Deilephila elpenor</i> | Elephant Hawk-moth | insect - moth | Moatfield Lane, Cow | TQ22312141 | West Sussex | 09/07/2017 | Creaye, Janine | Creaye, Janine |

Further indications of habitat quality at Crateman's Farm

Another insect that is particular to this very specific undisturbed habitat is the beautiful demoiselles which are seen at the most Southerly corner of Field A near the Cowfold Stream every year. They are an indicator of the stream quality. They mate on the sunny hedges and lay eggs on plants in the stream. I have many photos and entries have been made into the biodiversity records during 2023. These damselflies are not widespread because they require such specific stream locations to breed. This includes flowing water with high levels of oxygen and little sediment. They also require very undisturbed stream sides with sheltered shady areas to cool the water. They are not common around this section of the river Adur itself. Mostly you only see banded demoiselles which are more tolerant of disturbance and water quality.



Female beautiful demoiselle near Cowfold Stream, corner of field A at Cratemans Farm



Female beautiful demoiselle near Cowfold Stream, corner of field A at Cratemans Farm



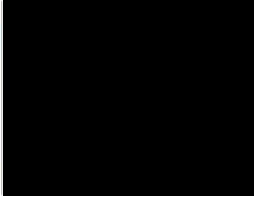
Banded demoiselle by neighbour's pond

Another indicator of the unpolluted quality of the air around these meadows are the lichens on trees and hedge plants at the field edges. These do not spread where the levels of nitrous oxide are high in the air. This is as a consequence of there being no public roads and few motor vehicles generally. Construction work of two HDD compounds, haul roads and trenching equipment will cause unnecessary damage to this rare unpolluted environment. **We believe that proper, in-depth field surveys must be completed in summer to establish the true quality of these meadows or they will be lost unnecessarily. The soil structure cannot be reinstated in our lifetimes. The DEFRA maps show very little priority habitat of Unimproved Lowland Meadow in the Horsham District or West Sussex in general.**





Mrs Janine Creaye



Arborweald Environmental
Planning Consultancy
Woodland Enterprise Centre
Hastings Road
Flimwell
East Sussex
TN5 7PR

Dear Mrs Creaye,

Further to our recent discussions regarding land at Crateman's Farm, off Dragons Lane, Cowfold, West Sussex, in the vicinity of RH13 8BF that will be affected by the proposed Rampion 2 overland cable route, I attach a letter containing the results of the survey.

Letter begins.

Thank you for providing further evidence of plant species found within fields A and B on the attached map, as I have now had time to check through it.

FIGURE 4. PROPOSED CABLE ROUTE (RED) IN THE VICINITY OF CRATEMAN'S FARM, WEST SUSSEX. THE RED LINE INDICATES THE PROPOSED CABLE ROUTE. SURVEYS OF TWO SPECIES-RICH, UNIMPROVED MEADOWS ON PUBLIC FOOTPATHS WHICH WOULD BE DUG UP BY THE CABLE CONSTRUCTION. MARKED AS FIELD A AND FIELD B.



A phase 1 habitat survey was undertaken of fields A and B on the 20th October 2023. Although undertaken outside of the ideal ecological season for grassland of April to September inclusive, the survey still provided adequate results to classify the grassland under the NVC methodology. Furthermore, the results gathered provided confirmation of species identified by local residents during the ideal season in 2023.

Grassland

The majority of the area in question is made up of semi-improved grassland typical of the Sussex landscape, split into individual permanent pastures by fences, ditches and hedgerows. There are numerous scattered trees throughout the landscape including mature ancient and veteran individuals. Some of these have already been identified by RWE during their BS:5837 tree surveys of the area. However, not clearly identified are numerous pockets of valuable blackthorn and hawthorn scrub with other mixed woody species.

The sward height across the site averages approximately 20cm, however sward heights are not homogenous with areas throughout the site as tall as 60cm and as short as 10cm. Diversity within the semi-improved grassland is broadly homogenous with an as-expected higher diversity at the edges.

The grassland on site is considered to be good quality semi-improved grassland having been un-seeded, unploughed, and had no artificial fertiliser or weed killed applied for over 60. Its quality varies across each field, with large areas matching multiple criteria for DEFRA semi-improved grassland classification as 'good quality'. This includes:

- 31 species of plants recorded including six indicators of good-quality (Red clover, sorrel, meadow buttercup, yarrow, self-heal, and black medick) as well as germander speedwell at the field edge.
- The sward is moderately species-rich (9-15 species/metre squared, including grasses)
- The cover of wildflowers (broadleaved herbs) and sedges excluding white clover, creeping buttercup and injurious weeds (no definition of injurious weeds is provided in the HLS FEP Manual, but the following examples are given in the Entry Level Stewardship: creeping thistle, spear thistle, curly dock, bitter dock) is 10% or more.

Furthermore, the grassland on site meets UKBAP criteria for semi-improved grassland as *'...all semi-improved and unimproved grassland occurring on circumneutral soils. It includes enclosed and managed grassland such as hay meadows and pastures, a range of grasslands which are inundated with water periodically, permanently moist or even waterlogged grassland, where the vegetation is dominated by grasses, and tall and unmanaged grassland'*.

This is in contrast to *'Improved grassland; This type includes species poor, grass dominated swards occurring on all soil types that have been either sown, or created by modification of unimproved grassland by fertilisers and selective herbicides, for agricultural or recreational purposes. It includes grassland that has been reseeded for more than one year.'*

Grassland within field A and field B has been un-seeded and unimproved for over 60 years.

The grassland is overall dominated by grass species comprising perennial rye grass, Yorkshire fog, creeping bent, cocksfoot, annual meadow grass, rough stalked meadow grass, and red fescue. Wavy hair grass, sweet vernal grass, timothy, crested dogstail, were also recorded in abundance.

19 other species were recorded, they comprised chickweed, meadow vetchling, tufted vetch, common sorrel, cuckoo flower, red clover, sheep sorrel, creeping cinquefoil, creeping buttercup, self-heal, black medick, yarrow, greater knapweed, wood dock, meadow buttercup, pignut, fleabane, soft rush, ground ivy,

Springy turf moss *Rhytidiadelphus squarrosus* was recorded throughout the site, indicating excellent grassland health and complex soil conditions.

Grassland on site is considered to primarily comprise NVC 'MG-6' with higher quality areas of 'MG-8' at the edges and in the fields in the south-west of the site. There are areas of 'MG-10' grassland in poorer drained areas close to the Cowfold stream which are exceptionally boggy. Some areas of the grassland towards the top of the hill away from the Cowfold stream could be classed as 'MG-5' grassland, which is of a particularly high quality. Further surveying will be required to ascertain whether indicator species are present during the summer months.

Surveying by local residents has revealed species in addition to those recorded in October 2023, including indicators of 'MG-5' grassland, and the land owner's agent has expanded on Rampion's designation of 'Semi-improved grassland' with the addition of the 'Species rich' tag which could potentially also apply to areas of unimproved grassland.

Hedgerows

Hedgerows bisect much of the local landscape including bounding all of the fields in the immediate vicinity. They are all in overall excellent condition, with woody species comprising early-mature examples of ash, blackthorn, dog rose, field maple, hawthorn, oak, bramble, spindle, and dogwood, with occasional crab apple and wild service tree. Furthermore, there are scattered mature and overmature / ancient standards within the hedgerows showing signs of veteranisation (BS:5837 (2012) category A3).

All of the hedgerows on site show signs of significant establishment within the field layer typical of remnant ancient woodland, including primrose, cuckoo flower, cleavers, bramble and lords and ladies. These species are indicative of a common practice in the southeast of England whereby hedgerows were formed out of remnants of woodlands felled to make way for agriculture.

Hedgerows are protected and considered 'ancient' under the Hedgerows Regulations Act 1997; Schedule 1, Part 2, Para 7., if they contain:

- *at least 7 woody species;*
- *at least 6 woody species, and has associated with it at least 3 of the features specified in sub-paragraph (4);*
- *at least 6 woody species, including one of the following (black-poplar tree (*Populus nigra* ssp *betulifolia*); large-leaved lime (*Tilia platyphyllos*); small-leaved lime (*Tilia cordata*); wild service-tree (*Sorbus torminalis*); or*
- *at least 5 woody species, and has associated with it at least 4 of the features specified in sub-paragraph (4)*

The first, second and fourth criteria are satisfied by all the hedgerows on site, therefore they are considered to be 'ancient' under the Hedgerows Regulations Act 1997, and must be protected.

Conclusion

It is my professional opinion that the grassland on site with surrounding habitats comprising scrub, hedgerows and scattered trees, as well as the riparian habitat within the Cowfold Stream has produced a complex ecosystem strongly networked with the habitats in the wider landscape.

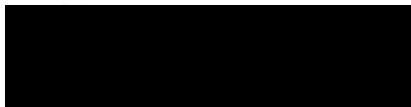
The proposed development of the site in its current form would result in a substantial and irrevocable loss to biodiversity that cannot be compensated, specifically by the usage of traditional cut and cover techniques which will affect the delicate soil conditions for hundreds of years to come, and by the usage of Field A as a HDD operational depot.

Further surveying at the ideal time of year will be required to ascertain the full extent of species present within the fields and hedgerows, including the protected species that utilise them. It is my professional opinion that as crossing the Cowfold Stream will require Horizontal Directional Drilling (HDD) that this section be extended to cover as much of the areas around Fields A and B as possible. Furthermore, the route should be adjusted to affect the less diverse areas of heavily grazed horse pasture in the immediate wider landscape.

Sincerely,

Perry Hockin BSc. (Hons.), FDSoc., ACIEEM – Principal Ecologist

Declaration: The information which I have prepared and provided for this report is true and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct; I confirm that the opinions expressed are my true and professional bona fide opinions.



FAO Eleri Wilce, Senior Consents Manager
Rampion 2 Extension Development Limited
C/o RWE Renewables
Greenwood House
Westwood Way
Westwood Business Park
Coventry
CV4 8PB

31st August, 2021.

Dear Sirs,

FORMAL CONSULTATION RESPONSE

Mr Tim Facer, Cratemans Farm, Dragons Lane, Henfield Road, Cowfold, RH13 8DX

We write on behalf of Mr Facer, the owner of Cratemans Farm, to provide his response to the published route for the cables for the above project.

We refer to the plan at the end of this letter, extracted from your consultation route plan, onto which we have marked the boundary of the farm in green hatching.

Background

Cratemans Farm is a small grassland and residential farm extending to approximately acres. It is situated at the end of Dragons Lane, approximately two thirds of a mile to the east of the A281 at the bottom of a small incline. As such, it is in a highly desirable, secluded and attractive situation, not overlooked and screened from road noise on the A281.

Management of the land

The farm was formerly run as a dairy, although our client ceased milking there many years ago. It is now used for hay production and livestock grazing.

The farm is unusual in that since our client first came to the farm, approximately 60 years ago, it has not had any fertilisers or pesticides applied to the land. The result of this is that **all the pasture on the farm is species rich grassland, which, combined with the many mature trees and hedgerows on the property, provides a highly valuable and diverse habitat for a range of flora and fauna, including red listed species.**

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Robert Crawford Clarke BSc AGSIC MRICS Richard Town BA (Hons) MARA Nicholas Haggood. Henry Adams HRR Ltd. operates under licence and is independently owned. Registered in England and Wales No. 11274708. Registered office: Mulberry House, The Square, Storrington, W. Sussex, RH20 4DJ. VAI No. 938 6934 67. Regulated by the RICS (Royal Institution of Chartered Surveyors)

4) THE ECOLOGY OF KENT STREET AND MOATFIELD/KINGS LANE VERGES

This includes:

Toad migration

Remnants of ancient woodland with indicative plant species

Glow worms

Crested newts

Owl hunting grounds, barn, tawny and little owls

Rarer butterflies, moths and other Insects

TOADS

Every year between February and April frogs and toads migrate to the pond at 'Kings' on Kent Street to breed. They are UK BAP Priority species and specifically the migration is protected. They can travel several kilometres in the breeding season, mostly by road and the construction would kill them. Some males will sit in the road, or the tributary where it joins the pond at night, in order to be ready for the arrival of females, particularly all across Kent Street Lane. On the first warm damp nights of the year there can be too many to avoid driving over so there are always a few killed even on these very quiet roads. Often finding dead ones is how you know that they are on the move, but they also rear up in the headlights, so can be very visible. The Cowfold Stream tributary which runs across Moatfield Lane at the bottom of Oak Cottage garden, and on to where the males await females by Kings pond, is to be crossed by the open trench cabling (see map below) which risks stopping the necessary water flow so they may not breed all through the construction phase. Light pollution as well as noise and vibration of pumps during winter construction may stop them breeding all together. They have to move in the dark to avoid predators. In winter it will be dark before construction stops. I have drawn attention to this with Rampion 5 times in consultation responses and letters yet the first reply I have had which mentions them is that they are not surveyed on the cable route, despite the information given. It was also stated by letter that just notching the hedges will help them, which is hardly relevant as they migrate mostly on the roads (see letter included from Chris Tomlinson dated 26th May 2023 below).

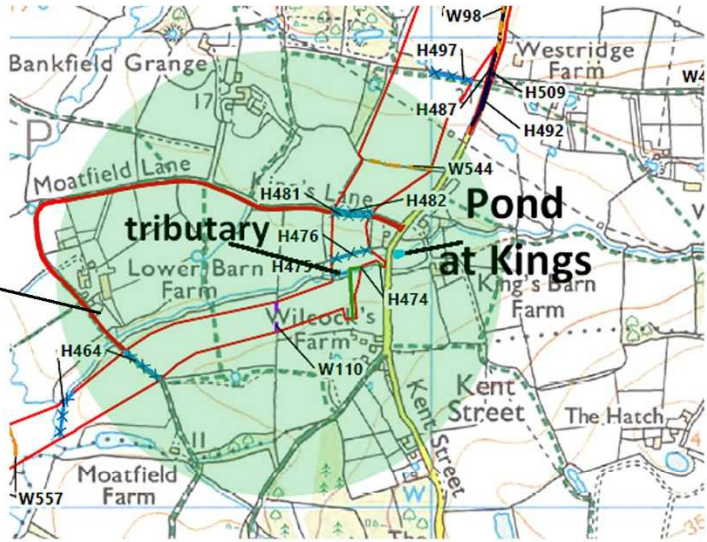
The DCO submission also says that toads do not need to be surveyed as no ponds are destroyed in construction, but if they are not considered how can mitigation include keeping the bisected tributary flowing, or even the breeding season be avoided altogether by construction? Surely this needs assessment?



Toad casualty on Kent Street by the pond at 'Kings' **14th February 2024**. This means that migration has started early due to warm damp weather.



Toad in the garden



Toad Migration every March on Kings Lane/Kent street right in cable construction route
Toads can be seen on roads at least as far away as indicated by green circle



patient male toad waiting in Kent Street tributary for females, nighttime March 2023



tiny toadlet leaving Kings pond
18th June 2023

There are toads in this area all the time and easy to find at night



toad in the potting shed

REMNANTS OF ANCIENT WOODLAND IN THE VERGES

The two cable trench crossings with haul roads destroy the verges of Kings/Moatfield Lane, which hold more meadow plants than the majority of adjacent fields (as these are cut early for hay and used for horse grazing). So much life exists at the edges of fields and woodland. At the Kent Street end of this private road early purple orchids, native bluebells, banks of primroses, cuckoo plants and meadow sweet grow on the verges to be crossed by construction vehicles and trench. Around Moatfield farm, dogs mercury grows out from the hedges (including in Oak Cottage garden), wood anemones have spread along the lane from Woodcock Shaw opposite Moatfield farm, There is a bank of wild primroses under the sign for Moatfield Farm in the cable route and lesser and greater stitchwort grow along the polo field edges in the cable route. These are all in the Woodland Trust's list of ancient woodland indicators.

Further indications of these lanes being remnants of ancient woodland are the proximity of spindle which grows all round here and wild service trees which are on Dragons Lane by the access routes at Cratemans Farm, Buckhatch Lane, the field opposite Moatfield Farm, and the field at the very end of Moatfield lane. Pendulous sedge grows in Buckhatch Lane. These are all indicator species for ancient woodland. Much of this would get destroyed by the change of soil put down by the haul road and access bridges. There is nothing like these undisturbed, private, single-track lanes in alternative routes.

Because of this rich plant life along the Lane we see many unusual moths and other insects (see photos). Moths particularly are being recognised as critical pollinators of plants. The construction will impact these with pollution, noise, light disturbance at HDD compounds and substation, and the obvious loss of habitat where haul roads and trenches cause tree, scrub, hedge and meadow loss. The alternative routes must be considered in more detail.

Indicator species of Ancient Woodland at edges of Moatfield/Kings Lane



native primroses and bluebells
on Moatfield laneside in cable route



Early purple orchids Kings Lane



Kings Lane meadowsweet, damp years



Native bluebells and greater stitchwort, Kings Lane



Dog violets and ground ivy



Wood Anemones at laneside,
Moatfield Farm in cable route



Spindle tree at Moatfield Lane edge



Pendulous sedge in Buckhatch Lane



Wild Service tree in Dragons Lane
by Cratemans Farm

Crested newts

I have seen these in my pond, at my front doorstep and in my kitchen (which most likely came out from under the suspended floor). I am adjacent to the cable route, my pond being at the closest point and a strip of flood meadow lies in between, which is likely where they forage and overwinter. Over the past years I have seen them many times, and have no doubt that they are still here. They have been added to the records in 2023, I have sent records and photos to RWE in 2021 and 2022. Although they have been found in the Oakendene area in Rampion surveys there were many errors, lack of equipment and inconclusive lab results so they are greatly underplayed (see Cowfold v Rampion LIR Biodiversity section) They were not conclusively found in Moatfield Farm pond and nobody asked me about my land or pond. Surely this is inadequate.



Tarry black lumpy crested newt on the driveway of Oak Cottage, Moatfield Lane adjacent to the cable route

Glow Worms

There are glow worms that breed in the lane right in the path of the cable. They have declined by 3/4 since 2001 and are a UK BAP priority species.

I recorded 9 glow worms in a Survey of Moatfield/Kings Lane 16th July this year, and I was still adding to the records on 15th September with a sighting right by the cable crossing in Moatfield Lane and close to an HDD compound. We believe that the impact of overnight lighting is not being considered enough during construction, this is known to stop glow worms breeding.



Images from 9th September and 15th September 2023

I have recorded badgers running along the lane 2023 year. They have set routes that they follow and if you return home at night, it is not uncommon to startle them somewhere on their foraging track (see detail below). I often see owls in the lane and have entered 5 tawny owls, 4 barn owls and a little owl into the records in 2023.

All the following insects were recorded as seen in Kings/Moatfield Lane, around the cable route.

Noise, vibration and lighting for HSDD Compounds at Moatfield and Cratemans Farms, 24 hour pumps to stop trench flooding etc will have an impact particularly on the nocturnal insect population here. It has been noted by Wineham Parish council that pumps were running continuously for 18 months during Rampion 1 construction.



Mottled sheildbug in Oak Cottage garden



Hummingbird Hawk moth. Photo C. Christian

Insects in Moatfield Lane around and across Rampion cable route



Beautiful demoiselle (female) by tributary next to cable



Emperor moth



Speckled wood

Elephant hawk moth



Copper underwing egg moth



Old lady moth



Glow worm

Silver Y moth



Banded demoiselle

White admiral



Cardinal beetle



iRecord Entries - Insects

| Insects | | ID | Species | Common name | Species group | Location | Map ref. | Vice county | Date | Recorder | Determiner |
|---------------------|----------|------------------------------|------------------------|-------------------------------|--------------------------------|-------------|------------|----------------|----------------|-----------------|------------|
| Accepted as correct | 33234597 | Rhaphigaster nebulosa | Glow-worm | insect - true bug (Hemiptera) | Moatfield Lane, Co. TQ22292143 | West Sussex | 10/09/2023 | Creaye, Janine | Creaye, Janine | Graeme Lyons | |
| Accepted as correct | 33234352 | Lampyrus noctiluca | Glow-worm | insect - beetle (Coleoptera) | Moatfield Lane, Co. TQ22442125 | West Sussex | 15/09/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32957833 | Lampyrus noctiluca | Migrant Hawker | insect - beetle (Coleoptera) | Moatfield Lane, Co. TQ22442124 | West Sussex | 09/09/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 32725864 | Aeshna mixta | Meadow Grasshopper | insect - dragonfly (Odonata) | off Dragons Lane, C TQ21882082 | West Sussex | 27/08/2023 | Creaye, Janine | Creaye, Janine | Simon Linington | |
| Not reviewed | 32724402 | Pseudochorthippus parallelus | Meadow Grasshopper | insect - orthopteran | off Dragons Lane, C TQ21962094 | West Sussex | 10/08/2023 | Creaye, Janine | Creaye, Janine | Creaye, Janine | |
| Not reviewed | 32398172 | Pseudochorthippus parallelus | Meadow Grasshopper | insect - orthopteran | off Dragons Lane, C TQ218207 | West Sussex | 31/07/2023 | Creaye, Janine | Creaye, Janine | Creaye, Janine | |
| Accepted as correct | 32397028 | Calopteryx splendens | Banded Demoiselle | insect - dragonfly (Odonata) | cowfold stream TQ21992041 | West Sussex | 26/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 31945938 | Pseudochorthippus parallelus | Meadow Grasshopper | insect - orthopteran | off Dragons Lane, C TQ21822079 | West Sussex | 26/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 31945734 | Pseudochorthippus parallelus | Meadow Grasshopper | insect - orthopteran | cowfold stream TQ21822079 | West Sussex | 18/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 31652904 | Calopteryx splendens | Banded Demoiselle | insect - dragonfly (Odonata) | Moatfield Lane, Co. TQ22282142 | West Sussex | 17/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 31652671 | Lampyrus noctiluca | Glow-worm [9] | insect - beetle (Coleoptera) | Moatfield Lane, Co. TQ22382130 | West Sussex | 16/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 31652582 | Pseudochorthippus parallelus | Meadow Grasshopper | insect - orthopteran | off Dragons Lane, C TQ21832077 | West Sussex | 10/07/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 31037732 | Pseudochorthippus parallelus | Meadow Grasshopper | insect - orthopteran | cowfold stream TQ21842072 | West Sussex | 21/06/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 31037144 | Pseudochorthippus parallelus | Meadow Grasshopper | insect - orthopteran | Moatfield Lane, Co. TQ22282142 | West Sussex | 22/06/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 31036928 | Calopteryx virgo | Beautiful Demoiselle | insect - dragonfly (Odonata) | cowfold stream TQ21882068 | West Sussex | 21/06/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 30695827 | Calopteryx splendens | Beautiful Demoiselle | insect - dragonfly (Odonata) | cowfold stream TQ22032086 | West Sussex | 02/06/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 30696074 | Calopteryx virgo | Beautiful Demoiselle | insect - dragonfly (Odonata) | cowfold stream TQ21952068 | West Sussex | 25/05/2023 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 30474791 | Calopteryx virgo | Beautiful Demoiselle | insect - dragonfly (Odonata) | cowfold stream TQ21932070 | West Sussex | 15/05/2023 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 29584031 | Dorcus parallelipipedus | Lesser Stag Beetle | insect - beetle (Coleoptera) | Cowfold, West Suss TQ224612085 | West Sussex | 23/07/2022 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29629533 | Lampyrus noctiluca | Glow-worm | insect - beetle (Coleoptera) | Moatfield Lane, Co. TQ22452120 | West Sussex | 29/07/2021 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29595498 | Calopteryx virgo | Beautiful Demoiselle | insect - dragonfly (Odonata) | cowfold stream TQ21912068 | West Sussex | 01/06/2021 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29629498 | Lampyrus noctiluca | Glow-worm | insect - beetle (Coleoptera) | Moatfield Lane, Co. TQ22412128 | West Sussex | 12/07/2020 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29590853 | Pyrochroa serraticornis | Common Cardinal Beetle | insect - beetle (Coleoptera) | cowfold stream TQ21942066 | West Sussex | 03/06/2020 | Creaye, Janine | Creaye, Janine | | |
| Not reviewed | 29629575 | Pholidoptera griseoptera | Dark Bush-cricket | insect - orthopteran | Moatfield Lane, Co. TQ22272144 | West Sussex | 29/08/2018 | Creaye, Janine | Creaye, Janine | | |
| Accepted as correct | 29629547 | Libellula depressa | Broad-bodied Chaser | insect - dragonfly (Odonata) | Moatfield Lane, Co. TQ22322139 | West Sussex | 24/05/2009 | Creaye, Janine | Creaye, Janine | | |

5) **GREEN LANE** dating over 150 years with veteran oaks, field maples and hawthorn, would be cut through by cable construction

There are 22 trees in the cable construction crossing here as marked in the DCO order limits, at least 11 of which are marked to be removed in the centre. 5 are significant oak trees of over 2.5M girth, but the greatest significance is the continuity of this wildlife corridor that comes directly from Buckhatch Lane which can be dated to before 1649 (there is documentation on it being repaired then).



Photos showing wildlife corridors of badger/deer path, ditch and bank boundary

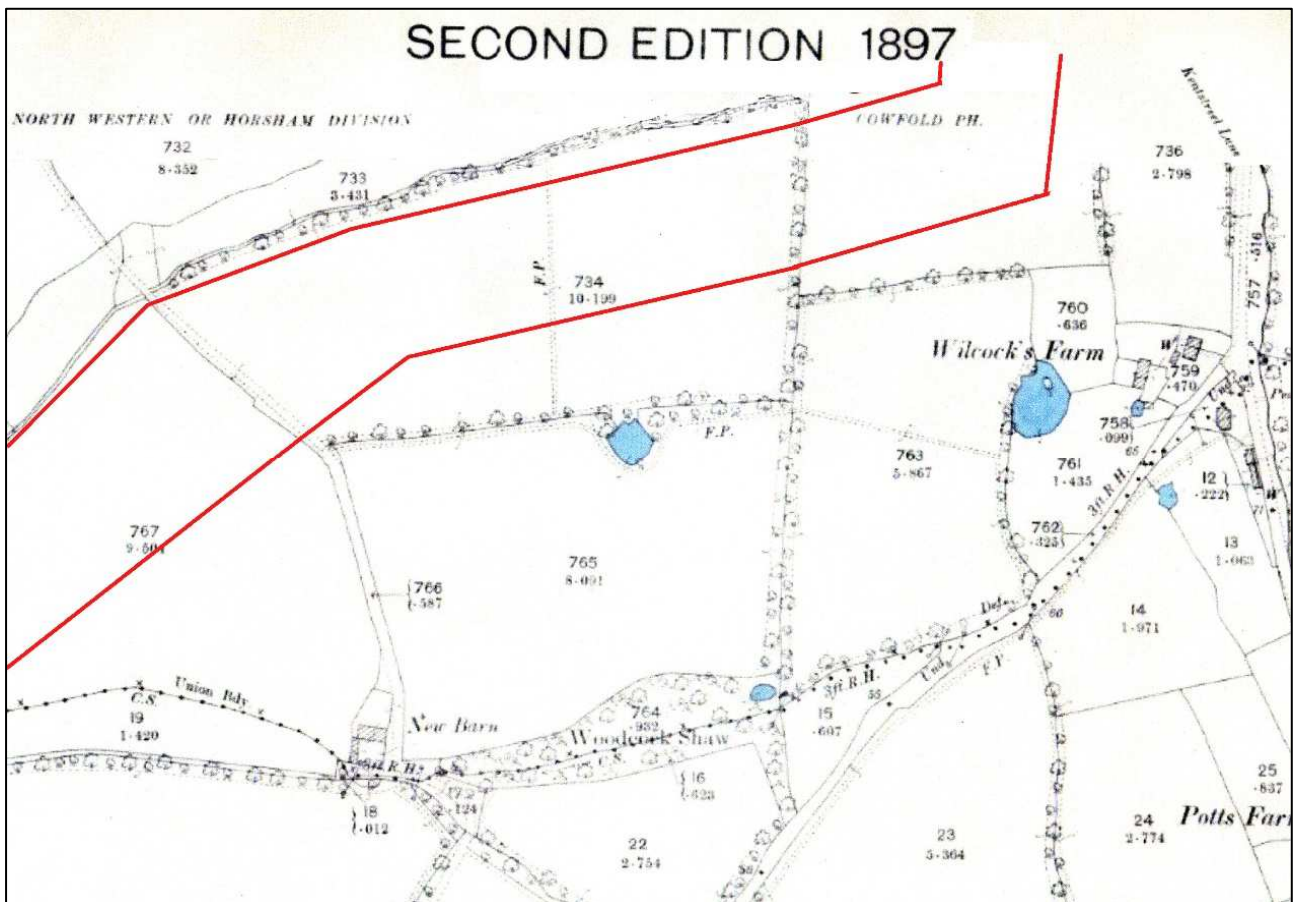


This oak to the left is in the centre and will be cut down. The ditch path bisected by the cable trench.



Tree Boundary/Green Lane between Moatfield Lane and Wilcocks Farm on Kent Street, marked for tree loss

This map shows the density of trees and the wildlife corridor coming from Buckhatch Lane, across Woodcock Shaw



The Green Lane is on a further map in Horsham Library dated between 1843 - 1892 Map Centre Ref: 522657, 121288



Landscape character of double tree boundary, 30m of the centre would be removed

Green Lane Double Tree Boundary - 'trees to be removed'



Perry Hockin of Arborweald suggests that these trees are likely to be much older as they have all grown very close together and show many other indicators of age

The trees in the DCO documentation are group labelled as G35 and although they are ringed by a green line indicating category A 'high quality' no mature oaks or single trees are marked out which fails to draw attention to their maturity, veteran features and wildlife value. On less detailed maps they are not even indicated as being woodland.

Woodland Trust says that a Veteran tree is: A tree with habitat features such as wounds or decay.

'Key habitat features of a veteran tree:

Evidence of decay processes, such as hollowing in the trunk, fruit bodies of fungi known to cause wood decay and cavities or rot holes (eg. where limbs have broken off or bark is damaged).

Significant amounts of dead wood: many dead limbs or branches (larger than 20cm in diameter) in the crown or fallen.'

Trees with such veteran features are shown in the photos below and are all in the cable path. I have drawn attention to this boundary, and wildlife corridor in each letter to RWE. Although Rampion have surveyed the trees as category A High Quality Trees in the DCO maps, no mitigation has been put forward, nor mention of its history, landscape or value as an ecological corridor. The field this is viewed from has been the site of annual charity polo events, the backdrop being the beautiful tree boundaries. The loss is unnecessary but nobody will discuss mitigation, see letters below.

There is an active badger sett in the middle of the cable construction path (see badger section below) and often when I take people to survey this site there are deer running through as we arrive, as witnessed by Perry Hockin (ecological survey October 2023), Geoff Hunt (nightingale surveys June/July 2023) and Chris Skinner undertaking the badger survey in May 2023.



Animal track



Moatfield Lane deer

Most deer here are roe deer. They are a common sight any time of day. I don't record them except as photos

Green Lane Trees with veteran features



Hollows in hawthorn

Oak tree with double trunk, branches bending to the ground and hollows in trunks at the base



Hawthorn hollow trunks

Oak with triple trunk and fungi with fruiting bodies at the base



Hawthorn with split and hollow trunk



At least 138 year old oak with dead lower branches bent to the ground but well alive at the crown



6) **BADGERS INCLUDING SENSITIVE INFORMATION ABOUT LOCATIONS**

I don't believe it is adequate to just move badgers where the sett is in the path of the cable construction as has been stated by RWE at drop in events. If the wildlife corridor is well established there is a lot more at stake than one family, it is part of a territory for a community. I commissioned a survey in 2023 from qualified professionals (see below). A whole area is undisturbed badger territory. There is a major sett in

[REDACTED]

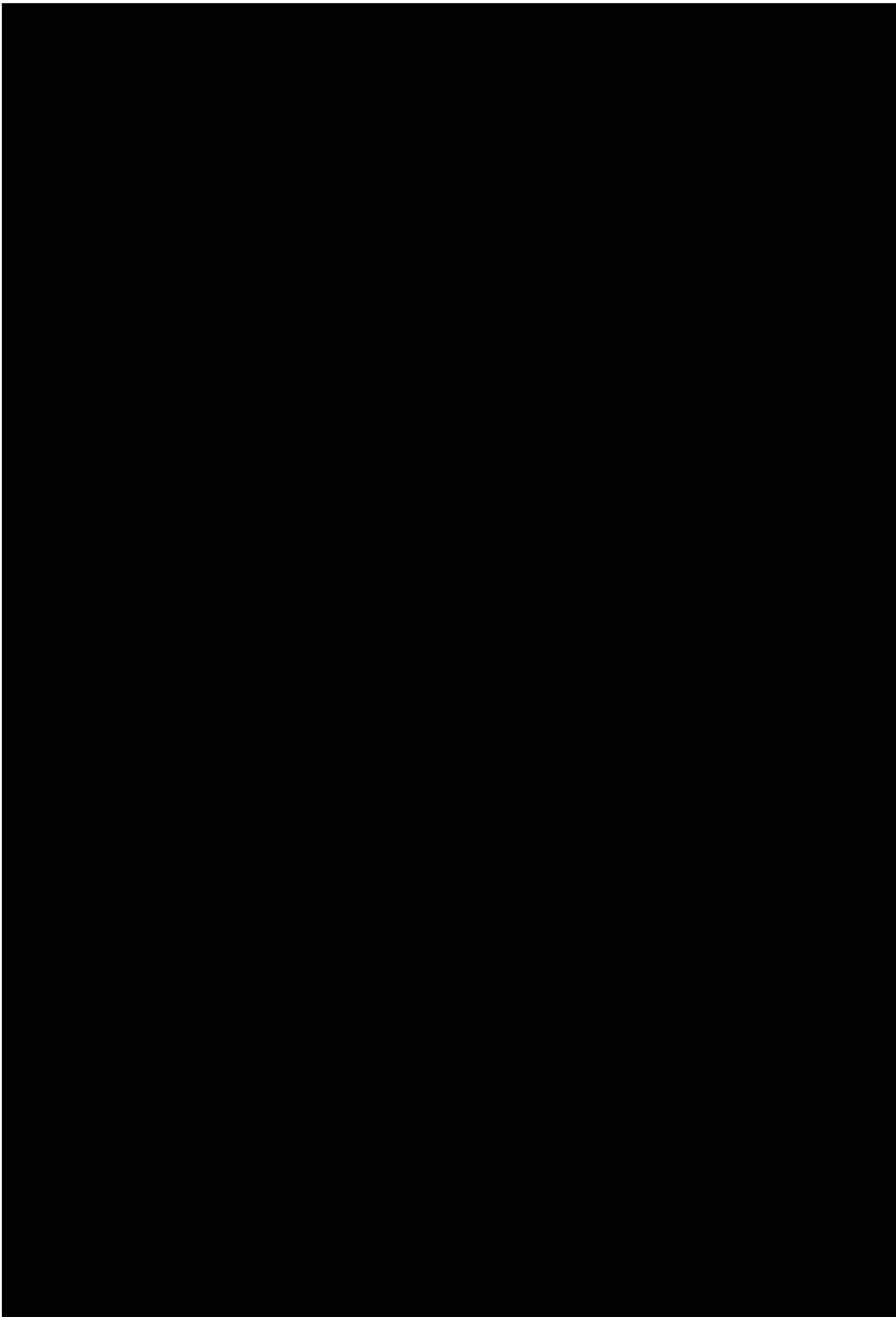
Badger footprints near sett and claw marks on fallen tree [REDACTED]

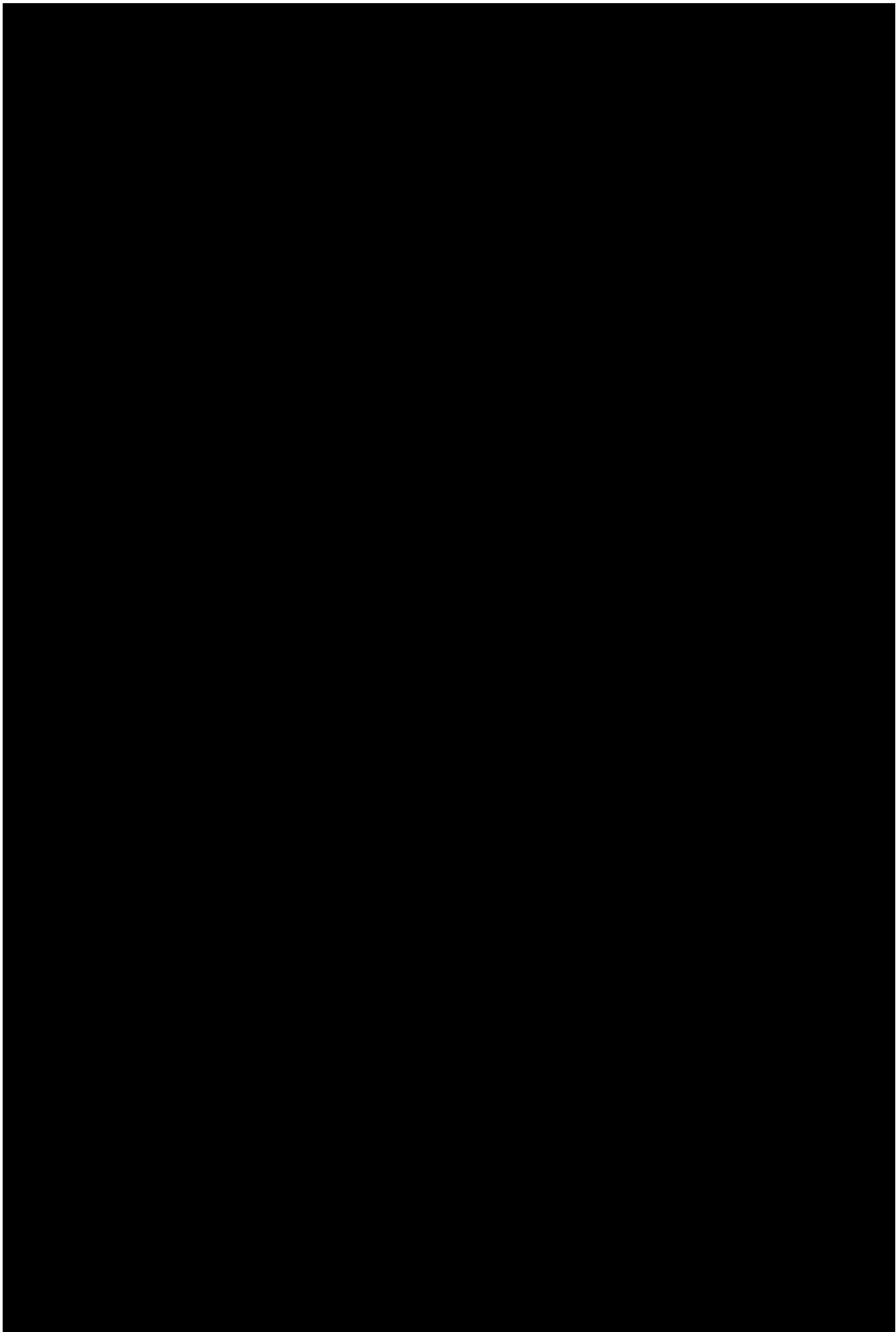


Photo P Lightburn at [REDACTED] May 2023



Photo R Finlay at [REDACTED] photo 2022





[Redacted text block]

[Redacted text block]

[Redacted text block]

- [Redacted list item]

- [Redacted list item]

- [Redacted list item]

- [Redacted list item]

5. [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

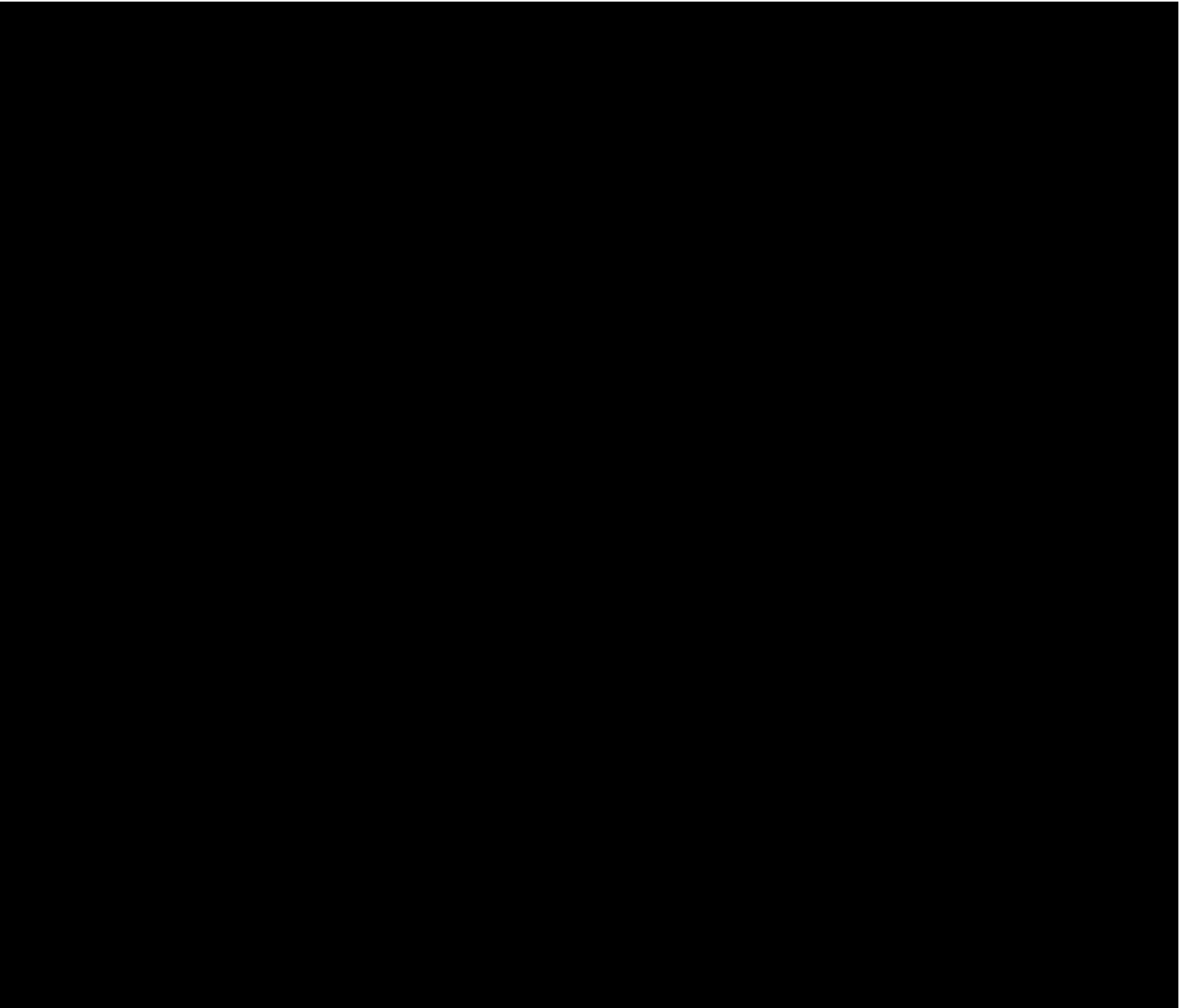
[Redacted]

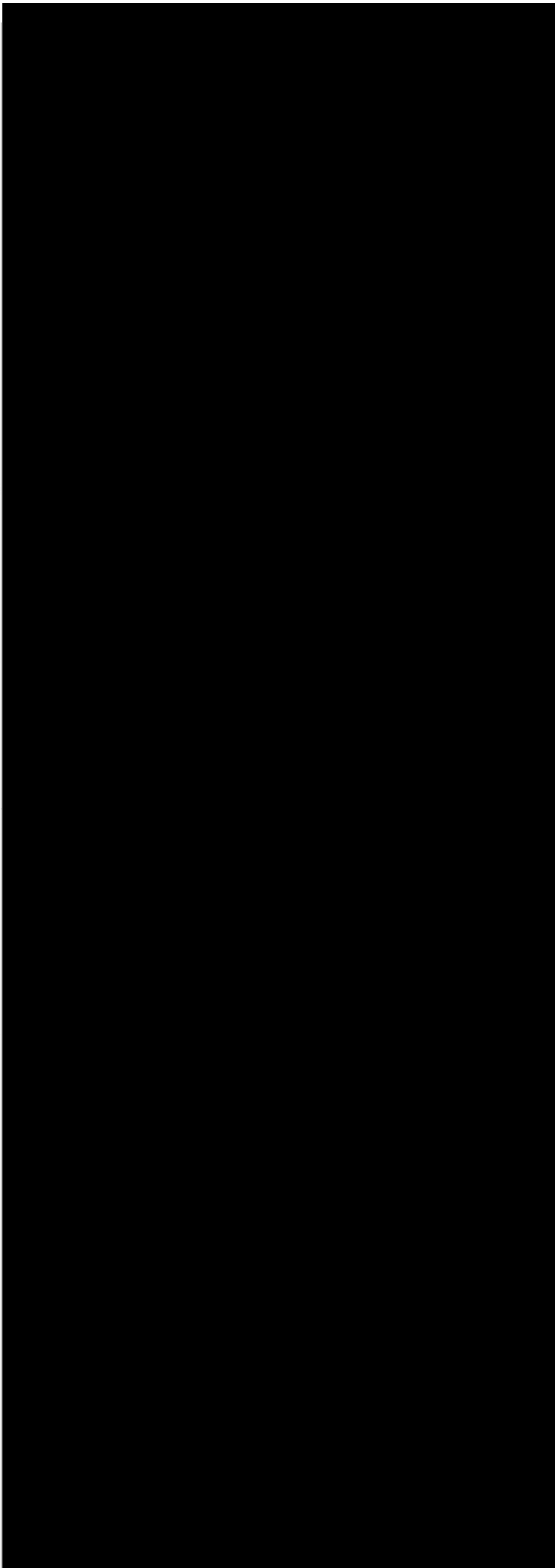
Other wildlife seen: a roe doe *Capreolus capreolus*, was startled by us during our survey and ran across the meadow at 16:25; a pair of buzzards *Buteo buteo*, circled overhead; c6 nightingales *Luscinia megarhynchos* were heard in the late morning whilst on survey.

Conclusion

[Redacted text]

[Redacted text]





7) REPTILES

We found so many slow worms and grass snakes next to the cable route that we have entered 15 new entries into the records for 2023 (both in decline and UK Priority Species). We have good evidence of adders which are deemed to be under threat of extinction in the next 20 years. The landowner of Crateman's farm says that he has handed the shed adder skins to relatives in past years. I have photographed a dead adder on the path by Crateman's pond, my neighbour (Andrew Porter) on Moatfield Lane has seen adders on his compost heap adjacent to the cable route.

These reptiles breed in the same sites year on year and it is thought to be human disturbance as well as loss of habitat which is causing this critical decline. They are very susceptible to vibration disturbance and there is a Rampion access/materials compound proposed to be set up next to their breeding site. I have been drawing attention to this with RWE since I sent records in 2021 but I had confirmation that reptiles are not surveyed in the cable route by James Alexandro 23rd December 2022, and again by Chris Tomlinson in 26th May 2023 writing 'desk study is normally considered sufficient for the cable route' (see letters below). So how can these vulnerable threatened species be protected if they are not even acknowledged or their breeding sites identified? Does 'green energy' have to destroy the BAP protected wildlife in its path, particularly when there were less damaging options available?

iRecord Entries - Reptiles and Amphibians

| Reptiles | | Amphibians | | | | | | |
|-------------------|------------------------------------|--------------------|--------------------------------------|------------|-------------|------------|----------------|---------------|
| ID | Species | Common name | Species group Location | Map ref. | Vice county | Date | Recorder | Determiner |
| Accepted a | 31945972 <i>Anguis fragilis</i> | Slow-worm | reptile Kings end, Cowfold | TQ22442047 | West Sussex | 26/07/2023 | Creaye, Janine | |
| Accepted a | 31945786 <i>Anguis fragilis</i> | Slow-worm | reptile Kings Lane, Cowfold | TQ22442048 | West Sussex | 20/07/2023 | Creaye, Janine | |
| Accepted a | 31282560 <i>Natrix helvetica</i> | Grass Snake | reptile off Dragons Lane, Cowfold | TQ21772102 | West Sussex | 01/07/2023 | Creaye, Janine | |
| Accepted a | 31175864 <i>Anguis fragilis</i> | Slow-worm | reptile Kings end, Cowfold | TQ22452048 | West Sussex | 26/06/2023 | Creaye, Janine | |
| Accepted a | 31161883 <i>Natrix helvetica</i> | Grass Snake | reptile off Dragons Lane, Cowfold | TQ21772102 | West Sussex | 27/06/2023 | Creaye, Janine | |
| Accepted a | 31037461 <i>Anguis fragilis</i> | Slow-worm | reptile Kings end, Cowfold | TQ22442048 | West Sussex | 21/06/2023 | Creaye, Janine | |
| Accepted a | 31037759 <i>Anguis fragilis</i> | Slow-worm | reptile Kings Lane, Cowfold | TQ22442048 | West Sussex | 15/06/2023 | Creaye, Janine | |
| Accepted a | 31036773 <i>Natrix helvetica</i> | Grass Snake | reptile Moatfield Lane, Cowfold | TQ22442048 | West Sussex | 10/06/2023 | Creaye, Janine | |
| Accepted a | 30695971 <i>Natrix helvetica</i> | Grass Snake | reptile Kings Lane, Cowfold | TQ22442048 | West Sussex | 05/06/2023 | Creaye, Janine | |
| Accepted a | 30695957 <i>Anguis fragilis</i> | Slow-worm | reptile Kings Lane, Cowfold | TQ22442048 | West Sussex | 03/06/2023 | Creaye, Janine | |
| Accepted a | 30633324 <i>Anguis fragilis</i> | Slow-worm | reptile Kings Lane, Cowfold | TQ22442048 | West Sussex | 03/06/2023 | Creaye, Janine | |
| Accepted a | 31176018 <i>Anguis fragilis</i> | Slow-worm | reptile Kent Street, Cowfold | TQ22682058 | West Sussex | 25/05/2023 | Creaye, Janine | Robert Finley |
| Accepted a | 31176018 <i>Natrix helvetica</i> | Grass Snake | reptile Moatfield Lane, Cowfold | TQ22302144 | West Sussex | 17/06/2017 | Creaye, Janine | Andrew Porter |
| Accepted a | 29590780 <i>Vipera berus</i> | Adder | reptile Moatfield Lane, Cowfold | TQ22 | West Sussex | 12/07/2016 | Creaye, Janine | |
| Accepted a | 31176036 <i>Natrix helvetica</i> | Grass Snake | reptile Moatfield Lane, Cowfold | TQ22192151 | West Sussex | 03/07/2016 | Creaye, Janine | Andrew Porter |
| Accepted a | 29595226 <i>Anguis fragilis</i> | Slow-worm | reptile Moatfield Lane, Cowfold | TQ22302143 | West Sussex | 15/04/2011 | Creaye, Janine | |
| Accepted a | 29590713 <i>Natrix helvetica</i> | Grass Snake | reptile Moatfield Lane, Cowfold | TQ22292142 | West Sussex | 02/09/2006 | Creaye, Janine | |
| Amphibians | | | | | | | | |
| Accepted a | 32725999 <i>Bufo bufo</i> | Common Toad | amphibian Moatfield Lane, Cowfold | TQ22292143 | West Sussex | 28/08/2023 | Creaye, Janine | |
| Accepted a | 31175853 <i>Bufo bufo</i> | Common Toad | amphibian Kent Street, Cowfold | TQ22912153 | West Sussex | 18/06/2023 | Creaye, Janine | Robert Finley |
| Accepted a | 29667422 <i>Bufo bufo</i> | Common Toad | amphibian Kent Street, Cowfold | TQ22922153 | West Sussex | 17/03/2023 | Creaye, Janine | |
| Accepted a | 29590828 <i>Bufo bufo</i> | Common Toad | amphibian Moatfield Lane, Cowfold | TQ22292145 | West Sussex | 12/04/2022 | Creaye, Janine | |
| Accepted a | 29595218 <i>Bufo bufo</i> | Common Toad | amphibian Moatfield Lane, Cowfold | TQ22262143 | West Sussex | 30/06/2021 | Creaye, Janine | |
| Accepted a | 29590636 <i>Anura</i> | frogs and toads | amphibian Kent Street, Cowfold | TQ22932159 | West Sussex | 11/03/2015 | Creaye, Janine | |
| Accepted a | 29587903 <i>Triturus cristatus</i> | Great Crested Newt | amphibian Moatfield Lane, Cowfold | TQ22272143 | West Sussex | 27/05/2010 | Creaye, Janine | |

Snakes at Cratemans and Moatfield Lane, in cable construction area
Uk Priority species, adders threatened with extinction in 20 years



Adder found killed on footpath, Cratemans Farm



Grass snake 27th June 2023, Cratemans



Grass snake, Lower Barn Farm
Moatfield Lane



Grass snake, Moatfield Lane, June 2023



Grass snake,
Oak Cottage, Moatfield Lane 2006



Grass snake, Cratemans 1st July 2023



Grass snake's shed skin
found June 2023

Slow-worms around Moatfield Lane



21st June 2023



27th June 2023



April 2011 at Oak Cottage



26th July 2023



3rd June 2023



20th July 2023

8) LOSS OF OAK TREES, AND THORNY SCRUB

The 5km extended route incurred by this Substation site choice loses many more mature oaks (many over 200 years old) and masses of dense thorny scrub and hedgerow which is critical to why it is habitat for so much biodiversity. No alterations or mitigations to this route have been discussed with the public or statutory consultees as the only consultation to follow the selection of substation site focussed on showing alternatives to the established sections from Climping up, which had been receiving responses since 2021. No images were given and no alterations to routes were on offer for the substation section. Many impacted local people only heard of the whole proposal at this final consultation so could not have made objections or be heard by this stage. Residents at the end of Kings Lane did not receive any direct correspondence on the Rampion proposals until early 2023 long after the final consultation had closed.

The maps from Annex 2, Arboricultural Impact Plans which were finally provided at the DCO submission are difficult for landowners and residents to assess, as much of the tree loss is grouped under one copse number and having assessed the Green Lane in some detail, I know that this can involve very significant oak trees and at least 11 in number in one cable crossing alone. Some of the land used has no public footpaths, so is difficult to access, unless much more time can be spent obtaining permissions. But taking an estimate of this tree loss, 19 tree groups have areas marked for removal in this section Gratwicke to Bolney Substation. This could represent the loss of 76 trees, and of this, 8 groups are marked as 'high quality' which could represent 28 of those trees being good oak trees. There are 38 trees marked individually for loss, of this 14 are assessed as 'High Quality'. That would mean the loss of at least **46** high quality trees and **114** trees in total incurred by this substation choice alone, particularly because it is the longest cable route. This in no way covers the loss of scrub and more importantly continuity of habit/animal breeding sites which are impacted by the losses in this area.

Oakendene location

By far the worst loss of individual trees is at Oakendene, many of which are oaks and some show many notable 'veteran' features (as described by the Woodland Trust above). These include dead branches left in situ, hollows making wildlife homes and fruiting fungi on the bark. Two notable trees which are marked for removal are labelled T265 with a girth of 390cm, so around **200 years old**, and T262 at 420cm girth and around **220 years old** (see images below). Other significant trees at this site are T281, T279, T273 T270 all over 100 years old and the latter being nearer 140 years old. Each oak is a whole ecosystem in the landscape and each a potential home to over 2,300 wildlife species.

Moatfield Lane and Green Lane (See two sections above).



Boundary off Moatfield Lane centre section for removal

Cratemans

The difficulty of reading this information is particularly notable at Cratemans. The inset plans 39 and 43 for this shows 5 areas of red for removal, but each tree is grouped together with all the density of scrub and no separate trees picked out. However this removal decimates the most wildlife rich location in the whole Oakdene approach section. One boundary simply marked G263 has a drainage channel between areas of tree and scrub which are around 6-8 metres thick. Add to this the trenchless crossing compound in the middle of the highest quality unimproved lowland meadow, and a haul road in the adjacent one causing the tree boundary to be cut through for access, the farm's historic and biodiverse qualities are likely to be decimated. Around each tree boundary is dense scrub which will also be lost in the process.

Again, we cannot emphasise enough the wildlife value of this scrub habitat. From Joint Nature Conservation Council REPORT 2000 Thorny Scrub:

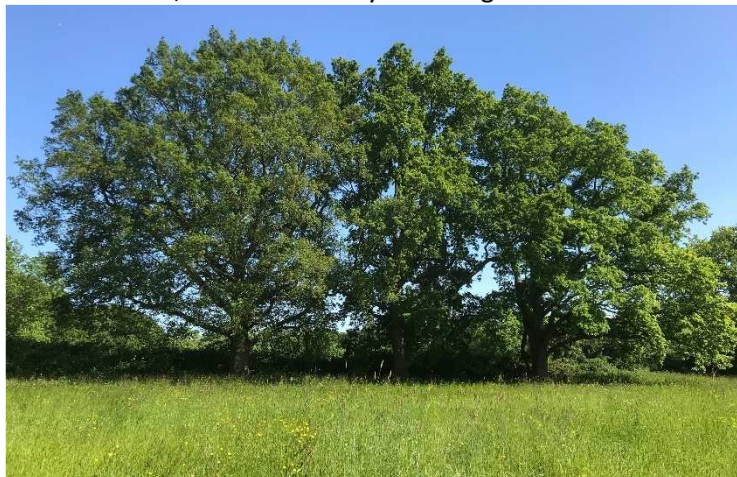
Although under-researched to date, 'Scrub is recognised to have considerable nature conservation value, both in its own right and as a habitat for flora and fauna...Many priority species in the UK Biodiversity Action Plan depend on scrub.'

Oakfield Farm field

Has tree boundaries on two sides which have great landscape and ecological value and are cut through by open trenching (inset map 44). For a single site this has a disproportionate impact. No detail was given until submission and still it is unclear how many trees are lost because they are largely just labelled as tree groups albeit one group to the East recognized as High Quality.



Oakfield Farm field, North boundary including oaks and horse chestnuts



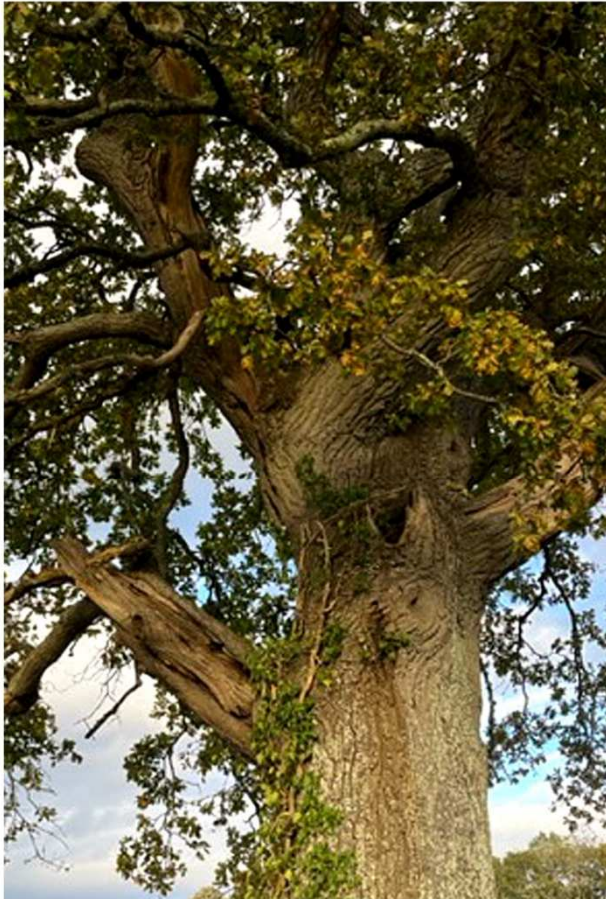
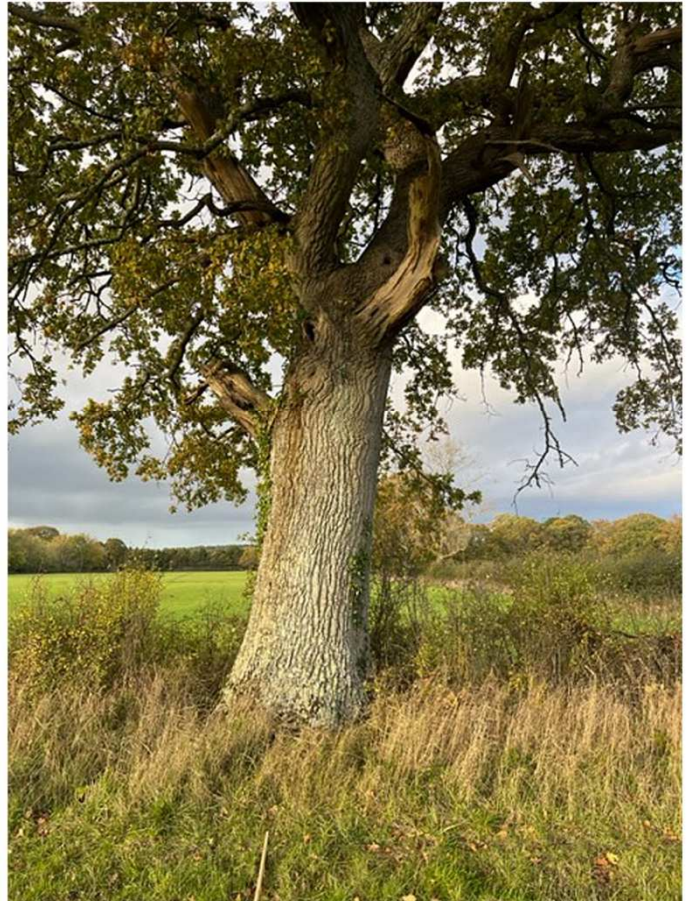
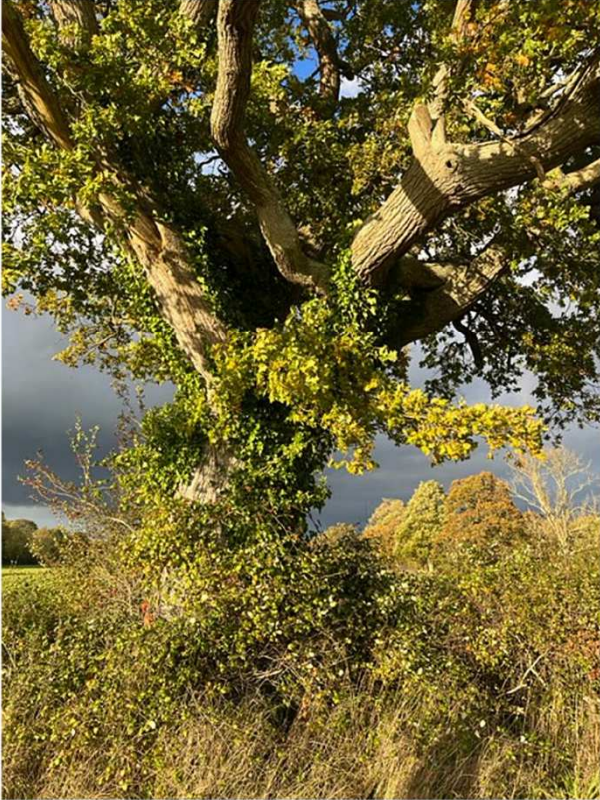
Oakfield Farm, East side tree boundary oak trees

Rampion 2 Tree loss (with scrub damage or loss) in the Cable route from Gratwicke to Oakendene and Oakendene to Bolney Substation
 From Annex 2: Arboricultural Impact Plans. Inset 38, 39, 43, 44, 47

'TO BE REMOVED'

| Location of losses | Single tree High Quality | Single tree Moderate Quality | low | Tree Group High Quality | Moderate Quality | Low quality | Scrub/comments |
|---------------------------------|--|---|------------------|-------------------------|---------------------------------------|-------------|--|
| Gratwicke | | T542, T529, T530 | T478 | G430 | G400 | | G349 low quality is mowed under. Why? |
| Crateman's Farm | | | | | G251, G263 G265 G270 G271 | | Haul road tree boundary Drain + 6-8m thick scrub With dense scrub Scrub and 3 trees Tip of dense scrub |
| Moatfield Farm | | | | | | | Managed hedge loss only |
| Bakers polo field/Wilcocks Farm | | | | G35 G27 | | | 11 trees almost all oaks Double tree boundary |
| Kings Lane (10 properties) | | | T56 | | | | Hedge and verge wildflower loss. Visible to lane at four places |
| Taintfield Farm | | | | G264 | | | Difficult to assess tree loss as grouped |
| Oakendene | T337, T279, T275, T271, T270, T265, T262, T259, T255, T250, T247, T329, T318 | T281, T277, T261, T230, T328, T327, T326, T325, T324, T280, T303, T299 | T331, T344, T340 | G257 G215, | G197 | | 13 high quality trees and 12 deemed moderate 3 poor 2 high quality tree groups 1 moderate |
| East of Kent Street | T296 | T239, T238, T288 | | G132 | | | Difficult to assess group |
| Eastridge Park Stud | | | | | G142, G147 | | Difficult to assess group |
| Oakfield Farm field | | T224 | | G155 | G154 | | Two visual boundaries of trees destroyed |
| West Wineham Lane | | | | | G218 | | Difficult to assess group |
| Totals | 14 + 19 + 5 = 38 individual trees | 8 + 11 = 19 Groups. Propose 4 each = 76 [One group known to lose 11 High quality] | | | | | Minimum loss 114 trees 46 'High quality' |

Oakendene trees with veteran features of hollows and dead limbs, but healthy growth
T265 and T262



The psychological impact on local people is underplayed in these proposals. What is not considered is the lifestyle of people in this area. They have farms and horses, gardens, studios and workshops that they work in. They are often outdoors a lot of the day, all year round. It is not just a visual impact that effects human health and wellbeing, our lives are already ruined by these proposals. Another group of people come from the residential areas of Cowfold where pollution is high due to the traffic build up on A272 and A281, to enjoy quiet walks in the countryside. A further group of people come from further afield in Sussex and enjoy guided group walks through these meadows. The monks from St Hughes monastery regularly walk through in their white robes and wellingtons. The anticipation of noise, vibration, vehicle activity where it is so quiet and the industrialisation of such a rich biodiverse area has meant that the impact has long begun on mental health for all these people. The anticipation that the footpaths will be closed for years is devastating to people's way of life. Many people who choose to live out in the countryside here are middle to older age and the prospect of over 10 years of disruption to the area is devastating. A large part of this is the contemplation of permanent loss of trees, landscape and biodiversity when we are hearing daily about climate change and how to counter it. The turbines only last 25 years. The tree, habitat, wildlife loss is for many more decades. This planet cannot afford this for the sake of electricity for a set number of people for a short while. There are better locations and better options.

TIMETABLE OF CONTACT WITH RWE

| | |
|---|--|
| 2/8/2021 | I found a planning notice on a pole in Frylands Lane where one of the cable options would cross. None of my neighbours had heard about the Rampion 2 proposals. |
| 14 th July – 16 th September 2021 | First consultation on Rampion Expansion including the 6 cable route options to the substation. Neighbours presumed it would follow Rampion 1 route. |
| 16 th August 2021 | Submitted written response to consultation Ref #00001916 (see below) |
| 23 rd August | I posted information to add to biodiversity surveys addressed to RWE and Carter Jonas. This comprised a statement including flood information, 51 photos of significant/BAP priority wildlife with location list, and 10 recordings of nightingales singing, in or adjacent to the cable route. |
| 2 nd September | Site visit with Eleri Wilce of RWE and Lucy Tebbut of Carter Jonas and walk round cable route option near the Cowfold Stream. They had little idea about the nature of the location and particularly the flooding patterns. They promised to send me the report on the meeting and the additions to the biodiversity surveys made. |
| 22 nd September 2021 | Emailed Eleri Wilce to chase up report of our meeting. No reply. Eventually I found that Eleri was no longer working on the project. I never received any report or response to this email. |
| 14 th July 2022 | Oakendene/Kent Street option chosen. |
| 21 st July 2022 | Option announced in a one column text only article in West Sussex County Times |
| 12 August 2022 | I wrote to James D'Alessandro at RWE. No reply. |
| 18 th October – 29 th November 2022 | Rampion 2: Public Consultation about 'onshore cable route alternatives and modifications' Submitted response and sent further images by post |
| 11 th November 2022 | Ashurst Rampion 2 drop in event. I spoke to Rob Gully – Senior consents Manager. Told him that nobody had replied to my letter of August. |
| 24 th November | Sent further recordings and maps directly to RWE to add to consultation. Also submitted formal consultation response |
| 28 th December 2022 | Reply from James Alessandro dated 23 rd December after consultation end. Says little but that nightingales have been noted round Cowfold Stream. No copies of environment reports. |
| 31 st March 2023 | Replied to James Alessandro |
| April 2023 | Final residents at Kings/Moatfield lane end receive first maps and information on Rampion 2. One household had not even received leaflets before. |
| 4 th April | Section 42 letter received about Moatfield Lane being required for 'Operational use' for Rampion 2 No explanation as to what that meant. No reply to email |
| 6 th May | Own Response to Section 42 consultation above by email. Drop in event Royal Oak Wineham About extension to Bolney substation Asked why no response to my letter date 31 st March to James Alessandro. She said she would prompt. Spoke to new Rampion staff about lack of response to letter and why reinstatement was so poor even to date after Rampion 1 and how there would be improvements this time. No reply. |
| 16 th June | Chris Tomlinson replies to my letter to James Alessandro by email. He details how protected wildlife of toad migrations, reptiles breeding sites will not be surveyed in the cable route and that red list bird species like nightingales and cuckoos are not considered separately to any other breeding birds. surveys will be released only at DCO submission |
| 21 st June | Drop in event at Allmond Centre Cowfold. First event from Rampion showing anything on the substation – the only permanent above ground element of the onshore construction. All formal consultation finished in November 2022 |
| 26 th June 2023 | My reply to Chris Tomlinson |
| October 2023 | Planning notice put up on lane end on use of Kings/Moatfield Lane for Rampion 2 construction. Statement on compulsory purchase of land strip across lane. No direct communication with residents of the 10 households affected. Residents seek legal advise. |

Consultation 1 response submitted 16/8/2021 reference #00001916

Rampion 2 Bolney Road/Kent Street substation cable route option

This option of Rampion cable route is devastating for many reasons. The main reason is destruction of habitat, wildlife and biodiversity and the continuity that supports the survival of a number of endangered species (that are not mentioned anywhere in the PEIR report that we can see). The second is issues with road access on the A272, to and from Kent Street, and on our private road, which would be crossed twice. The third is disruption to access for local people for wellbeing, exercise, including noise disturbance to people working in the area.

We do not believe existing wildlife surveys have covered this area, to some extent because much of it is private land, and it hasn't had cause to come to the attention of campaign groups who may have already commissioned such studies. So 'desk study' mentioned in the PEIR report is not going to give much accurate information. The people undertaking the surveys have only visited the sites a very few times and have not asked landowners or local people to share their knowledge. So we question how any understanding for example of adder, nightingale, cuckoo or turtle dove presence and behaviour can be put forward.

Habitat and wildlife loss

I believe that the location of this cable route is an invaluable habitat of undisturbed hedgerow, blackthorn scrub, lichen and interconnected flood meadow. All along the Cowfold Stream on its way to the river Adur, including the tributaries that join in to it across Moatfield Road, is such a special habitat for wildlife, which spreads far beyond the immediate borders of these water courses. This pocket of land shares many elements with Knepp Castle's 'Wilding' project, yet it has not been a monitored process, but has just been left for flood meadow, grazed or cut for hay for decades. It has not needed rewilding. The undisturbed nature of the soil, trees and hedgerows is a benefit for carbon storage that will also be lost with this process. There are so many endangered species that are still in this habitat which will vanish with ongoing disruption of 50m wide swath of cable-laying construction over years (as it has taken for Rampion 1). There are nightingales (red list 91% decline in 40 years), cuckoos (65% decline since 1980's), sky larks, great crested newts, turtle doves, purple hairstreak butterflies, adders and grass snakes, wild service trees and much more, but all in this little area that Rampion would destroy to get cables to the new substation if was sited at Oakendene.

Nightingales

We are in hotspot for nightingales all along and even across this proposed cable route option. Yet they are not even mentioned in the PEIR report. They compete in song every year (including this year) from April through to mid July, in the same sites, where other sites across Sussex have gone silent. Last year there was a great loss of valuable blackthorn scrub (around 5m depth and 3m high and hung through with moss and lichens) all along the Gratwicke side of the Cowfold stream because the newest owners did not consider wildlife. In the last 10 years all through Taintfield Wood the ground level scrub was taken out (possibly for duck shooting) which completely stopped the nightingales which had converged to breed in that wood over many previous years. They need dense low-level scrubland to continue breeding as they create nests only just off the ground. This has compressed their range into a smaller space around us to the end of our garden and around the hedgerows of the fields opposite – just where this Rampion option would disrupt for years and in parts destroy these last quiet areas of habitat. They eat insects, and the destruction of the adjacent meadows even in the short term could take their food supply away and would mean that they don't breed as well and so fewer return the next year. I have over 20 short sound recordings of nightingales from different years and many from earlier this year made at the end of our garden in Moatfield Lane, along Crateman's field edges and all along the Cowfold stream in the blackthorn at the edges. I have marked a map

with the distribution and I have a photo of a nightingale near the Cowfold Stream just by where the route is proposed to go. Photos are only possible where there is enough competition to breed that the males sing high up in the bushes to make sure they can attract a mate and claim the best territory possible. They will struggle to be heard over construction machinery.

Turtle doves can be heard by the cowfold stream, and along the flood area at the end of our garden well into the summer. This little area also was host to only **cuckoo** that arrived this year after previous years of there being so many. These will decline further if the habitat continuity is lost by taking out all these metres of complex hedgerow pattern around the large width of cable construction. If they each fail to breed, they decline further in numbers and are unlikely to return. Even if hedgerow is finally replaced it would take many years to get it to the density which is needed for this breeding habitat.

What would be the loss of **oak trees** in this process? So many grow within the hedgerows they would not all be avoided in the construction process and yet each is an irreplaceable ecosystem. They grow in symbiosis with fungi, insects and caterpillars, which then support bird breeding etc. We have **purple hairstreak** butterflies in one of our oaks each year – there must also be others in the cable route as it runs adjacent to our property. On the cable route, the boundary of Wilcox Farm and the Taintfield polo field is entirely made up of a double row of oak trees with a drainage ditch between. If these are not moled underneath for cable laying they will be lost and cannot be replaced in our lifetime, even with the stated intentions of putting habitat back or better. Would drilling under disturb the tap roots and the trees die anyway? This is just not the route to choose.

This is also a hotspot for **crested newts**. These have been in our pond, under our suspended floor, on our doorstep and come to us across the flood area between our garden and the field where these cables are proposed to come through. These are endangered and protected by law.

Toads migrate to a breeding site in the property 'Kings' every March and are already seen crushed on their journey as far away as Park Farm on Moatfield Lane and beyond Wilcox Farm on Kent Street. The cable route goes right across this toad super highway. I have some photos of this event. With years of construction going across Kings lane and Moatfield Lane and an increased number of vehicles on Kent Street this population will be devastated.

[REDACTED]

I have seen **weasels** all around this area and have a photo of one found on my property that my cat brought to me.

Grass snakes commonly bask at the sides of Crateman's farm fields where the cable is proposed to go, and the field across the bridlepath nearby. There are also **adders** at times. I have photos of a dead adder which was on the footpath behind the pond at Crateman's Farm, and a grass snake caught by my cat a while ago (it was released again unharmed). I have also got photos of a **slow worm** found on my property. My neighbour's cat has caught a grass snake this year. These creatures are sensitive to vibration and so are unlikely to remain here because of the sheer scale of this construction and prolonged work.

Wild service trees are all round this small area including on Dragons Lane near Crateman's farm and on the bridlepath that goes up from Wilcox Farm where the cable is planned to go. As this is an indicator of ancient

woodland along with wood anemones. Strips of woods like this are all around this location and digging for the cables would destroy the meadow corridors the wildlife uses to get between them.

Every year we count the **Glow worms** which shine out to attract a mate all along Moatfield Lane between June and the end of August. I have photos. There can be as many as 14 in one grass verge area. They are always along by Moatfield Farm and across the field edges between there and our house. This year there was one right in the middle of the proposed cable route.

Woodpeckers

We have greater spotted woodpeckers on our feeders every day which often come across from the Badger wood the other side of the cable route. We also have many green woodpeckers come down on the lawn to dig out crane fly larvae. This search for food sources would be disturbed by prolonged construction work in the polo field between here and their nest sites.

Owls

Little owls hunt on the polo field that would become the cable route behind our property in this proposal. I have a photo as one stayed so long there. Little owls are also often seen on Kent Street where they hunt very low to the ground and have even become a hazard to traffic in past years. These will be under threat with construction, a change in traffic and noise disturbance.

Barn owls very prominently hunt across Crateman's farm fields where the cable is to go and are seen many many times in the trees that hang over Moatfield/Kings lane. They have been known to nest in Lower Barn Farm sand school next to the cable site, the shelter adjacent to the cable route in the field on the other side, and the barns at Crateman's Farm. They are also often seen on Kent Street.

We hear and see **Tawny owls** very often anywhere along the lane and around our property. **Buzzards** and **red kites** are also a common site over our garden and the surrounding fields where the cable is proposed to go. Therefore there must be a good rodent population to supply this amount of hunting (cats catch voles and field mice daily). With the loss of so much hedgerow and undisturbed field here how can the continuity of this hunting be maintained throughout the construction phase?

Bats

The wildflowers of the meadows and field edges bring many insects. The meadows particularly at Crateman's Farm are a constant buzz of insect life until the hay is cut, which means that there are bats skimming around the area for many months of the year. The Oakendene lake in the site of the proposed substation is also a key location for bats and the loss of meadow along the cable route along with light pollution at the substation would be devastating for the bat population through here.

Flood plain

The cable route would go through small fields that regularly flood dramatically and stay under water for days, as well as the seasonal flooding of more obvious flood meadow. These are used by herons and grey lag geese and many wild meadow plants and reeds grow across the wetter areas. I have even found a fish (perch) in a field where the Cowfold Stream has flooded and then retreated. The cable channel at over a metre deep would adversely affect where water routinely pools and vastly alter how wildlife can still use it.

Two of the landowners have told me that their fields have not been ploughed for decades, but are only grazed or used for hay. There must be many meadow **plant species** that are particular to the lack of disturbance. I have many photos over the years. This cannot be put back after the years of construction phase. You cannot restore time.

Road access and road damage

I am very concerned with this cable route option's effect on access to and from the A272 for both people who live down Kent Street as well as for users of the already very congested main road. This is likely to be very disrupted for

years during construction and maintenance after. Already we can be stuck for 20 minutes just trying to get to Cowfold village at rush hour or when there are issues on the A23 that have diverted traffic. The knock-on effect could also be more traffic all around these small single carriage lanes.

Kent Street is a fragile, single carriageway road and extra traffic would cause further structural damage and extensive disruption to local traffic. Already this year the edges have caused a horse lorry full of horses to fall into the ditch as the hidden edge crumbled when passing another vehicle.

Our very small private Lane (Kings/Moatfield Lane) would be disproportionately affected by being crossed twice under this proposal at 50m wide at a time. It is unadopted and used by 9 properties and 11 families as well as necessary access for farm traffic (sometimes 7 or 8 times in a day with haybales and livestock delivery). This will massively be disrupted during construction however it is managed, yet nobody thought to contact any of the non-landowners of the cable route until now. The residents finance all repairs, so are very concerned about both access of construction vehicles and structural damage to the road.

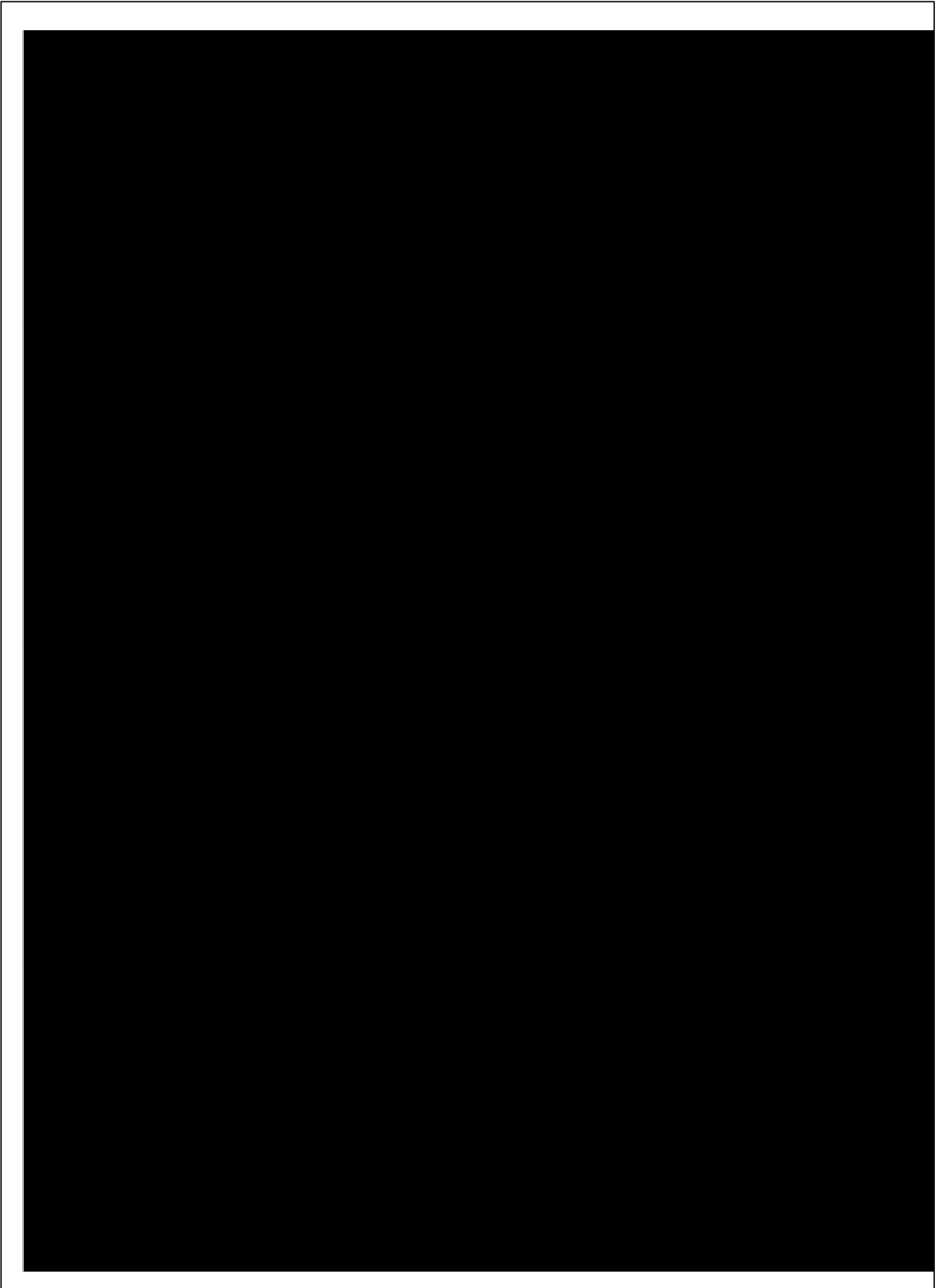
Psychological wellbeing and exercise

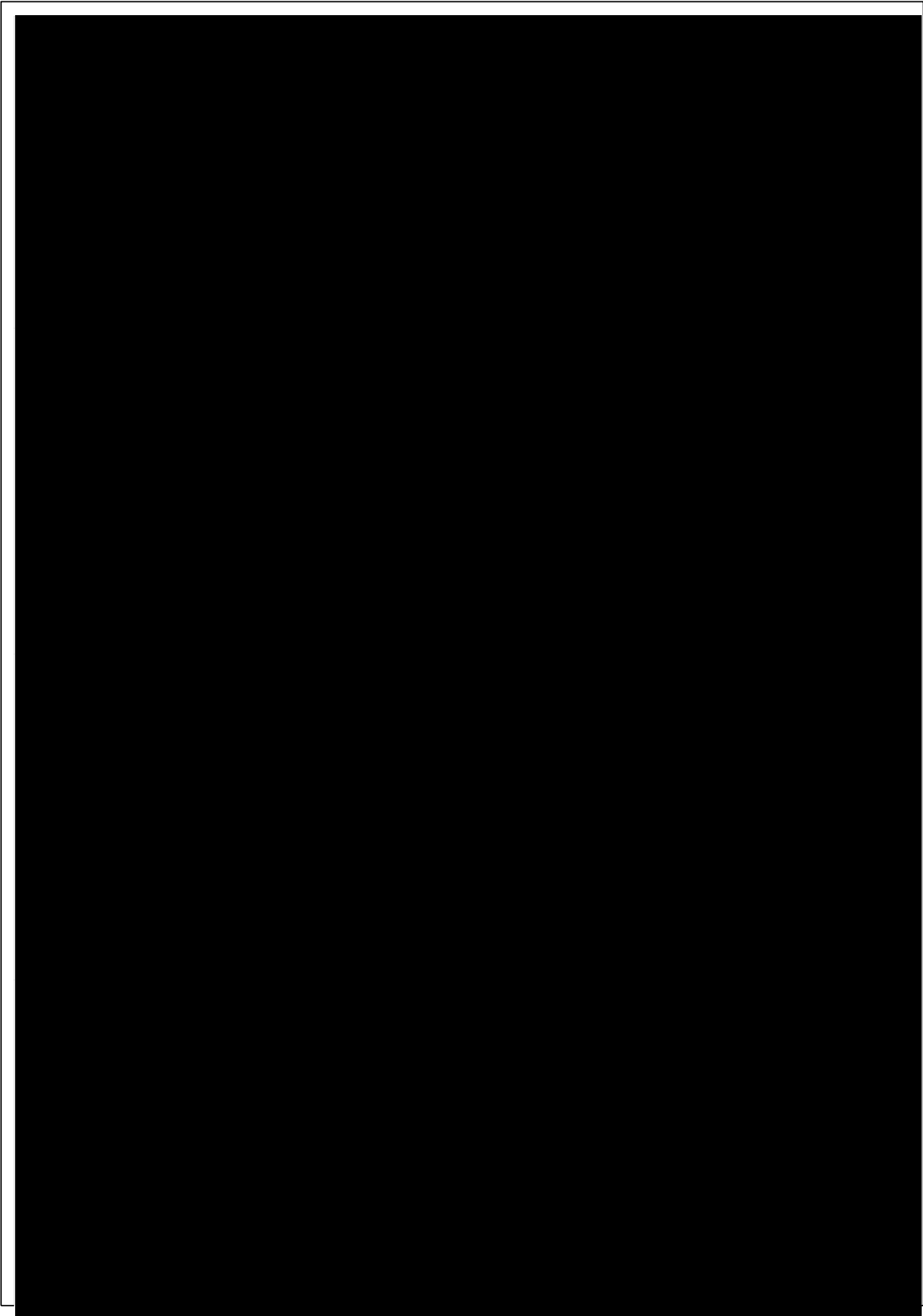
Disruption to the complex network of footpaths that many people from Cowfold village and beyond have been reliant on (especially since Covid lockdown) for recreation and exercise would be a huge problem as there are no alternative routes for these. A well-used route goes around Crateman's Farm and onto Kings Lane, leading through to Frylands lane. I walk a circuit most days through here to photograph wildlife, see the changes in the season and think through my work schedule for the day. The Cowfold Stream regularly floods right across the field below our property and Crateman's and Park Farm are the routes where the bridges may still be passable even when the field opposite is under flood water. If these paths are out of action for many months I cannot think how myself and others in the area with continue to function and make productive work.

Noise disturbance

I work as a visual artist on public art projects which are large scale wood carvings. Not only do I rely on studying the wildlife I carve which lives around this property, I also complete the work outside the studio at the bottom of my garden, and rely on the quiet and natural environment for concentration. Prolonged construction work just next to me creating devastating noise and dust would be terrible for me and I would even consider moving if this proposed route goes ahead. This would have a huge economic effect on my business. There are many people who choose to be outside in these locations because of the natural environment and peace and this needs to be considered. It is a web of small properties and landowners. I am very aware of how extensive the construction phase turned out to be for Rampion 1 and know that it is a long period before anything gets restored, if indeed it can be. This is not endurable as a working environment.

The following 2 pages are thumbnail summaries of A5 sized images, location lists, recordings and text sent to RWE and Carter Jonas in August 2021 on memory sticks, and further additions sent during the consultation in November 2022. There is little evidence in the DCO that these were considered or included except a mention of nightingales. I never received the promised copies of surveys or what was added from this.





Response

I live at [REDACTED] South of Cowfold.

Please see the updated images and recordings attached on a memory stick, but to summarise: the choice of siting a substation at Oakendene and therefore bringing cables all through this route and back to Wineham Lane is totally disastrous for the biodiversity of this part of the River Adur catchment area. It contravenes the government policy of increasing/protecting biodiversity and there must be less destructive options. At the very least this wildlife must be considered and despite sending information and recordings last year and walking around the site with Eleri Wilce of RWE 2nd September 2021, I have received none of the promised copies of what was put forward to include in the surveys. I wrote again in August addressed James D'Alessandro but still have received no copies of surveys or even an acknowledgement of my letter. Key species are not in either the PEIR or Supplementary report that I can see for this area. This and the poor reinstatement following Rampion 1 gives little faith that any wildlife will be taken into consideration during this project. How can this be called 'Green energy' when there is so much unnecessary destruction of carbon storing hedges, soil and trees and disruption of wildlife in its construction? At the very least local people deserve an explanation of how each aspect will be managed and loss of biodiversity mitigated.

To highlight key points of this very special habitat:

- 1) **Nightingales** which are a red list species – see updated map of the locations, photos 27 & 28 and 14 recordings. Nightingales come back each year all through the area **6f South of Cowfold**. They nest in the blackthorn scrub on the further side of the tributary at the bottom of our garden that runs into the Cowfold Stream along the construction route (see map). They also sing and nest all along and around the Cowfold Stream where the cable route has been shifted closer across their territory at **MR12** and **MR13** and in the small hedge boundaries around Taintfield Farm near **MR14 in Area 7a**. This is a particular issue because territory was lost when scrub was cleared in Taintfield Wood and along the Cowfold Stream at Gratwicke Stud Farm, where they used to nest in profusion. Their territory is now very compressed and so we have more nightingales nesting every year at the bottom of our garden, when 15 years ago they were mostly concentrated around the Cowfold Stream and West Ridge. They arrive around 9th April and are gone by late July. They feed on insects from the adjacent meadow and nest just off the ground largely in dense blackthorn/hawthorn scrub. Surely the cable route can avoid these sites and nesting times?
- 2) **Cuckoos** (65% decline since 1980's) **and turtle doves** – (see no 22) also nest every year along the Cowfold Stream and feed all round where Crateman's farm is to be extensively dug to work round **TC17 and TC18**. Both have critically low numbers breeding in the uk.
- 3) **Adders** live around Crateman's Farm, very close to **MR13** (see photo 16). They are a protected species. They bask next to the farm pond and nest nearby. Slow worms and grass snakes (photos 14 & 15) are a common sight in summer backing along the side of fields and all around the footpaths.
- 4) **Toads** migrate all along Kings Lane where the cable route crosses, both near **TC18 on 6f** and by **MR14 of Area 7a** (see photos 12, 13 & 52). They make their way across to the pond at King's every March. This must be avoided or at worst construction must avoid these times and reinstatement needs to be complete for the next migration.

5) **Crested newts** have been found on our doorstep, in the kitchen after emerging from the suspended floor, and in our pond (see photo 11). These are another protected species. They are all around the area and most likely living around the tributary at the bottom of our garden. The planned cable route is right next to this. Nobody has come to survey this that I know of.

6) **Tree/wildlife corridor loss** at the boundary with Wilcox Farm and the polo field behind our garden (on the top right corner of **Area 6f**). There is a double width boundary of oak trees with a ditch between (see photo 44 & 45) that runs along making a significant route through from the small area of woods with badger setts opposite Moatfield Farm buildings (see wildlife map). The cable crosses this boundary and nobody will tell us what happens to the trees, rabbit warrens and through route. There are potentially 25 trees involved, most are mature oak trees with all the ecology that these provide. We need to know that this will not be lost.

7) Little owls, barn owls, tawny owls, buzzards, red kites, bats all hunt across here (top right of the **Area 6f**). Greater spotted woodpeckers and green woodpeckers are commonly in our garden. We have many bats hunting at night. They cannot be deprived of the continuity of their territory for 2 years. There are voles, shrews, stoats, weasels, field mice, brown rats all in our garden at times. Insects have included elephant hawk moth, white admiral, emperor moth, purple hairstreak butterflies in our oak next to the cable site as well as all the common insects like red admiral, meadow browns and gatekeeper butterflies which are in the fields that are to be dug up. I have included photographic evidence of many of these. We believe that wildlife comes to our garden from across the field of the cable construction site because the other sides of our property are residential or fields which are constantly grazed by horses and so have short grass and few wildflowers.

This precious network of hay fields, flood meadow, oak tree boundaries and hedges cannot be left as a construction site for years without a massive loss of biodiversity. We need to know what will be done to prevent this. Fundamentally it is the wrong site to proceed with.

Janine Creaye

12 August 2022

Dear James D'Alessandro

We are happy that wind farms are being proposed to supply 'green' energy, however we are devastated to hear about the final choice of onshore cable route for the Rampion 2 windfarm which was released to the press on 14th July this year, with no information given to the people effected except the direct landowners. The destruction of habitats for wildlife around this small quiet network of lanes leading to the new substation would take decades to put right and if the trees are cut down, many generations. How 'green' is this proposal with such destruction caused by its installation? There has been no information given to local people about how this is going to be managed when it will so impact our lives here. Even on the practical side, it crosses our privately maintained lane twice and the traffic is already often a serious problem on the A272 where the substation is proposed to be located. How will this be managed so that we can continue to live here?

I am shocked that there has been no consultation with local people about what the wildlife here actually is when we have been here all year round for many years but the surveyors are from another part of the country and just drop in for a few hours, largely at less active times of year. One example is that we have nightingales nesting at the bottom of our garden every year and the cables would be installed right across the field directly behind where they feed. The PIER report failed to note these red list species or the turtle doves and to my knowledge nobody visited during the nesting time. We need to know that wildlife is actually being considered and how it will be dealt with both in the construction timing as well as the speed and care of reinstatement. We know how poorly reinstatement was managed after Rampion 1 and can still see the plastic tubes in the struggling hedge on Bob Lane these 7 or so years on.

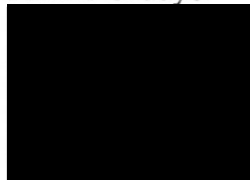
I sent RWE recorded evidence last August of nightingales, flood sites, toad migration down this lane, exceptional meadows at Crateman's farm where we all walk, and the double row of oak trees in the hedgerow directly behind us where at least 25 could be in the path of the cables. This led to a site meeting with Eleri Wilce and a member of the Carter Jonas team 2nd September last year. We walked round the location and she admitted that reinstatement had not been ideal with Rampion 1. She knew little about the flood meadows and how long the water remains across large areas of the cable route through winter and even flash floods regularly in summer. She promised that I would receive copies of what was passed on to add to the environmental reports but I received nothing. I totally refute that 'extensive consultation' has been carried out with local communities as is says on your website.

Please contact us and tell us how this is to be managed. Why should we be left like this, not knowing how issues can be mitigated? How will local people actually be included in working out the construction phase? Please send me copies of what was sent to the environmental surveyors following on from my meeting with Eleri last year. Please send me copies of the environmental reports so that we can understand what is actually being considered about the wildlife that we see every day. I look forward to a response.

Yours sincerely

Janine Creaye

Janine Creaye



Rampion 2 Project
Rampion Extension Development Ltd

c/o RWE Renewables
Greenwood House
Westwood Way
Westwood Business Park
Coventry
CV4 8PB

T:
E:



[Sent by email]

23rd December 2022

Dear Janine,

Thank you for your letter of 12th August, and for the information that you have previously provided of various wildlife records and information for the area within the catchment of the Cowfold Stream.

I apologise for my delay in replying to your letter. Having consulted with colleagues on the Rampion 2 project, I am now able to provide you with the following response.

Please rest assured that the information that you have provided to us will be referenced and included within the desk study that will accompany the Environmental Statement, that will accompany the Rampion 2 Development Consent Order application.

We have undertaken a range of surveys in this general area (Shermanbury to Oakendene) including:

- Phase 1 habitat survey
- Hedgerows Regulations Assessments
- Bat surveys (activity transects, static detectors and ground based visual assessment of potential tree roosts)
- Breeding bird surveys (following a 6 visit common bird census style methodology)
- Great crested newt surveys (eDNA sampling)
- Dormouse survey (nest tube deployment)
- Badger survey
- Otter survey
- Water vole survey
- Reptile survey (at Oakendene only)

We have been using this information to refine both the cable route design and the mitigation that accompanies it: to ensure that environmental effects are avoided where possible, and minimised where they can't be avoided. This work will see a large reduction in the worst case amounts of hedgerows, woodlands etc. that would be temporarily lost to development (as reported in the Preliminary Environmental Information Report submitted last year). Further, the project has committed to using Natural England's Biodiversity Metric 3.1 to quantify biodiversity losses and ensure that a measurable biodiversity net gain will be delivered for the onshore cable route and substation.

All of this information will be provided within the Environmental Statement and other documents supporting a future planning application. It is also notable that in the area of most interest to yourself, the design is seeking to use trenchless crossing methodologies to retain strong corridors of vegetation to avoid fragmentation of the landscape.

The data gathered does reflect the information that you kindly provided to the project, including the confirmation of breeding nightingales. This species and many others have been considered within the design, and will be assessed within the Environmental Statement. For nightingales the emphasis has been placed on the retention of scrub in damp areas (i.e. along the course of the Cowfold Stream and its tributaries) as preferred nesting habitat. The baseline data reports will be compiled and published alongside the Environmental Statement to enable the assessment provided to be considered by stakeholders in light of the data available.

As part of the process we have liaised with a number of stakeholders including Natural England, West Sussex County Council, South Downs National Park Authority, Forestry Commission, Sussex Wildlife Trust, Sussex Ornithological Society, RSPB and a range of others (such as district councils) to identify the best available desk study information. We have also gathered information from landowners over which the proposed infrastructure would be installed and members of the public through the informal and formal consultation process. Rest assured that the information gathered and the views expressed have been taken into account when designing the survey programme, and designing the scheme and the mitigation that supports it.

Unfortunately, any development of this nature (e.g. linear developments such as cables, pipelines etc.) will result in damage to the natural environment, and it has therefore been our focus to minimise these effects (either when comparing between options on the basis of biodiversity or when focused on an individual stretch of cable) whilst being cognisant of other driving factors such as electrical design needs, other environmental drivers (e.g. cultural heritage, transport, noise etc.) and efficiency. Once deliberations within the project team, consultation with the public and engagement with technical stakeholders is complete a final design (and its accompanying mitigation) will come forward that will be assessed on a wide-range of grounds. This will be submitted to the

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Planning Inspectorate, who will then run a further stage of the project (known as the examination) where anyone can submit representations for consideration. The Planning Inspectorate will take the information they receive, consider it and then write a recommendation report for the Secretary of State to make a decision based on legislation and planning policy.

With regard to the effect of traffic arising from the windfarm-related activities upon the A272, we have conducted an assessment of traffic on this road for the purposes of our forthcoming Development Consent Order planning application. The measures that we take in respect of traffic will ultimately be agreed with the relevant highway authorities.

I hope that the above information is helpful, but if you have any further questions then please contact me (at james.d'alessandro@rwe.com) and Lucy Tebbutt (at [REDACTED]) and we will be happy to help.

Yours sincerely,

[REDACTED]

James D'Alessandro
Commercial Manager
Rampion 2, RWE

31st March 2023

Dear James D'Alessandro

Following on from my letter dated 12 August 2022 and your response dated 23rd December (arrived 28th December after the consultation) I absolutely refute your statement that you have 'gathered information from landowners ...and members of the public' on the biodiversity of where the proposed Rampion 2 infrastructure would be installed. If you are relying on who responds to the consultations, many did not realise that the cable could come to this substation site in consultation one, and the second consultation was about 'cable route modifications as if it was all agreed already. Where is the evidence of how you have deliberately asked and listened to the people who live on or adjacent to your proposed cable route and at the substation site, of their local biodiversity knowledge? The Oakendene substation site was only announced as chosen 14th July 2022 in a small article in the local press that few noticed. My neighbours only received a leaflet with offshore wind turbines on the front when the subsequent consultation was advertised, yet it crosses our dead end, private lane twice, and cuts through the small flood meadow fields all round us. I have talked to the three key landowners in this section of the proposed cable route, none of whom feel that they have been asked about wildlife and biodiversity in this area. I will repeat again that the people surveying would neither tell us what specifically they were looking for in our lane, nor listen to a word we were trying to tell them, and there has been little place in either official consultation for adding the extensive knowledge people like myself and my neighbours have on the local ecology, flood patterns and wildlife.

I have no reassurance that what has been given is being acted on as no reports have been sent to me. A case in point is that I have sent in evidence of adders and grass snakes at Cratemans Farm in both 2021 and 2022. I pointed the basking sites out to Eleri Wilce, and Lucy Tebbut when they visited 2nd September 2021. The proposals show a line all around the field next to the farmhouse at Cratemans on the Rampion 2 plan and there is extensive construction work through the fields to install cables. How does this impact the reptiles? Had you asked Mr Facer at Cratemans he would have told you about how he commonly sees adders and has given the shed skins away to friends. These are UK Biodiversity Action Plan Priority Species and are protected from disturbance in law. There is a legal obligation to survey where planning applications are made, yet I can see no survey here in your list. My neighbour has seen adders here in Moatfield Lane and we commonly see grass snakes (I submitted evidence of grass snakes each consultation), yet you list no reptile survey here for Moatfield Lane. How have you responded to my local evidence? I was assured again at the Ashurst drop in event 11th November 2022 that my evidence would be taken into account. How have you fulfilled your obligations to assess the situation?

There is a toad migration that converges at the property Kings, in Kent Street which the residents down this lane and on Kent Street have witnessed over decades and I submitted photo and map evidence to Rampion, both 22nd August 2021 and again 2022 (signed as received 28 November). The cable construction crosses the migration route on Kings lane. Toads are also UK Biodiversity Action Plan Priority Species and there is again a legal obligation to survey the site if a migration is present, yet I see no survey listed in your letter. How has this been responded to?

I have sent you evidence of nightingale locations and recordings both in 2021 and 2022. They were not even featured in Pier report as significant or the supplementary report and finally you say that they are only being considered at the Cowfold Stream and Tributaries. They are far more wide-spread than this in this area and right up to the Oakendene site. At the tributary that crosses Moatfield Lane you are constructing all along their nesting sites. What are the assessments of how this impacts their ground level breeding? These are a Red List species, both habitat and nesting sites are protected in law and they must be taken seriously. I will be collaborating with Sussex Ornithological Society and in the next 3 months we will be adding new evidence to public record, as they are already very concerned about this situation. They have now verified my retrospective nightingale, cuckoo, swallow and skylark sightings and added them to the SOS database. All these are endangered species and this is precious remaining habitat for them. Other route options did not have this density of nightingales.

I have also submitted my retrospective evidence of sightings of other notable species like adders, toads and stoats, through iRecord and most have already been verified, so will also enter Sussex Records Office database.

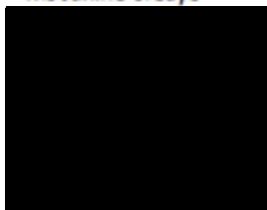
I want to draw attention again to the loss of oak trees and hedgerow in this specific section of the cable route to Oakendene. This substation option brings the worse devastation because it is a patchwork of tiny fields and flood meadows with many Oak, hawthorn and blackthorn boundaries. We need to know how many oak trees are under threat. We know of at least 33 mature oaks that would be lost in this chosen option and it is possibly many more. Please correct this if this is not so. How is this the least devastating choice of substation location? I will ask again about the boundary between the polo field (off Moatfield Lane) and Wilcocks Farm, where there is a potential loss of 25 oak trees and the destruction of a badger path and rabbit warrens in between. Why is there no trenchless crossing marked for here? How will the wildlife corridor be protected as well as the whole ecology of all those trees? We are now in dialogue with the Knepp Wildlands Foundation who are very concerned about reinstating linked wildlife corridors, and now they see that here there is such an unnecessary loss of wildlife corridors in this proposal. We question that any 'net gain' for ecology can ever compensate for this level of loss. How does this notably inconsistent windfarm energy merit the loss of so much carbon storage by destroying so many trees, hedges, and undisturbed meadows?

You say that it has been your 'focus to minimise these effects when comparing between options on the basis of biodiversity or when focused on an individual stretch of cable'. How was this section the right choice? You have to listen to local people, not just put out a poorly advertised consultation on a different subject, and then pay little heed to those who do respond. Had ecological information been properly and proactively gathered from the local people who are affected, a balanced overview would have come to light, then we would have listened your justifications for making this the site of substation and cable approach. As it stands due process has not been followed and it is completely wrong to proceed.

I look forward to answers to my questions and ask again for copies of the surveys you have done in advance of the Development Consent Order application, so that we can put forward our informed and balanced representation.

Yours sincerely
Janine Creaye

Ms Janine Creaye



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Swindon
Wiltshire
SN5 6PB

Contact the team at:
Rampion2@rwe.com

For More Information:
www.rampion2.com

26th May 2023

Dear Ms Creaye,

Rampion 2 enquiry response

Many thanks for your letter dated 31st March addressed to James D'Alessandro and please accept my apologies for the delay in replying.

I set out below a detailed response to the issues raised in your letter and I have grouped the issues raised to help navigate my response.

Decision to select the Oakendene Substation Site

In identifying a preferred option for the onshore substation site for Rampion 2, we initially started with a long list of possible options. Most of these were subsequently omitted due to space requirements or access constraints. Three sites were then taken to our non-statutory consultation in January/February 2021, following which 'Wineham Lane South' was dropped. This was in response to concerns regarding potential impacts to a number of homes directly opposite, in addition to constraints over the size and orientation of the site.

Two sites were then taken to statutory consultation in July – September 2021. The Oakendene site was selected over Wineham Lane North for a number of reasons, including:

- direct access off the A272 with no need to use country roads such as Wineham Lane;
- larger site with more usable shape and orientation, offering greater flexibility during construction and for designing the substation to allow for adequate space for mitigation landscaping and planting;
- competing land interests at the Wineham Lane North site.

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Consultation process

Our project-wide non-statutory consultation in January/February 2021 and our project-wide statutory consultation held in 2021 included the substation proposals, followed by a public announcement, after consultation, on the Oakendene location in the summer, 2022.

In terms of how we have conducted our Statutory public consultations, we are required by the Planning Act 2008 to produce a Statement of Community Consultation (SoCC), which sets out how, when, about what and with whom we intend to consult. We consulted local authorities on the SoCC to ensure it met their requirements, and the document was published during both statutory consultations and is a public document available on our website here [Statement of Community Consultation \(rampion2.com\)](https://www.rampion2.com).

Alongside the SoCC, a Consultation Report will set out the consultation feedback we received, our response to that feedback (including any changes made to our proposals), and a detailed description of how we developed and delivered the consultations in accordance with the SoCC, the Planning Act 2008, Gunning Principles and other forms of guidance for consultation. Our Consultation Report will form an integral part of the DCO application we are aiming to submit later this year.

You will of course have an opportunity to make representations should you wish, during the Examination phase of our application, later this year.

Wildlife and ecology concerns

Where to find our wildlife & ecology surveys

These will be appended to the final Environmental Statement, an integral part of our development consent order (DCO) application, which you will be able to view on the Planning Inspectorate website after application acceptance.

Landowner claims we have not carried out wildlife and ecology surveys on their land

We have undertaken surveys on the cable route where we have permission from landowners. Alternatively, we have used Public Rights of Way if access was not available, in addition to the findings of our desk studies and environment records.

The evidence you have kindly submitted to Rampion 2

Many thanks for providing this; we have referenced it as part of the desk study and it will form part of Appendix 22.2 of our final Environmental Statement submitted with our DCO application, later this summer. However, please note we do not mention individual names in order to protect privacy and accord with the Data Protection Act.

Our surveys of adders, grass snakes and toad migrations and how our proposals may impact them

We have undertaken reptile studies at the substation location, although desk studies are normally considered sufficient for the cable route. Mitigation will be managed on site by the Ecological Clerk of

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Works. Note that all ponds are retained, and our efforts to maintain hedgerows (by notching the narrowest route possible) will reduce disruption to reptile migration.

Our assessment of Red List species such as nightingales, cuckoos, swallows and skylarks

The mitigations planned for birds are not necessarily species specific, but include restrictions during the breeding season at some locations. Notably the planting on the fringe of the substation (wet woodland, combining water management, visual screening and habitat creation) is a suitable habitat for nightingales. The Commitments Register and Ecology chapter in the final Environmental Statement will contain details of these mitigation proposals.

Protection of the wildlife corridor between the polo field off Moatfield Lane and Wilcocks Farm

Detailed design should allow us to avoid major warrens and setts, noting that interfering with badger setts would require a Natural England licence. Trenching in any given area should be swift, and thereafter the badgers may choose to traverse the work site at night as they would any ploughed field.

Oak trees

We will be able to discuss the finer details with you at the Cowfold Information Event on 21st June at the Allmond Centre. However, I can tell you that the permanent substation equipment will be taking up a much reduced area of the original site area, so we are able to avoid most of the mature trees. For those that cannot be avoided, we will be planting up areas around the rest of the site as part of our mitigation plan. We have also voluntarily committed to 10% biodiversity net gain, meaning that we will calculate the habitat lost as result of our project (in biodiversity units), and ensure that this is replaced elsewhere, with a 10% uplift. Use of biodiversity units takes into account the significant value of mature trees. Please note, we are also electing to drill underneath mature trees to the south of the substation site, to avoid their removal in siting our underground cables.

I do recognise the vital contribution mature trees make to carbon storage and our commitment to biodiversity net gain recognises this. However, I would like to mention that Rampion 2 is set to provide power for the equivalent of over 1million homes (annual average equivalent) and save as much as 1.8million tonnes of carbon dioxide every year, for the lifetime of the project. The complete carbon cost of manufacturing and constructing the project will be offset in less than a year by the generation of clean, green energy from Rampion 2.

I hope this provides a comprehensive response to your concerns and demonstrates our approach to environmental assessment and mitigation for the Rampion 2 project.

I look forward to meeting you at our Cowfold Information Event on 21st June.

Many thanks for your interest.

Chris Tomlinson
Development & Stakeholder Manager
Rampion 2

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16th June 2023

Chris Tomlinson
Development and Stakeholder Manager
Rampion Extension Development Ltd
Windmill Hell Business Park
Whitehill Business Park
Whitehill Way
Swindon
Wiltshire
SN5 6PB

Dear Chris Tomlinson

Your response dated 26th May to my letter (of 31st March) is so dismissive of all my points about biodiversity and how its loss will be mitigated in this Gratwicke to Oakendene section of the Rampion 2 cable construction. These answers cannot be acceptable to local people or the planning process. We have government strategies on biodiversity which must receive attention. This demonstrates that your 'approach to environmental assessment and mitigation for Rampion 2' is to deny that it matters. How can you believe that there is no need to properly assess priority species in the cable route? Historic data records are just not good enough.

I will say again that your biodiversity survey results to date need to be provided to stakeholders in advance of the project being submitted to DCO. Without issuing survey results, following up with public consultation and then subsequently making the choice of substation based on local people's comments and additions, the whole process is flawed. Instead, you leave stakeholders to make their own surveys and assessments without any idea of what already has been done or what mitigations may be offered. How is this consultation? How is this a proper dialogue with the community as you keep emphasising in articles? Even in this letter you cannot put in writing that you have consulted with local people and landowners on their knowledge of biodiversity and wildlife, because it has not been done. You only state considering your surveys, and desk studies (which have rarely covered this private land). I also understand from landowners that the surveyors did not cover their land widely even when allowed to do so, but stuck to public footpaths, which give a very limited picture.



How are we to trust Rampion to reinstate or provide biodiversity net gain?

Please see above photo taken this year showing the 'reinstated' hedge in Bob Lane just round the corner from the substation in Wineham Lane after cable construction was completed in Rampion 1. It is now six

years on and the hedge has failed with no sign of follow-up to put it right. South Downs National Park authority reproduced drone photos in their response to your Rampion 2 consultation which showed the failure of many areas of reinstatement, Sussex Wildlife Trust also pick out reinstatement failures, particularly chalk grassland in Tottington Mount. How are we expected to believe that any reinstatement or attempts at biodiversity 'net gain' will be successful or receive any after care? You have to commit to return and work with local people and the appropriate organisations over a ten year period or more as promised in your proposal document, to ensure any success in reinstatement. What assurance can you give that things may be different this time? What is happening about all the Rampion 1 failed reinstatements?

You say that 'the mitigations planned for birds are not necessarily species specific'. The breeding birds cannot be lumped together and dismissed like this. We have a number of red list species. Sussex holds around 13% of the national population of nightingales and this site has a dense and successfully breeding number of them. We have surveyed this year and they are present throughout this part of the cable route, even nesting within the parameters outlined. I have entered all the grid references into iRecord so that will reach the Sussex Records Office and Sussex Ornithological Society databases who are supporting us in this work.

Your suggestions of new planting on the fringe of the substation 'being suitable habitat for nightingales' show a complete lack of understanding of what you are dealing with. There is currently little habitat for them at the substation site, but they are concentrated in the hedgerows around the Cowfold Stream, all through the flood meadow that crosses Moatfield Lane, in hedges south of Taintfield Wood and in the hedges on the east side of Kent Street. The hedges are often more than 5 metres thick, mostly blackthorn and established over many, many years to the point where they are dense right to the ground and hung with lichens. This is necessary and special habitat for these and many other birds to breed, and the cable construction will tear out many metres of this rare habitat. There is no way that you can reinstate this by putting a few whips into plastic tubes in a different place, then leave them unmonitored to re-establish, despite droughts, as was done in Rampion 1.

I walked yesterday and a skylark flew up from within the cable construction route in Crateman's Farm. These birds are also a priority species and actually nest on the ground in fields in undisturbed undergrowth. They nest each year around Crateman's Farm particularly in an area that you have marked as a depot for materials and vehicles. We are also hearing turtle doves in this area. They also breed low down, feed on fine weed seeds and their numbers are in steep decline. The disruption of the habitat will lose the continuity of breeding birds in the construction process. This does not even take into account the miles of meadow with all the wildflower seeds and insects that birds feed on, being dug up and left while waiting for the construction to be completed elsewhere. This is the wrong site to use.

You dismiss my question about reptile studies in this area of the cable route by saying that 'desk studies are normally considered sufficient for the cable route' without any consideration of the priority species of grass snakes and adders. Why would data have been entered into the records before this major planning application? They are not easy creatures to photograph or record. Desk studies are not good enough. This year I am finding more and more evidence of grass snakes, adders and slow worms all round this part of the cable route out to Kent Street. I have new photos and many local witnesses to the ongoing presence of snakes. The construction activity at Crateman's is right by adder and grass snake hibernations sites. Adders

have so declined in numbers that they are now considered under threat of extinction in this country. They hibernate in the same places year on year and loss or disturbance of this habitat is given as one of the main causes of their decline. This location has this very special habitat and is an established breeding snake site so must be taken into account.

You dismiss the toad migration to Kings with the phrase 'our efforts to maintain hedgerows will reduce disruption to reptile migration' shows a total lack of understanding. Toads (not reptiles) walk/crawl to breeding ponds often along tarmac because that is the easiest access, which is why there are toad patrols all across the country where people pick them up and carry them across busy roads. In this case they can be found all around the junction of Kent Street and Kings Lane on tarmac, for some distance in any direction. Their numbers are in decline so they are also a priority species. The Rampion construction work has marked accesses on Kent Street at Wilcocks Farm and is right in the middle of their migration. It also crosses Kings Lane twice, where migrating toads can be found as far down as Moatfield Farm. This needs consideration not offhand dismissal.

We have undertaken a badger survey (which I have entered into iRecord) and we now have good evidence of an active badger sett right in middle of the cable construction route and a major sett very nearby with a large very active population of badgers.

The boundary between Moatfield Lane Polo field and Wilcocks Farm was determined as 'a green lane' in the badger survey and we have traced it back over 150 years so far. There is a double row of trees with a bank one side, a very old line of twisted field maples and many oak trees some of which are classed as 'veteran' because of their unique features that serve wildlife so well. It is a 'wildlife corridor' and track for deer, rabbits and badgers coming off Woodcock Shaw and Buckhatch Lane (which dates from before 1649). There is no 'net gain' which could offset this both current and historical value. One oak tree is over 200years old (385cm girth) in this field and another right in the middle of the construction route is over 150 years old (290cm girth). What can the justification be of destroying all this to create a windfarm that lasts only 25/30 years?

You will not detail how many trees will be lost in this section of cable route alone so I question how your carbon figures are worked out. I have now met other landowners who are devastated by the lack of coherent discussion and clarity on which trees will be cut down. One who is close to the substation where the cable returns to Wineham Lane, stands to lose more than 6 mature oaks (three are around 200 years old, one in excess of 4m girth) and many horse chestnuts and other trees in his field boundaries. How is this acceptable that people cannot find out what devastating loss would be incurred, but just have to guess for themselves. The lack of open dialogue is what will drive so much more of the opposition that you face. How is this meaningful consultation?

Yours sincerely

Janine Creaye

CC: Planning Inspectorate; WSCC; Andrew Griffiths MP; Sussex Ornithological Society; Sussex Wildlife Trust