RAM2-AFP1710 20045335

Mr Thomas Ralph Dickson

Written Representation: Rampion Extension Development Limited for an Order Granting Development Consent for Rampion 2 Offshore Wind Farm

Lester Aldridge
Alleyn House
Carlton Crescent
Southampton
SO15 2EU

Ref: DIC03803.000002

Index

A. Section 1

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Our ref DIC3803.000002

28 February 2024

Dear Sirs / Madams of Examining Authority,

RAM2-AFP1710 20045335 Mr Thomas Ralph Dickson

Written Representation: Rampion Extension Development Limited for an Order Granting Development Consent for Rampion 2 Offshore Wind Farm

1. We write on behalf of our client, Mr. Dickson to introduce the written representations in response to the application by Rampion Extension Development Limited for an order granting development consent for the Rampion 2 Offshore Wind Farm Project. Our client has set out three alternatives which we commend to the Examining Authority in order of preference.

2. The proposed project has significant implications for our client, who owns and operates the land at College Wood Farm, which is referenced within the DCO limits and defined as plots 24/17, 25/2, 25/3, 25/4, and 25/5. This land, utilised for low-intensity farming of beef cattle, stands to be directly and detrimentally affected by the compulsory acquisition powers sought in the draft order.

3. Mr. Dickson is professionally represented by:

- Annabel Graham Paul, Counsel, of Francis Taylor Building Chambers
- Matt Gilks & Tom Etherton, Solicitors, of Lester Aldridge LLP
- Simon Mole, Chartered Surveyor, of Montagu Evans
- Perry Hockin, BSc (Hons.), FDSc, ACIEEM, of Arborweald Environmental Planning Consultancy

- Tom Bishop, BSc (Hons) MRICS FAAV, of BCM Rural Property Specialists

4. The main representation is produced by Simon Mole who introduces evidence of Perry Hockin and Tom Bishop. Our client's objections, concerns, and proposed alternatives are detailed extensively in the enclosed written representations of Simon Mole.

5. For ease of reference of the Examining Authority, the alternative route plans can be seen at Enclosure 1. They are further referred to and appended on the respective evidence as introduced by Simon Mole.

6. In summary, our client strongly objects to the acquisition of rights and imposition of restrictive covenants over his land as the proposed construction method will result in the loss of substantial parts of productive farmland. Mr. Dickson has personally submitted a written representation to demonstrate his experience with the applicant in his own words. A copy of this can be found at Enclosure 2.

7. We firmly believe that the Applicant has failed in their duty to satisfy the use of compulsory acquisition powers, showing a lack of consideration for alternatives, failure to negotiate or engage in meaningful consultation with our client, and disregarding due consideration for our client's protected characteristic relating to age pursuant to the Equality Act 2010.

8. The Examining Authority is respectfully reminded of its duty pursuant to section 149 of the Equality Act 2010. The disproportionate impact faced by Mr Dickson as a result of a lack of consultation was extensively addressed in correspondence sent to the Secretary of State by Lester Aldridge LLP dated 31 August 2023. A copy was uploaded to the Planning Inspectorate's website and can be accessed here: SoS Letter Rampion 2 31.08.DOCX (planninginspectorate.gov.uk).

9. Due to the applicant's ongoing failure to address our client's personal circumstances relating to his protected characteristics, coupled with the failure to offer reasonable adjustments, the Examining Authority must give due regard to issues arising under equalities when making their consideration. The Examining Authority must make a properly informed, rational view on the extent of likely impact in the context of Mr Dickson's personal circumstances, particularly because the Applicant has egregiously disregarded these factors throughout the consenting process.

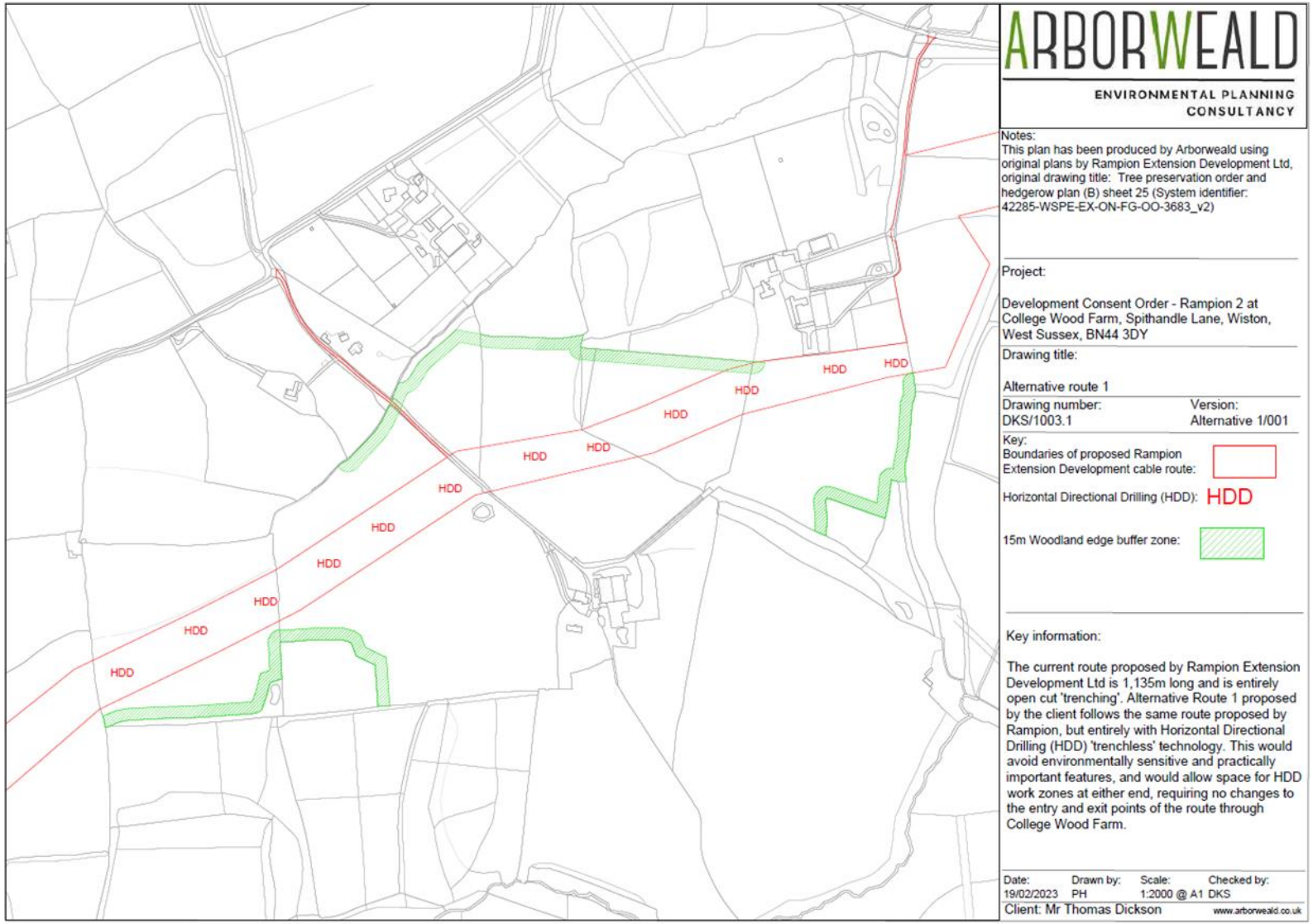
10. We trust that these concerns will be taken into account by the Examining Authority during the decision-making process. We look forward to your understanding and careful consideration of the matters raised.

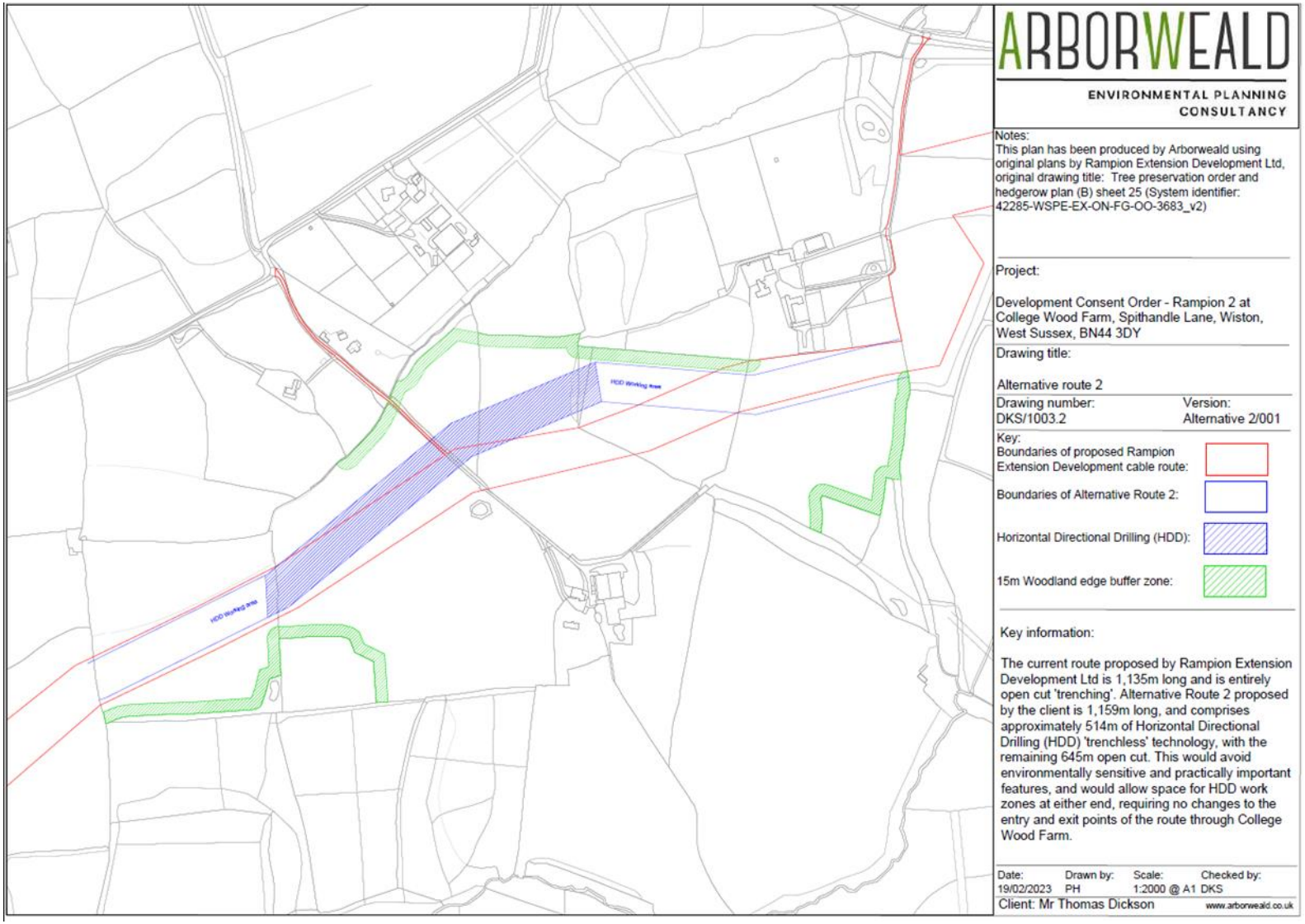
Yours faithfully,

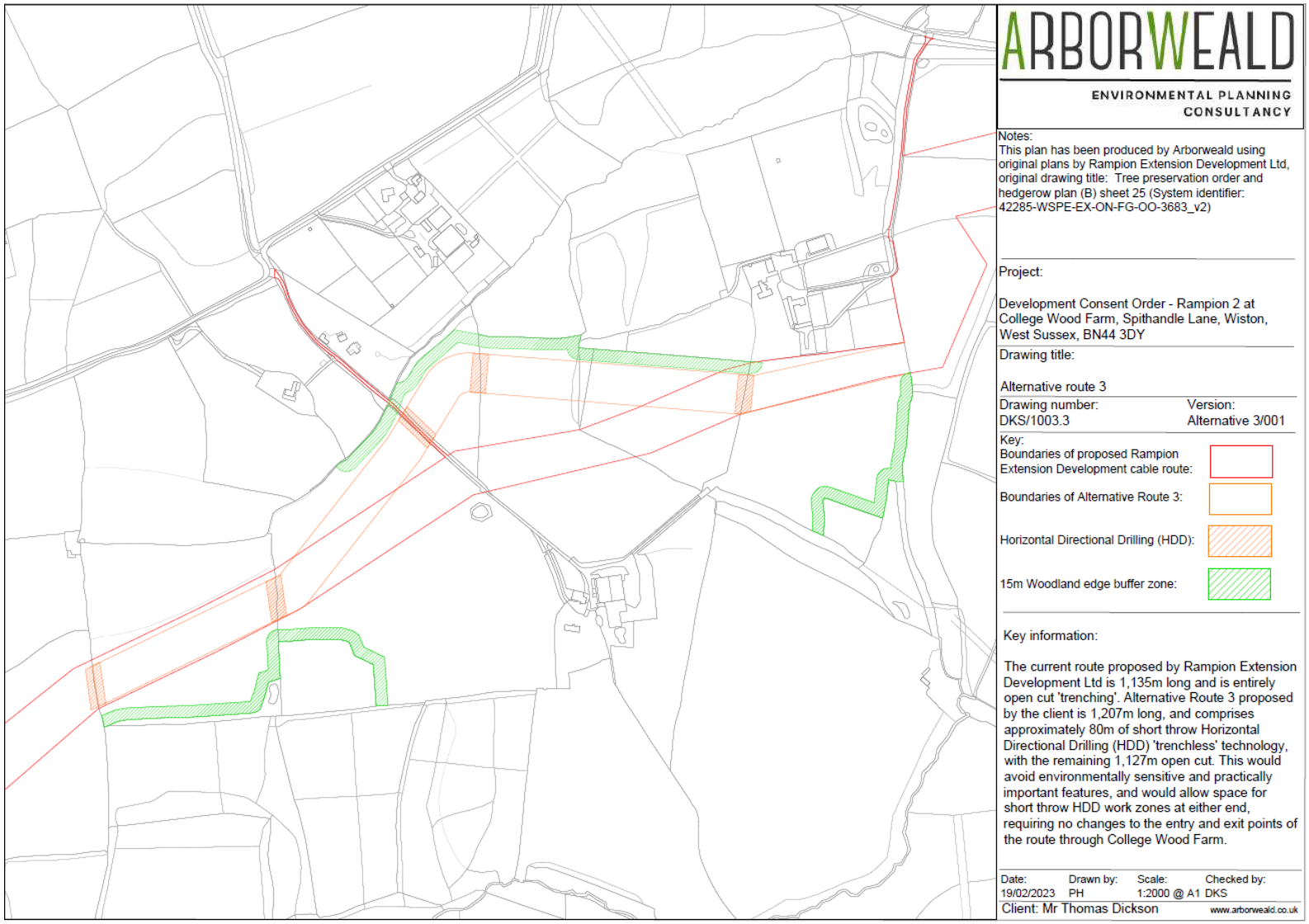
[redacted]

LESTER ALDRIDGE LLP

APPENDIX A Figures




ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY
Notes:
This plan has been produced by Arborweald using original plans by Rampion Extension Development Ltd, original drawing title: Tree preservation order and hedgerow plan (B) sheet 25 (System identifier: 42285-WSPE-EX-ON-FG-OO-3683_v2)
Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Alternative route 2
Drawing number:
DKS/1003.2
Version:
Alternative 2/001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Boundaries of Alternative Route 2:
Horizontal Directional Drilling (HDD):
15m Woodland edge buffer zone:
Key information:
The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 2 proposed by the client is 1,159m long, and comprises approximately 514m of Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 645m open cut. This would avoid environmentally sensitive and practically important features, and would allow space for HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.
Date:
19/02/2023
Drawn by:
PH
Scale:
1:2000 @ A1
Checked by:
DKS
Client: Mr Thomas Dickson
www.arborweald.co.uk


ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY
Notes:
This plan has been produced by Arborweald using original plans by Rampion Extension Development Ltd, original drawing title: Tree preservation order and hedgerow plan (B) sheet 25 (System identifier: 42285-WSPE-EX-ON-FG-OO-3683_v2)
Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Alternative route 3
Drawing number:
DKS/1003.3
Version:
Alternative 3/001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Boundaries of Alternative Route 3:
Horizontal Directional Drilling (HDD):
15m Woodland edge buffer zone:
Key information:
The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 3 proposed by the client is 1,207m long, and comprises approximately 80m of short throw Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 1,127m open cut. This would avoid environmentally sensitive and practically important features, and would allow space for short throw HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.
Date: 19/02/2023
Drawn by: PH
Scale: 1:2000 @ A1
Checked by: DKS
Client: Mr Thomas Dickson
www.arborweald.co.uk

STATEMENT OF MR DICKSON

The Examining Authority

Dear Sir/Madam

College Wood Farm

Wiston

Steyning

BN44 3DY

I wish to disclose facts & information regarding my experience of the last 3 ½ years dealing with RWE. The worst 3 ½ years of my life.

I have been in business all my life, however I never knew that people could stoop so low in, deceiving, misleading, discrimination, dishonesty, disrespectful, providing false evidence, false promises. The list goes on.

The current methodology causes extensive severance of farmland, sterilising a high percentage of the farm. This will render it impossible for me to remain in business at College Wood Farm. It would be unviable.

I have personally experienced very dangerous situations when handling cattle. I have had friends die in cattle related incidents and I have no intention of knowingly entering into an agreement which would further put my life at risk.

Bearing in mind the above, I am perfectly happy to enter into a voluntary agreement with the Applicant and have requested this for several years. However there needs to be negotiation on the cable route and methodology. The current proposed route and methodology will be very strenuously resisted at every stage of the process. Two young men, aged 24 and 25 were killed by high voltage cables at College Wood Farm several years ago.

I have suffered enormous stress at the hands of RWE. The personal impact on me is severe. The dishonesty displayed is intolerable. Constant attempts to falsely and dishonestly undermine and discredit me to gain advantage. For example:

Quotes from Savills acting for me –

> 19 July 2022 to the Applicant's agent: " My client had been intentionally ignored, fobbed off and given false promises by the Rampion Development Team."
>
> 26 October 2022 to the Applicant's agent: "My client has been ignores, fobbed off and given false promises by the RWE Team" "Mr Dickson felt that he had been wholly deceived by you and James" "Mr Dickson felt completely hoodwinked by you & James".
>
> 17 Nov 2022 to the Applicant's agent: "My client is now being discriminated against."
>
> 11 May 2022 to the Applicant's agent: "Mr Dickson has asked me to put on record that despite false promises at site meetings you have consistently deprived and refused him the opportunity to have a meaningful (blank) the discussion around your project and the impact to his property"

All the stress suffered could have been avoided if RWE had engaged in a meaningful way from the start. I have been willing all along as is evidenced in my extensive written correspondence since Nov 2020. I am now incurring considerable costs to protect my livelihood, my health & my property. RWE refuse to contribute towards any negotiation costs & site visits. A contribution at the outset was very soon used up.

Documents were not delivered in a timely manner mostly only after requests. All on farm consultations with the Applicant's agent took place 15 June 2022. The Applicant's Agent told us the meeting should have taken place 2 years before. None of our proposals were considered following the meeting or acted on.

I have been grossly, dishonestly misrepresented to the Examining Authority by the Applicant. I have "never requested not to be sent Heads of Terms for entering into a voluntary option agreement." The truth is quite the opposite as evidenced in various correspondence to RWE including Savills. 15 Dec 2022 "we still await draft Heads of Terms which were promised around a year ago".

RWEs adamant refusal to send Heads of Terms is clear evidence that they from the start had no intention of negotiating with me, refusing meaningful consultation in a timely manner. Ignoring their own advisers. Then dishonestly attempting to mislead the examining Authority by declaring that I had requested not to be sent Head of Terms. Forcing me now unjustly to spend considerable sums of money with professionals to protect my livelihood, health & property.

I have been misled, deceived, and bullied throughout this whole process & suffered enormous stress which has impacted my health through no fault of my own.

I would like the examining Authority to look particularly at issues where I have been misled by RWE. Their refusal to answer questions documented to them & their determined attempts to dissuade me from my preferred routes and methodology which would prevent significant ecological & environmental harm arising from their scheme.

I wrote a 9 page letter to RWE on 31/7/23, the letter contained numerous requests for information. Eventually received only a partial response almost 6 months later in January 2024. Showing a blatant lack of engagement. RWE have not offered me any opportunities to make changes at College Wood my Home Farm whatsoever. They have never explained to me what opportunities there were to make changes to the route.

RWE misled & deceived me into believing that they were going to make changes at College Wood along with 60 other changes along the route. This was clear deception as they had no intention of making changes. As shown in the Savills letter 26/10/22 "Mr Dickson felt that he had been wholly deceived by you [the applicant]"

I am extremely concerned at the level of false & misleading statements made by RWE in correspondence to me and my lawyer. Clearly intended to discredit me.

When I wrote in correspondence 18/4/23 to RWE and expressed my real concern about the way I had been bullied, intimidated & discriminated against I received a phone call 11/5/23

assuring me that somebody would be contacting me. However, this was never actioned & I never received a call.

Signed TR Dickson

Application by Rampion Extension Development Limited for an Order granting Development Consent for the Rampion 2 Offshore Wind Farm Project

Written Representations submitted jointly on behalf of Mr T Dickson

RAM2-AFP1710 20045335 Mr Thomas Ralph Dickson

Planning Inspectorate Reference: EN010117

1. These Written Representations are submitted on behalf of Mr T Dickson (our Client) in response to the application by Rampion Extension Development Limited (the Applicant) for an Order granting Development Consent for the Rampion 2 Offshore Wind Farm Project (the Draft Order).

2. This section relates to the compulsory acquisition powers contained in the DCO and the impact they will have on our Client's land.

3. We also cross reference to the representations by Perry Hockin of Arborweald Environmental Planning Consultancy in relation to ecology matters, a summary of which is attached at **Appendix 1** and Tom Bishop of BCM Rural Property Specialists in relation to business impact matters which is attached at **Appendix 2.**

4. Our Client is the owner and occupier of land referenced within the DCO limits as land at College Wood Farm (plots 24/17, 25/2, 25/3, 25/4, 25/5 – "the Land")

5. The Land is directly affected by compulsory acquisition powers sought in the Draft Order.

SUMMARY OF WRITTEN REPRESENTATIONS

6. Our Client's position on matters remains as substantially set out in the Relevant Representations submitted on 6th November 2023 which are attached at **Appendix 3** of these Written Representations.

7. Our Client objects to the acquisition of rights and imposition of restrictive covenants over his Land.

8. The proposed construction method of open cut trenches across and unjustified wide area of the Land subject to CPO will lead to the loss of substantial parts of productive farmland which may result in the extinguishment of his business and loss of income for a sole trader farmer.

9. The Applicant has completely failed in their duty to satisfy Government Guidance on the use of Compulsory Acquisition powers at every level. They have:

    (i) Failed to consider alternatives and suggested route changes put forward by our Client.
    (ii) Failed to negotiate prior to the submission of the DCO application. No heads of terms have been issued during the pre-examination phase.
    (iii) Failed to engage in meaningful consultation with our Client and in some cases failed to include them in consultation events.
    (iv) Failed to offer dispute resolution.
    (v) Failed to justify the extent of powers being applied for.
    (vi) Failed to have due regard to our Client's protected characteristic pursuant to the Equality Act 2010,

We have presented three alternative route options for the applicant's consideration. These are detailed in the covering letter from Lester Aldridge LLP and in the evidence provided in this Written Representation.

WRITTEN REPRESENTATIONS

Background

10. The Relevant Representations attached hereto set out details of Our Client's ownership. In summary, College Wood Farm comprises 62.23 hectares of permanent pasture and woodland owned and farmed by our Client on a low intensity basis with beef cattle. The fields are lightly grazed and not ploughed and are abundant with flora and fauna.

11. Our Client does not employ any full-time, part-time or seasonal staff and therefore operates the farm solely by himself.

Effect on Agricultural Land and Businesses

12. The risk of significant impacts as set out above not only creates operational uncertainty for Our Clients' farming operations but also would have a direct and negative impact on the financial viability of the individual farming operations. Our Client is 72 years old and the blight of uncertainty around the timing and long-term impact of the Project directly impacts on his ability to undertake management and succession planning at the farm.

13. The report by BCM attached at **Appendix 2** also set out in detail the likely impact of the Project on the ability to farm at College Wood Farm. In summary BCM anticipate the impact on business matters arising from compulsory acquisition include:
    - The cable route passing through the farm access road (this is described in more detail below)
    - Serious implicants on our Client's health and safely from resulting from open-cut cable installation across an operational farm
    - Severance of large parts of the farm for undefined periods
    - Impact on the movement/loading of livestock and their welfare
    - Loss of grazing areas for undefined periods
    - Impact to farm drainage system

Land take and severance during construction

14. The Draft Order will grant rights for the Applicant to take possession of a linear strip of land at College Wood Farm of some 1,133 metres in length for an undefined period to install 4 cable circuits in an open cut trench within a linear strip of land up to 40 metres in width.

15. The powers being sought are defined at Work No.9 on the Works Plans which is referred to in the Draft DCO as being the onshore connections works including the installation of four transmission cables and temporary construction consolidation sites, construction of a

haul road and accesses and other rights. It is understood Work No.9 will grant permanent rights to the Applicant (i.e. across the entire 40 metre width).

16. However, the Applicant confirms in their Cable and Grid Connection Document (Document Reference 5.5) the required permanent corridor width (permanent rights) is only 25 metres in maximum as a reasonable worst case scenario. It is not clear how the extent of land not required permanently will be released from the permanent rights and in effect the Applicant is burdening more land than is needed for the operation of the Project. This is unsatisfactory and an ineffective way to use compulsory acquisition powers.

17. The DCO Land Plans affecting College Wood Farm (sheet 25) show the linear parcel of land effectively severing the holding into 2 halves and depriving our Client from being able to access approximately 50% of his holding during the construction period which is undefined.

18. At present there is no provision for our Client to pass and repass over the Order land to access land on the northern side of the acquisition corridor and the public highway during both the construction period and following the extinguishment of his private rights. The impact of the loss of the access road on business operations is highlighted in the representations from BCM at Appendix 2.

Loss of Access to College Wood Farm

19. In addition, as the cable corridor passes over farm access road (parcel 25/2) the permanent rights will cut off the College Wood Farmhouse from the nearest public highway point as Article 25 of the Draft DCO confirms that all existing private rights over the Order land will be extinguished. There are no crossing points proposed or identified and the Environmental Statement Volume 4, Appendix 4.1 Crossings Schedule (Document Reference 6.4.4.1) identifies the 'track' as being open cut.

20. The access road is also identified on the Works Plans and Appendix 1 of the Statement of Reasons (Document Reference 4.1.1) as being required by the Applicant for Operational Access but the Applicant has not confirmed what that means practically in terms of anticipated usage for the project, maintenance of the access road and how they intend to ensure all existing uses/users of the access road can be maintained.

21. Our Client requires a binding commitment from the Applicant, which includes detail and agreement on how shared access arrangements would be safely managed. To date no offer of such a commitment has been made by the Applicant.

Unreasonable extent of powers

22. Article 23 of the draft Order proposes the Applicant can have up to 7 years after the Order is made to serve acquisition notices. This period is unprecedented and wholly unreasonable in burdening private land for such a long period. Similar DCO Projects (e.g. Bramford to Twinstead Reinforcement) have requested a period of no more than 5 years after the Order is made to serve acquisition notices.

23. The 7 year period requested by the Applicant suggests their application is premature and has no identifiable funding to pay for project.

Compulsory acquisition – Clear idea of use of land

24. DCLG Guidance: Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land ('CA Guidance') sets out the relevant tests. It states at Paragraph 9:

> *"The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire."*

25. The Applicant does not have a clear idea of how they intend to use the Land which is proposed to acquire. The Applicant is uncertain as to how the Land will be used and are applying for powers over a greater extent of land than is required. This is described above and in summary:

    - The Applicant is applying for permanent rights over (at least) 40 metres width of land. The submission documents confirm that a maximum of 25 metres width is required in a worse case scenario.
    - The DCO will extinguish all existing private rights in land including the Owner's only means of access between his dwelling and public highway at College Wood Farm.
    - The Applicant is proposing up to 7 years after the making of the DCO to serve acquisition notices. Together with the 3-year construction programme this could blight land for up to 10 years.

Compulsory Acquisition – reasonable efforts to reach agreement by negotiation.

26. CA Guidance states:

> *"Applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail." (paragraph 25)*

27. Case law, other guidance and recent Inspector Reports following Public Inquiries confirms that such efforts should be reasonable.

28. The Applicant failed to issue Heads of Terms (HOTs) for an agreement or attempt to engage with our Client until January 2024 which was only triggered by the submission of Our Client's relevant representation. Terms were finally issued on 26th January 2024 and contain several points which are inconsistent with the DCO including the width of land over which rights are required.

29. Our Client does not consider the terms to be reasonable because they require even more onerous and restrictive rights to be created than provided for in the Draft DCO, and over a much larger area of his Land than the Order Limits (described in the HOTs as the 'Grantor's Property').

30. Examples of onerous obligations over the Grantor's Property in the HOTs include requirements to:
    - Enter into an Option Agreement for a temporary Construction Corridor, Construction Access and other rights as necessary including an Easement Strip over the entirety of our Client's Property including his dwelling houses and buildings.
    - Unlimited rights to enter the entirety of our Client's Property as may reasonably required in connection with the Project.
    - Seek the Grantee's (RED) consent before routine property management decisions, including disposing of any interest or letting in the Grantor's Property (not just in the Order Limits).

31. Our Client is committed to constructive engagement with the Applicant to seek to agree terms by negotiation, however to date and in light of the onerous HOTs presented, do not consider the Applicant has made reasonable efforts to acquire the rights it seeks in the Land by agreement.

32. We also question the motive of the Applicant in only issuing heads of terms after the submission of Relevant Representations which raised this as a matter of concern.

33. We note in the Barking Vicarage Fields decision, the Inspector analysed whether the applicant in that case had followed the specific recommendations of compulsory purchase guidance when considering if reasonable efforts had been made to use compulsory purchase as a last resort. The applicant's failure to follow guidance in that case was a significant contributing factor in the CPO application being rejected.

34. We conclude the Applicant's failure to follow guidance throughout the planning process is a relevant consideration as to whether reasonable efforts have been made to use compulsory acquisition as a last resort.

Failure to consult with our client and consider alternatives.

35. As can be seen in the evidence of Perry Hockin, a number of alternative suggestions to the cable corridor are being considered by our client in an attempt to alleviate the impact of the Scheme on the use and enjoyment of his property.

36. This includes the use of HDD over all or part of the cable corridor to mitigate the otherwise harmful impact open cut trenching will have to hedgerows, permanent pasture and the access road. BCM report on the health and safety aspects of open cut trenching together with impacts to his farming business.

37. These issues have been raised in correspondence before with the Applicant and have not been given due consideration or consulted on. For reference we attach a letter dated 19th July 2022 from Savills (agents at the time for our Client) to Carter Jonas (agents to RED) attached at **Appendix 4**. The letter explains our client's concerns as to the detrimental impact of the proposed open cut method, puts forward an alternative HDD solution and offers the Applicant a chance to consider and consult on this alternative.

38. Our client's relevant representation attached at **Appendix 3** highlighted the failure of the Applicant to include our client in targeted cable route consultation exercise which were designed to canvass the opinions of those affected by the cable corridor in local area. We attach the consultation booklet at **Appendix 5** for the Wiston area (the location of our client's property). This targeted consultation exercise completely omitted College Wood Farm from any proposed modifications. This is despite the Applicant being aware of the alternatives from the Savills letter.

39. This is particularly acute as it is clear from reading page 63 of the consultation booklet that a Modified Route (MR-09) was considered and adopted by the Applicant to "*reduce the severance of agricultural fields and maximise their use during construction".*

40. This is the exact same point made by our client in his discussion with the Applicant. We are at a loss as to why his modified route was not considered by the Applicant which could have been accommodated whilst maintaining the appropriate standoff distance from the ancient woodland.

41. The first correspondence from the Applicant in response to this suggestion was via a letter from Vicky Portwain of RED to our client dated 24th May 2023, attached at **Appendix 6**. This is some 6 months after the Autumn 2022 consultation exercise suggesting that the Applicant failed to properly consider the modified route as part of the statutory consultation. In paragraph 3 of the section "Cable Routeing – Woodland/tree constraints", Ms Portwain confirms that the *"additional cable length required by the routeing of the cable northward along the field boundary would need to be justified on environmental or engineering grounds (which the Rampion 2 team do not believe it to be)".*

42. We raise two concerns about this comment: (i) the Applicant has not communicated or shared on what grounds the modified route was considered and provided details of the outcome of this consideration and, (ii) clearly from the example in page 63 of the consultation booklet at Appendix 5 the grounds for re-routeing the cable corridor has included reducing the severance of agricultural fields. What is the difference between the two cases?

Equalities

43. The Public Sector Equality Duty (PSED), as outlined in Section 149 of the Equality Act 2010, imposes a clear procedural requirement on decision-makers to duly consider a range of specified factors.

44. The Examining Authority is aware that our client is accorded protection under the Equality Act 2010, specifically due to age-related considerations as previously detailed in Relevant Representations.

45. It is therefore vitally important to our Client that Equality duties considered ensuring the objectives of anti-discrimination legislation are met, practically in the context of Section 149(3) of the Equality Act 2010:

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

(a)remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;

(b)take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(c)encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

46. Our broad submission is that the Applicant has failed to take into account our Client's protected characteristics and has failed to make appropriate reasonable adjustments that are required to comply with the protection granted by the Equality Act 2010. Lester Aldridge LLP has submitted a further representation on this issue.

Use of HDD

47. Our client has repeatedly put forward the suggestion of the Applicant employing HDD installation technique to mitigate the impacts of the scheme at College Wood Farm.

48. Evidence from Perry Hockin (Ecology) and BCM (Impact to Farm Business) has also concluded that HDD would provide the most optimal outcome to minimise the impact on ecology, including hedgerows and from a farming perspective including the private access road.

49. The 24th May 2023 from Vicky Portwain dismisses this proposal in respect of HDD beneath the farm track on grounds of cost. However, as above, this is contradicted by the Autumn 2022 consultation exercise where a Trenchless Crossing (TC15) of a farm track was accepted by the Applicant.

50. The Applicant has failed to, and needs to, demonstrate by way of providing a detailed cost comparison of HDD vs open cut trenching.

51. Similarly HDD crossings were accepted by the Applicant in other areas consulted on by the Application – See Modified Route MR-13 (page 66) and Trenchless Crossing TC-18 (page 66).

52. It is understandable that our client feels completely let down and ignored by the Applicant. He is put forward similar suggestions to use HDD on his land to alleviate the impact of the project. These suggestions have been completely overlooked/ignored in the Autumn 2022 consultation exercise. This is even more compounded when it is learned from the consultation material that HDD is being used on other land holdings in very similar circumstances to his.

Conclusion

53. The project will have a detrimental impact on the ecology of our client's land by destroying hedgerows and permanent pasture habitats. In addition significant amounts of land will be lost during the construction period and reinstatement of the land, this period could be up to 3 years.

54. Our client has put alternatives to the Applicant to mitigate these impacts. He has been repeatedly ignored throughout the pre-examination period. It is only latterly the Applicant has provided scant information to justify their approach to his land, albeit this is after statutory consultations which has overlooked him.

55. Throughout the pre-examination phase of the project there has been a failure by the Applicant to properly consult, engage, consider alternatives put to them and negotiate. Paragraphs 35 to 47 above set out how the Applicant has tried to put forward alternatives to mitigate the impact of the scheme, but he has been ignored by the Applicant.

56. Planning Act Guidance related to the procedures for the compulsory acquisition of land (Sept 2013) confirms that Applicants should carry out early consultation with landowners to build up a good working relationship with those whose interests are affected by showing that the applicant is willing to be open and to treat their concerns with respect. We consider the Applicant has failed in their duty and has not treated our client with respect.

57. In respect of negotiations the Planning Act Guidance states:

    Applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail.

58. The Applicant has failed to adhere to the guidance. There were no attempts to acquire our client's interest by agreement. Heads of Terms were only issued in January 2024, 4 months after the submission of the DCO and only after receiving our client's relevant representation. This is poor practice and follows the pattern established in consultation with our client.

59. Our client considers that there is not a compelling case in the public interest to authorise compulsory acquisition of his land in accordance with the Draft DCO.

60. Our client seeks to amend the Draft DCO to include provisions to HDD underneath his land holding as shown on pages 52 and 53 of Perry Hockin's ecology report. These suggestions have been previously communicated to the Applicant without receiving any form of detailed response with costings.

61. In addition the existing private rights along the farm track should not be extinguished by the DCO.

62. The Order powers should be available no more than 5 years after the Order is made.

Simon Mole
Montagu Evans LLP

ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY

Landscape, Arboriculture and Ecology

Surveys – Plans – Assessments - Mitigation – Solutions – Methodology

[redacted]

Executive summary of written Representation for Development Consent Order

College Wood Farm

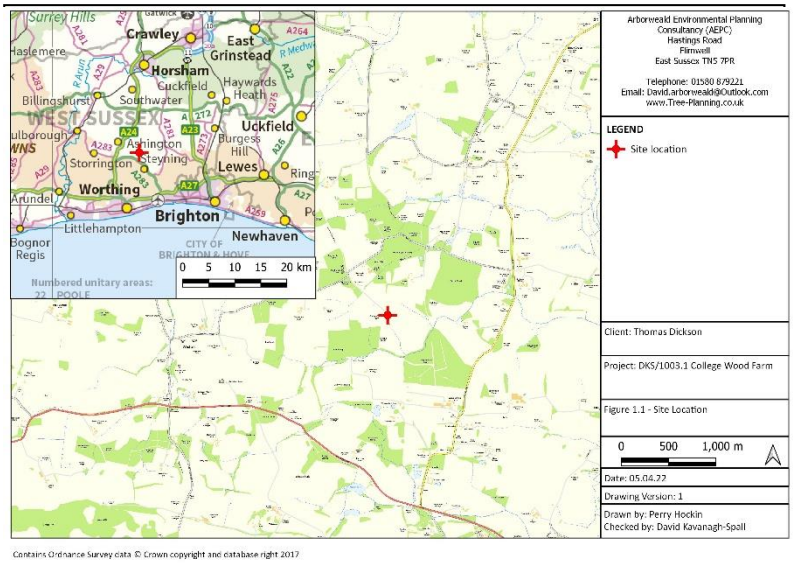
Spithandle Lane

Wiston

Steyning

West Sussex

BN44 3DY



26th February 2024

Thomas Dickson
College Wood Farm
Spithandle Lane
Wiston
Steyning
West Sussex
BN44 3DY

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

Document information

Report title:	DKS/1003.7 Executive summary of 'Written Representation'
Client:	Mr Thomas Dickson
Document ref:	DKS/1003.7 Executive summary of 'Written Representation'
Author / Surveyor:	Perry Hockin BSc (Hons.), FDSc, ACIEEM – Principal Ecologist
Reviewed by:	David Kavanagh-Spall BSc (Hons.), FDSc, AA
Approved By:	Alex Livingstone BA (Hons), ND, NC Forestry
Report date:	26th February 2024

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.

Printed: Perry Hockin BSc (Hons.), FDSc, ACIEEM – Principal Ecologist

Signed: 

Executive Summary

This document is an executive summary of the full Ecological Written Representation document reference DKS/1003.6 Written Representation. This document should not be used in a standalone context, and is subordinate to the main written representation document.

Background

Arborweald Environmental Planning Consultancy (AEPC) were commissioned by Mr Thomas Dickson to undertake a Preliminary Ecological Appraisal (PEA) at College Wood Farm, Spithandle Lane, Wiston, Steyning, West Sussex, BN44 3DY to provide an ecological baseline to inform routing, and mitigation, compensation and enhancement measures provided as a part of the proposed Rampion 2 wind farm development.

Arborweald are a professional environmental consultancy first established in 2012, renowned for high quality and holistic ecological, arboricultural and landscape surveys and assessments.

The author, Perry Hockin holds a BSc (hons.) in ecology, and a Foundation Degree (FDSc) in countryside management, as well as being an Associate member of the Chartered Institute of Ecological and Environmental Management (CIEEM). He has over 6 years professional experience in ecological and arboricultural consultancy and has worked in the countryside sector in the fields of habitat management, tree surgery and environmental consultancy for 11 years.

This document was written as a collaborative effort with David Kavanagh-Spall, the founder of Arborweald. David holds a BSc (hons.) in ecology, a Foundation Degree in arboriculture, and is a professional member of the Arboriculture Association. Furthermore, David has over 25 years' experience in environmental consultancy, including 8 years as a district Senior Arboriculturist and Assistant Biodiversity Officer.

Purpose of evidence

The purpose of this written representation document is to analyse and where necessary contest the value of habitats stated in Rampion's documentation and compare and contrast the different approaches taken by Rampion and Arborweald. This analysis will ensure that the facts of the case are delivered to the inspectorate, which will allow an impartial and fully informed decision to be achieved under the obligations imposed on the inspectorate by Section 40 of the NERC Act 2006 and Section 99 the Environment Act 2021.

This evidence shall be used to inform routing of the proposed Rampion 2 cable route across College Wood Farm. Accordingly, a suite of three alternative routes and methodologies for the Rampion 2 cable are proposed, that are not only more ecologically sensitive but also feed into economic and practicality arguments for an alternative route.

To gather evidence of biodiversity value, a Preliminary Ecological Appraisal (PEA), Habitat Suitability Index (HSI) assessment for newts, and a Hedgerow Regulations Assessment (1997) hedge survey was undertaken in March and June 2022 to provide a holistic and complete view of habitats at College Wood Farm. Data was also gathered to inform a future Biodiversity Metric assessment.

The objectives of the PEA were to:

- Assess the type of habitats on site, providing species lists where appropriate, and making condition assessments to the standards of the Natural England Biodiversity Metric.
- Assess the potential of those habitats to support protected species and/or species of conservation importance by identifying, and evaluating the constraints that the presence of any protected species or species of conservation concern may place on the proposed re-development of the site.

Development Proposals

A third-party development company, Rampion Extension Development Limited, have proposed an extension to the existing Rampion offshore wind turbine array currently sited between Newhaven in the east and Worthing in the west. The existing development comprises 116 turbines covering an area of 72km^2.

The client has advised the author that Rampion Extension Development Limited have been in contact with residents and stated that access to a band of land between 50 and 100m wide will be required to bury a set of underground cables, and that access will be required for up to 4 years. This area has since been revised to approximately a 60m wide strip across College Wood Farm.

The PEA survey undertaken by Arborweald was designed to provide an ecological baseline to ensure that the biodiversity value of the site is not lowered by the development and is instead enhanced where possible in line with Section 99 and Schedule 15 of The Environment Act 2021.

Site Description

The site is located on Spithandle Lane to the north of Steyning, West Sussex (Ordnance Survey Grid Reference for the centre of the site: TQ 16705 14474). The site is approximately 60 hectares in area and comprises good quality semi-improved grassland, hardstanding, deciduous woodland, buildings, waterbodies, scrub, native species-rich hedgerow and scattered trees.

Woodlands within and adjacent to College Wood Farm comprise Spithandle Rough to the north, Love's Rough and Sandpit Rough to the south, Great Pepper's Wood to the north, Felbridge Rough to the east, and Wappingthorn Wood to the south-east.

Summary of results

Hedgerows

All of the hedgerows have been surveyed by both WSP / Woods on behalf of Rampion, and Arborweald using the same methodology, but at different times of year. Woods Ecology undertook surveys in July and August 2021 with Arborweald conducting two site visits in March and June 2022 so as to catch both spring and summer flowers and forbs.

WSP have classified all of the hedgerows as being 'unimportant' as per the Hedgerow Regulations Act 1997, as they fail to meet the criteria for an 'important' hedgerow as outlined in Section 4. However, Arborweald revealed with their surveys that this is incorrect, and that all five hedgerows meet criteria for 'important' classification, and should be accordingly protected as a priority habitat.

The assessment of hedgerows at College Wood Farm made by Woods and WSP is at best brief in its description compared to that undertaken by Arborweald. The inaccuracies that have come to light as a result of analysis of these results are detailed below.

Other habitats

Surveys were conducted by Woods and WSP along the cable route throughout 2021-2023, comprising protected species and NVC surveys as a part of a package of phase 1 surveys.

The Phase 1 habitat survey report (6.4.22.3) summarises all of the habitats that are within the DCO limits. The area of College Wood Farm within direct influence of the proposed route was classified as being predominantly improved grassland with hedgerows and dry ditches, and as such was not subjected to detailed surveying – this is in contrast to the Arborweald surveys, which revealed that the site is made up of good-quality semi-improved grassland, deciduous woodland, scrub, native species-rich hedgerows, waterbodies, wet ditches, scattered trees, hardstanding and buildings.

Rampion's effort to survey College Wood Farm has been *de minimis* at best, and the issues that this approach has caused are analysed further in the main written representation.

Summary of issues

Multiple issues exist within the current proposals due to Rampion's insufficiently detailed approach to biodiversity at College Wood Farm. This is predominantly down to the following factors:

- Inadequate surveying, and poor translation of industry best practice, industry best methodology, and legislation - including missing species from legislated lists.
- Obfuscation of results through manipulation of data on habitat areas (including hedgerows), such as the extent of hedgerows surveyed and what is considered 'within influence' of the proposals.
- Poor extrapolation of data contributing to a limited assessment of the value of habitats within influence of the DCO area.

Hedgerows

The proposals currently threaten the survival of protected species within hedgerows that have been identified as priority habitats by Arborweald and as 'important' using the methodology from the Hedgerow Regulations Act 1997.

Removal of sections of hedgerow at College Wood Farm will cause a temporary complete loss of biodiversity units whilst the works are undertaken – a period of up to 4 years - a reduction in biodiversity units whilst the site recovers – a period of between 12 and 20 years, and a permanent reduction in the biodiversity value of these hedgerows once target condition of replacement hedgerows is reached after that 12-20 year period.

Hedgerow removal will also result in loss of connectivity between priority habitats identified under Section 41 of the NERC Act 2006 which will be both immediate and long lasting.

As well as localised effects, the removal of hedgerow connectivity between areas of higher quality habitat in the wider landscape such as the priority habitat deciduous woodlands at Love's Rough, Spithandle Rough, Great Pepper's Wood, and Felbridge Rough (some of which are designated ancient woodland) will result in isolation of some pockets of woodland and will restrict the movement of protected species such as herptiles and mammals.

Hedgerows can easily be avoided throughout the scheme by short throw HDD and re-routing of the proposed cable.

Habitats

Rampion's lack of detailed survey effort of the other habitats at College Wood Farm and failure to appreciate the holistic value of these habitats has resulted in an oversight as to the impact of the scheme on biodiversity at the local, District and County level.

Furthermore, the delicate and highly valuable soil structure at College Wood Farm which is demonstrated by the overall high grassland diversity would be ruined by cut and cover trenching technology. This complex balance of ecotones within the soil has taken decades to create and would take decades to recover if disturbed.

One of the arguments presented by Rampion Extension Development Ltd. throughout the consultation process is that because wind power is effectively 'eco-friendly' and provides clean

power – facts that are not in dispute – damage to habitats in the 'short' term is acceptable. This goes against the NERC Act 2006, the Environment Act 2021, the NPPF 2023, and the Conservation of Habitats and Species Regulations 2017, all of which legislate the need for biodiversity to be accounted for in any development, regardless of the benefits of that development.

Well managed grasslands, woodlands, and hedgerows [and other habitats] are carbon sinks, and actively sequester carbon dioxide from the atmosphere. Wind turbines provide clean power such that less carbon is released into the atmosphere, which is also beneficial to the environment. However, their construction should not come at the cost of local biodiversity where other proportionate solutions or alternatives are available that would allow both to coexist.

It is the author's professional recommendation that investigation into the cost of appropriate mitigation measures such as HDD should be undertaken, and that evidence is gathered regarding the costs of habitat removal and reinstatement vs avoidance, route change, and HDD.

Enhancement

Rampion have provided no specificity regarding enhancement, what will be done, where, how, when, and by whom. Rampion have also not provided specifics about how the scheme can be enhanced elsewhere, where it is not possible to do so at the site of the impacts.

Wider context

All of the issues raised as a part of this report have been discussed in the context of College Wood Farm and its immediate surroundings. However, this does not mean that these issues are isolated or unique to the subject site, and many of these issues are likely prevalent across the entire cable route and throughout the connected wider landscape.

Current routing

In its current form, the proposed routing through College Wood Farm is not ecologically viable, as it would result in the following effects:

- Reduction in biodiversity units immediately on commencement of works; the biodiversity value of the site would be reduced for the duration of works, and then would only recover by around 65% once compensation measures have matured – a period of up to 20 years. This 'rollercoaster' of biodiversity loss is unacceptable.
- Loss of connectivity between woodlands in the north and to the south of the farm, and within the grassland fields identified as high quality semi-improved grassland. This will lead to isolation of habitats including the nationally designated priority ancient semi-natural deciduous woodland at Spithandle Rough, which is otherwise disconnected from other woody features.
- Removal of mature trees that are likely BS:5837 category A1, B1, or A3 due to their ecological and landscape value. This would permanently detract from the biodiversity

value of the site and immediate landscape and cannot be compensated for by replacement planting.

- Disturbance of nationally and European protected species, as well as vulnerable, rare, or scarce species, and species of national importance. Avoidance of this disturbance should be the first option, with mitigation being a last resort alternative where impacts are unavoidable.
- Disturbance of the extremely valuable mycorrhizae layers within the untilled grassland soils, their quality having been demonstrated by the high overall diversity. This damage would be permanent and irreparable.

These shortcomings are by no means unsurmountable, and Arborweald have provided three alternative routes that are more ecologically desirable.

Alternative routes

The most environmentally favourable option for the development is for the cable route to cross land of less ecological value and to avoid sensitive features in their entirety. This would also deliver savings in ecological surveys and the associated works required.

The most desirable option would be for the impact of the development to be reduced by undertaking the cable laying with Horizontal Directional Drilling (HDD) or 'Thrust boring'. This method will have to be applied to other areas of the cable route and would reduce the environmental impact on College Wood Farm particularly with regard to disturbing soil layers.

If this method was adopted on College Wood Farm, then ecological mitigation, compensation and enhancement measures could be directed at smaller areas used as access points to the boring sites, and to smaller sections of open cut at each end.

The following proposed routes are in descending order of preference by the client, the priority of which has been reached following a study of all relevant factors.

Alternative route 1

8.1 Drawing number DKS/1003.1 shows the proposed alternative route 1.

8.2 The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 1 follows the same route proposed by Rampion but is entirely Horizontal Directional Drilling (HDD) 'trenchless' technology.

8.3 This would avoid all environmentally sensitive and practically important features and would allow space for HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.

8.4 Alternative route 1 is the most ecologically desirable route as it would avoid all sensitive features such as hedgerows and all of the high-quality semi-improved grassland. It would also avoid all other woody features including scattered trees in the centre of the site between H235 and H246.

8.5 Alternative route 1 effectively joins photo points [from west to east] 16, 15, 12, 11, 1, 2, 4, 3.

Alternative route 2

8.6 Drawing number DKS/1003.2 shows the proposed alternative route 2.

8.7 The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 2 proposed by the client is 1,159m long, and comprises approximately 514m of Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 645m open cut.

8.8 Please note that this drawing does not show the ‘short throw’ HDD sections that would be required for traversing hedgerows not covered by the long throw HDD.

8.9 This would avoid environmentally sensitive and practically important features and would allow space for HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.

8.10 Alternative route 2 is the second most ecologically desirable route as it would avoid sensitive features such as hedgerows and large swathes of high-quality semi-improved grassland. It would also avoid the majority of woody features including scattered trees in the centre of the site between H235 and H246.

8.11 Alternative route 2 effectively joins photo points [from west to east] 16, 15, 12, 11, 7, 8, 6, and 5.

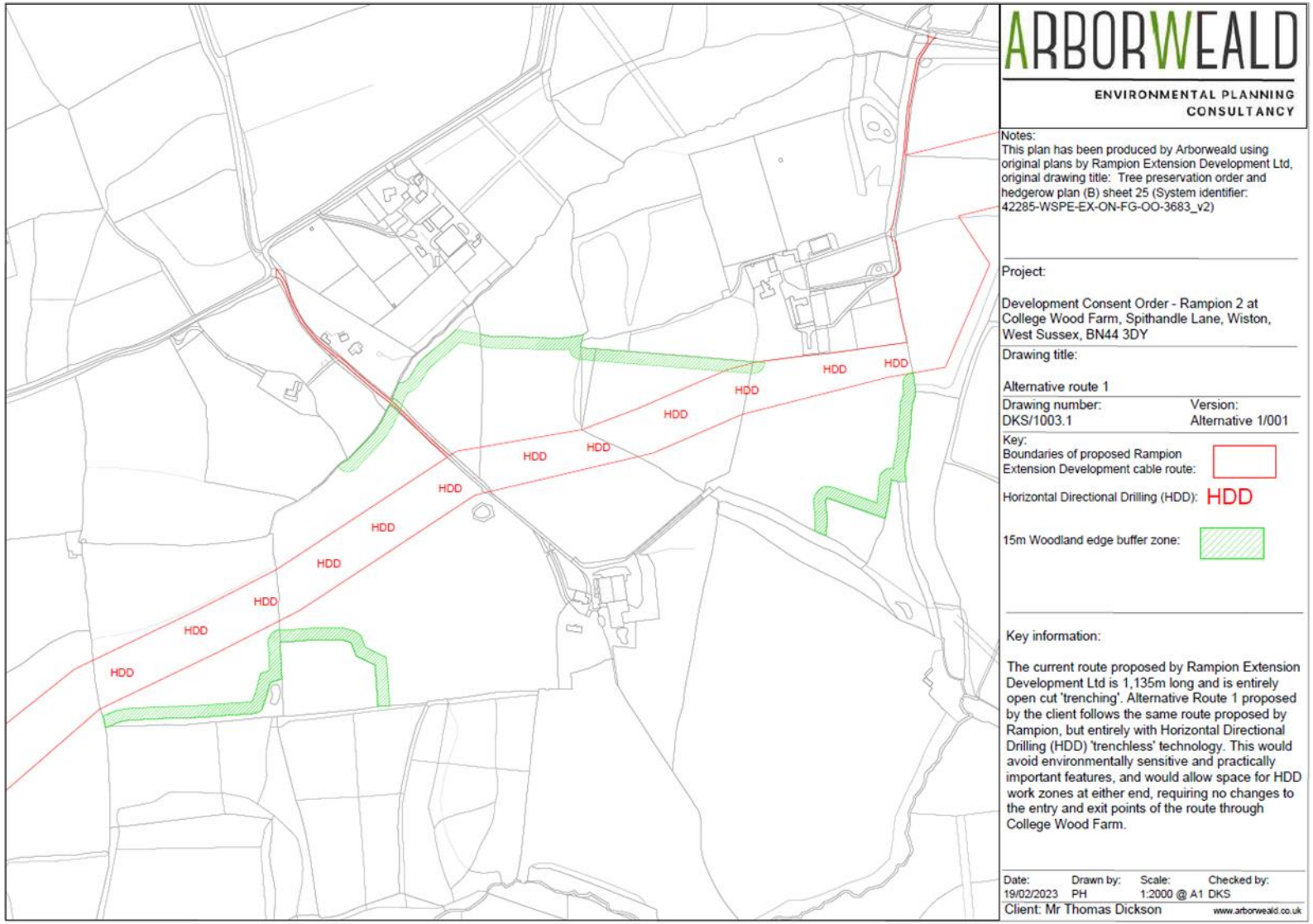
Alternative route 3

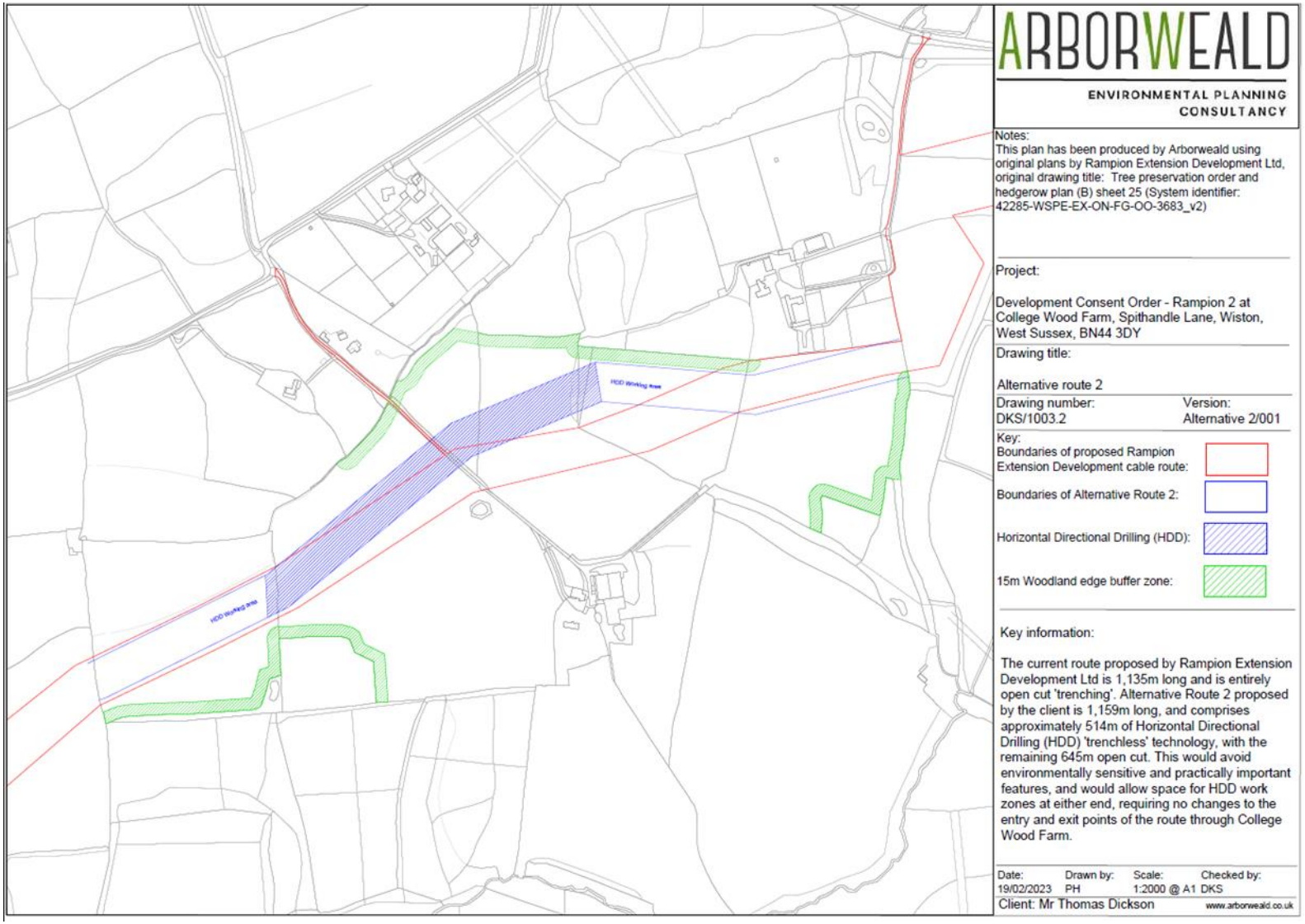
8.12 Drawing number DKS/1003.3 shows the third proposed alternative route. Alternative Route 3 proposed by the client is 1,207m long, and comprises approximately 80m of short throw Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remainder open cut.

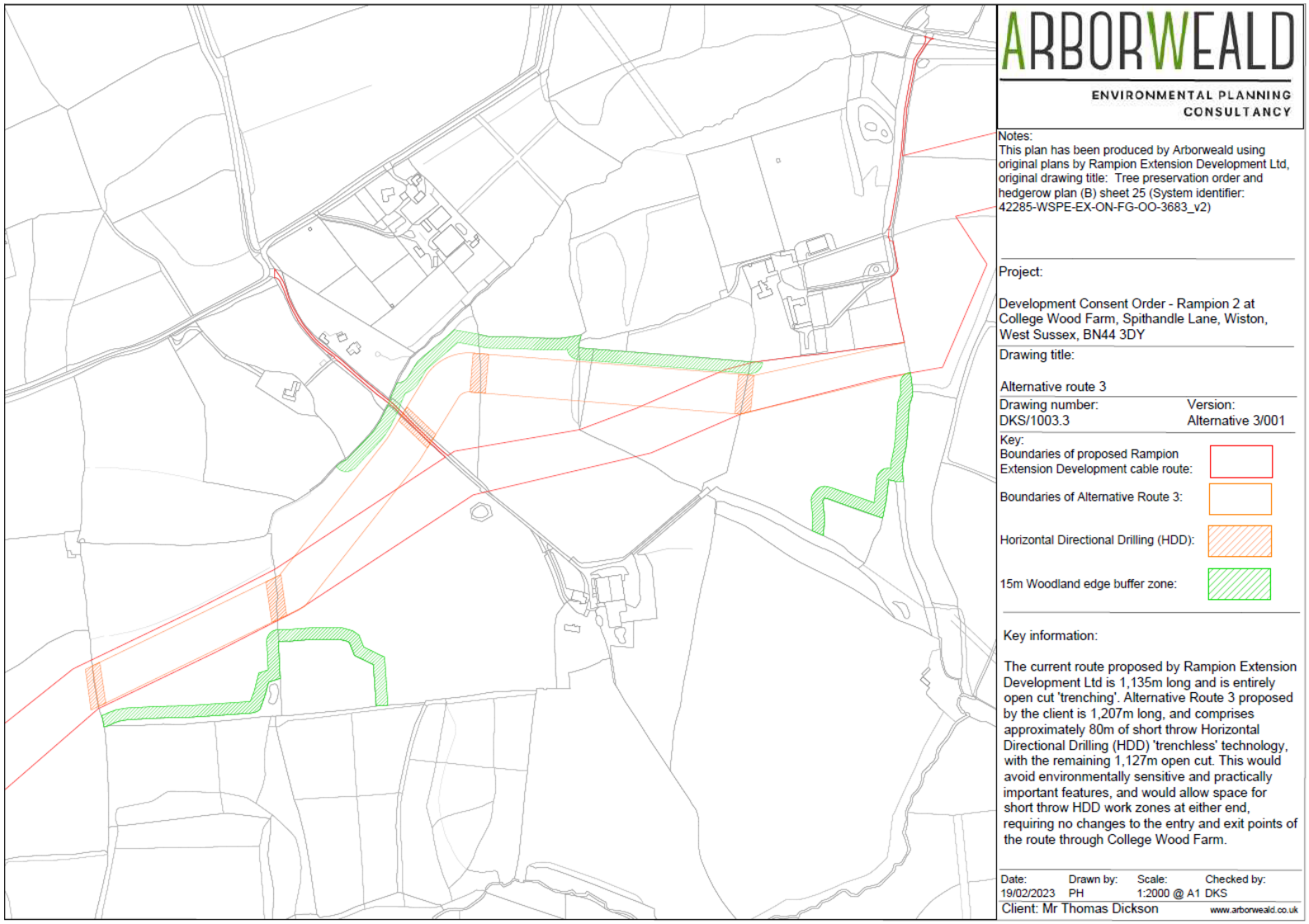
8.13 Alternative route 3 is the third most ecologically desirable route as it would avoid sensitive features such as hedgerows but would still allow open trenching within the semi-improved grassland – however the route has been moved to the field edges such that the majority of the remaining grassland is not fragmented. It would also avoid the majority of woody features including scattered trees in the centre of the site between H235 and H246.

8.14 Alternative route 3 effectively joins photo points [from west to east] 16, 15, 13, 14, 9, 10, 7, 8, 6 and 5.

APPENDIX A Figures




ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY
Notes:
This plan has been produced by Arborweald using original plans by Rampion Extension Development Ltd, original drawing title: Tree preservation order and hedgerow plan (B) sheet 25 (System identifier: 42285-WSPE-EX-ON-FG-OO-3683_v2)
Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Alternative route 2
Drawing number:
DKS/1003.2
Version:
Alternative 2/001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Boundaries of Alternative Route 2:
Horizontal Directional Drilling (HDD):
15m Woodland edge buffer zone:
Key information:
The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 2 proposed by the client is 1,159m long, and comprises approximately 514m of Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 645m open cut. This would avoid environmentally sensitive and practically important features, and would allow space for HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.
Date: 19/02/2023
Drawn by: PH
Scale: 1:2000 @ A1
Checked by: DKS
Client: Mr Thomas Dickson
www.arborweald.co.uk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Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Alternative route 3
Drawing number:
DKS/1003.3
Version:
Alternative 3/001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Boundaries of Alternative Route 3:
Horizontal Directional Drilling (HDD):
15m Woodland edge buffer zone:
Key information:
The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 3 proposed by the client is 1,207m long, and comprises approximately 80m of short throw Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 1,127m open cut. This would avoid environmentally sensitive and practically important features, and would allow space for short throw HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.
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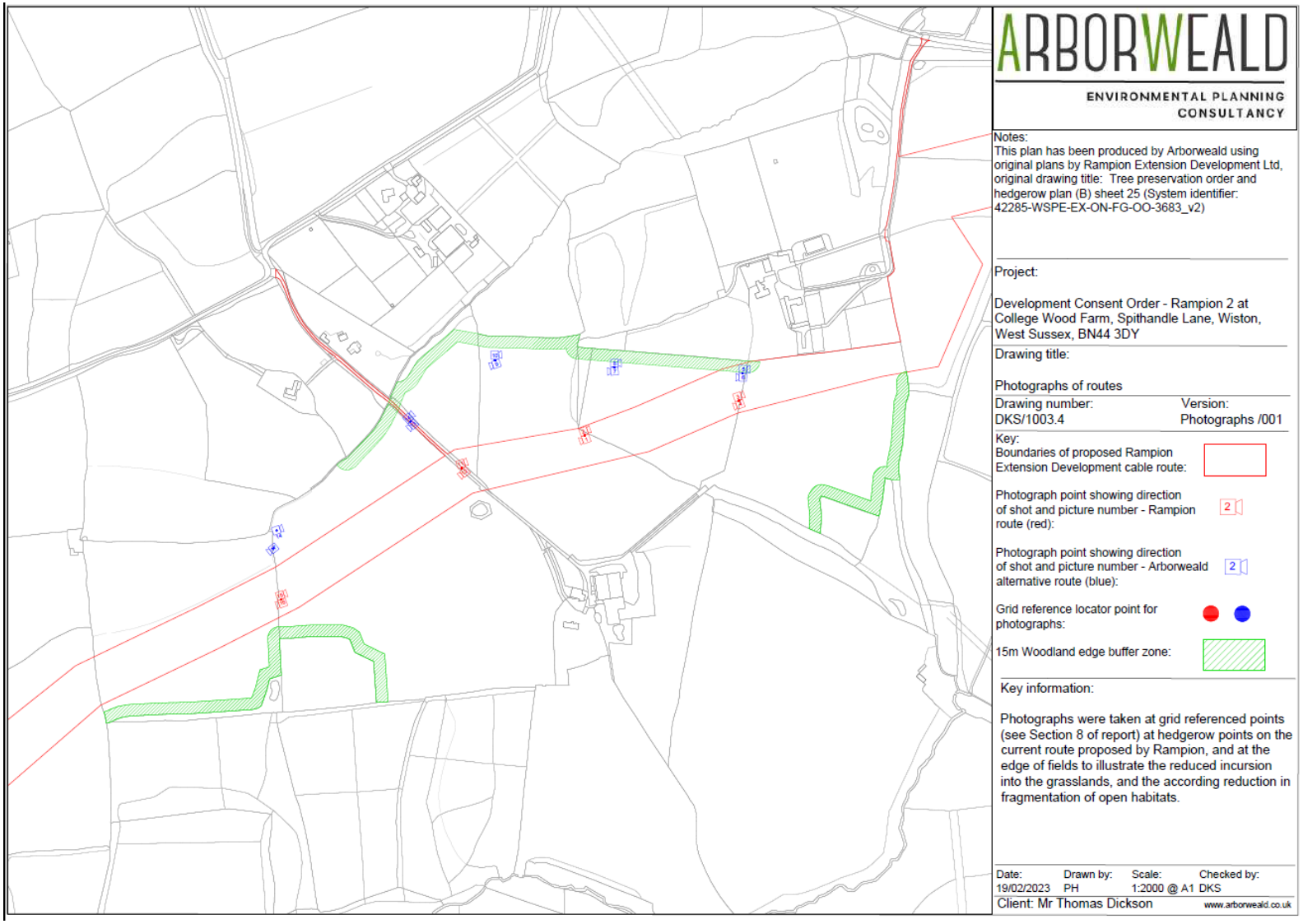
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Notes:
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Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Photographs of routes
Drawing number:
DKS/1003.4
Version:
Photographs /001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Photograph point showing direction of shot and picture number - Rampion route (red):
2
Photograph point showing direction of shot and picture number - Arborweald alternative route (blue):
2
Grid reference locator point for photographs:
15m Woodland edge buffer zone:
Key information:
Photographs were taken at grid referenced points (see Section 8 of report) at hedgerow points on the current route proposed by Rampion, and at the edge of fields to illustrate the reduced incursion into the grasslands, and the according reduction in fragmentation of open habitats.
Date:
19/02/2023
Drawn by:
PH
Scale:
1:2000 @ A1
Checked by:
DKS
Client: Mr Thomas Dickson
www.arborweald.co.uk

ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY

Landscape, Arboriculture and Ecology

Surveys – Plans – Assessments - Mitigation – Solutions – Methodology

[redacted]

Written Representation for Development Consent Order

College Wood Farm

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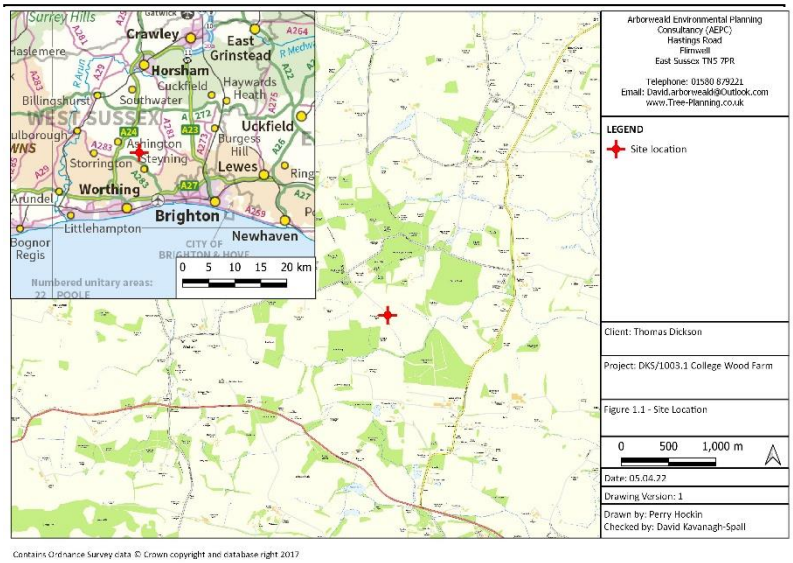

26th February 2024

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Reviewed by:	David Kavanagh-Spall BSc (Hons.), FDSc, AA
Approved By:	Alex Livingstone BA (Hons), ND, NC Forestry
Report date:	26th February 2024

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.

Printed: Perry Hockin BSc (Hons.), FDSc, ACIEEM – Principal Ecologist

Signed: [redacted]

Notice to Interested Parties

The author has prepared this report for the sole use of the commissioning party in accordance with the agreement under which our services were performed. No warranty, express or implied, is made as to the advice in this report or any other service provided by us. This report may not be relied upon by any other party without the prior written permission of the author. The content of this report is, at least in part, based upon information provided by others and on the assumption that all relevant information has been provided by those parties from whom it has been requested. Information obtained from any third party has not been independently verified by the author, unless otherwise stated in the report.

No investigative method can completely eliminate the possibility of obtaining partially imprecise or incomplete information. Thus, we cannot guarantee that the investigations completely defined the degree or extent of species abundances or habitat management efficacy described in the report.

The material presented in this report is confidential. This report has been prepared for the exclusive use of the client and shall not be distributed or made available to any other company or person without the knowledge and written consent of the author. Notwithstanding confidentiality, this document may be utilised and publicly displayed with reference to the development proposal planning application.

This report and all survey work have been prepared to British Standard 42020 and rely on information and methodology from the Joint Nature Conservation Committee and the Chartered Institute of Ecological and Environmental Management. Additionally, this report relies on information from other third parties, some of which may include, but not be limited to; DEFRA's MAGIC database, local record centres, local wildlife spotter groups such as badger groups, and the NBN atlas.

Purpose of this document

This document is a written representation referring to works undertaken at College Wood Farm under contract with Mr Thomas Dickson for 'DKS/1003.1 Preliminary Ecological Appraisal', and is intended for public display as analysis of the results of survey(s) undertaken and as expert witness material to guide the development process to an approach that is environmentally sensitive and follows all relevant legislation.

CONTENTS

1 QUALIFICATIONS

1.1 Arborweald Environmental Planning Consultancy (AEPC) were commissioned by Mr Thomas Dickson to undertake a Preliminary Ecological Appraisal (PEA) at College Wood Farm, Spithandle Lane, Wiston, Steyning, West Sussex, BN44 3DY to provide an ecological baseline to inform routing, and mitigation, compensation and enhancement measures provided as a part of the proposed Rampion 2 wind farm development.

1.2 Arborweald are a professional environmental consultancy first established in 2012, renowned for high quality and holistic ecological, arboricultural and landscape surveys and assessments. Arborweald's portfolio includes production of the Horsham District Council (HDC) Tree Strategy, an important habitat management document informing HDC's policy and management practice, including the use of ecosystem services and reinforcing / creating climate change resilience.

1.3 Additionally, Arborweald specialise in environmental reporting, and have done so for dozens of multi-unit residential developments, and management of land for private companies and municipal bodies such as the High Weald Area of Outstanding Natural Beauty Partnership, as well as providing ecological, arboricultural and woodland specialist services including planning inquiries to a number of Local Planning Authorities such as Barnet, Brighton and Hove, Arun, and Wealden.

1.4 The author, Perry Hockin holds a BSc (hons.) in ecology, and a Foundation Degree (FDSc) in countryside management, as well as being an Associate member of the Chartered Institute of Ecological and Environmental Management (CIEEM). He has over 6 years professional experience in ecological and arboricultural consultancy and has worked in the countryside sector in the fields of habitat management, tree surgery and environmental consultancy for 11 years.

1.5 Perry’s achievements include provision of expert witness documentation for planning inquiries including the recent proposed development at Downlands Farm in Uckfield, East Sussex, as well as being the lead on the ecosystem services elements and statistical analysis as a part of production of the Horsham District Tree Strategy.

1.6 Perry’s work is often highly technical, and includes data management, analysis and AutoCAD and GIS mapping.

1.7 This document was written as a collaborative effort with David Kavanagh-Spall, the founder of Arborweald. David holds a BSc (hons.) in ecology, a Foundation Degree in arboriculture, and is a professional member of the Arboriculture Association. Furthermore, David has over 25 years’ experience in environmental consultancy, including 8 years as a district Senior Arboriculturist and Assistant Biodiversity Officer.

1.8 David’s role at Wealden District Council (WDC) as Senior Arboriculturist and Assistant Biodiversity Officer included providing a service of landscape and wildlife appraisals, advising on planning legislation, environmental legislation and management, and served as the Council’s specialist consultant at inquiries for Arboriculture, Woodland Assessment and Ecology.

1.9 David’s experience includes lecturing at higher education level in Arboriculture and associated sciences, including ecological modules.

1.10 During his 8 years at WDC, he worked on many projects of significance to biodiverse landscape management and climate proofing, including providing a service as Assistant Lead Officer for the first UK Ancient Woodland Survey for woodlands under 2 hectares in size, and as Lead Officer for an extensive survey of the district's veteran trees.

1.11 The ancient woodland survey project was undertaken in partnership with the Woodland Trust and High Weald Area of Outstanding Natural Beauty Partnership and was supported by Natural England and the Forestry Commission.

1.12 WDC were quoted as an exemplar regarding Ancient Woodland consideration in the Planning Policy Statement 9 Guidance document. David also worked in partnership with the Woodland Trust for the veteran tree survey with support from Natural England and the Forestry Commission.

2 PURPOSE OF EVIDENCE

2.1 The purpose of this written representation document is to analyse and where necessary contest the value of habitats stated in Rampion's documentation and compare and contrast the different approaches taken by Rampion and Arborweald. This analysis will ensure that the facts of the case are delivered to the inspectorate, which will allow an impartial and fully informed decision to be achieved under the obligations imposed on the inspectorate by Section 40 of the NERC Act 2006 and Section 99 the Environment Act 2021.

2.2 This evidence shall be used to inform routing of the proposed Rampion 2 cable route across College Wood Farm. Accordingly, a suite of three alternative routes and methodologies for the Rampion 2 cable are proposed, that are not only more ecologically sensitive but also feed into economic and practicality arguments for an alternative route.

2.3 This document is not simply a catalogue of errors, as this would be of little use to the DCO process. Instead, this document is designed to provide solutions to the issues raised to ensure legislative compliance, and to assist the development in going ahead in the most environmentally sensitive way possible.

2.4 To gather evidence of biodiversity value, a Preliminary Ecological Appraisal (PEA), Habitat Suitability Index (HSI) assessment for newts, and a Hedgerow Regulations Assessment (1997) hedge survey was undertaken in March and June 2022 to provide a holistic and complete view of habitats at College Wood Farm. Data was also gathered to inform a future Biodiversity Metric assessment.

2.5 The objectives of the PEA were to:

- Assess the type of habitats on site, providing species lists where appropriate, and making condition assessments to the standards of the Natural England Biodiversity Metric.
- Assess the potential of those habitats to support protected species and/or species of conservation importance by identifying, and evaluating the constraints that the presence of any protected species or species of conservation concern may place on the proposed re-development of the site.

2.6 This document provides three alternative routes for consideration that would be more ecologically desirable as they:

- Avoid particularly sensitive ecological features such as hedgerows, high value grassland, and other woody features such as standard trees.
- Would not disturb connectivity between areas of grassland on site, and higher quality habitats in the wider landscape; and
- Would reduce the 'rollercoaster' effect of biodiversity units being immediately lost on scheme commencement, a period of reduced biodiversity followed by a period of many years to recover those units to a lower value than that originally held. This would have the knock-on effect of reducing the scale of enhancement required for this section of the route.

3 BACKGROUND

Development Proposals

3.1 A third-party development company, Rampion Extension Development Limited, have proposed an extension to the existing Rampion offshore wind turbine array currently sited between Newhaven in the east and Worthing in the west. The existing development comprises 116 turbines covering an area of 72km^2.

3.2 The proposed extension to the array, known as 'Rampion 2' is still at the consultation stage, however the new array will be no closer to shore than Rampion 1 (between 13 and 25km from shore) and will comprise no more than 116 new turbines.

3.3 Like Rampion 1, Rampion 2 will comprise an array of turbines connected to the shore by an undersea cable. This cable (along with three others) will take a curved path underground north and then east to Bolney sub-station in West Sussex, with the route currently under consultation. The current proposed route would bisect College Wood Farm, the subject of this report.

3.4 The client has advised the author that Rampion Extension Development Limited have been in contact with residents and stated that access to a band of land between 50 and 100m wide will be required to bury the set of underground cables, and that access will be required for up to 4 years. This area has since been revised to approximately a 60m wide strip across College Wood Farm.

3.5 The PEA survey undertaken by Arborweald was designed to provide an ecological baseline to ensure that the biodiversity value of the site is not lowered by the development and is instead enhanced where possible in line with Section 99 and Schedule 15 of The Environment Act 2021.

Site Description

3.6 The site is located on Spithandle Lane to the north of Steyning, West Sussex (Ordnance Survey Grid Reference for the centre of the site: TQ 16705 14474). The site is approximately 60 hectares in area and comprises good quality semi-improved grassland, hardstanding, deciduous woodland, buildings, waterbodies, scrub, native species-rich hedgerow and scattered trees.

3.7 The habitats in the wider landscape (3km radius from College Wood Farm) comprise arable, semi-improved grassland, deciduous woodland, riparian, unimproved grassland, and urban residential. Further to this, the wider landscape contains three Habitats of Principal Importance (HPIs) covered under Section 41 of the Natural Environment and Rural Communities Act, consisting of deciduous woodland including ancient woodland, coastal and floodplain grazing marsh, and wood pasture and parkland.

3.8 Woodlands within and adjacent to College Wood Farm comprise Spithandle Rough to the north, Love's Rough and Sandpit Rough to the south, Great Pepper's Wood to the north, Felbridge Rough to the east, and Wappingthorn Wood to the south-east.

4 PLANNING POLICY and LEGISLATION

Legislation

Species

4.1 Certain habitats and species including nesting birds, bats, dormice, otter, and great crested newts, are afforded protection under the Conservation of Habitats and Species Regulations 2017 and the Wildlife & Countryside Act 1981 (as amended). Further information on the legislation is included in Appendix A.

4.2 In general, the above legislation makes it an offence to:

- Deliberately/intentionally or recklessly kill, injure or take a protected species;
- Intentionally or recklessly damage, destroy or obstruct access to any place that a protected species uses for shelter or protection whether the species is present or not;
- Intentionally or recklessly disturb a protected species while it is occupying a structure or place that it uses for shelter or protection;
- Deliberately take or destroy the eggs of species protected by this legislation (such as nesting birds).

4.3 The Protection of Badgers Act (1992) prohibits reckless and/or intentional cruelty, injury or killing of badgers and the interference with badger setts.

Biodiversity

4.4 Section 41 of the Natural Environment and Rural Communities Act (2006) lists the species and habitats of principal importance for the conservation of biodiversity in England and acts as a guide to local authorities in implementing their duties under Section 40, to have regard to the conservation of biodiversity in England.

4.5 Schedule 14 Section 99, and Schedule 15 of the Environment Act 2021 mandates the need for a minimum 10% net gain in biodiversity value for development sites. This does not apply directly to developments covered under Development Consent Orders, whereby the percentage net gain requirement is decided on a case-by-case basis by the Secretary of State. However, this does not negate the need for the government to have regard for the conservation of biodiversity under the Natural Environment and Rural Communities (NERC) Act 2006.

Hedgerows

4.6 Hedgerows, which satisfy specific size and location criteria, are safeguarded under the Hedgerows Regulations 1997 (SI 1997/1160) ("Regulations"). These regulations inhibit the uncontrolled alteration or removal of hedgerows.

4.7 A countryside hedgerow is protected under the following conditions:

- It represents a boundary line of trees and shrubs that was continuously connected at some point in the past.
- It extends over 20m in length with any gaps in between being 20m or less.
- It is shorter than 20m but connected to another hedge at both ends.
- It measures less than 5m at its base.
- It is located next to land used for agriculture or forestry purposes.

4.8 In addition to the above, "important hedgerows" are granted extra protection. The criteria for classifying a hedgerow as "important" are outlined in Part II of Schedule 1 of the Regulations.

4.9 An "important" hedgerow must have been in existence for at least 30 years and must fulfil more specific criteria pertaining to its archaeological and historical aspects, as well as its wildlife and landscape value. The relevant criteria for determining this, in addition to the requisite time period are as follows:

a) at least 7 woody species;

OR

b) at least 6 woody species, and has associated with it at least 3 of the features specified in sub-paragraph (4);

c) 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

d) at least 5 woody species, and has associated with it at least 4 of the features specified in sub-paragraph – defined below

- a bank or wall for at least half the length;
- a ditch for at least half the length;
- gaps over no more than 10 percent of the length;
- at least one standard tree per 50m;
- at least three ground flora woodland species as defined in Schedule 2 of the Regulations within 1m of the hedgerow;
- connections scoring four or more points, where connection to a hedgerow counts as one, a broad-leaved woodland or pond counts as two; and
- a parallel hedge within 15m.

4.10 Woody species are detailed in Annex D Table 4.1, with woodland ground flora species in Annex D Table 4.2

4.11 Other heritage and archaeological criteria for determining hedgerow importance, in addition to the requisite time period are as follows:

- marks all or part of a parish boundary that existed before 1850
- contains an archaeological feature such as a scheduled monument
- is completely or partly in or next to an archaeological site listed on a Historic Environment Record (HER), (formerly a Sites and Monuments Record)
- marks the boundary of an estate or manor or looks to be related to any building or other feature that's part of the estate or manor that existed before 1600
- is part of a field system or looks to be related to any building or other feature associated with the field system that existed before 1845; you can check the County Records Office for this information
- contains protected species listed in the Wildlife and Countryside Act 1981
- contains species that are endangered, vulnerable and rare and identified in the British Red Data books

Policy

Planning policy

4.12 Under The National Planning Policy Framework (NPPF, 2023) protected sites and species are a material consideration in determining planning applications in terms of minimising impacts on biodiversity.

4.13 National Planning Policy guidance uses a mitigation hierarchy, whereby potential impacts are first avoided through changes to design plans; then unavoidable impacts are mitigated against to reduce the negative effect of the impact; finally, residual impacts that remain after avoidance and mitigation measures are applied are compensated for (BS 42020, 2013, Section 5.2). Further to this, it is a requirement under National Planning Policy for developers to actively enhance the biodiversity value of development projects.

5 HEDGEROW ASSESSMENT

Rampion's assessment

5.1 Rampion's assessment of hedgerows was made by Woods Ecology and WSP Environment & Infrastructure Solutions UK Limited in August 2023, document reference: *Rampion 2 Wind Farm, Category 6: Environmental Statement, Appendix 22.5: Hedgerow survey report, Revision A.*

5.2 Methodology for both WSP and Arborweald was as follows:

5.3 Hedgerow surveys were undertaken within the Study Area between 2021 and 2023, following the methodology set out in Schedule 1, part II of the Hedgerow Regulations 1997, following the Hedgerow Survey Handbook (Department for Environment, Food and Rural Affairs (Defra), 2007). The purpose of hedgerow surveys was to identify whether any hedgerows within the proposed onshore cable corridor qualify as ecologically "important" under the Regulations criteria.

5.4 The hedgerows in question at College Wood Farm are H228, H230, H235, H237, and H246. The results of WSP's surveys are detailed in table 5.1 below.

Table 5.1 – Rampion's hedgerow assessment (WSP and Woods Ecology)

Hedge ref:	Dimensions			Associated features						Connections					Description and context
	Height (m)	Width (m)	Length (m)	Woody species	Road / track / bridleway / PROW	Bank / ditch	Gaps less than 10%	Trees per 50m	3 woodland ground flora species	Connections scoring 4	Parallel hedges	Hedges	Woodlands	Ponds	
H228	1	1	106	1	X	X	X	X	X	X	X	X	X	X	Less than 1m tall for most of length. Bracken, bramble and blackthorn abundant.
H230	2	2	130	1	X	U	U	X	X	U	X	2	1	X	No gaps. Stream along north side. Connected to woodland at south and two hedges at north. Blackthorn dominant, bramble abundant. Ground flora false wood brome and tall fescue abundant, Juncus species frequent, hemp agrimony, bracken.
H235	<2	<2	113	3	X	U	X	X	X	X	X	X	X	X	Holly, hawthorn, blackthorn, goat willow. Shallow dry ditch with pendulous sedge and soft rush patches.
H237	<2	<2	96	4	X	X	X	U	X	X	X	X	X	X	Hawthorn, blackthorn and hazel with oak standards
H246	<2	<2	457	2	X	X	X	X	X	X	X	X	1	X	Dense hedge dominated by blackthorn, with frequent bramble and hawthorn, stand of hazel at southern end. Connected directly to broadleaved woodland.

5.5 As a result of these findings, WSP have classified all of the hedgerows as being ‘unimportant’ as per the Hedgerow Regulations Act 1997, as they fail to meet the criteria for an ‘important’ hedgerow as outlined in Section 4.

5.6 This is contrary to the results obtained by Arborweald in March and June 2022, outlined in Table 5.2 below (for names of woodlands, please refer to Section 3.8).

Table 5.2 – Arborweald's hedgerow assessment

Hedge ref:	Dimensions			Associated features						Connections					Description and context
	Height (m)	Width (m)	Length (m)	Woody species	Road / track / bridleway / PROW	Bank / ditch	Gaps less than 10%	Trees per 50m	3 woodland ground flora species	Connections scoring 4	Parallel hedges	Hedges	Woodlands	Ponds	
H228	1.5	1	106	6	X	X	√	X	√	√	X	2	1	X	Approximately 1.5m tall at time of survey, comprising predominantly blackthorn, hawthorn, and field maple with abundant dog rose, English oak, and hazel with occasional honeysuckle, and elder. Ground flora emergent in March with woodland species abundant in June, comprising dominant bramble, bracken and red campion. Other species recorded abundantly included primrose, heath bedstraw, wood speedwell, herb Robert, and lesser stitchwort with occasional hedge vetch, foxglove and hedge woundwort. No bank or ditch system, however hedgerow is connected to woodland in the south, Loves Rough.

														Furthermore, H228 is connected to two other hedgerows in the north, earning it 4 connection points. No ponds or parallel hedges present within stretch identified by Rampion, and fewer than 1 tree per 50m. No significant gaps, and meets the 'important' criteria with 6 woody species and 3 additional features.
H230	2	2	130	8	X	√	√	X	√	√	X	2	1	X	Likely the most established and important hedgerow on site, H230 was approximately 2m tall and 2m thick at the time of surveying being subjected to biannual flailing. Woody species comprised dominant hawthorn, blackthorn, and field maple with regularly abundant dog rose , English oak, hazel, and elder with occasional wayfaring tree. Bullace was also present within the hedge. Ground flora was similar to H228 being dominated by bracken and bramble, but with a distinct field layer of primrose, red campion, heath bedstraw, wood speedwell, herb Robert, and lesser stitchwort with occasional hedge vetch, foxglove and hedge woundwort. There is a stream running along the western edge of the hedge which crosses at its northern extent before travelling north-east. Much of the field layer is typical of wetter areas of grassland with rush species and hemp agrimony. Meets 'important' criteria with 8 woody species and 4 other features.

H235	3	2	113	6	X	√	√	√	√	√	X	2	1	X	H235 is a tall and dense hedgerow connected to H237 and H242. On the ground the hedge appears to be a continuation of H237. It comprises dominant hawthorn, blackthorn, holly, and goat willow with abundant field maple, and elder. There are occasional hazel plants within the hedge as well as oaks (including standards), but these are too infrequent to count towards the woody species. The hedgerow is dense, with no significant gaps and is adjacent to a seasonal ditch. Woodland ground flora are similar to H230 being similarly wet in Spring. It is connected to two other hedgerows, H237 and H242, and to Spithandle Rough in the north. Meets 'important' criteria with 6 woody species and 5 other features.
H237	3	2	96	6	X	√	√	√	√	√	X	2	1	X	H237 is a tall and dense hedgerow connected to H235 and H242. On the ground the hedge appears to be a continuation of H235. It comprises dominant hawthorn, blackthorn, holly, and goat willow with abundant field maple and elder. There are occasional hazel plants within the hedge as well as oaks (including standards), but these are too infrequent to count towards the woody species. The hedgerow is dense, with no significant gaps and is adjacent to a seasonal ditch. Woodland ground flora are similar to H230 being similarly wet in Spring. It is connected to two other hedgerows, H235 and H242, and to Great Pepper's Wood in the north (PHID51682714_011516622) which is ancient.

														Meets ‘important’ criteria with 6 woody species and 5 other features.
H246	<2	<2	457	7	X	X	√	X	√	√	X	1	2	1	H246 is a well-maintained hedge similar to H230 being biannually flailed. It was less than 2m tall at the time of survey, averaging around 1.6m along its length. Similarly to the other hedges on site it is dominated by blackthorn, hawthorn and field maple with regularly abundant dog rose, English oak, hazel, and elder. There is also a stand of hazel at the southern end, but otherwise there are no standard trees within the hedgerow. Ground flora are similar to H228 being drier than the other hedges on site with woodland species dominating in June comprising dominant bramble, bracken and red campion. Other species recorded abundantly included primrose, heath bedstraw, wood speedwell, herb Robert, and lesser stitchwort with occasional hedge vetch, foxglove and hedge woundwort. The hedge is connected to another hedgerow H245 in the north, and to both Great Pepper’s Wood in the north and Felbridge Rough in the south, both of which have ancient portions, as well as a pond at its northern extent. Meets ‘important’ criteria with 7 woody species and 3 other features.

Analysis of hedge results – Rampion vs Arborweald

5.7 All of the hedgerows have been surveyed by both WSP / Woods and Arborweald using the same methodology, but at different times of year. Woods Ecology undertook surveys in July and August 2021 with Arborweald conducting two site visits in March and June 2022 so as to catch both spring and summer flowers and forbs.

5.8 By surveying only in mid-summer, Woods Ecology would have missed the majority of the spring woodland flowers that are key to achieving the '3 woodland flora' criteria for 'importance', due to the hedgerows being in full leaf and other more dominant forbs and grasses making wildflowers harder to see.

Individual hedgerows - analysis

H228

5.9 H228 has been defined by Rampion only where it is within influence of the proposals, despite being much longer than specified and connecting Love's Rough with the hedgerow on the south side of Spithandle Lane. Furthermore, 116m north of the 'end' point of H228 as defined by Rampion, contiguous with the rest of the hedge is a pond, which is visible on Rampion's own maps (Page 27 of document ref. *Category 2: plans, Tree Preservation Order and Hedgerow Plan, January 2024, Revision B).*

H230

5.10 H230 is likely the most important hedgerow on site with direct connectivity between Love's Rough in the south and Spithandle Rough in the north, the latter of which is ancient. It also displays the highest diversity in both woody species and woodland ground flora species, likely due to its ancient status.

5.11 This refers to a historic practice common in the south of England whereby hedges were formed from remnants of woodland left as barriers when the woodland was cleared for agricultural use. This practice can be seen across the West Sussex countryside, with indicator species within hedgerows including bluebells, primrose, and wood anemone; the latter species reproduces through rhizomes which can take many decades to spread and establish.

5.12 Furthermore, H230 is adjacent to a watercourse that stretches from land on the Wiston Estate to the west of College Wood Farm east across the farm onto the southern boundary of Spithandle Rough before travelling north-east towards Ashurst and joining the River Adur. These two habitats have become intimately linked with vegetation within the hedgerow strongly affected by the watercourse, and vice versa.

H235 and H237

5.13 H235 and H237 are both very similar and appear to be an extension of each other. They are the least diverse hedgerows in terms of woody and woodland species; however, they still form a vital link between Great Pepper's Wood in the north-east and Spithandle Rough in the north-west which is a comparatively isolated island of ancient woodland habitat. Both hedgerows also contain mature oak trees which provide a myriad of benefits to birds, bats and invertebrates whilst also contributing to the parkland-esque landscape of the eastern and southern half of the farm.

H246

5.14 H246 is similar in structure to H228, and has direct connectivity to a hedgerow identified as 'important' by Rampion, as well as to two woodlands in the north and south. It is easily the longest hedgerow that comes into the site and has been measured all the way north to Spithandle Lane as it is adjacent to the proposed construction access along the track to the adjacent Dove's Farm.

5.15 On its route north H246 passes waterbodies and areas of woodland, and therefore provides a critical link between College Wood Farm and other areas of high-quality habitat in the wider landscape.

5.16 Great crested newts have been recorded in the pond adjacent to the driveway to College Wood Farm, and as such this waterbody is a priority habitat due to the presence of a red-listed European protected species. Newts utilising the grassland at College Wood Farm could use hedges such as H246 to commute to other breeding habitat in the wider landscape, as well as other feeding grounds, as newt territories can vary from a few hundred metres to several kilometres in size.

Erroneous results in the Rampion assessment

5.17 The assessment of hedgerows at College Wood Farm made by Woods and WSP is at best brief in its description compared to that undertaken by Arborweald. Furthermore, numerus inaccuracies that have come to light as a result of analysis of these results, and these are explored in greater detail below.

Size of hedgerows

5.18 Rampion's assessment was undertaken in July and August 2021 with two visits undertaken by ecologists from Woods. The client has written records of these attendances. During the assessments undertaken in 2021, average measurements of hedgerows were taken which were considerably lower than those taken by Arborweald in 2022. This is partially to be expected due to the management of the hedgerows being on a biannual / irregular basis such that they would have grown significantly in this period. Therefore, the overall size / dimensions of hedgerows as recorded are not in dispute.

Extent of hedgerows

5.19 The method of scoping hedgerows in / out of the influence of the proposed development is made clear throughout the documentation provided by Rampion in terms of direct influence (Appendix 22.3: Extended Phase 1 habitat survey report, Volume 4; Rampion 2 Environmental Statement, Volume 4, Appendix 22.5: Hedgerow survey report, 2.1.1); however, it is worth noting that although consistent, this methodology is fundamentally flawed as it treats hedgerows as if the areas being affected / within influence of the proposed development are disconnected from the areas that are not affected.

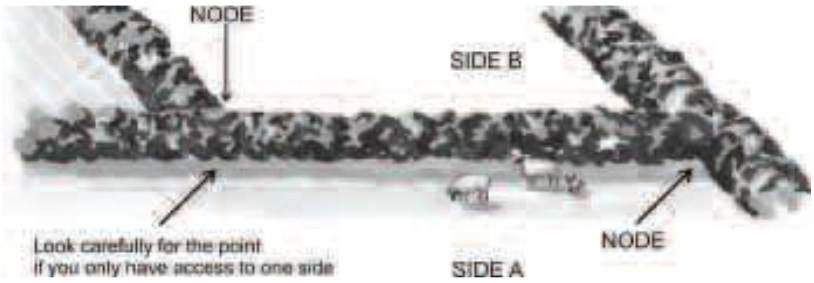
5.20 As touched on in point 5.6, when discussing connectivity features such as hedgerows it is fallacious to discuss only the implications of a scheme on a section of that feature.

Hedgerows are important for biodiversity due to their provision of land corridors between areas of higher quality habitats, which within the predominantly agricultural landscape of West Sussex is of paramount importance as most areas of woodland and other priority habitats such as calcareous grassland are heavily isolated and only connected by hedgerows.

5.21 As such, all of the hedgerows discussed within this and WSP's reports should be analysed in terms of their landscape context, as well as the direct value of the section of hedgerow that may be affected. Such analysis would not need to be exhaustive, but it is important to recognise that by severing a connectivity feature at any one point, the entire feature loses its connectivity value. Whilst it may retain some or all of its other biodiversity features and subsequent value, the effect on wildlife corridors would be felt for decades to come.

5.22 DEFRA's Hedgerow Survey Handbook (2007) discusses the need for hedgerows to be considered for their whole length, and that a hedgerow is only separated at the junction of nodes. The following is an extract from Page 12, Chapter 1:

Each section between two end points or nodes is considered a separate hedgerow (see Figure 1). Sometimes a section between end points may go round a sharp corner that may historically have been a 'T' junction or even a cross-intersection (this can often be checked with reference to historic maps, see Table 4). This is regarded as the same hedgerow as far as this Handbook is concerned (see Figure 1).



I.e. long runs of hedgerow are all part of the same hedge, until they reach a T junction with another feature or hedgerow, or encounter a gap of over 20m. This is echoed in the Hedgerow Regulations Act 1997, which states that gaps of under 20m are included within the hedgerow and do not affect its continuity with respect of its classification as one hedge. This does not detract from the effect that a 20m gap would have on its *connectivity* value, however.

Woody species

5.23 WSP clearly state the content of the Hedgerow Regulations Act 1997 within Annex B of their report *Rampion 2 Environmental Statement, Volume 4, Appendix 22.5: Hedgerow survey report* pages B1-B5. Within this report on page B2-B3 is the list of 'woody species' as per Schedule 3 of the Hedgerow Regulations, however there are a number of omissions from this list which are summarised in Table 5.3 below.

Table 5.3 – Woody species omitted from WSP report

Currant, mountain	Poplar, white

Hornbeam	Privet, wild
Juniper, common	Rose
Lime, large-leaved	Rowan
Lime, small-leaved	Sea-buckthorn
Maple, field	Service-tree, wild
Mezereon	Spindle
Oak, pedunculate	Spurge-laurel
Oak, sessile	Walnut
Osier	Wayfaring-tree
Pear, Plymouth	Whitebeam
Pear, wild	Willow
Poplar, grey	Yew

5.24 Had the five hedgerows in question been assessed according to the correct woody species list as per the government website, H230 and H246 would have automatically passed the 7 woody species criteria and been labelled 'important' without the need for assessment of additional features.

5.25 It would also have been possible to properly assess the additional features for H228, H235 and H237, as the regulations clearly state that with fewer than 5 woody species, a hedgerow cannot be classified as 'important' no matter how many additional features it may have.

Ground flora

5.26 As the surveys by Woods at College Wood Farm were conducted in July and August 2021 (Rampion 2 Environmental Statement, Volume 4, Appendix 22.5: Hedgerow survey report), this would have provided only a brief snapshot of what plants are present.

- Woodland flowers start to emerge in February / March, are normally in full flower by May, and start to retreat in June. As such many woodland indicator species as found in the Arborweald survey would no longer have been present / visible in July / August.
- Seasonal growth patterns of the more dominant species such as bramble and bracken would have swamped other plants and made surveying difficult, and as such a completely thorough survey of the less dominant forbs would have been much harder in July and August than in June when Arborweald visited.
- The visit by Arborweald in mid-March would have provided a more thorough idea of what plants were present before the hedgerow gained leaves, and plants in the centre of the hedges became harder to see. A cursory look along the hedge line only a month later would have revealed much less diverse results.

5.27 The list of 'woodland flora' as identified in Schedule 2 of the Hedgerows Regulations Act provided by WSP is correct and has been echoed in Section 4 of this report. However, the surveying by Woods did not reveal as many plants as those by Arborweald. The reason for this is unknown but is likely due to insufficient survey effort and time of year of surveys.

5.28 British Standard 42020 (BS:42020, 2013) refers the user to CIEEM's Good Practice Guidance for Habitats and Species, Version 3, May 2021, which in turn refers to DEFRA's Hedgerow Survey Handbook (Second edition, 2007). This document states that:

The field survey period extends approximately from April to October, depending on the part of the country. June and July are ideal months, particularly where surveys include assessments of the ground flora. Over this period, a number of hedgerow shrubs may be flowering, and the spring flowering species will still be reasonably apparent, although the rank vegetation in a hedge-bottom will obscure evidence of plants like wood anemone, bluebell and dog's mercury later in the season.

5.29 This supports the hypothesis that surveying in late July and August had an effect on the number of ground flora species recorded by Woods; in contrast, Arborweald's approach allowed an accurate and unobstructed view of spring flowering species coupled with a survey of other species in mid-June, when both the woody plants and summer flowering species would have been in full leaf.

Gaps

5.30 None of the hedgerows at College Wood Farm have significant gaps of over 4m – the largest being five bar gates into fields – with canopy connectivity throughout over 90% of the length of each hedge. This has not been reflected in the assessment by WSP, which claims that H228, H235, H237, and H246 all have gaps over 10% of their lengths – this would amount to a total gap coverage of nearly 10 metres for the shortest hedge, and over 45m for the longest.

5.31 If the hedges had gaps over 10% of their total length, this would be clearly visible on aerial photography, and from photographs taken on the ground. Furthermore, any perceived gaps present during the surveys undertaken by Woods have since recovered as surveys by Arborweald revealed no significant gaps in hedges at any point on the farm, with vital and healthy growth throughout.

5.32 This is further evidenced by photographs of viewpoints of the proposed route(s) across the farm, and where the route(s) bisect hedgerows, taken as a part of this written representation (Figure DKS/1003.4, and Figures 8.1-8.17).

5.33 DEFRA's Hedgerow Survey Handbook states that *"Even breaks in canopy of less than 1m are regarded as gaps and surveyors should try to estimate these breaks to the nearest 50cm. However, the gap has to be a complete break in the canopy; overlapping canopies are not considered as gaps"*

5.34 This supports the fact that complete breaks in canopy would be easily visible in photographs and during the surveys themselves.

Other features

5.35 Rampion's assessment of other features associated with hedgerows (comprising accessways and bank and ditch systems) neglects to mention the seasonal ditch adjacent to H237 which drains into the stream on the northern boundary of the site, which was wet at the time of the Arborweald survey in March 2022; this ditch would have been clearly visible during the dry season as it is over 50cm deep at points with exposed roots of mature trees, remaining damp year-round.

5.36 The assessment also fails to recognise the trees present in H235, with one at each end and a single standard in the centre. This is likely due to the fact that Rampion have only classified 113m of hedgerow as 'H235' despite the fact it continues northwards from its marked northern extent until it meets Spithandle Rough in the north.

Connection points

5.37 H228 is marked as having no connectivity with any other features such as woodlands, ponds or other hedgerows (Tree Preservation Order and Hedgerow Plan (B) Sheet 25). This is incorrect as it is shown on Rampion's own maps of hedgerows being connected to both Love's Rough to the south – a designated Priority Habitat 'Deciduous Woodland' – and to two hedgerows in the north which cross H228 east to west.

5.38 H235 and H237 are also incorrectly marked as having no connectivity to other hedgerows or woodlands despite being connected to each other, and both being connected to H242 as per Rampion's own maps. Furthermore, both hedges are connected to Spithandle Rough in the north-west and Great Pepper's Wood in the north-east respectively.

5.39 H246 is incorrectly marked as only having connectivity with Felbridge Rough in the south, despite the fact that Rampion's own maps show that it has connectivity with H245 [approximately in the centre], to Great Pepper's Wood at its northern extent (PHID51717072_011514877), and to a pond in the north.

General comments

5.40 The Hedgerow Regulations Act 1997 is fit for purpose in the context of assessing the importance of a hedgerow for comparison. It does have limitations however, and some of these are outlined below.

The importance of 'importance'

5.41 In broad brush terms, the Hedgerow Regulations Act 1997 has been designed to protect important hedgerows from deliberate removal in contravention of Provision 6 of the act. However, this only goes half-way in terms of the importance of hedgerows for biodiversity, as its assessment process relies on criteria that many hedgerows would fail to meet, despite the fact that they provide significant benefits to biodiversity.

5.42 For the act to even apply, hedgerows must be:

- over 20m long

OR

- less then 20m long, but connected to hedgerows at either end; and
- contain species on part 1 of Schedule 1; Schedule 5; or Schedule 8 of the Wildlife and Countryside Act 1981, or other defined species including certain Red Data Book species.

5.43 Hedgerows are then only *protected* as a priority habitat [under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006] if they meet the criteria outlined in Section 4 of this report. They are not covered by the act if within or marking a boundary of a dwelling house, or if they are less than 30 years old.

5.44 As such, a native species rich hedgerow with 7 woody species and numerous other ecological features that can be proven to be less than 30 years old is automatically not 'important' and therefore replaceable in the context of a proposed development *even if it is 29 years old and supporting protected species under the Habitat Regulations 2017* (although there would be separate protective legislation covering those species).

5.45 In the context of biodiversity as a holistic concept, the Act is not fit for purpose as it completely misses the point of the overall biodiversity *value* of the entire hedge, and of the holistic benefits of hedgerows on the wider landscape. As an Act it is suitable in terms of determining proposed development, but *only* in conjunction with other legislation, not as a standalone piece of legislation. To ensure biodiversity is adequately protected, the development must be assessed not only with respect to the Act but to other Legislation such as the NERC Act 2006 and the Environment Act 2021.

5.46 By failing to appreciate the overall biodiversity value of the hedgerows at College Wood Farm in terms of the habitats that they connect and the species that they support (not just their 'importance' as per the HRA 1997) the assessment of these hedgerows is inadequate, and a ruling on the effects that the proposed routing would have on biodiversity cannot be made in good and full knowledge. This would mean that the inspectorate would be unable to exercise their due diligence with respect of Section 40 of the NERC Act 2006 to 'have regard for biodiversity'.

Value vs 'importance'

5.47 Importance alone is not enough to determine the value of a hedgerow to biodiversity in a holistic sense, with species records also required to ascertain which protected, notable or conservation concern species could be utilising hedgerows for commuting, foraging and nesting.

5.48 Furthermore, the biodiversity value of the hedgerow can be judged using the Natural England biodiversity metric 4.0 and condition scoring sheets. An assessment of hedgerows has been made as a part of this report, the results of which are detailed in Table 5.4 below.

5.49 The criteria for condition scoring hedgerows comprise the following:

- Height averaging over 1.5m along its length
- Width averaging over 1.5m along its length

- Gap between base of canopy and ground less than 0.5m over 90% of its length
- Gaps make up <10% of total length; and No canopy gaps >5 m
- >1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length; Measured from outer edge of hedgerow; and is present on one side of the hedgerow (at least)
- Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground (The indicator species used are nettles Urtica spp., cleavers Galium aparine and docks Rumex spp. Their presence, either singly or together, does not exceed the 20% cover threshold).
- >90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA3) and recently introduced species.
- >90% of the hedgerow or undisturbed ground is free of damage caused by human activities.
- There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow.
- At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.

Table 5.4 – Hedgerow condition score assessment

Hedge reference and habitat type	Sheet	Condition	Justification
H228 - Species-rich native hedgerow	8A	Good	9 points out of a possible 10. Lost points due to: • Single age class present, no variance in tree age or morphology
H230 - Species-rich native hedgerow - associated with bank or ditch	8A	Good	9 points out of a possible 10. Lost points due to: • Single age class present, no variance in tree age or morphology
H235 - Species-rich native hedgerow with trees - associated with bank or ditch	8A	Good	10 points out of a possible 10. No failures
H237 - Species-rich native hedgerow with trees - associated with bank or ditch	8A	Good	10 points out of a possible 10. No failures

H246 - Species-rich native hedgerow	8A	Good	9 points out of a possible 10. Lost points due to: • Single age class present, no variance in tree age or morphology

5.50 The condition score is fed into the biodiversity metric calculator to ascertain the value of the hedgerow in 'biodiversity units', which then informs the difficulties in replacement.

5.51 As the hedgerow types and their conditions are so good, the value is high, and therefore the difficulty of replacement is particularly high. The Biodiversity Metric returns a standard time of 12 years for the replacement of H228, H230, and H246 to achieve matching condition, and 20 years for H235 and H237.

5.52 This is because although H235 and H237 score the lowest 'importance' of all the hedgerows on site due to their lower woody species diversity, their structural diversity, inclusion of mature trees, and adjacent ditch places them at a higher value within the biodiversity metric, making their replacement 'difficult'.

5.53 The replacement value in biodiversity units for all five sections of hedgerow that would need to be removed as a part of the proposals is lower than the equivalent existing hedgerow and would replace only two thirds of the units lost. Tables 5.5 and 5.6 summarise the results.

Table 5.5 – BM4.0 results - Hedgerows

Hedge reference	Hedge type	Length (km)	Units	Length lost (km)	Units lost
H228	Species-rich native hedgerow	0.106	1.27	0.06	0.72
H230	Species-rich native hedgerow - associated with bank or ditch	0.13	2.34	0.06	1.08
H235	Species-rich native hedgerow with trees - associated with bank or ditch	0.113	2.71	0.06	1.44
H237	Species-rich native hedgerow with trees - associated with bank or ditch	0.96	23.04	0.06	1.44
H246	Species-rich native hedgerow	0.457	5.48	0.04	0.72
		TOTAL	34.48	N/a	**5.4**

Table 5.6 – BM4.0 – Replacement hedgerows

Hedge reference	Hedge type	Length planted (km)	Units replaced
H228	Species-rich native hedgerow	0.06	0.47
H230	Species-rich native hedgerow - associated with bank or ditch	0.06	0.70
H235	Species-rich native hedgerow with trees - associated with bank or ditch	0.06	0.71
H237	Species-rich native hedgerow with trees - associated with bank or ditch	0.06	0.71
H246	Species-rich native hedgerow	0.04	0.31
		TOTAL	**3.6**

5.54 These results clearly show that there is a net loss of 1.8 units even when replacing the areas of hedgerow removed with like-for-like replacement.

Rampion hedgerow conclusion

5.55 This section refers to sections 22.9.100 to 22.9.112 of 22.9.107 of Rampion 2 Environmental Statement Volume 2, Chapter 22: Terrestrial ecology and nature conservation.

5.56 22.9.107 of Rampion 2 Environmental Statement Volume 2, Chapter 22: Terrestrial ecology and nature conservation states that *"…the magnitude of change is assessed to be low due to the extent of the loss in comparison to the resource in West Sussex, the restricted lengths associated with individual hedgerow crossings and the approach to reinstatement".*

5.57 This statement is fallacious, as the quantity of available habitat in West Sussex is irrelevant. As well as providing no figures regarding the quantity of habitat available in the County, this argument is reductive as it fails to take account of the direct effects on species utilising the hedgerows in the local landscape, rather than at the County level.

5.58 Rampion admit that hedgerow loss will have a 'negative' effect on biodiversity at the County level in the short term, described as the first 10 years. This is incorrect, as the potential loss of hedgerows could last for up to 4 years, with reinstatement only started after this period. Even if the loss is limited to a working period of 6 months whilst the cables are installed, the biodiversity value will still be reduced until the hedgerow is fully re-instated and has matched condition.

5.59 Rampion also state that in the long-term, effects can be negated as 'replacement features will have established within 10 years'. This has been disproven at College Wood Farm by the use of the BM4.0 calculator, which shows that time to match existing condition would be a minimum 12 years. The effects will also not be negated, as only two thirds of the biodiversity units will be regained by like-for-like replacement alone.

5.60 Rampion state that damage to biodiversity will be localised, not at a level of national importance; therefore stating that the losses are 'acceptable' is both incorrect and misleading, as it does not take account of the cumulative effects on biodiversity on College Wood Farm and the immediate surrounding landscape of ancient woodland and semi-improved grassland.

5.61 Furthermore, nationally designated priority habitats such as those identified as 'Important' under the Hedgerow Regulations Act 1997 have been designated as such due to their cumulative value at *every* scale; local, district, county, and national. The government has written Section 41 of the NERC Act 2006 for exactly this reason – in order to protect particularly valuable habitats for their *overall* benefits to biodiversity.

5.62 With priority habitats having been designated as such at the national level, any effect on them is a significant effect at a national scale.

5.63 The CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland (September 2018) states in point 5.28 that "*When seeking mitigation or compensation solutions efforts should be consistent with the geographical scale at which an effect is significant*".

Thus, as the effect of the proposed hedgerow removal has been assessed by Rampion as being 'negative' up to a County level (although 'low' at national level), mitigation must be proportionate *up to* County level, and should be particularly mindful of the effects on the local and District landscape.

5.64 The erroneous and reductive nature of Point 22.9.107 of Rampion 2 Environmental Statement can best be illustrated by considering the following hypothetical scenario in the context of highways works:

- *A hole 20 metres wide will need to be dug perpendicular across the centre of the A27 dual carriageway between Brighton and Worthing. It will remain in place with the road completely impassable in both directions for up to 4 years.*
- *Once the works are complete after between 6 months and 4 years, the road will be replaced, but it is expected that it will take up to 10 years for the road to be in the same state it was before it was dug up. As such, it will operate at a reduced capacity for this period, gradually improving as time passes. Once replaced, the road surface will only be two-thirds the quality it was prior to the hole being dug.*
- *The magnitude of change is considered to be 'low' due to the size of the hole – only 20 metres wide in the context of a road that is over 50 miles long – and will have a 'low' effect on traffic due to the number of other roads available in West Sussex.*
- *Furthermore, the effect is considered to be 'Not significant' at a national level.*
- *To compensate for the works, the B2112 Ditchling to Clayton road will be resurfaced as an enhancement measure to benefit road users in West Sussex.*

5.65 In the context of hedgerows and other habitats that provide connectivity (such as treelines and woodlands), the scope of their removal should be considered cumulatively in terms of the number of features affected, rather than the metreage of hedgerow that will be affected.

5.66 This is because even if the length that is removed from each hedge is 'small', removal will negate the connectivity benefits that that hedge provides, which will in turn devalue the rest of the hedge in its entirety and potentially any other priority habitats connected at either end such as deciduous woodland or ponds.

6 HABITAT ASSESSMENT

Habitat Assessment - Rampion

6.1 This section particularly refers to 6.4.22.3 Environmental Statement - Volume 4 Appendix 22.3 Extended Phase 1 habitat survey report, and 6.4.22.4 Environmental Statement - Volume 4 Appendix 22.4 National Vegetation Classification survey report 2021-2022.

6.2 Surveys were conducted by Woods and WSP along the cable route throughout 2021-2023, comprising protected species and NVC surveys as a part of a package of phase 1 surveys.

6.3 The NVC survey (6.4.22.4) focuses entirely on 12 sites identified at the scoping stage, five of which are no longer within the DCO limits. The report also provides a brief summary of designated sites within a short distance of the DCO limits. Rampion have claimed that it is not proportionate to survey all habitats within the DCO limits.

6.4 The Phase 1 habitat survey report (6.4.22.3) summarises all of the habitats that are within the DCO limits. The area of College Wood Farm within direct influence of the proposed route was classified as being predominantly improved grassland with hedgerows and dry ditches, and as such was not subjected to detailed surveying.

6.5 Rampion's effort to survey College Wood Farm has been *de minimis* at best, and the issues that this approach has caused are analysed further in this report.

Habitat Assessment – Arborweald

6.6 The following section refers to a Phase 1 habitat survey and Preliminary Ecological Appraisal undertaken at College Wood Farm by Arborweald in March and June 2022. For brevity, only the habitats within influence of the proposed cable route are covered in detail, with adjacent habitats covered briefly. Species names and scientific names are not exhaustive.

Field Study - results

Site description

6.7 The site comprises approximately 60 hectares of permanent pastures separated by intact species-rich hedgerows, fences, and species-rich land drains. The site is grazed by between 100 and 150 head of cattle throughout the summer, and sheep during the winter; the farm itself is run primarily as beef production. The entire site is run organically, with no fertilisers or pesticides and a no-till policy throughout and has been managed in this way for 40 years.

6.8 A historical report on the site indicated that the College Wood Farmhouse has been present since the early 16th century, with records showing continuous farming of the area for at least the last 500 years. The site boundary contains remnants of a drove within old common land in the north – an area that would be affected by the proposed cable route.

Phase 1 Habitat Survey

6.9 Habitats within direct influence of the proposed cable route comprise good quality semi-improved grassland, native species-rich hedgerow, and scattered trees. Please note, that as a matter of course the DEFRA Magic Map should be updated to identify the grassland as 'good quality'.

6.10 Other habitats within the redline boundary that are not within direct influence of the proposed cable route comprise, scrub, hardstanding, deciduous woodland, buildings, and waterbodies.

Habitats within direct influence

Semi-improved grassland

6.11 The majority of the site is made up of good quality semi-improved grassland typical of the Sussex landscape. The grassland is split into individual permanent pastures by fences, ditches and hedgerows.

6.12 The sward height across the site averages approximately 30cm, 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 greatest at the edges with the centre of the fields primarily dominated by grasses.

6.13 The grassland on site is considered to be overall good quality semi-improved grassland; its quality varies across each field, with large areas matching multiple criteria for DEFRA semi-improved grassland classification as 'good quality'. This includes:

- 40 species of plants recorded including seven indicators of good-quality (Red clover, sorrel, meadow buttercup, cuckoo flower, 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.

6.14 Furthermore, the grassland on site meets United Kingdom Biodiversity Action Plan (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'.*

6.15 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.*' This is not the case at College Wood Farm which has been organically and holistically managed for 40 years.

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

6.17 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 within the centre of fields which are exceptionally boggy.

6.18 A full species list is included in table 6.2 below.

Table 6.1

Grass species (dominant)	Abundant	Frequent	Occasional
Perennial rye grass	Meadow bindweed	Primrose	Hogweed
Yorkshire fog	Dandelion	Cleavers	Teasel
Creeping bent	Wood dock	Cuckoo flower	Pignut
Rough stalked meadow grass	White clover	Spear thistle	Red dead nettle
Red fescue	Red clover	Hedge vetch	Sow thistle
Wavey hair grass	Fleabane	Sorrel	Blackthorn
	Lesser celandine		Broadleaved dock
	Nettle		Yarrow
	Broadleaved plantain		Chickweed
	Bramble		Bristly ox-tongue
	Creeping cinquefoil		Creeping buttercup
	Birds foot trefoil		Meadow buttercup
	Black medick		Pineapple weed
	Self heal		Germander speedwell

Native species rich hedgerow

6.19 Hedgerows are discussed in detail in Section 5.

Scattered trees

6.20 There are a number of scattered trees throughout the site within hedgerows as standards, along watercourses, and in the centre of the fields. Species comprise primarily oak and ash, with some of the latter appearing to be suffering from late-stage ash die-back *Hymenoscyphus fraxineus*.

6.21 The scattered trees vary in age and size, however all of them are mature with some individuals showing signs of development to veteran stage with significant wounds, cavities and rot pockets caused by tear-outs.

6.22 A brief assessment of the scattered trees on site was made to BS:5837 standards, and revealed that due to their age, condition and according features all of the scattered trees on site were either 'Category B1' or 'Category A1' assets, with some individuals falling into 'Category A3' due to their possible veteran status; therefore, ranging from at least moderate quality (B) to high quality (A) trees.

Habitats out of direct influence

Scrub

6.23 There is an area of patchy scrub surrounding waterbody 1. Plants comprise primarily early-mature examples of woody species with ruderal vegetation surrounding them.

6.24 Species comprise goat willow, hawthorn, and blackthorn, and a field layer similar to that found within the semi-improved grassland.

Hardstanding

6.25 The driveway to the farm and the surround of the farm buildings and farmhouse comprises concrete hardstanding, the latter of which is covered in a thin layer of gravel. The hardstanding is almost entirely unvegetated with occasional remnant individuals as those found in the semi-improved grassland.

Deciduous woodland

6.26 The site is both surrounded by and contains pockets of deciduous and mixed woodland. Woodland on site is limited to three areas: a section of Dove's Ghyll in the north, a section of Sandpit Rough in the south, and an area to the west of Felbridge Rough.

6.27 None of the woodland on site is designated as ancient, however all of the woodland on site is contiguous with areas that are designated as ancient, or form parts of ancient woodlands.

6.28 The woodland on site comprises locally common species including mature ash and oak canopy covering mature hazel coppice, and holly understorey. The woodlands on and surrounding the site are typical of NVC 'W8' or 'W10' communities.

6.29 There is a distinct structural heterogeneity within all of the woodlands on site and within the wider landscape, with a field layer comprising species typical of Sussex woodlands including bluebell, wood anemone, primrose, cleavers, bramble, and lords and ladies.

Buildings

6.30 The buildings on site comprise a 16th century farmhouse in the south, two storage barns, and modern cattle shed.

6.31 As the buildings on site are not due to be affected by the proposed development, they were not extensively surveyed, however they are considered to be of a minimum 'moderate' suitability to support roosting bats due to their age, number of bat access and potential roosting features, and position within the wider landscape.

Waterbodies

6.32 There are four ponds on site comprising natural drainage points connected by drainage ditches. All four ponds are surrounded by vegetation similar to that found within the semi-improved grassland on site, as well as bulrush *Scirpoides holoschoenus*, *Juncus spp*., and common reed *Phragmites australis*.

6.33 Water quality within all four ponds was found to be good; coupled with good terrestrial habitat throughout the site it was deemed necessary to undertake a Habitat Suitability Index assessment for great crested newts, the results of which are outlined in Table 6.2 below.

Table 6.2:

Waterbody Number	Description	HSI Score	Probability of ponds supporting GCN	eDNA Results
1	A drainage pond in the centre of one of the pastures on site containing species typical of the wider semi-improved grassland. Protected from grazing by fencing.	0.87	Excellent	Positive (Rampion Extension Development Ltd)
2	A drainage pond at the edge of a woodland in the south of the site. Protected from grazing by fencing. As waterbody 1.	0.89	Excellent	Untested
3	A drainage pond in the centre of a field to the south of the main house. As waterbody 1.	0.84	Excellent	Untested
4	A drainage pond on the edge of woodland in the east of the site. As waterbody 1.	0.89	Excellent	Untested

6.34 The pond directly to the west of the driveway (Waterbody 1) is categorised as a priority habitat automatically due to the confirmed presence of great crested newts.

6.35 Priority habitat status is afforded to ponds if they support *'Species of high conservation importance: Ponds supporting Red Data Book species, UK BAP species, species fully protected under the Wildlife and Countryside Act Schedule 5 and 8, Habitats Directive*

Annex II species, a Nationally Scarce wetland plant species, or three Nationally Scarce aquatic invertebrate species.'

Other habitats

6.36 The wet ditches throughout the site are of notably high ecological quality and have features typical of chalk streams found in the local area. These features include high water clarity, and presence of common watercress *Rorippa nasturtium-aquaticum*, and hemlock *Conium maculatum*. These species coupled with a lack of algae or other dominant macrophytes indicates that these ditches provide a crucial service to numerous organisms, as well as ultimately feeding the nearby Adur river to the east.

Species constraints

6.37 For brevity, protected species results are summarised below:

- The scattered trees on site were deemed broadly suitable to support roosting **bats** due to their age-related features such as deep cracks, loose bark, crevices, rot holes and dry cavities. A full Ground Level Tree Assessment (GLTA) was outside of the scope of this report.
- The habitats within the site boundary provide ample foraging and commuting opportunities for **bats** with linear features such as fence lines and hedgerows, and semi-improved grassland, areas of woodland, scattered trees and buildings. The site is rich in invertebrates key to bat survival, and this is helped by the network of wet ditches, number of waterbodies close to the site, and the sward height of the semi-improved grassland.
- The entire site provides suitable foraging and sett building habitat for **badgers**, and badger feeding activity was recorded throughout the site, particularly north of waterbody 1. A badger sett is thought to exist in Spithandle Rough to the north of the site boundary, but this could not be confirmed due to access restrictions.
- An abundance of songbirds was recorded during the survey, being both heard and seen. Species recorded included blackbird *Turdus merula*, blue tit *Cyanistes caeruleus*, goldfinch *Carduelis carduelis*, wren *Troglodytes troglodytes* and great tit *Parus major*.
- Other species recorded included the **amber listed** [bird of conservation concern] **tawny owl (feathers) *Strix aluco,*** and **yellowhammer *Emberiza citrinella* which is red** under the Birds of Conservation Concern 5: the Red List for Birds (2021), protected in the UK under the Wildlife and Countryside Act, 1981, and a Priority Species under the UK Post-2010 Biodiversity Framework.
- Furthermore, the client provided an anecdotal list of birds seen and heard throughout the farm including numerous **Schedule 1 protected species** such as fieldfare *Turdus pilaris*, red kite *Milvus milvus*, barn owl *Tito alba*, peregrine falcon *Falco peregrinus*, and hobby *Falco subbuteo*.

- The site has good connectivity to areas of high-quality **hazel dormouse** habitat in the wider landscape including Spithandle Wood to the north, Dove's Ghyll to the north and Wappingthorn Wood to the south – all areas of ancient woodland. Numerous other parcels of ancient woodland are found within 2km of College Wood Farm, and dormice are known to utilise hedgerows for commuting and as breeding and feeding habitat. Hazel dormice have been confirmed present on College Wood Farm on the NBN Atlas.
- The water courses on site and within the wider landscape are considered suitable to support the **internationally critically endangered European eel** as eels will utilise a wide variety of streams, rivers and ditches throughout their lives. Freshwater connectivity with rivers including the Adur to the east is good, and eel have been known to cross flooded areas to reach isolated waterbodies. European eel have been recorded within the wider landscape on the NBN Atlas.
- Waterbody 1 has been confirmed by eDNA surveying to support **great crested newts**, All of the non-built habitats on site are considered suitable to support great crested newts due to the adequate cover provided by hedgerows, tall sward height within the semi-improved grassland, and good connectivity between waterbodies through the slow flowing ditches.
- On the survey days, the species small tortoiseshell butterfly *Aglais urticae* and peacock butterfly *Aglais io* were recorded, along with the **ancient woodland indicator** species **dark-edged bee-fly** *Bombylius major* – a parasitic bee-mimic species which parasitises solitary bees. Solitary bees are often saproxylic and are found at the woodland edge, with adults relying on nectar sources in grasslands and hedgerows. Other species recorded included white admiral *Limenitis camilla*, small skipper *Thymelicus sylvestris*, and meadow brown *Maniola jurtina*.
- The sward height throughout the site and level of cover provided by the double-thickness hedgerows is ideal for **reptile** utilisation. Ample invertebrate and small mammal life will in turn encourage healthy reptile populations on site. Proximity to the South Downs National Park to the south and High Weald Area of Outstanding Natural Beauty to the north is such that the site is well situated in a landscape renowned for high reptile presence.

6.38 Specific impacts picked from the full PEA report include:

- It is the author's professional opinion that the site is suitable to support the internationally vulnerable species turtle dove *Streptopelia turtur* - a UK Biodiversity Action Plan 'Red' list species.
- Furthermore, ground nesting species such as **skylark** *Alauda arvensis* [Classified in the UK as **Red** under the Birds of Conservation Concern 5: the Red List for Birds (2021)] could be deleteriously affected by works to the semi-improved grassland. Other species that could be affected due to a long-term reduction in foraging opportunities include all species of bats, fieldfare, yellowhammer, woodcock, and nightingale – **all UK BAP 'Red' list species**.

- Potential reduction of water quality within waterbodies and watercourses due to ingress of dust and pollutants (fuel oil etc.) will reduce suitability of these habitats to support the **internationally critically endangered European eel**.
- Potential damage to waterbody 1 confirmed as a breeding pond for **great crested newts**, and likely the location of an established meta-population supporting newts within the surrounding terrestrial landscape. Free movement of these individuals would be reduced by damage to the watercourses on site.
- Significant reduction in the availability of foraging opportunities for invertebrate species.
- Direct risk of death or injury to reptile species as well as a reduction in available foraging habitat in the long term.

Analysis of habitat results – Rampion vs Arborweald

Habitats at College Wood Farm

6.39 All of the habitats have been surveyed by both WSP / Woods and Arborweald using the same methodology, but at different times of year with Arborweald conducting two site visits in March and June so as to catch both spring and summer flowers and forbs.

6.40 The habitat survey results provided by Rampion are of little use in the context of College Wood Farm, as no detailed habitat surveying has occurred on site. This is in contrast to the detailed phase 1 habitat survey undertaken by Arborweald which has revealed a complex network of habitats supporting protected, rare and notable species in abundance.

6.41 Rampion themselves have identified parcels of neutral semi-improved grassland in and around Partridge Green and at the base of the South Downs, and this is certainly the case at College Wood Farm where the grassland diversity reflects the management practices that have been in place for decades.

6.42 Rampion have incorrectly identified the grassland that makes up the majority of College Wood Farm to be improved grassland, which is proven incorrect by both DEFRA's and the UKBAP classification of good quality semi-improved grassland. NVC results also revealed that the grassland was a mixture of different neutral semi-improved grassland types.

6.43 Rampion were made aware of the results of the first Arborweald survey [in March 2022] at a meeting in April 2022, yet despite this and the disparity between the findings of both Arborweald and Rampion, they have made no effort to undertake further surveying at College Wood Farm or to appreciate its overall biodiversity value.

General approach

6.44 Rampion's approach to NVC surveying has been extremely minimal covering only 12 sites; this is only half of the problem however, as nearly half of those sites are not within the DCO limits and as such are irrelevant with respect to the habitats that will be directly affected.

6.45 At this advanced stage in the DCO application process, Rampion should provide detailed NVC survey data for more example habitats within the DCO limits, as the client

has been led to believe on numerous occasions that we are no longer at the stage of deciding “where the route will go”, and that the broad route of the cable is now fixed. If this is the case, then we know the habitats that will be affected and those that are a point of contention should be surveyed in greater detail.

6.46 Whilst it is the author’s professional opinion that it would indeed be disproportionate to survey all habitats within the DCO limits, Rampion have pursued this approach to such a degree that only a small percentage of the route has been surveyed at all.

6.47 Rampion have made extensive use of aerial photography during the scoping process and have classified some habitats entirely through aerial photographs. The JNCC National Vegetation Classification Users Handbook states that:

Aerial photographs, especially those in full colour, can be very useful in delimiting boundaries between stands provided these are ground-truthed. In such a cloudy climate as Britain’s, however, shadows and reflectance variations related to slope and aspect can be very deceptive when trying to interpret aerial photographs.

6.48 Throughout the route planning process Rampion have focussed almost exclusively on priority habitats as stated in Section 41 of the NERC Act 2006 and have mostly ignored the impact that the proposed routing would have on unprotected habitats.

6.49 By definition, ‘Priority habitats’ are exactly that, a ‘priority’. This does not mean that other habitats are not important, it simply means that priority habitats require both specific and urgent conservation effort, so as to reverse the trend in their overall decline in both area and quality / condition, but not mutually exclusive to the conservation of other habitats.

6.50 Had Rampion accounted for the cumulative effect of habitat losses as a whole, and the effect that the proposed routing and open cut technology would have on the species that utilise those habitats, the losses within non-priority habitats [in addition to priority habitats] would be significant when judged at the local and County levels.

6.51 The only analysis Rampion have done on the cumulative effects of their proposed development is when combined with the effects of other large infrastructure projects such as the A27 Arundel bypass. There has been no effort to analyse the cumulative effects *within* the development.

6.52 The Biodiversity Metric 4.0 calculator shows that all non-built habitats have a habitat value that can be quantified, and that losses to these habitats cannot be recovered by simply reinstating them once works are completed as the replacement yields less than 100% of the units lost in the first place. Needless to say, this does not account for the time for which those units are completely lost whilst works take place, which is one of the fundamental issues with the net gain system.

6.53 Rampion’s approach to the proposed cable routing through College Wood Farm and likely other sites has been one of avoiding priority habitats such as woodlands. Whilst this goes some way to protect those habitats, it has pushed the route into more open habitats such as grasslands and arable fields which have not been surveyed sufficiently using the correct methodology in accordance with industry best practice.

6.54 Routing through College Wood Farm should instead only be advised either by the results of the surveys by Arborweald, or by a comparably detailed alternative.

Exploration of alternative options

6.55 Rampion have made little effort to explore alternative options which could comprise:

- Bringing down the quality threshold for a habitat to qualify for long throw Horizontal Direction Drilling (HDD), so as to allow protection of high *value* habitats through effective usage of HDD.
- Use of short throw HDD to avoid high value hedgerows – this is both high value in terms of 'importance' under the HRA 1997, as well as their actual *value* to wildlife comprising the species that utilise them, their connectivity and landscape value, their BM4.0 unitary value, and the challenges posed with replacing them.
- Re-routing of the cable to the edges of fields etc. to reduce the overall impact on the field as a whole and to reduce the number of habitat 'islands' created and general breaking up of grasslands and open habitats.
- Avoidance of features of biodiversity importance that also present other issues such as practicality. Examples include wet ditches, which both provide habitat for numerous species not considered in Rampion's assessment, and present engineering challenges such as waterlogging. An example on College Wood Farm is the MG10 grassland in boggier areas of the field directly west of the driveway, which is in the centre of the proposed route; Rampion's own engineers commented that these areas could be a challenge, and could easily be avoided by rerouting to the edge of the field to the north.

6.56 The main issue raised by Rampion regarding these potential changes is one of finance, with changes to the proposed route increasing both its length (and therefore cost of cable and installation) and the cost of HDD. No evidence has been provided to justify these decisions, and this approach has not taken account of the costs that would be incurred as a result of removal of habitats, a few examples of which include:

- Loss of biodiversity units, which have a monetary value under the Biodiversity Net Gain scheme. Reinstatement could potentially need to be off site, which would increase costs.
- Cost of reinstatement of habitats, which includes provision of seeds / plants / materials, installation of those materials, aftercare, long term management, surveying to ensure conditions are matched to the original habitats, and liaison.
- Compensation for landowners as a result of more of their land being made unavailable or unviable for use by the proposed route.
- Natural England EPSM licencing or district licencing for protected species, and the mitigation measures that come with these, including further surveying on and possibly off-site, assessments, reports and implementation of mitigation, compensation and where possible enhancement measures.
- The value of tree loss under a Capital Asset Valuation of Amenity Trees (CAVAT) assessment being undertaken.

6.57 Soil quality on College Wood Farm is especially high due to the decades long 'no till' policy, and as such the grasslands on site have become a carbon sequestration 'sink'.

This will be ruined by the usage of cut and cover ‘trenching’ technology, as it will disturb the soil layers and mycorrhiza present within it.

6.58 Biodiverse rich habitats have been found to be significant carbon dioxide sequesters with appropriately managed biodiverse habitats having a good correlation with carbon dioxide sequestration (Gregg et al., 2021).

6.59 Soil carbon sequestration is also directly correlated with habitat diversity (Yang et al., 2019; Prommer et al., 2019), which is high within the grasslands and hedgerows at College Wood Farm.

6.60 Protecting, enhancing and increasing biodiverse habitats across the area will significantly help in building in climate change resilience; opportunities to do this – and to avoid damage that could easily be avoided through different routing and methodology - should not be missed.

7 SUMMARY of ISSUES

7.1 Multiple issues exist within the current proposals due to the insufficiently detailed approach to biodiversity at College Wood Farm. This is predominantly down to the following factors:

- Inadequate surveying, and poor translation of industry best practice, industry best methodology, and legislation - including missing species from legislated lists.
- Obfuscation of results through manipulation of data on habitat areas (including hedgerows), such as the extent of hedgerows surveyed and what is considered 'within influence' of the proposals.
- Poor extrapolation of data contributing to a limited assessment of the value of habitats within influence of the DCO area.

Hedgerows

7.2 The proposals currently threaten the survival of protected species within hedgerows that have been identified as priority habitats using the methodology from the Hedgerow Regulations Act 1997.

7.3 Removal of sections of hedgerow at College Wood Farm will cause a temporary complete loss of biodiversity units whilst the works are undertaken – a period of up to 4 years - a reduction in biodiversity units whilst the site recovers – a period of between 12 and 20 years, and a permanent reduction in the biodiversity value of these hedgerows once target condition of replacement hedgerows is reached after that 12-20 year period.

7.4 Hedgerow removal will also result in loss of connectivity between priority habitats identified under Section 41 of the NERC Act 2006 which will be both immediate and long lasting.

7.5 As well as localised effects, the removal of hedgerow connectivity between areas of higher quality habitat in the wider landscape such as the priority habitat deciduous woodlands at Love's Rough, Spithandle Rough, Great Pepper's Wood, and Felbridge Rough (some of which are designated ancient woodland) will result in isolation of some pockets of woodland and will restrict the movement of protected species such as herptiles and mammals.

7.6 Hedgerows can easily be avoided throughout the scheme by short throw HDD and re-routing of the proposed cable.

Habitats

7.7 Rampion's lack of detailed survey effort of the other habitats at College Wood Farm and failure to appreciate the holistic value of these habitats has resulted in an oversight as to the impact of the scheme on biodiversity at the local, District and County level.

7.8 Furthermore, the delicate and highly valuable soil structure at College Wood Farm which is demonstrated by the overall high grassland diversity would be ruined by cut and cover

trenching technology. This complex balance of ecotones within the soil has taken decades to create and would take decades to recover if disturbed.

Other issues

'Green' power vs 'greenwashing'

7.9 One of the arguments presented by Rampion Extension Development Ltd. throughout the consultation process is that because wind power is effectively 'eco-friendly' and provides clean power – facts that are not in dispute – damage to habitats in the 'short' term is acceptable. This goes against the NERC Act 2006, the Environment Act 2021, the NPPF 2023, and the Conservation of Habitats and Species Regulations 2017, all of which legislate the need for biodiversity to be accounted for in any development, regardless of the benefits of that development.

7.10 Whilst the benefits of wind power are not in dispute, wind turbines are not a panacea to countering climate change. It is the author's personal opinion that all parties involved in the Rampion 2 development process are in support of the concept of clean energy and are in favour of extension of wind turbine arrays in principle. However, the benefits of wind power and the benefits of well managed habitats are disconnected from each other.

7.11 Well managed grasslands, woodlands, and hedgerows [and other habitats] are carbon sinks, and actively sequester carbon dioxide from the atmosphere. Wind turbines provide clean power such that less carbon is released into the atmosphere, which is also beneficial to the environment. However, their construction should not come at the cost of local biodiversity where other proportionate solutions or alternatives are available that would allow both to coexist.

7.12 Throughout the consultation process finance has been raised as a limiting factor on numerous occasions, and it is the author's professional opinion that the profitability of the proposed scheme has taken priority over its environmental impact. In this case, it is a question of proportionality.

7.13 The CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland states that:

The evaluation of significant effects should always be based on the best available scientific evidence proportionate to the severity of those effects. If sufficient information is not available further survey or additional research may be required. In cases of reasonable doubt, where it is not possible to robustly justify a conclusion of no significant effects, mitigation/compensation measures should be applied in accordance with the precautionary principle. Where uncertainty exists, it must be acknowledged in the EcIA.

It is the author's professional recommendation that investigation into the cost of appropriate mitigation measures such as HDD is undertaken, and that evidence is gathered regarding the costs of habitat removal and reinstatement vs avoidance, route change, and HDD.

Enhancement

7.14 Rampion have provided no specificity regarding enhancement, what will be done, where, how, when, and by whom. Rampion have also not provided specifics about how the scheme can be enhanced elsewhere, where it is not possible to do so at the site of the impacts.

7.15 Woodland, trees and other arboricultural features may not always be the best habitat solution for climate change resilience and should not be planted or generated on, or replace other well managed habitats that also provide a carbon dioxide sequestration ecosystem service, including unimproved and good quality semi-improved grassland, heathland, hedgerows, scrub and wetlands.

Wider context

7.16 All of the issues raised as a part of this report have been discussed in the context of College Wood Farm and its immediate surroundings. However, this does not mean that these issues are isolated or unique to the subject site, and many of these issues are likely prevalent across the entire cable route and throughout the connected wider landscape.

Current routing

7.17 In its current form, the proposed routing through College Wood Farm is not ecologically viable, as it would result in the following effects:

- Reduction in biodiversity units immediately on commencement of works; the biodiversity value of the site would be reduced for the duration of works, and then would only recover by around 65% once compensation measures have matured – a period of up to 20 years. This 'rollercoaster' of biodiversity loss is unacceptable.
- Loss of connectivity between woodlands in the north and to the south of the farm, and within the grassland fields identified as high quality semi-improved grassland. This will lead to isolation of habitats including the nationally designated priority ancient semi-natural deciduous woodland at Spithandle Rough, which is otherwise disconnected from other woody features.
- Removal of mature trees that are likely BS:5837 category A1, B1, or A3 due to their ecological and landscape value. This would permanently detract from the biodiversity value of the site and immediate landscape and cannot be compensated for by replacement planting.
- Disturbance of nationally and European protected species, as well as vulnerable, rare, or scarce species, and species of national importance. Avoidance of this disturbance should be the first option, with mitigation being a last resort alternative where impacts are unavoidable.
- Disturbance of the extremely valuable mycorrhizae layers within the untilled grassland soils, their quality having been demonstrated by the high overall diversity. This damage would be permanent and irreparable.

7.18 These shortcomings are by no means unsurmountable, and Section 8 and Annex C of this report provides three alternative routes that are more ecologically desirable.

8 ALTERNATIVE ROUTES

8.1 Local planning authorities use a mitigation hierarchy to determine planning applications. Prior to the Environment Act 2021 this was comprised of three parts: avoid, mitigate, and compensate / enhance. This has been strengthened by Schedule 14 Section 99 of the Environment Act 2021 which has increased the importance of biodiversity net gain, legislated methods to measure biodiversity net gain (with the Natural England Biodiversity Metric) and put greater emphasis on enhancement.

8.2 The most environmentally favourable option for the development is for the cable route to cross land of less ecological value and to avoid sensitive features in their entirety. This would also deliver savings in ecological surveys and the associated works required.

8.3 The most desirable option would be for the impact of the development to be reduced by undertaking the cable laying with Horizontal Directional Drilling (HDD) or 'Thrust boring'. This method will have to be applied to other areas of the cable route and would reduce the environmental impact on College Wood Farm particularly with regard to disturbing soil layers.

8.4 If this method was adopted on College Wood Farm, then ecological mitigation, compensation and enhancement measures could be directed at smaller areas used as access points to the boring sites, and to smaller sections of open cut at each end.

Rampion's current route

8.5 Figure DKS/1003.4 shows the sites of photographs taken showing the lines of site at numerous points (figures 8.1 - 8.17) along both Rampion's current proposed route, and the alternative routes as outlined below.

8.6 These photographs clearly show that Rampion's current route bisects the farm in its entirety severing vital connectivity features between woodlands and the wider landscape and fragmenting high quality grassland. By contrast, the routes proposed by Arborweald on behalf of the client take a more conservative approach that takes account of the key points below:

- Avoidance of woody features such as healthy standard scattered trees.
- Complete avoidance and / or HDD under hedgerows H228, H230, H235, H237 and H246.
- Complete avoidance of watercourses.
- Minimise fragmentation of grassland and other habitats by moving the route to field edges rather than through the centre of the site.

8.7 The red photo points were taken at points along the route proposed by Rampion where the route crosses hedgerows and other linear features. The blue photo points were taken at the field edge outside of the 15m woodland edge buffer zone. As a result, the blue points are illustrative of the need to move the route to the edges of fields where possible so as to minimise the fragmentation of grassland and other open habitats.

Alternative routes

8.8 The following proposed routes are in descending order of preference by the client, the priority of which has been reached following a study of all relevant factors.

Alternative route 1

8.9 Drawing number DKS/1003.1 shows the proposed alternative route 1.

8.10 The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 1 follows the same route proposed by Rampion but is entirely Horizontal Directional Drilling (HDD) 'trenchless' technology.

8.11 This would avoid all environmentally sensitive and practically important features and would allow space for HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.

8.12 Alternative route 1 is the most ecologically desirable route as it would avoid all sensitive features such as hedgerows and all of the high-quality semi-improved grassland. It would also avoid all other woody features including scattered trees in the centre of the site between H235 and H246.

8.13 Alternative route 1 effectively joins photo points [from west to east] 16, 15, 12, 11, 1, 2, 4, 3.

Alternative route 2

8.14 Drawing number DKS/1003.2 shows the proposed alternative route 2.

8.15 The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 2 proposed by the client is 1,159m long, and comprises approximately 514m of Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 645m open cut.

8.16 Please note that this drawing does not show the ‘short throw’ HDD sections that would be required for traversing hedgerows not covered by the long throw HDD.

8.17 This would avoid environmentally sensitive and practically important features and would allow space for HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.

8.18 Alternative route 2 is the second most ecologically desirable route as it would avoid sensitive features such as hedgerows and large swathes of high-quality semi-improved grassland. It would also avoid the majority of woody features including scattered trees in the centre of the site between H235 and H246.

8.19 Alternative route 2 effectively joins photo points [from west to east] 16, 15, 12, 11, 7, 8, 6, and 5.

Alternative route 3

8.20 Drawing number DKS/1003.3 shows the third proposed alternative route. Alternative Route 3 proposed by the client is 1,207m long, and comprises approximately 80m of

short throw Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remainder open cut.

8.21 Alternative route 3 is the third most ecologically desirable route as it would avoid sensitive features such as hedgerows but would still allow open trenching within the semi-improved grassland – however the route has been moved to the field edges such that the majority of the remaining grassland is not fragmented. It would also avoid the majority of woody features including scattered trees in the centre of the site between H235 and H246.

8.22 Alternative route 3 effectively joins photo points [from west to east] 16, 15, 13, 14, 9, 10, 7, 8, 6 and 5.

Conclusion

8.23 Arborweald have conducted a thorough investigation into the surveys undertaken by Rampion with respect to terrestrial ecology, specifically protected species, habitats and hedgerows. This investigation has revealed that the survey results lack depth and detail and are erroneous at times, which has lead to an incomplete and at times fallacious analysis of said results by WSP on behalf of Rampion.

8.24 All three of the alternative routes provided by Arborweald are more ecologically desirable as they provide the following improvements over the original Rampion design. They;

- Avoid particularly sensitive ecological features such as hedgerows, watercourses, high value grassland, and other woody features such as standard trees.
- Avoid permanent and irreparable impacts to sensitive soil layers that have been built up over centuries, aided by the decades long no-till policy.
- Would avoid the need to disturb protected, notable, rare, scarce, or vulnerable species. This is of particular importance for those species that are not specifically protected, as they are much more vulnerable to being ignored in the planning process.
- Would not disturb connectivity between areas of grassland on site, and higher quality habitats in the wider landscape, reducing fragmentation; and
- Would reduce the ‘rollercoaster’ effect of biodiversity units being immediately lost on scheme commencement, a period of reduced biodiversity followed by a period of many years to recover those units to a lower value than that originally held. This would have the knock-on effect of reducing the scale of enhancement required for this section of the route.

APPENDIX A Site Photographs

For clarity, photographs taken on Rampion's current proposed route are colour coded red, with photographs taken on Arborweald's proposed route along the field edge are in blue as per Figure DKS/1003.4

Figure 8.1 **Photograph 1** – West – 516692 114666

Figure 8.2 **Photograph 2** – East – 516692 114666

Figure 8.3 **Photograph 3** – East – 516891 114711

Figure 8.4 **Photograph 4** – West – 516891 114711

Figure 8.5 **Photograph 5** – East – 516896 114746

Figure 8.6 **Photograph 6** – West – 516896 114746

Figure 8.7 **Photograph 7** – West – 516730 114754

Figure 8.8 **Photograph 8** – East – 516730 114754

Figure 8.9 **Photograph 9** – West – 516576 114763

Figure 8.10 **Photograph 10** – East – 516576 114763

Figure 8.11 **Photograph 11** – East – 516533 114624

Figure 8.12 **Photograph 12** – West – 516533 114624

Figure 8.13 **Photograph 13** – West – 516467 114684

Figure 8.14 **Photograph 14** – East – 516294 114543

Figure 8.15 **Photograph 15** – East – 516300 114454

Figure 8.16 **Photograph 16** – West – 516300 114454

Figure 8.17 **Photograph 17** – West – 516290 114520

APPENDIX B Wildlife Legislation

The Wildlife and Countryside Act 1981 (as amended)

Schedule 1
*A*pplies to all wild birds where it is an offence:

- to take, damage or destroy a nest whilst it is being built or in use
- to kill, injure or take any wild bird (subject to certain exceptions and / or licencing)
- to take or destroy the egg of any wild bird.

It is also an offence to disturb any wild bird listed on Schedule 1 of the Wildlife & Countryside Act 1981 (as amended):

- while it is nest building
- at a nest containing eggs or young
- to disturb the dependant young of any such bird.

Schedule 5
Other protected animals are listed in Schedule 5; a full list of protected species can be found on the Legislation.gov.uk website. Schedule 5 contains several advancing levels of protection outlined below:

Protected under section 9(5) of Schedule 5, it is an offence:

- to sell or advertise for sale, or participate in the sale of these species; many species of invertebrate are listed under this section including butterflies, moths and beetles as well as common frog, palmate and smooth newts

Protected under section 9(1) of Schedule 5, it is an offence:

- to intentionally kill or injure or take these species – this applies to adder, grass snake, common lizard and slow worm

For animals fully protected under Schedule 5 - which includes, the hazel dormouse, otter, water vole, pine marten, shrews, hedgehog, great crested newt, natterjack toad, sand lizard, smooth snake, red squirrel and all bats – all of the above apply, however it is also an offence:

- to intentionally or recklessly damage or destroy or obstruct access to any structure or place which a species uses for shelter or protection, at any time even if the animal is not present.
- to intentionally or recklessly disturb whilst it is occupying a place which it uses for shelter or protection.

Schedule 8
Specific species of plants listed in Schedule 8 are protected. It is an offence: to intentionally pick, uproot or destroy a wild plant listed in Schedule 8.

Schedule 9
Invasive non-native species are listed under Schedule 9. It is an offence:

- to plant or otherwise cause to grow in the wild.

- If soils are contaminated by invasive non-native plant species it becomes classified as '*controlled waste*' under the Environmental Protection Act 1990 (England, Wales & Scotland), and must be disposed of accordingly.

The Conservation of Habitat and Species Regulations 2017

Schedule 2 applies to all European Protected Species (EPS) which includes all bat species, great crested newts, otter and dormice. The protection afforded is overlapping but separate from the Wildlife and Countryside Act 1981 (as amended)

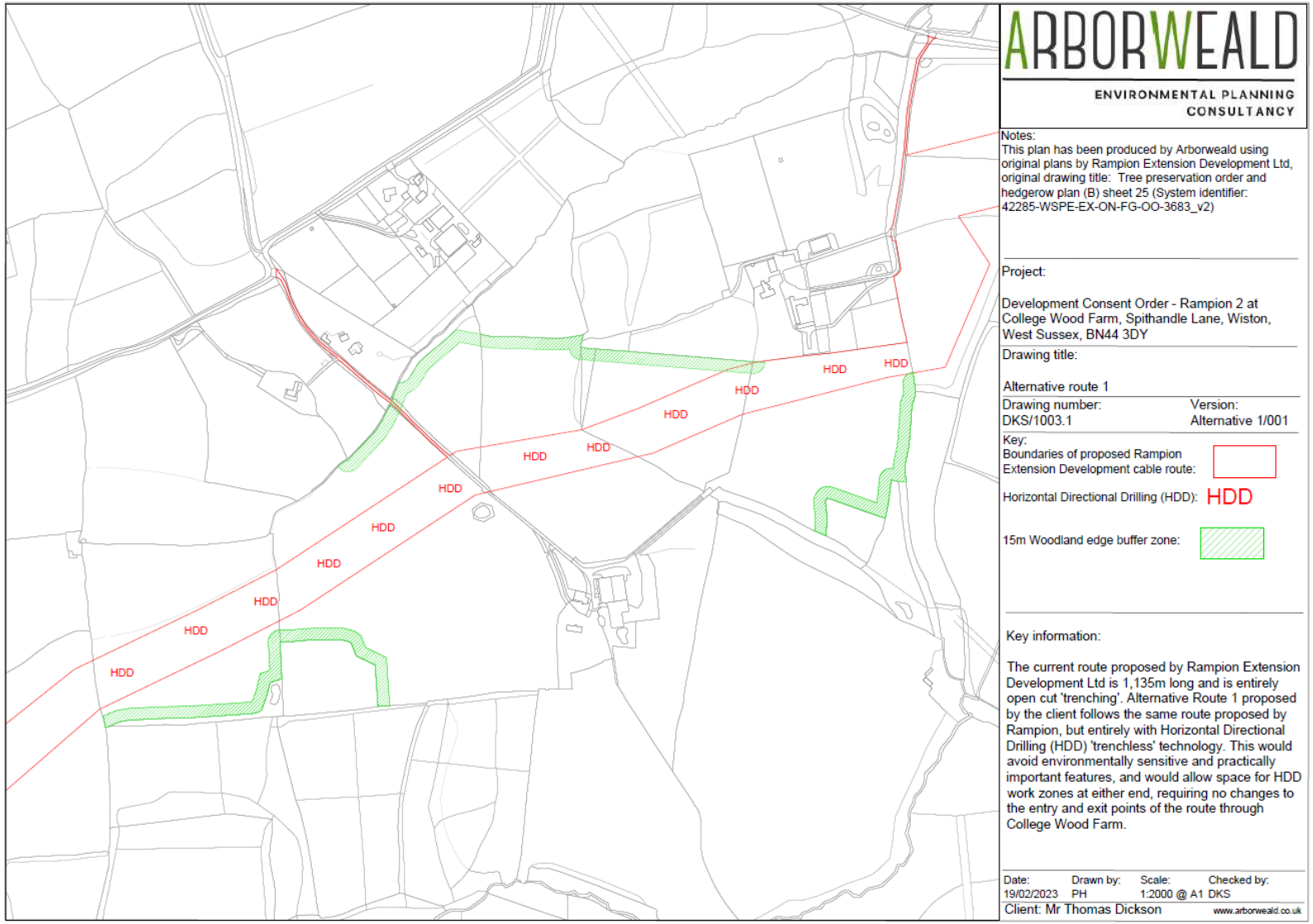
The Protection of Badgers Act 1992

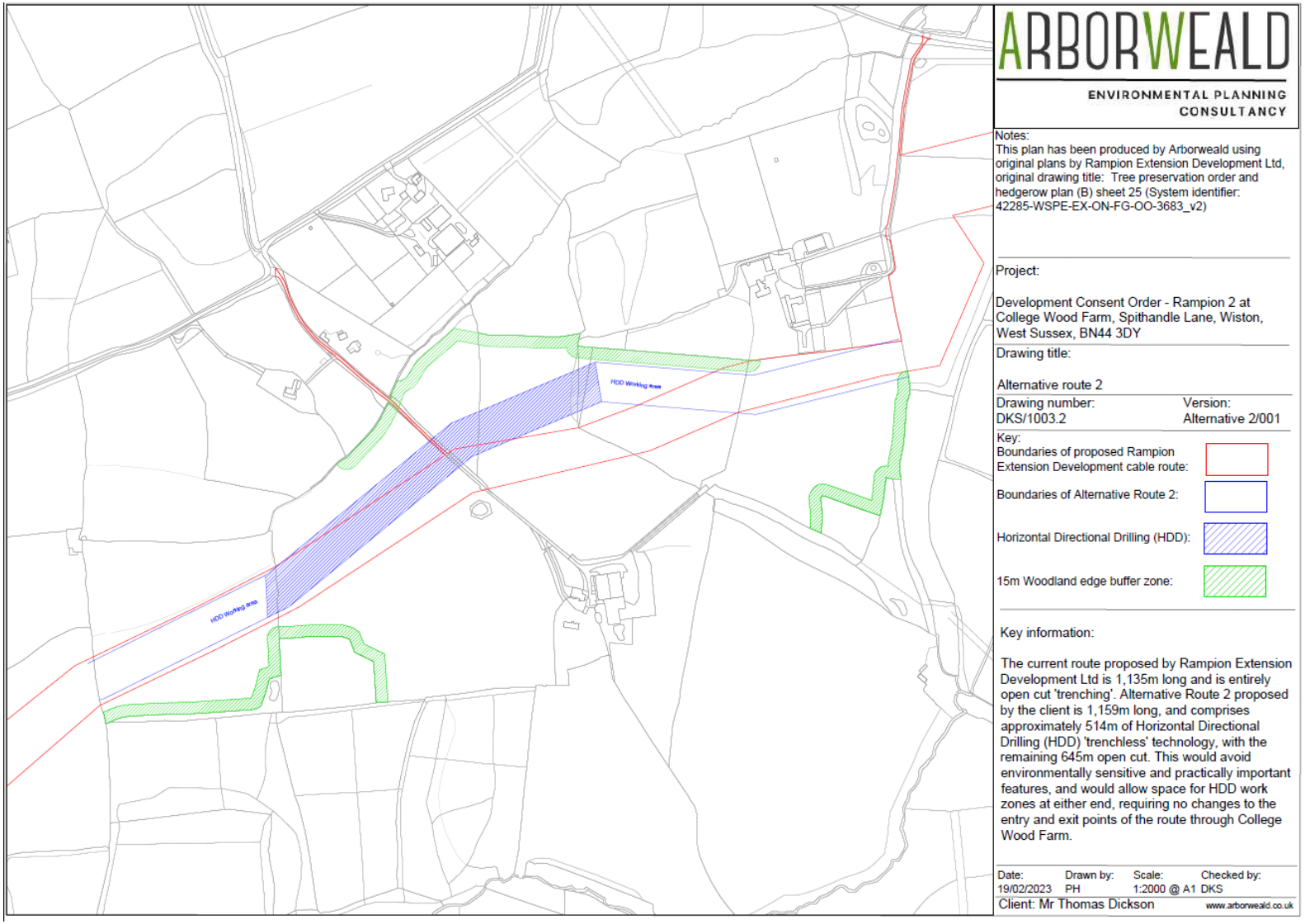
Under this Act it is an offence:

- To intentionally or recklessly interfere by damaging, destroying, obstructing access to, or disturbing a badger whilst in a sett either directly or through causing a dog to enter a badger sett
- To wilfully kill, injure or take a badger, or to attempt to do so; in a case of attempt, if there is reasonable evidence to suggest an offence may have been committed, evidence would be required to prove innocence
- To possess or be under control of a dead badger, or part of, or anything derived from a dead badger which may have been killed in contravention of the above
- To sell, possess or attempt / offer to sell a live badger

Where interference with a badger sett cannot be avoided during development, a licence from Natural England must be applied for.

APPENDIX C Figures





ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY

Notes:
This plan has been produced by Arborweald using original plans by Rampion Extension Development Ltd, original drawing title: Tree preservation order and hedgerow plan (B) sheet 25 (System identifier: 42285-WSPE-EX-ON-FG-OO-3683_v2)

Project:

Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY

Drawing title:

Alternative route 2

Drawing number: DKS/1003.2
Version: Alternative 2/001

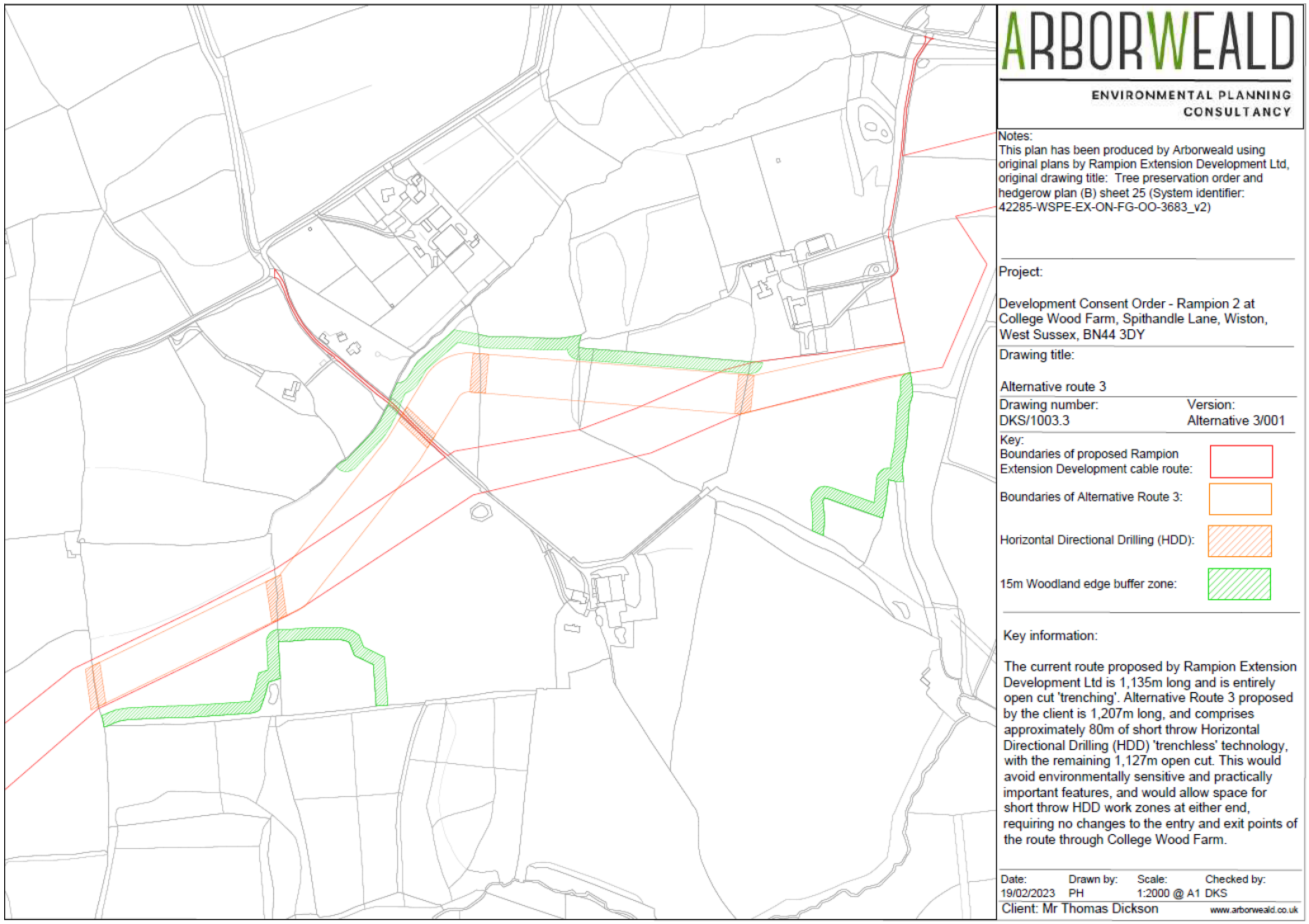
Key:
Boundaries of proposed Rampion Extension Development cable route:
Boundaries of Alternative Route 2:
Horizontal Directional Drilling (HDD):
15m Woodland edge buffer zone:

Key information:

The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 2 proposed by the client is 1,159m long, and comprises approximately 514m of Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 645m open cut. This would avoid environmentally sensitive and practically important features, and would allow space for HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.

Date:	Drawn by:	Scale:	Checked by:
19/02/2023	PH	1:2000 @ A1	DKS

Client: Mr Thomas Dickson
www.arborweald.co.uk


ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY
Notes:
This plan has been produced by Arborweald using original plans by Rampion Extension Development Ltd, original drawing title: Tree preservation order and hedgerow plan (B) sheet 25 (System identifier: 42285-WSPE-EX-ON-FG-OO-3683_v2)
Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Alternative route 3
Drawing number:
DKS/1003.3
Version:
Alternative 3/001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Boundaries of Alternative Route 3:
Horizontal Directional Drilling (HDD):
15m Woodland edge buffer zone:
Key information:
The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 3 proposed by the client is 1,207m long, and comprises approximately 80m of short throw Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 1,127m open cut. This would avoid environmentally sensitive and practically important features, and would allow space for short throw HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.
Date:
19/02/2023
Drawn by:
PH
Scale:
1:2000 @ A1
Checked by:
DKS
Client: Mr Thomas Dickson
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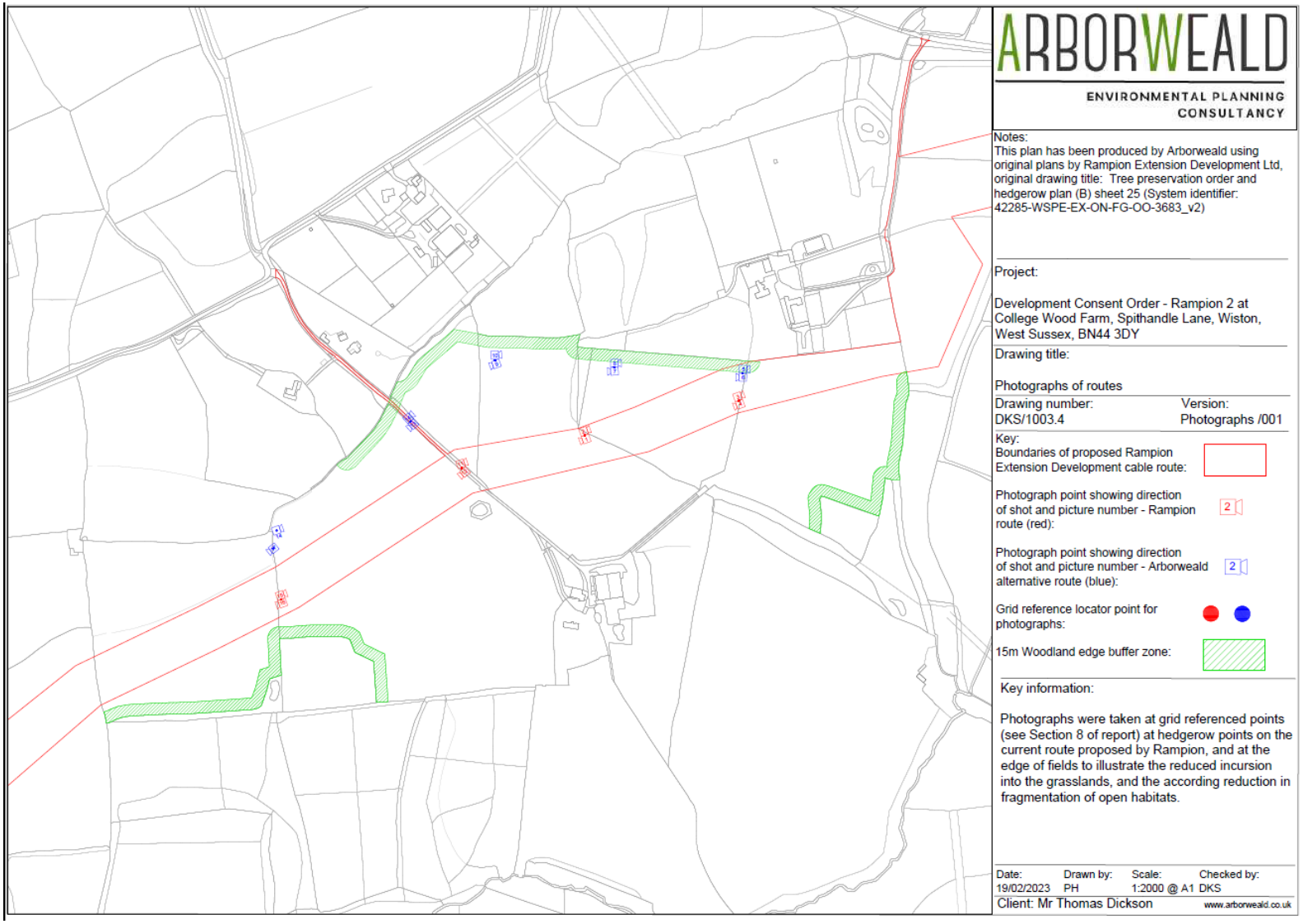

ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY
Notes:
This plan has been produced by Arborweald using original plans by Rampion Extension Development Ltd, original drawing title: Tree preservation order and hedgerow plan (B) sheet 25 (System identifier: 42285-WSPE-EX-ON-FG-OO-3683_v2)
Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Photographs of routes
Drawing number:
DKS/1003.4
Version:
Photographs /001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Photograph point showing direction of shot and picture number - Rampion route (red):
Photograph point showing direction of shot and picture number - Arborweald alternative route (blue):
Grid reference locator point for photographs:
15m Woodland edge buffer zone:
Key information:
Photographs were taken at grid referenced points (see Section 8 of report) at hedgerow points on the current route proposed by Rampion, and at the edge of fields to illustrate the reduced incursion into the grasslands, and the according reduction in fragmentation of open habitats.
Date:
19/02/2023
Drawn by:
PH
Scale:
1:2000 @ A1
Checked by:
DKS
Client: Mr Thomas Dickson
www.arborweald.co.uk

APPENDIX D Tables

Table 4.1 Woody species

English name	Scientific name
Alder	*Alnus glutinosa*
Apple, crab	*Malus sylvestris*
Ash	*Fraxinus excelsior*
Aspen	*Populus tremula*
Beech	*Fagus sylvatica*
Birch, downy	*Betula pubescens*
Birch, silver	*Betula pendula*
Black-poplar	*Populus nigra sub-species betulifolia*
Blackthorn	*Prunus spinosa*
Box	*Buxus sempervirens*
Broom	*Cytisus scoparius*
Buckthorn	*Rhamnus cathartica*
Buckthorn, alder	*Frangula alnus*
Butcher's-broom	*Ruscus aculeatus*
Cherry, bird	*Prunus padus*
Cherry, wild	*Prunus avium*
Cotoneaster, wild	*Cotoneaster integerrimus*
Currant, downy	*Ribes spicatum*
Currant, mountain	*Ribes alpinum*
Dogwood	*Cornus sanguinea*
Elder	*Sambucus nigra*
Elm	*Ulmus species*
Gooseberry	*Ribes uva-crispa*
Gorse	*Ulex europaeus*
Gorse, dwarf	*Ulex minor*
Gorse, western	*Ulex gallii*
Guelder rose	*Viburnum opulus*
Hawthorn	*Crataegus monogyna*
Hawthorn, midland	*Crataegus laevigata*

English name	Scientific name
Hazel	*Corylus avellana*
Holly	*Ilex aquilfolium*
Hornbeam	*Carpinus betulus*
Juniper, common	*Juniperus communis*
Lime, large-leaved	*Tilia platyphyllos*
Lime, small-leaved	*Tilia cordata*
Maple, field	*Acer campestre*
Mezereon	*Daphne mezereum*
Oak, pedunculate	*Quercus robur*
Oak, sessile	*Quercus petraea*
Osier	*Salix viminalis*
Pear, Plymouth	*Pyrus cordata*
Pear, wild	*Pyrus pyraster*
Poplar, grey	*Populus x canescens*
Poplar, white	*Populus alba*
Privet, wild	*Ligustrum vulgare*
Rose	*Rosa species*
Rowan	*Sorbus aucuparia*
Sea-buckthorn	*Hippophae rhamnnoides*
Service-tree, wild	*Sorbus torminalis*
Spindle	*Euonymus europaeus*
Spurge-laurel	*Daphne laureola*
Walnut	*Juglans regia*
Wayfaring-tree	*Viburnum lantana*
Whitebeam	*Sorbus species*
Willow	*Salix species*
Yew	*Taxus baccata*

Table 4.2 Woodland ground flora species

English name	Scientific name
Forbs	
Barren strawberry	*Potentilla sterilis*
Bluebell	*Hyacinthoides non-scripta*
Broad-leaved helleborine	*Epipactis helleborine*
Bugle	*Ajuga reptans*
Common cow-wheat	*Melampyrum pratense*
Common dog violet	*Veronica riviniana*
Dog's mercury	*Mercuralis perennis*
Early dog-violet	*Viola reichenbachian*
Early purple orchid	*Orchis mascula*
Enchanter's nightshade	*Circaea lutetiana*
Goldilocks buttercup	*Ranunculus auricomus*
Great bell-flower	*Campanula latifolia*
Heath bedstraw	*Galium saxatile*
Herb Paris	*Paris quadrifolia*
Herb-Robert	*Geranium robertianum*
Lords-and-ladies	*Arum maculatum*
Moschatel	*Adoxa moschatellina*
Nettle-leaved bell-flower	*Campanula trachelium*
Oxlip	*Primula elatior*
Pignut	*Conopodium majus*
Primrose	*Primula vulgaris*
Ramsons	*Allium ursinum*
Sanicle	*Sanicula europaea*
Small cow-wheat	*Melampyrum sylvaticum*
Sweet violet	*Viola odorata*
Toothwort	*Lathraea squamaria*
Tormentil	*Potentilla erecta*
Wild strawberry	*Fragaria vesca*
Wood anemone	*Anemone nemorosa*
Wood avens/Herb bennet	*Geum urbanum*

English name	Scientific name
Wood horsetail	*Equisetum sylvaticum*
Wood sage	*Teucrium scorodonia*
Wood sorrel	*Oxalis acetosella*
Wood speedwell	*Veronica montana*
Wood spurge	*Euphorbia amygdaloides*
Woodruff	*Galium odoratum*
Yellow archangel	*Lamiastrum galeobdolon*
Yellow pimpernel	*Lysimachia nemorum*
Ferns	
English name	**Scientific name**
Broad buckler fern	*Dryopteris dilatata*
Common polypody	*Polypodium vulgare*
Hard fern	*Blechnum spicant*
Hard shield fern	*Polystichum aculeatum*
Hart's tongue	*Asplenium scolopendrium*
Lady fern	*Athyrium filix-femina*
Male fern	*Dryopteris filix-mas*
Narrow buckler-fern	*Dryopteris carthusiana*
Scaly male-fern	*Dryopteris affinis*
Soft shield fern	*Polystichum setiferum*
Grasses, sedges and rushes	
English name	**Scientific name**
Giant fescue	*Festuca gigantea*
Greater wood-rush	*Luzula sylvatica*
Hairy brome	*Bromus ramosus*
Hairy woodrush	*Luzula pilosa*
Wood false-brome	*Brachypodium sylvaticum*
Wood meadow-grass	*Poa nemoralis*
Wood melick	*Melica uniflora*
Wood millet	*Millium effusum*
Wood sedge	*Carex sylvatica*

AGRICULTURAL

BUSINESS IMPACT ASSESSMENT

College Wood Farm

Spithandle Lane, Wiston, Steyning, West Sussex BN44 3DY

February 2024

Contents

Appendix

1. Introduction

1.1. BCM have been asked to provide a report detailing the current Farming Business Operations at College Wood Farm ('the Site') and provide analysis as to the impact of the anticipated route and proposed alternatives for the installation of an electricity cable through the Site as part of the Rampion 2 project.

1.2. This report will consider the impact of the route, together with alternatives on the current agricultural practices at College Wood Farm and the impact on all potential business operations which could reasonably be implemented on the Site.

2. Location

2.1. The Site is situated in rural Sussex to the east of the village of Wiston and southwest of the village of Ashurst. A variety of amenities and services are available in the nearby town of Ashington, some 2.5 miles to the northwest of the Site.

2.2. The A24 is 3.5 miles to the west of the site while the A283 is a little under 2 miles to the south.

2.3. The Site is surrounded by other existing agricultural properties.

2.4. The Site comes under the jurisdiction of West Sussex County Council and Horsham District Council.

2.5. The Site is not located within any designated landscapes but is in close proximity to the South Downs National Park.

2.6. A location and site plan can be seen in Appendix 1.

3. Site Description

3.1. The Site is a farm of approximately 62.23 hectares (153.77 acres) of which 54.59 hectares (134.91 acres) is permanent pasture with the rest being an assemblage of established woodland and infrastructure.

3.2. The Provisional Agricultural Land Classification for the majority of the Site is Grade 4, with a small portion of the Site to the southeast being Grade 3. Soilscapes classifies the Site as slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils.

3.3. The topography of the Site is mostly flat with some gentle undulations.

3.4. The main dwelling for the Site is located at the centre of the property and is a Grade II listed farmhouse which is owned and occupied as part of the current farming operation. We have been informed that the brick barn adjacent to the farmhouse is currently being converted into a residential dwelling under Class Q, however this report does not review any of the existing or future planning of the Site.

3.5. There are two steel portal framed agricultural buildings under cement and asbestos sheeting totalling 11,300ft^2 in the yard adjacent to the dwellings which are connected to cattle handling facilities.

3.6. There is a general-purpose agricultural barn located to the north of the Site with a separate single-track access.

3.7. The principal access for the Site is a single concrete track exiting from Spithandle Lane to the north of the property. There is additional field access to areas of pasture on the northern boundary of the Site, however, this does not adequately serve the wider site.

3.8. Over half of the main access track is designated as a Public Right of Way (PRoW), which also runs to the centre of the Site's eastern boundary. The PRoW follows the circumference of the boundary from the southern edge to the northeastern corner. This can be seen in Appendix 2.

3.9. The Site is reliant on a series of land drains across all parcels. Heavy seasonal flooding can be observed across the Site. Photographs demonstrating the flooding seen annually on the Site are shown in Appendix 3.

4. Current Farming Business operation

4.1. College Wood Farm is solely farmed by the owner, Mr Thomas Dickson, principally as a beef farm with a regenerative focus, utilising a predominantly grazing based system.

4.2. Mr Dickson does not employ any full-time, part-time or seasonal staff due to the farming methods adopted.

4.3. Very little machinery is used in the farming operation with Mr Dickson dealing with his livestock on foot and only using his four-wheel drive vehicle where ground conditions allow.

4.4. The beef farming operation is run on the same model annually, with 12-16-month store cattle being purchased from February/March at market and turned out to pasture as soon as conditions allow. Where necessary, livestock can be housed before grazing the Site, utilising supplementary as required.

4.5. Finished cattle are taken to market every three weeks from October until the herd is depleted for the beef market or sold onsite throughout this period. Cattle not making weight can also be sold as stores. Over 100 finished cattle are sold each year, with a further 40 or so stores sold on average annually. Where economical and required for livestock husbandry, cattle will be retained kept during the winter.

4.6. Artificial fertilisers are not applied to the Site. The Site is run to an Organic standard, however, is not currently certified. If it ever became necessary, farmyard manure (FYM) from the Site herd would be applied.

4.7. A secondary site of approximately 80 acres is also owned offering some areas of permanent pasture. Movement of livestock between the two sites is not frequent but could occur.

4.8. On occasion, additional third-party stock will be brought in to graze the Site in addition to cattle when there is a need/capacity to do so.

4.9. No forage is currently produced onsite due to the regenerative grazing approach taken in regard to pasture management but it would be possible if required. Hay, straw and supplements are purchased for housed cattle.

4.10. The current Health and Safety and Lone Working Policy is based on Mr Dickson being the sole operative onsite.

4.11. Mr Dickson has previously claimed BPS over the holding and will benefit from De-Linked Payments going forward. The farming business does not claim any further income from Sustainable Farming Incentive, Mid-Tier Countryside Stewardship or Higher Tier Countryside Stewardship Agreements at present.

4.12. The Site is not currently utilised to generate any additional income from Commercial operations.

4.13. The Site is not currently utilised to generate any additional income from Sporting, Leisure or Tourism revenue streams.

5. Ecology

5.1. Arborweal Environmental Planning Consultancy have conducted a full Preliminary Ecological Appraisal of the Site. BCM have taken the findings of this report into consideration.

6. Health and Safety

6.1. The current H&S and Lone Working Policy is suitable at this current time but is unlikely to be robust enough to suitably manage any significant modification to the current farming practices. Any such modification to practices would also likely require modification of the business insurance policy.

6.2. Farming can be an incredibly dangerous occupation, with the industry accounting for roughly 19% of fatal workplace injuries annually despite only making up 1.8% of the UK workforce. Working with livestock in particular can present significantly elevated risks of workplace injury.

6.3. The presence of properly maintained cattle handling facilities on the Site reduces the risk of injury to those handling cattle.

6.4. The main access in and out of the property is vital to allow Emergency Service Access should an accident occur on the Site. Other field access would be inadequate.

6.5. The topography of the Site is unlikely to increase the risk of a workplace accident in its own right.

6.6. The use of minimal agricultural machinery on the Site slightly reduces the risk of injury to those working on the Site in comparison to other similar sites where heavy machinery is used regularly.

7. Further Business Opportunities

7.1. The Site offers a good deal of potential for further sources of income.

7.2. Whilst the business has historically claimed BPS and will benefit from De-Linked Payments in the short term, the Site could easily benefit from a Sustainable Farming Incentive (SFI) or a Countryside Stewardship (CSS) Agreement (mid or higher tier). Given the sustainable farming methods practiced on the Site, alongside the ecological significance of the Site, schemes could potentially generate a good deal of income.

7.3. There are a number of buildings on the Site which have the potential to be converted into residential or commercial units (in addition to the property currently undergoing renovation), offering further potential income streams.

7.4. There is potential for the Site to gain income through diversification into the Leisure or Tourism industries. Given the presence of a PRoW and proximity to the South Downs National Park it is possible to speculate that diversification to offer a Camp Site or '*Glamping'* pods could potentially be very lucrative.

8. Impact of Current Route

8.1. It has been proposed that an electric cable be installed on the Site as part of a wider network to complete the Rampion 2 project. The proposed route in outlined within Appendix 4. Alternative routes and Horizontal Direct Drilling (HDD) methods have been proposed and outlined in Appendix 4 and section 9 below.

8.2. The proposed route bisects the Site from east to west, going through six parcels of permanent pasture and the single access route for the Site. The route will have a significant impact on the current farming operation. These impacts are listed below.

8.3. Access

8.3.1. The proposed route passes through the single access track for the Site posing potentially significant problems. The first problem that must be considered is how the proprietor would actually access the Site at all without undue stress should the access route be lost.

8.3.2. The area where the route crosses the access track is also the access point for large parcels of pasture to the west of the Site, as well as access to a significant portion of the parcels to the east of the Site. Loss of these access points would cause major disruption to the current farming operation in terms of livestock welfare management and movement.

8.3.3. The access track is required for the access of HGVs regularly for deliveries and livestock movements, both internally to housing and areas of pasture and externally to and from markets. It would not be possible for HGVs to access the Site if this access was removed or lowered in specification to any great extent.

8.4. Livestock Handling

8.4.1. Mr Dickson farms using his four-wheel drive vehicle and on foot. The ditch that would be present following the installation of the cable along the proposed route would make it impossible for him to access the northern parcels of his property without changes to the current infrastructure and practices. It would also result in change to current livestock movement practices to allow cattle to access all the parcels of permanent pasture as it would be unfavourable/not possible to move them through/over ditches.

8.4.2. As stated in 8.3.3 HGVs are required to move cattle internally and externally. Ditches in the western and eastern parcels would mean there became a requirement to load and transport cattle to the alternative access on Spithandle Lane to graze the northwestern parcel.

8.5. Loss of Grazing

8.5.1. In addition to movement issues caused by ditches, following installation along the proposed route, there would be an undeniable loss to grazing both immediately along the route but also on large areas running parallel to the route following installation works. Loss of grazing would directly impact the number of cattle able to graze the ground and therefore the output of the business.

8.6. Drainage

8.6.1. As noted in 3.9 and Appendix 3, seasonal flooding occurs annually on the Site. All drainage across the Site is via a series of land drains, at least two of which are bisected by the proposed route. It is likely that there would be a negative impact, rendering a good deal of the pasture un-grazeable for long periods or until remedied. This would impact the number of cattle the Site could hold, the output of finished stock and the workability of the Site as a whole.

8.7. Health and Safety

8.7.1. The loss of decent access to the Site raises serious concerns over Health and Safety on the Site when carrying out farming operations.

8.7.2. Firstly, due to a lack of proper access, it is possible that Mr Dickson would be forced to take his vehicle or walk on unsuitable routes, increasing the risk of an accident.

8.7.3. If an accident was to occur, the ease of access for emergency services would be greatly reduced. Farming related injuries can be life threatening and so speed of treatment is paramount. Therefore, any possible steps should be taken to avoid any measures that are going to reduce the ease of access and therefore speed of treatment.

8.7.4. The topographical change to the Site with the introduction of a large ditch through the Site would increase the risk of an accident when carrying out farming practices on foot or using a vehicle, especially when livestock were involved. For example, if it became necessary to free an animal which had become stuck in the ditch.

8.7.5. Increased presence of standing water due to damage to drainage on the Site caused by the proposed route would further increase the risk of accidents when carrying out farming activities. For example, if Mr Dickson were forced to take an unsuitable alternative route due to standing water, had to try an extract machinery which became stuck in heavy/wet ground or had to try and handle cattle in wet and boggy ground then the risk of an accident would be substantially increased.

8.7.6. The employment of an additional member of staff could be considered by some to mitigate the risk to an extent, but this is unlikely to be the case. Livestock handling and farming operations cannot necessarily be restricted to working hours, so any additional staff would not always be present during high-risk operations (e.g. livestock movements at night due to escapes). In addition, as Mr Dickson current operates by himself, there is no suitable Health and Safety policy in place to suitably protect any employees. Mr Dickson would also have to manage this individual which may add additional strain to the business and him personally.

8.8. Ecological Impact

8.8.1. Based on the content of the Site ecological report, it is likely that the Site may be eligible for a complex Higher Tier Agreement which would offer significant ecological benefits and a beneficial revenue stream. The impact of the proposed

route on hedgerows, ditches and potential wetland features could impact on the options available to the business when entering into an Agreement.

8.8.2. Consideration should also be given to the wider ecological impact, but this advice should be sought from an ecological consultant.

8.9. Sterilisation

8.9.1. Loss of grazing has already been raised as a potential major impact of the proposed route. In addition to the material loss of formerly grazed pasture, the potential for long-term sterilisation of the wider area due to the installation works should not be ignored.

8.9.2. On a Site of this scale, even minimal sterilisation would have a knock-on effect on the productivity and output of the farming enterprise. It is plausible that between 5% and 20% of the Site grazing area could be sterilised by the initially proposed route. This is based on the area actively disturbed by the pipeline installation and areas of grazing which will be unreachable whilst works are being undertaken and ditches are open. We understand that this period of sterilisation could be between at least 3-5 years.

8.9.3. Should the farming business wish to expand by building further livestock housing or infrastructure the proposed cable will cause permanent sterilisation with the buildings or infrastructure therefore not being able to be built above or adjacent to the route.

8.10. Animal Welfare

8.10.1. The presence of steep ditches on the Site would present a possible hazard to cattle and other livestock as they could potentially become stuck, injuring themselves in the process.

8.10.2. Due to the increased handling required as illustrated in 8.4, this increases the number of instances where cattle must be handled or transported potentially leading to unnecessary stress.

9. Impact of Alternative Proposed Routes

9.1. Alternative routes and Horizontal Direct Drilling (HDD) methods have been proposed and outlined in Appendix 4. The alternatives proposals can be summarised as follows;

- **Alternative 1** – HDD proposed route
- **Alternative 2** – Re-route & HDD part
- **Alternative 3** – Re-route & HDD access points only

The potential impacts of a cable installed along the alternative route have been highlighted below, considering the routes with and without the use of HDD methodology.

9.2. Access

9.2.1. Alternatives 2 & 3 also pass through the single access track for the Site posing potentially significant problems. The access track has been suggested as a possible point for HDD to occur. If it were possible to carry out HDD without impacting the structure or use of the track, then this should be considered the favoured option. This would allow the Site to continue to be accessed in the current fashion. If this were not possible, the same considerations as 8.3 should be applied.

9.2.2. As per 8.3.3, the access track is required for the access of HGVs for various reasons. The alternative routes would pose similar issues, unless the use of HDD allowed for the current access route to be unaltered and the use to be uninterrupted. If this were the case, this would again make Alternatives 2 & 3 with HDD the favoured option.

9.3. Livestock Handling

9.3.1. The alternative routes would pose the same issues as raised in 8.4.1 if installed using the standard methodology. If HDD were used to avoid disruption to the accessing of the northern parcels as outlined in Alternative 2, impacts from ditches would be mitigated, reducing the amount of livestock handling. Alternative 2 would be preferred due to a greater reduction in open ditches and crowding issues for livestock at crossing points.

9.3.2. The requirement to transport cattle using an HGV to a separate access on Spithandle lane would, as highlighted in 8.4.2, be required if the alternative route were to be followed using the standard methodology. However, if HDD were to be utilised, it is likely that there would not be needed to existing access still being available in Alternative 3. However, concerns are raised at crossing points as outlined in section 9.9.

9.4. Loss of Grazing

9.4.1. As highlighted in 8.5.1, following installation, there would be an undeniable loss to grazing, both immediately along the alternative routes but also on large areas running parallel to the route following the works. Loss of grazing would directly impact the number of cattle able to graze the ground and therefore the output of the business of the predicted 3-5 year period.

9.4.2. The employment of HDD would likely greatly reduce the grazing loss on Site, thus making this Alternative 2 & 3 preferable.

9.5. Drainage

9.5.1. The impact of seasonal flooding has already been referenced at length and as per 8.6.1 installation works could potentially greatly impact field drains.

9.5.2. It is possible that the change in route and use of HDD would mitigate any concerns over drainage but a hydro-morphologist should be consulted to confirm whether this would be the case. Historic land drains may still be damaged using HDD methods.

9.6. Health and Safety

9.6.1. The alternative routes using HDD could assist with the access of emergency services in the event of an accident via the main access track.

9.6.2. The impact on the access to parcels of pasture is greatly reduced along the Alternative 2 and 3 when compared to the initial route, mitigating the need for any risks being taken on unsuitable routes to access grazing.

9.6.3. The alternative routes would still pose a significant change to the topography but the ditching is likely to be in less prominent positions in Alternative 2, due to greater HDD work, thus reducing health and safety and animal welfare concerns.

9.6.4. Any concerns surrounding drainage and the increased presence of standing water would not be mitigated by the alternative routes. The same health and safety concerns should therefore be applied to the alternative routes when considering standing water and heavy ground and would potentially be increased. If the use of HDD were likely to have a lesser impact on the drainage, this would render the alternative routes and use of HDD as the favourable option.

9.7. Ecological Impact

9.7.1. Applying the same views as 8.8.1, Alternatives 2 and 3 could potentially have the same impacts as highlighted in 8.8.2. Given that the alternative routes appear to interfere with natural features such as hedges, woodland and field drains. Alternative 2 with greater HDD may reduce the impact on the ecological environmental factors, and therefore reducing effects on any potential CS Agreement.

9.7.2. If greater HDD were to be employed as in Alternative 2, it is plausible that there may be a lesser impact on ecologically significant features, making this a preferable option. The opinion of an ecological consultant should be sought to confirm whether or not this is the case.

9.8. Sterilisation

9.8.1. Alternative 3 assists with reducing the widespread pasture sterilisation compared to the initial proposed route, due to the layout being closer to the field boundaries. However, Alternative 2 using greater HDD methods is likely to reduce sterilisation and less grazing disturbance over the 3-5 year period.

9.8.2. Alternatives 2 & 3 pose the same level of risk in regard to widespread sterilisation as the initially proposed route when considering future buildings or infrastructure.

9.9. Animal Welfare

9.9.1. The presence of steep ditches along the Alternatives 2 & 3 would present the same issues as highlighted in 8.10.1. However, where HDD was to be utilised, this would mitigate these concerns in those access areas only. Alternative 2 would therefore assist with animal welfare.

9.9.2. Increased handling issues as outlined in 8.10.2 would also reduce by adopting Alternative 2 and 3, with Alternative 2 providing a greater reduced in disturbance.

9.9.3. It should be noted that if HDD was only to be used at access points, as per Alternative 3, there could still be an elevated risk to animal welfare. Access points can be considered ‘pinch points' for livestock when being moved, and should animals spook and become agitated, they are liable to run away from perceived danger, sometimes in large numbers. If ditches were to be present in areas of pasture near access points, it is likely that if spooked, cattle could flee from perceived danger and fall in such ditches, possibly becoming stuck and causing injuries. This also creating a Health and Safety risk for Mr. Dickson when extracting the cattle.

10. Conclusion

10.1. Alternative 1 utilising the HDD method for the whole cable length would provide the greatest reduction in impact. However, sterilisation of future development and effects on drainage would still be apparent.

10.2. Alternatives 2 and 3 would still have significant impacts on the current farming operation. As outlined in Sections 8 and 9, there are positives and negatives to both routes. When considered broadly, Alternative 2 is preferable. The use of HDD in part, provides greater mitigation for the impacts on the farming operation when compared to the other options.

10.3. A route which avoided the Site in its entirety would of course be the favoured option in this context but may not be reasonably practicable.

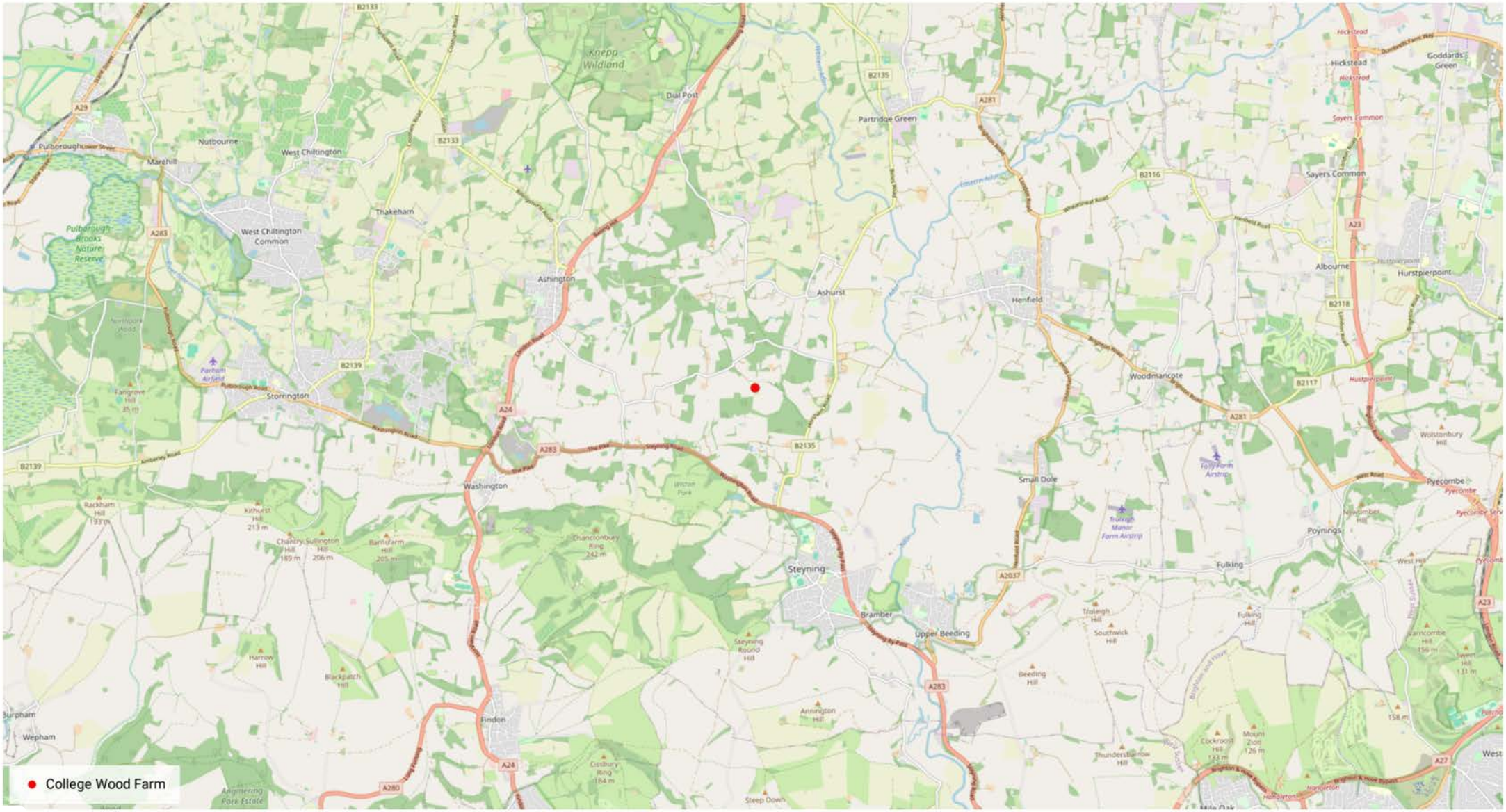
February 2024

Appendix 1
Location and Site Plan

BCM

College Wood Farm - Location Plan

Land App



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oduced on Feb 20, 2024.
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For identification purposes only

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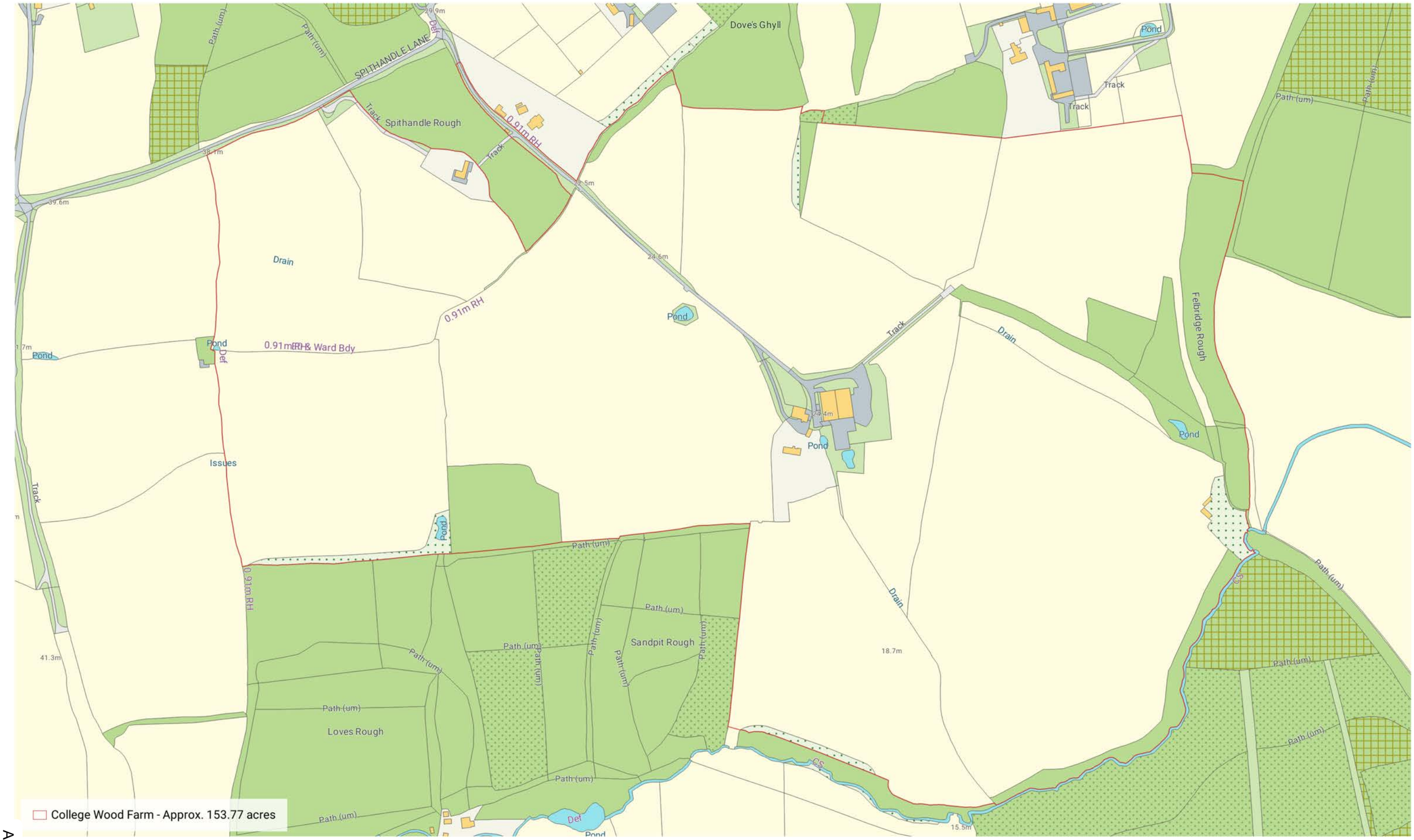
BCM

College Wood Farm - Site Plan

Land App



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For identification purposes only

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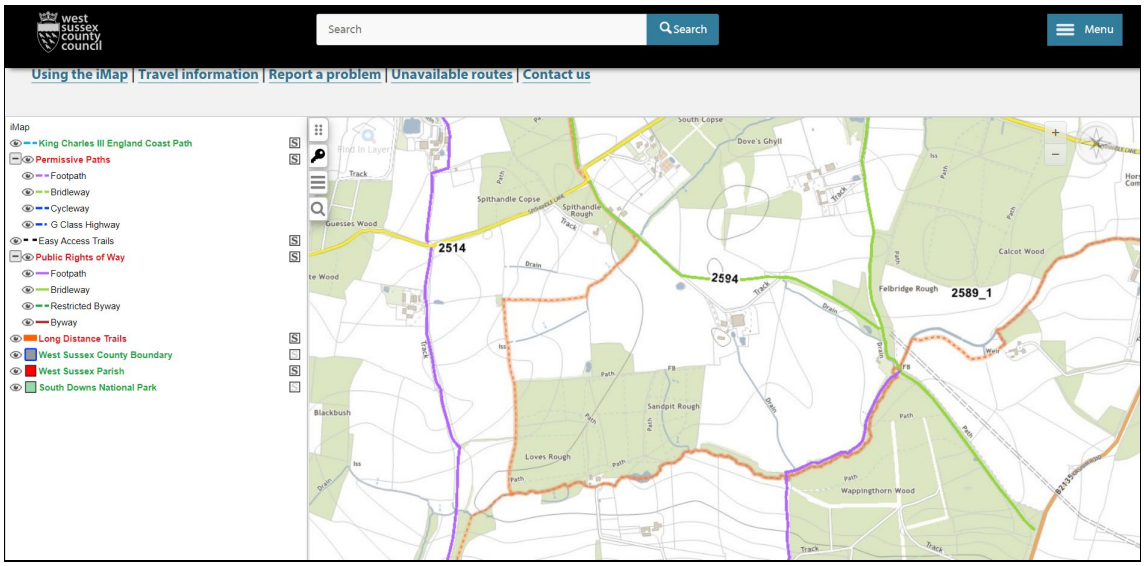
Appendix 2
Definitive Plan – Public Rights of Way

Public Rights of Way

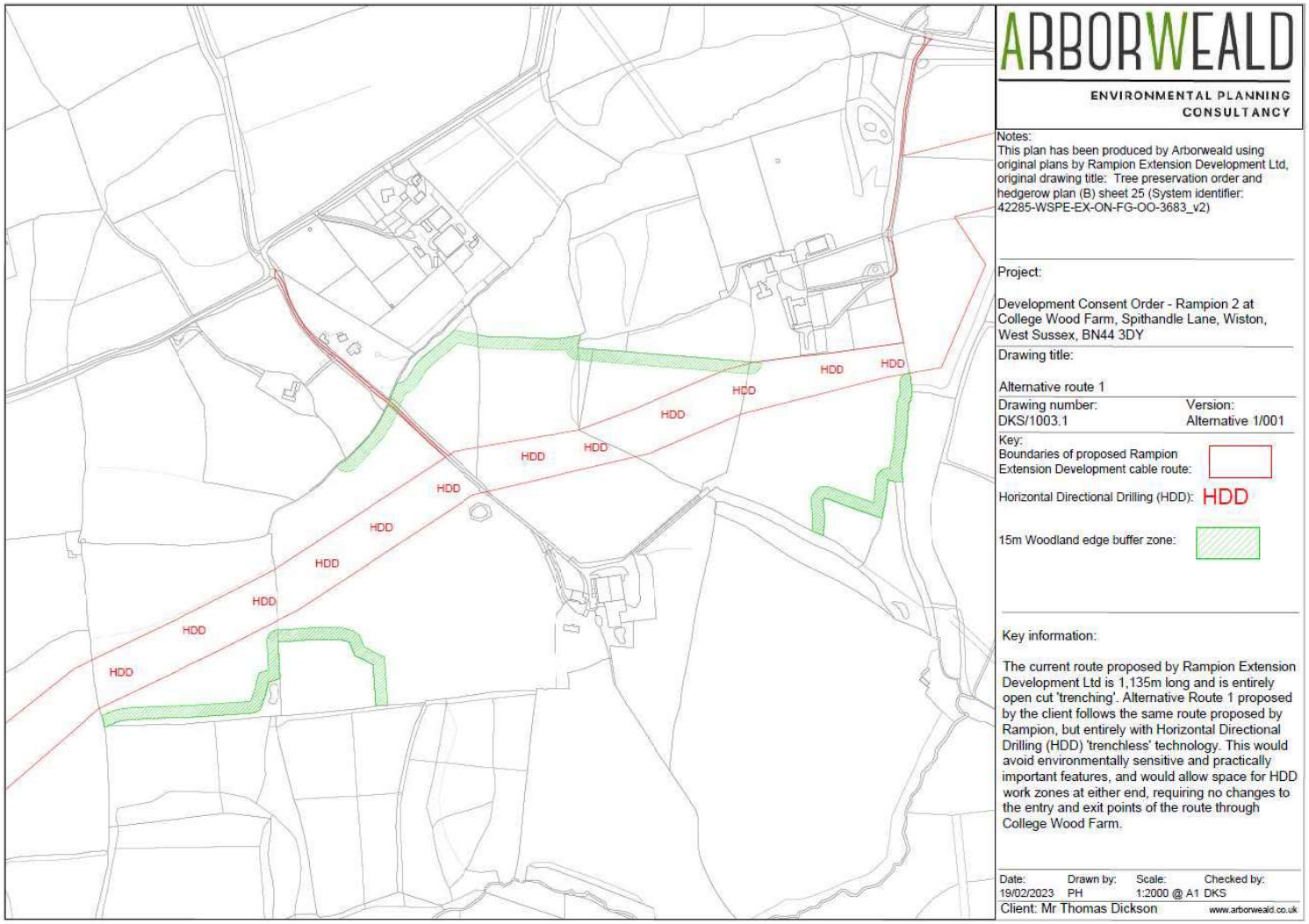


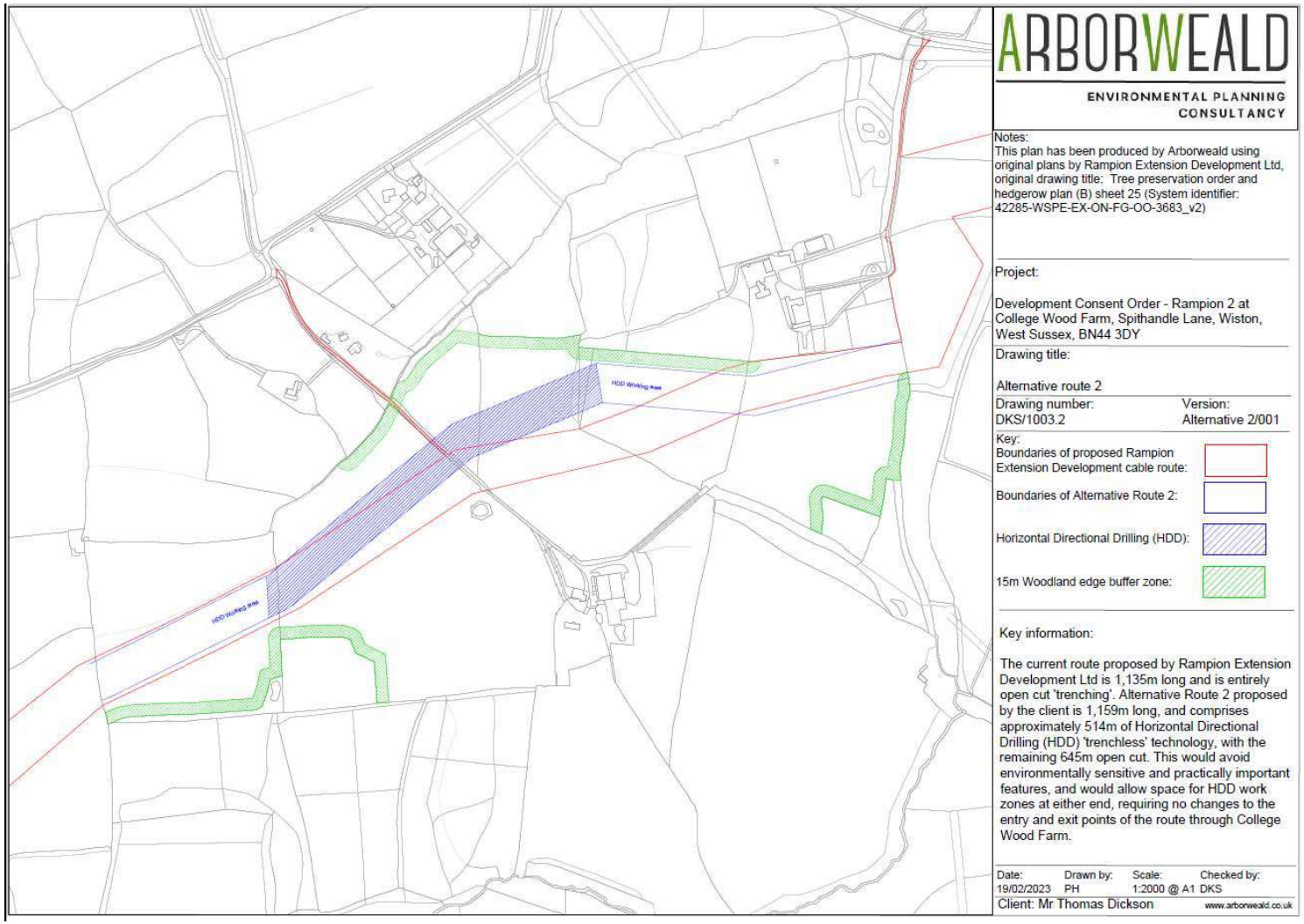
Appendix 3
Images of Site Flooding

Images of Site Flooding

Appendix 4
Cable Installation Routes

APPENDIX C Figures




ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY
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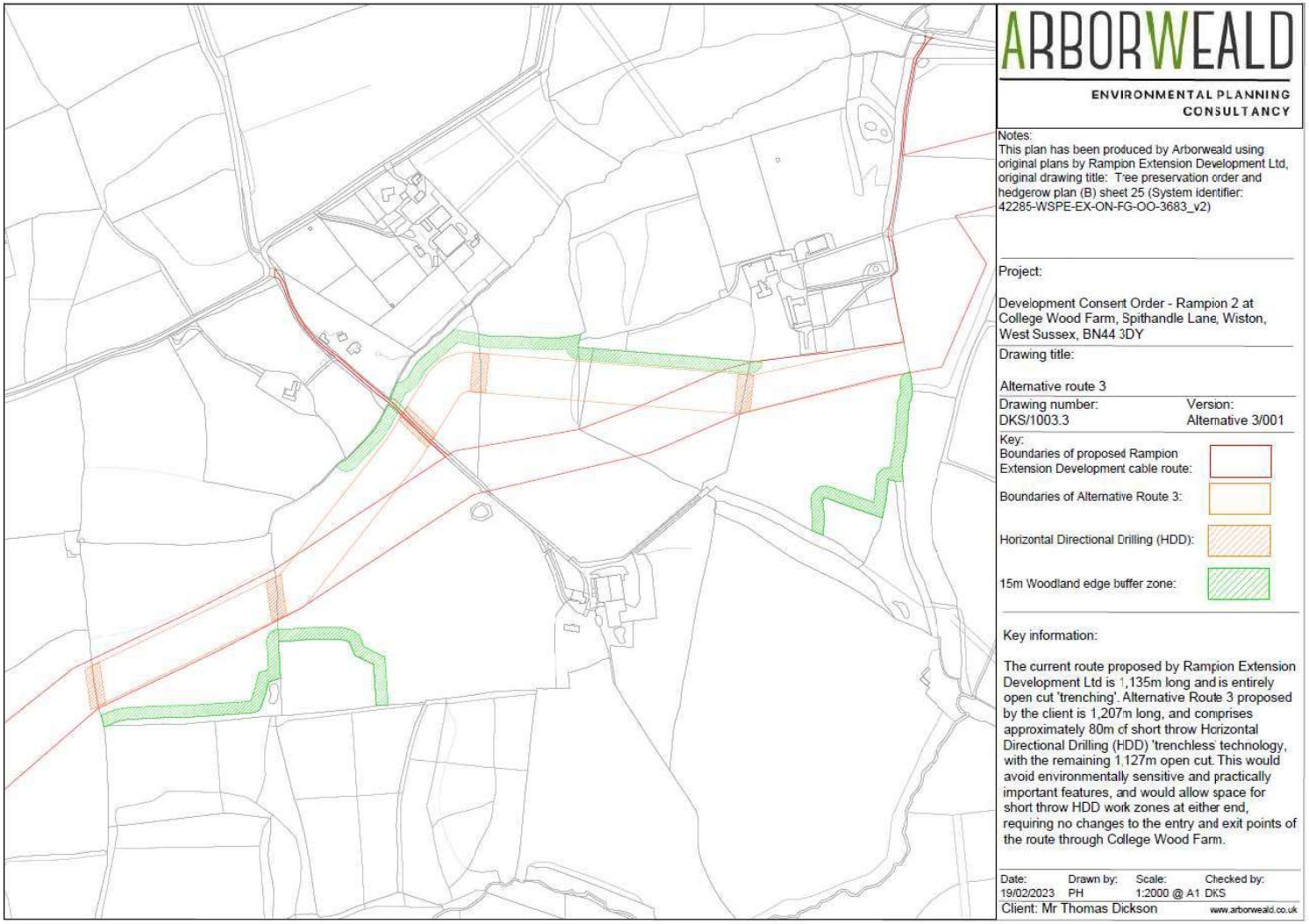
Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Alternative route 2
Drawing number:
DKS/1003.2
Version:
Alternative 2/001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Boundaries of Alternative Route 2:
Horizontal Directional Drilling (HDD):
15m Woodland edge buffer zone:
Key information:
The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 2 proposed by the client is 1,159m long, and comprises approximately 514m of Horizontal Directional Drilling (HDD) 'trenchless' technology, with the remaining 645m open cut. This would avoid environmentally sensitive and practically important features, and would allow space for HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.
Date:
19/02/2023
Drawn by:
PH
Scale:
1:2000 @ A1
Checked by:
DKS
Client: Mr Thomas Dickson
www.arborweald.co.uk


ARBORWEALD
ENVIRONMENTAL PLANNING CONSULTANCY
Notes:
This plan has been produced by Arborweald using original plans by Rampion Extension Development Ltd, original drawing title: Tree preservation order and hedgerow plan (B) sheet 25 (System identifier: 42285-WSPE-EX-ON-FG-OO-3683_v2)
Project:
Development Consent Order - Rampion 2 at College Wood Farm, Spithandle Lane, Wiston, West Sussex, BN44 3DY
Drawing title:
Alternative route 3
Drawing number:
DKS/1003.3
Version:
Alternative 3/001
Key:
Boundaries of proposed Rampion Extension Development cable route:
Boundaries of Alternative Route 3:
Horizontal Directional Drilling (HDD):
15m Woodland edge buffer zone:
Key information:
The current route proposed by Rampion Extension Development Ltd is 1,135m long and is entirely open cut 'trenching'. Alternative Route 3 proposed by the client is 1,207m long, and comprises approximately 80m of short throw Horizontal Directional Drilling (HDD) 'trenchless technology, with the remaining 1,127m open cut. This would avoid environmentally sensitive and practically important features, and would allow space for short throw HDD work zones at either end, requiring no changes to the entry and exit points of the route through College Wood Farm.
Date:
19/02/2023
Drawn by:
PH
Scale:
1:2000 @ A1
Checked by:
DKS
Client: Mr Thomas Dickson
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Project information (/projects/EN010117)

Documents (/projects/EN010117/documents)

Relevant representations (registration comments)

Examination timetable (/projects/EN010117/examination-timetable)

Have your say (/projects/EN010117/examination/have-your-say-during-examination)

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Rampion 2 Offshore Wind Farm

Representation by Thomas Ralph Dickson (Thomas Ralph Dickson)

Date submitted	6 November 2023
Submitted by	Members of the public/businesses

REPRESENTATION FORM Rights Sought 1. Thomas Ralph Dickson ("Dickson") is represented by Lester Aldridge LLP. Mr Dickson is the freehold owner of the land known as [REDACTED] ("Land") and is an Interested Party for the purposes of the DCO. The relevant order plots are 24/17, 25/2, 25/3, 25/4, 25/5 as listed in Category 1 of the Book of Reference ("Order Plots"). 2. Mr Dickson objects the acquisition of rights and the imposition of restrictive covenants over his Land. 3. The acquisition of the rights and imposition of restrictive covenants via deploying open cut route cross-farm Order Plots. 4. A summary of the principal issues are below. Mr Dickson reserves the right to expand and

Section 51 advice (/projects/EN010117/s51advice)

add to these points as the examination unfolds and in result of any response from the Applicant. Equality Act 2010 (“EA”) 5. The Applicant has disregarded Mr Dickson's protection under the Equality Act 2010 due to his age. For example, in a letter to Mr Dickson dated 24 May 2023, the Applicant erroneously conflates age and disability, showcasing a total lack of understanding of equality legislation and a woeful neglect in adequately addressing his distinctive circumstances. 6. The cable routes will inevitably cause unnecessary operational difficulties for Mr Dickson in respect of the farm that could be avoided. This point will be significantly expanded as the inquiry unfolds. Failure to Consider Alternatives 7. The Applicant’s Statement of Reasons (“SoR”) alleges that as result of their consultation process, cable route amendment and construction related change requests have been subject to review by the Applicant’s team during the evolution of the scheme design and accommodated where justified (see SoR at 6.2.3). 8. Prior to a decision being made the Applicant ignored and failed to engage in meaningful and collaborative consultation in respect of the alternative routes and methodology through the Land: a. The installation of the cable via hybrid methodology part HDD part open-cut. b. Relocation of the open trench cable to the northern point of the field boundary of the Land (together the “Alternatives”) 9. The Alternatives would have significantly reduced the impact on Mr Dickson’s livelihood thereby negating the need to provide crossing points. The impact of the Applicant’s proposals are a breach of the EA due to Mr Dickon’s personal circumstances. 10. Sample evidence includes: a. Omission to include Mr Dickson’s land in Targeted Onshore Cable Route Consultation from 18th October 2022 to 29th November 2022. b. The final decision for the chosen cable corridor affecting Land was not communicated prior to the DCO Application being submitted. c. In a letter dated 14th April 2023, the Applicant confirmed a 25 metre stand off from ancient woodland, following consultation with WSCC and NE. Instead, the Order Limits is approximately 70 meters. 11. Other than an unsubstantiated funding explanation (a summary of which has been requested and not provided), there has not been a substantive reason as to why the alternatives cannot be accommodated. Mr Dickson (via his

agents) is open to meaningful negotiation with the Applicant and awaits engagement to agree an acceptable route. Failure to Negotiate the CPO 12. Compulsory purchase is a measure of last resort, and the Applicant has not seriously considered alternative means of bringing about the objective of the CPO in respect of the Land: a. The Applicant's SoR acknowledges ongoing discussions with landowners, but no heads of terms for a voluntary agreement have been issued to Mr Dickson, despite documented requests from agents and assurances from the Applicant. b. The Applicant was only in negotiation with 25 out of 173 landowners (14%) and has agreed on terms with only 3 landowners (1.7%). c. No attempts were made to meaningfully and collaboratively negotiate with Mr Dickson before making the Draft Order despite Mr Dickon’s strenuous attempts over a long period of time as evidenced in very extensive written correspondence, phone calls and emails. 13. Relocation of the open trench cable to the northern point of the field boundary is feasible to deliver the objective of the CPO. Failure to Offer Dispute Resolution 14. The Applicant has not offered Mr Dickson access to ADR throughout the CPO process, contrary to the Government’s CPO Guidance. Failure to Adequately Consider Environmental Engineering and Ecology Factors 15. The Order would cause serious environmental issues in respect of the Land, which the Applicant has not considered, example: a. The proposed scheme poses risks to biodiversity, including vulnerable species like the turtle dove. b. Damage to a breeding pond for great crested newts. c. Foraging opportunities for invertebrates would be significantly reduced. d. Reptile species face direct risks of injury and loss of habitat. e. Disruption with connectivity with higher quality habitats, affecting terrestrial animals and bats. f. Priority habitats like deciduous woodland, waterbodies, and hedgerows are at threat and require conservation action. Lack of Funding 16. The Applicant lacks funds and cannot guarantee funding from its shareholders for the project as it is a SPV, which does not have assets of its own. There is a risk the Applicant cannot fund the project and would be unable to offer compensation to affected parties. Failure to Conduct with the Conformity of Natural

Justice 17. The Applicant has repeatedly made verifiable inaccuracies to the determinant of Mr Dickson.

Related guides

The process for Nationally Significant Infrastructure Projects (NSIPs) (/decision-making-process-guide)

Having your say about a national infrastructure project (/having-your-say-guide)

Rampion 2
WIND FARM

Rampion 2

Second Round of Statutory Consultation:

Potential Onshore Cable Route Changes

Have your say on our proposals between Tuesday 18th October and Tuesday 29th November 2022

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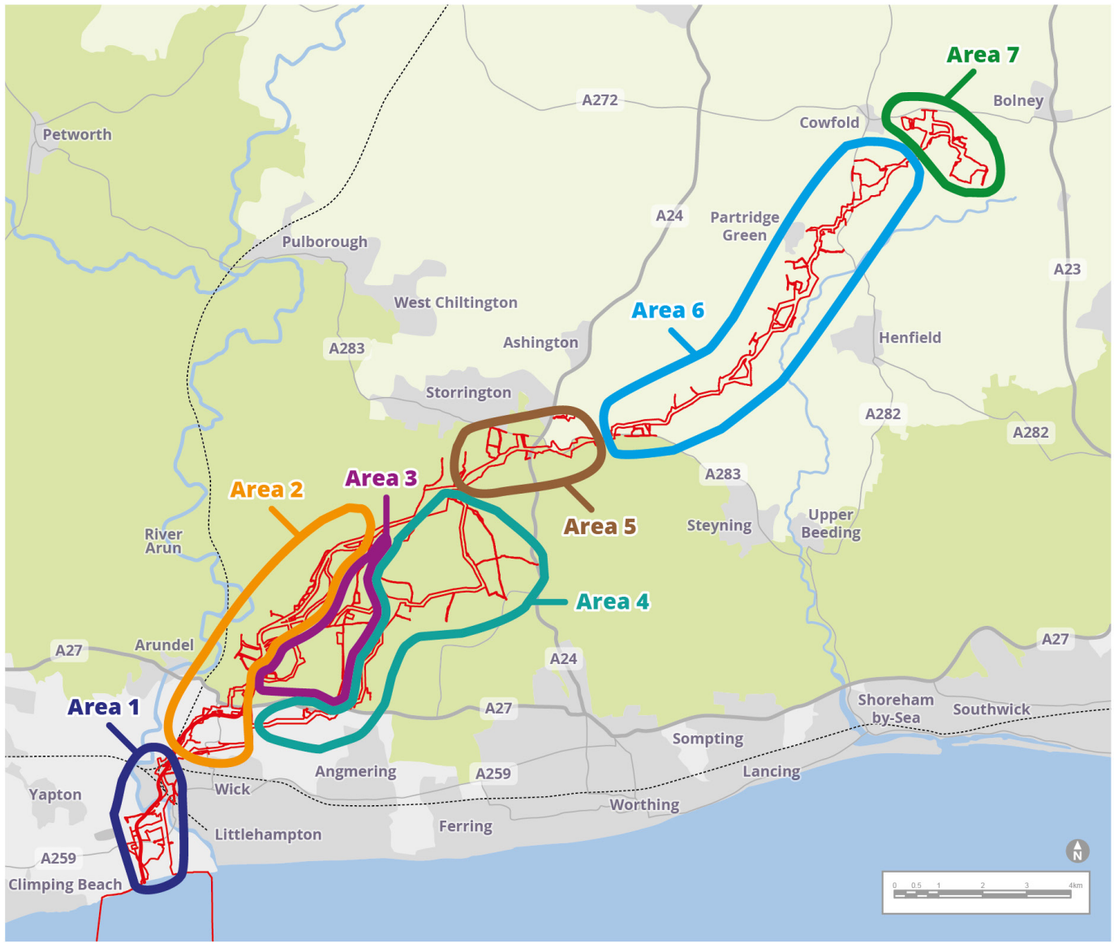
Contents



Introduction to this Consultation

This section of our booklet tells you:

- about this consultation
- some of the decisions we have already made about our project
- how we have divided up our cable route into areas so you can find the changes of most interest to you
- about our approach to cable route construction and reinstatement
- about our environmental assessments

What is this consultation about?

This consultation is only about potential changes to our onshore cable route. The onshore cable route would cover a distance of approximately 40km, but the works to install the cables would only be temporary. The land affected by the installation works would be fully restored back to its former condition once complete, other than occasional access covers for maintenance.

We are doing this consultation because of feedback we have received from consultation and ongoing engagement, along with our own engineering and environmental work.

We are presenting a number of potential changes for consultation, in the form of alternative and modified cable routes or accesses, or entirely new trenchless crossings or accesses. The new accesses could be for use during construction, operation or both. In some areas we are proposing much longer alternative cable routes.

This booklet provides a summary of the new potential changes and shows where they are on the route. If you want to, you can just respond based on this document, or you can read more in our other consultation documents. This includes more detailed information about potential environmental effects in our "Preliminary Environmental Information Report - Supplementary Information Report' (or 'PEIR SIR' for short). The PEIR SIR adds more environmental information about these new potential changes to the PEIR we consulted on last year.

The onshore cable route changes are the focus of this consultation. All feedback received will be considered alongside the feedback already received on our original cable route proposals. This will help us reach a final decision on which options to adopt for our final proposals, which we will submit in our consent application in 2023.

What makes up this consultation?

The main things making up this consultation are:

This Consultation Booklet

This booklet contains a summary of the potential onshore alternatives and modifications and how to respond to this consultation.

Consultation response form

A form for respondents to express their views on the changes and submit to the project team for consideration. Consultation responses will also be accepted via email and mail.

Work Plans

We've produced plans for our potential changes which are similar to those that will be in our future consent application. These give more information on where we are proposing extra works areas relative to the original route that we consulted upon in 2021.

Outline Code of Construction

We previously developed an Outline Code of Construction which sets out how we would manage the construction works in a responsible manner. This can be viewed and commented on as part of this latest consultation via our website.

Videos

You can watch various videos to help understand this consultation and our approach to onshore construction. These are:

- Introduction to the consultation from the Project Manager and Stakeholder Manager
- Cable route reinstatement video from the original Rampion project, about how we restore the land after our cable is laid
- A series of construction videos from the original Rampion project

PEIR SIR

The PEIR Supplementary Information Report, which includes more detailed preliminary environmental information about our proposed alternatives and modifications. Our original PEIR document also forms part of this consultation, as you can use it to understand more about what is written in our PEIR SIR.

Archived Consultation Materials

Although we are not asking for comments on them in this consultation, you can still view all our original consultation materials from our Statutory Public Consultation held from July to September 2021. You may want to view them for a wider understanding of our project, so we continue to make them available at www.Rampion2.com/consultations-2021

We want to hear from you:

This consultation has been designed for people and organisations to give us their views and contribute to the evolving design of the Rampion 2 project. It provides an opportunity to comment on potential changes to our onshore cable route which may be local to your home or business, or be somewhere that you visit.

Providing your feedback on our potential alternatives and modifications, can help influence our final onshore cable route proposals.

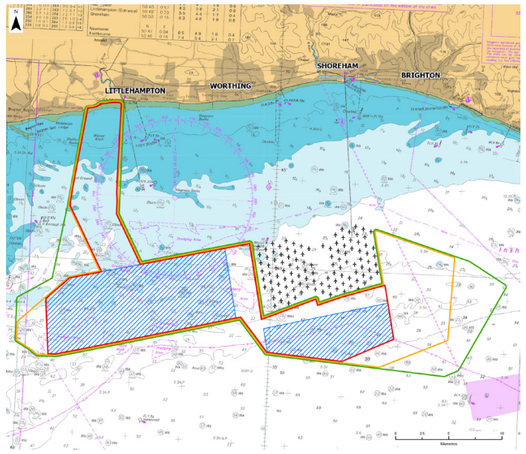
We encourage anyone who has any kind of interest in our potential changes to give us their views. This could be about how the potential changes may benefit or impact you, or something you care about.

Parts of our project we've now fixed

This consultation is about potential changes to our onshore cable route only. However, based on two previous stages of consultation, we've already been able to make some final decisions about other parts of our project:

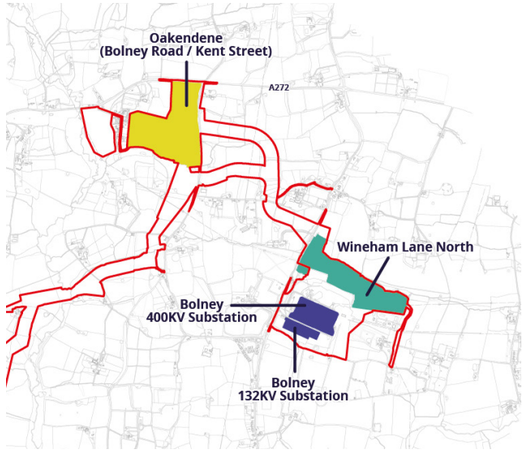
Where our offshore wind turbines might go:

We recently announced changes we've made to the offshore areas of our wind farm in response to consultation feedback. We are not proposing to hold any further consultation on the offshore parts of our project before our application for development consent. However, you can learn more about the changes we have made to the offshore proposals at www.Rampion2.com/consultation



Our chosen onshore substation location:

We've also recently announced the site we have chosen for our onshore project electricity substation. This was selected from a shortlist of two locations which we consulted on last summer. These were Bolney Road/Kent Street (which we are now calling "Oakendene") and Wineham Lane North. We have decided to move forward with the site we are calling 'Oakendene' and have formally dropped the Wineham Lane North site. We've also dropped some cable route options that were only required for Wineham Lane North, but will still need some cables in that area, as that is where we connect to the existing National Grid Bolney substation.



We've produced a document that captures the main feedback we've received to date and how we've sought to respond and make changes where appropriate. You can read this document at www.Rampion2.com/consultation.

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Definitions Throughout this document we use some key definitions:

Alternative Cable Route (ACR): Potential cable route alternatives which we would like your feedback on.

Longer Alternative Cable Route (LACR): Just north of Lyminster we have two much longer alternative cable routes several kilometres in length, so we have named them differently to make them clearer.

Modified Route (MR): New areas added to give extra flexibility around our existing cable route or acccess proposals. They are less likely to lead to new significant environmental impacts relative to ACR and LACR.

Alternative Access (AA): New accesses for construction and/or operation which we are considering to get access from the local highway network.

Open trenching: Most of our cable route will be installed by digging a trench and putting ducts in. Ducts are like tubes that we join together. The cables are then pulled through the ducts later. Using ducts allows us to dig shorter trenches at a time and reinstate the ground above them more quickly.

Trenchless crossing (TC): In some locations we will need to drill or bore under obstacles such as rivers, railways and Climping Beach. This avoids disturbing the environment above or stopping transport services. A temporary drilling construction compound is needed at each end of the works.

Receptors: Something that could be affected by our works, for example, a property or nature conservation site that might hear construction noise. We identify receptors to understand the potential effect of our project.

Landfall: Where our offshore cables come ashore at Climping Beach.

Onshore substation: Our new project substation at Oakendene, to transform the power from the wind farm to a higher voltage for connection to the national electricity transmission network.

National Grid Bolney substation: The existing substation for our connection to the national electricity transmission network.

Cable route: The route for our electricity cables from the landfall to the Bolney substation, via our own onshore project substation. The cables would be laid underground over a normal construction width of 50m, including our temporary construction works and the 20m permanent space we need for cables.

Cable corridor: A wider corridor is often shown beyond our cable route, to allow flexibility, which we will decide whether to keep after our consultation.

Indicative cable route: This is to help the reader interpret the maps, but is only an example of where the 50m route might run.

Construction traffic: This could run along our actual cable route, dedicated access routes we create, or on the local highway network.

Construction access: Used for construction vehicles to get to our cable route from the local highway network.

Operational access: Used by vehicles to monitor or maintain our cables during operation of the wind farm.

PEIR: Our Preliminary Environmental Information Report (PEIR) is an initial assessment of the original project, consulted on in summer 2021.

PEIR boundary: The boundary for the onshore proposals we consulted on in summer 2021.

PEIR SIR: Our PEIR Supplementary Information Report (SIR) provides extra information on the changes that are the subject of this consultation.

Work Plans: Plans prepared to show the general categories of works in each of the new areas we are consulting on.

Cable route construction and reinstatement

What is your cable route like?

There will be no electricity pylons as the cables will be buried underground for the whole route, meaning most cable route impacts will be temporary. This consultation will help us look at how we might reduce our impacts further.

We aim to make our cable route as short as possible, whilst still carefully considering its impacts and avoiding key obstacles, locations or features.

Our 50m construction width allows:

- The permanent width of our electricity cable route and enough room to maintain it
- Extra width which we only need when building the cables, such as to store material we dig up, for construction compounds and for access routes within our working area

How do you build the cable route?

When installing cables we typically:

1. Prepare the site with accesses and fencing. We also remove soil except where we use trenchless crossings
2. Open trench or trenchless crossing are used to install ducts for the future cables
3. Cables are pulled through the ducts and connected together
4. Reinstatement where we have dug trenches or removed soil
5. Removal of all temporary fences, compounds and access routes

What about the environmental impacts?

Overall, our preliminary assessments show that some of our potential changes in this booklet are likely to change the overall conclusions on impacts that we presented in our PEIR in summer 2021. We have therefore included a summary of these changes in each part of this booklet, which looks at our cable route in 7 areas. You can tell us about any comments or concerns you have about the enviornment in those areas.

You can also read more detailed environmental information about our potential changes in our PEIR SIR including new receptors.

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"Reinstatement": The process of putting the land back to how it was

Once the cables have been pulled through the ducting, the construction areas we have disturbed are fully reinstated. Soil is returned, hedgerows are replanted and grass is reseeded.

Once the reinstatement is fully established, the fencing and access points are removed and the land is handed back to the landowner.

For the original Rampion project, there is a requirement to monitor the reinstatement over a 10 year period and we propose to do the same for Rampion 2.

Watch the video at www.Rampion2.com/consultation to see how the original Rampion cable route was successfully reinstated.

During reinstatement after main construction

This is what our normal cable route looks like when we reinstate the surface after temporary construction. During construction, we also have construction compounds and accesses, along with drilling areas where different equipment is used for our trenchless crossings.

After reinstatement

The electricity cable installation would be a temporary impact as all cables would be buried underground except for occasional inspection covers. We are committed to reinstating the land back to its former condition as soon as we can.

Area 1

Climping* Beach (landfall) to Lyminster

This Area considers the cable route between the 'landfall' at Climping Beach and Lyminster. It includes an **alternative cable route (ACR), two modified routes (MR), two new trenchless crossings (TC) and three alternative accesses (AA)**. They are all referenced on the following pages using the abbreviations above.

Remember: Words such as "receptor" and "trenchless crossing" are explained in the Definitions section of this document.

Our Environmental Assessment of Climping Beach to Lyminster

On the following pages you can read about our preliminary assessment of potential changes in Area 1. We don't believe that introducing these changes is likely to change the overall conclusions of our PEIR from summer 2021. You can read more about our consideration of these potential changes in our PEIR SIR at *www.Rampion2.com/consultation*. Just look for the relevant ACR, MR, AA or TC reference.

*We are aware of different local and national spellings of Climping. We use Climping throughout this consultation to also mean Clymping.

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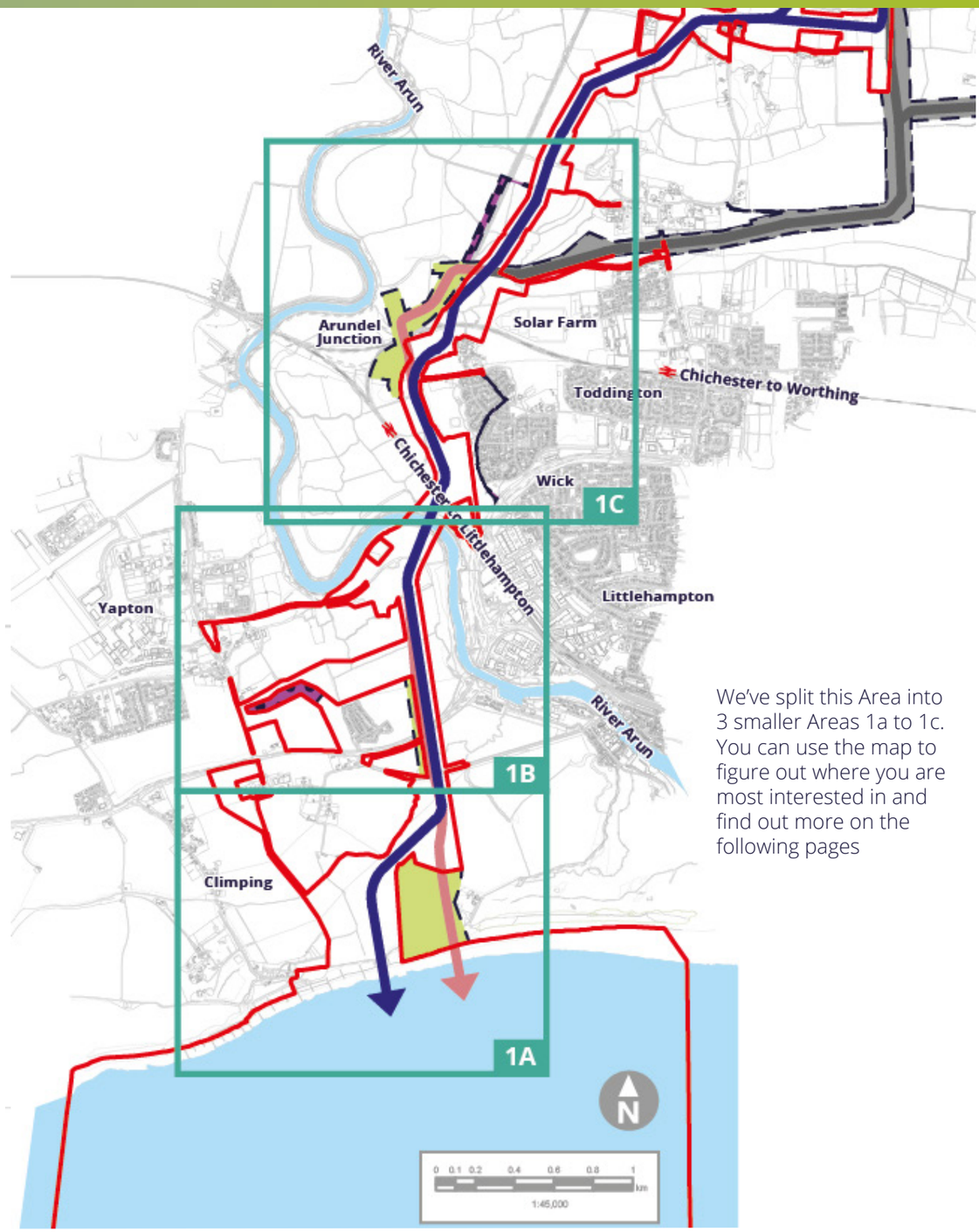


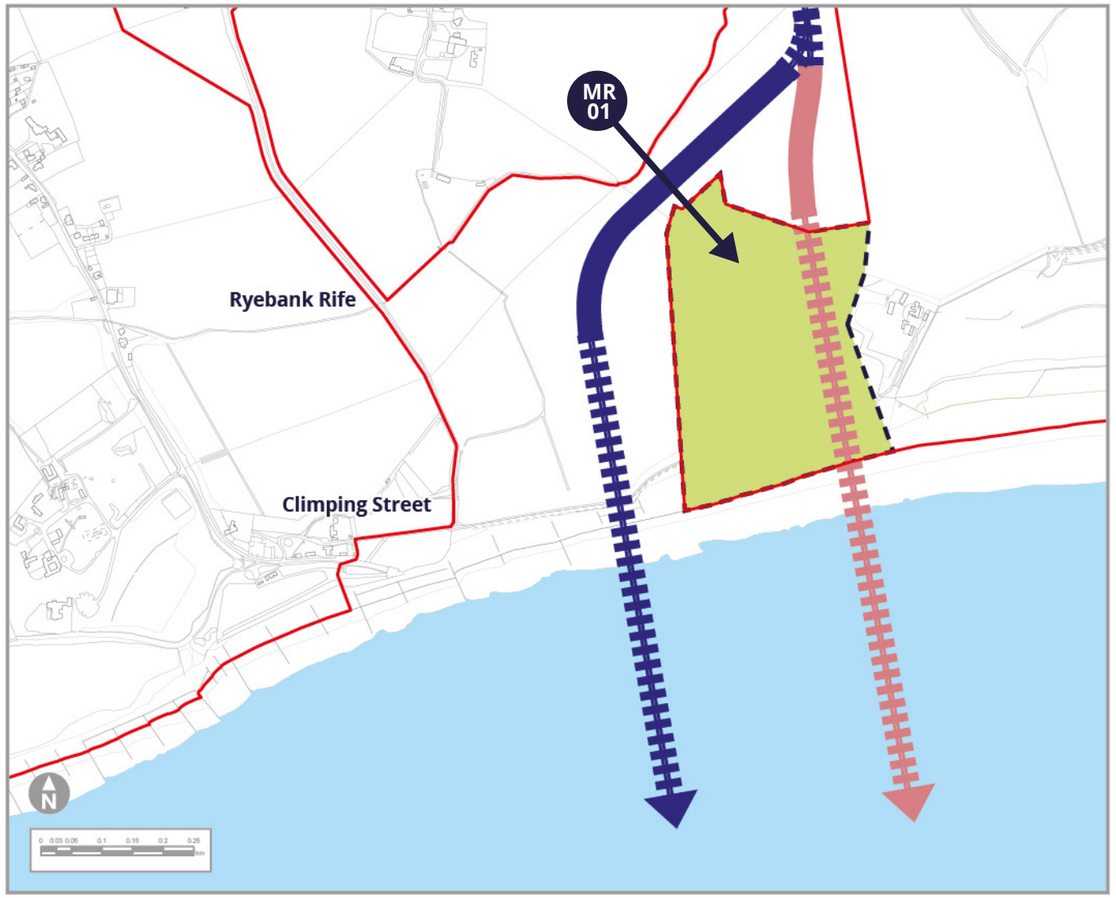
We've split this Area into 3 smaller Areas 1a to 1c. You can use the map to figure out where you are most interested in and find out more on the following pages

KEY:

- Our previous project boundary (from our summer 2021 consultation)
- Our indicative cable route
- Previously proposed trenchless crossing points
- New areas for cable construction works
- New indicative cable route & trenchless crossing points (see Area Maps for crossing points)
- New alternative accesses
- Route or change in another Area of this booklet

Note: Only 1 cable route is required and indicative cables routes are shown for illustration only

Area 1a: Climping Beach to Ferry Road



Modified Route MR-01

We've listened to concerns about potential coastal erosion and flood risk. This extra area just north of Climping beach would give us greater flexibility on where to drill under MR-01 and the beach. The drilling compound would still be in the north in an area we consulted on last year, or in the very north of MR-01.

We might also need to store soil temporarily in the northern part of MR-01.

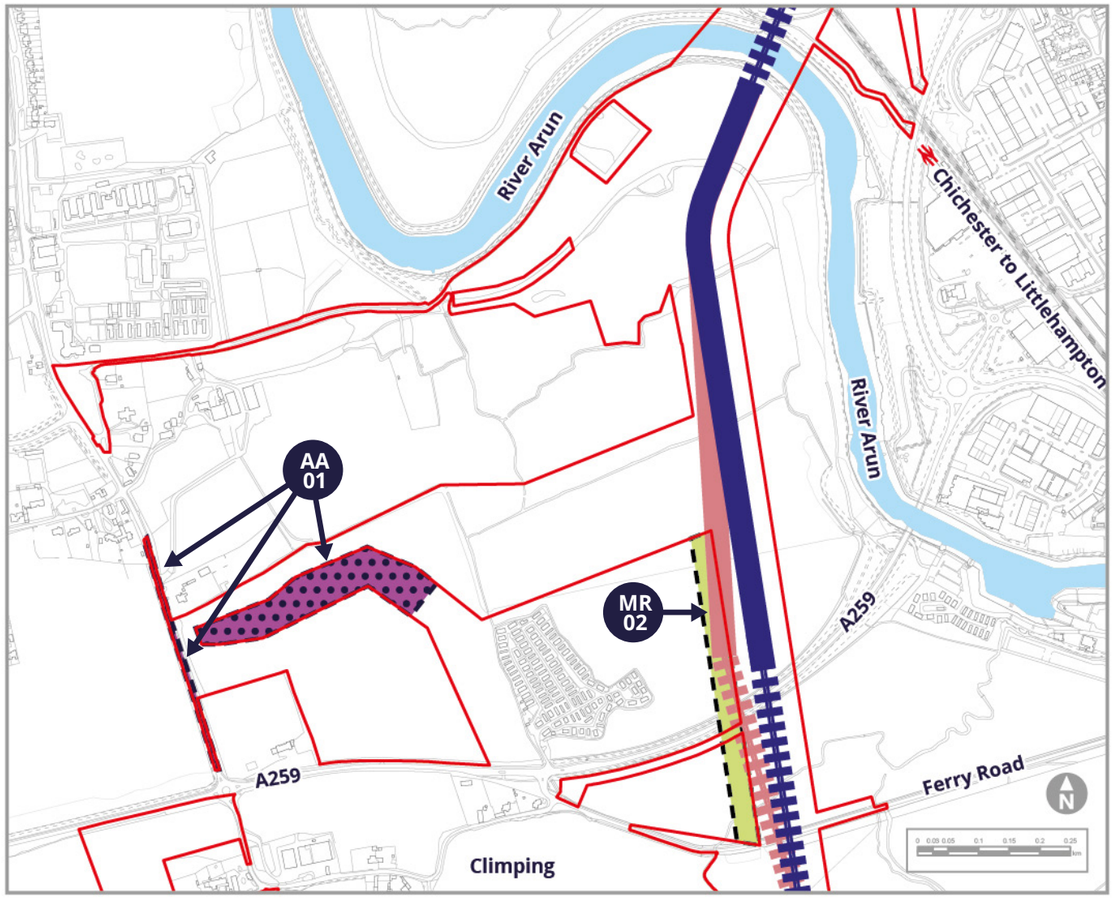
We wouldn't need any above ground works in the southern part of MR-01, nor any additional accesses. However we might need a drilling compound in the northern part of MR-01. We also need to allow the potential for our drilling to start in a small area just north of MR-01, that we previously only proposed for soil storage. If you want to see this exact area then have a look at Sheet 1 of our Works Plans at www.Rampion2.com/consultation

Potential Environmental Impacts

MR-01 would be closer to residences to the east and the Littlehampton Golf Club course. It would also pass under the Climping Beach Site of Special Scientific Interest (SSSI) and a belt of woodland.

These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual and ecology and nature conservation effects.

Area 1b: Ferry Road and the A259



Alternative Access AA-01

This new potential access is proposed to link a construction compound more directly to where the cables are buried. AA-01 includes 90m of temporary works to create better visibility for construction vehicles at Church Lane.

Modified Route MR-02

North of Ferry Road we propose widening the cable corridor by 50m into MR-02. This responds to potential overlap with the West Bank mixed-use development area, but also tries to keep distant from the Climping Park (park home estate) and a historic landfill area.

MR-02 would be closer to Climping Park and next to a historic landfill site. The main area of AA-01 is in an agricultural field, whilst the narrower parts are to create better visibility by widening the existing road. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, ground conditions, ecology and nature conservation effects.

Tell us what you think about any proposals in this booklet. Are there other things you want to highlight to us?

Area 1c:
Crossing the tracks at Arundel Junction

Alternative Cable Route ACR-01

On the approach to the more northerly railway crossing we have identified the 750m long ACR-01, which is a separate alternative to our existing cable corridor and runs parallel to the railway line for an open trench section between two trenchless crossings. We are including ACR-01 to explore whether we can avoid archaeological finds, which we are still investigating but are more likely to lie on our original route to the east.

Trenchless Crossings TC-01 & TC-02

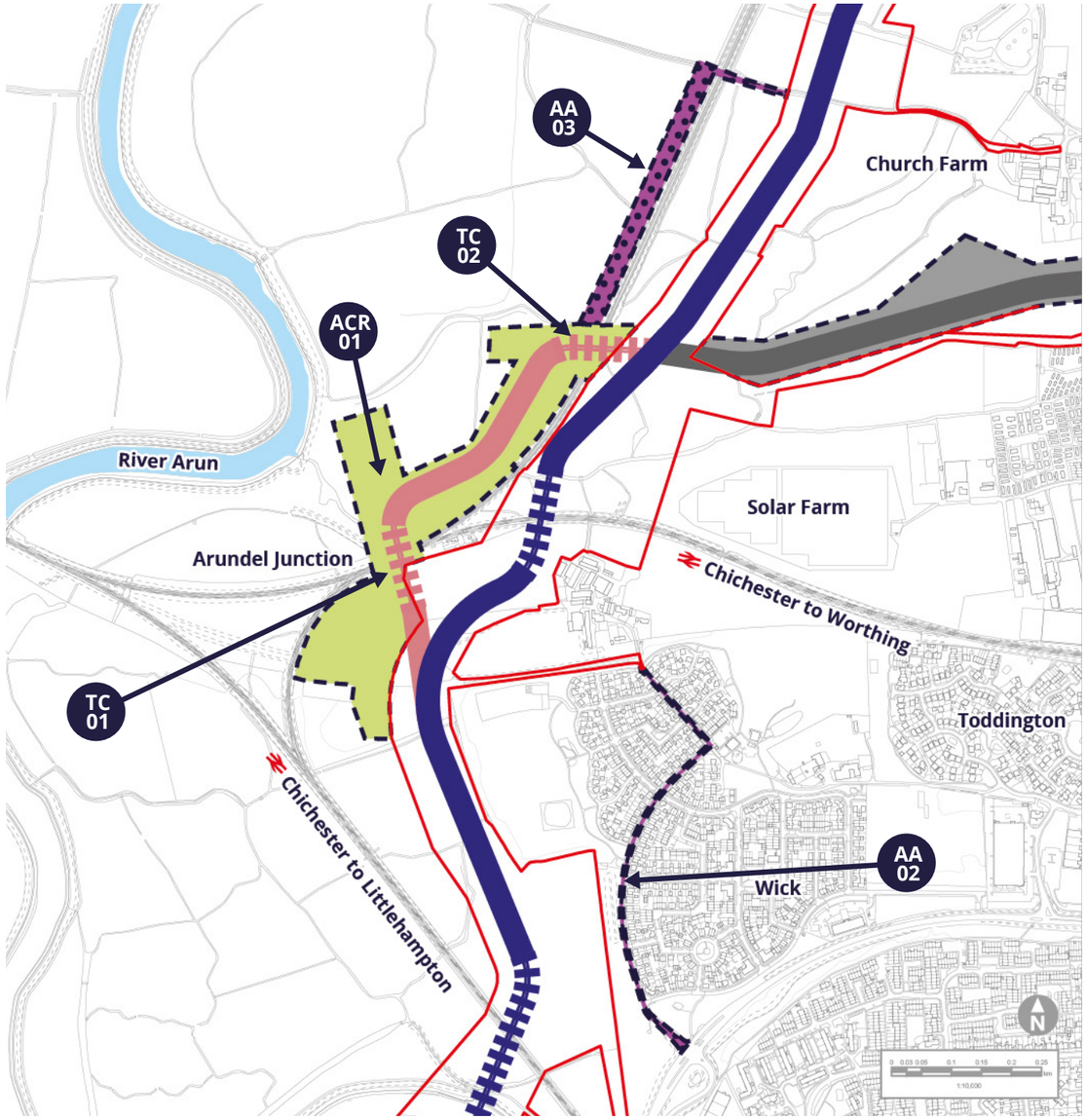
ACR-01 requires two new trenchless crossings to access the western side of the railway line when leaving and rejoining the existing cable corridor.

TC-01 and TC-02 would take the cables under the railway lines to Worthing and Arundel, and the Black Ditch.

Alternative Accesses AA-02 and AA-03

AA-02 is an existing private road that we are considering for operational access during the life of the wind farm, therefore we need to include it in our revised boundary to ensure access.

AA-03 is proposed to allow temporary construction and permanent operational access to ACR-01. This includes equipment to construct the two trenchless crossings under the railway lines. AA-03 would use an existing private crossing of the railway line and then run parallel to the railway line.



Potential Environmental Impacts

ACR-01, AA-03, TC-01 and TC-02 have all been considered together as the access and additional trenchless crossings will only be needed if the Alternative Cable Route is taken forward. AA-02 is an existing private access road through a residential area. Coastal floodplain and grazing marsh have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to ecology and nature conservation effects.

Tell us what you think about any proposals in this booklet. Are there other things you want to highlight to us?

Area 2

Lyminster to Sullington Hill

Our modified route

This Area considers the cable route between Lyminster and Angmering Park, where we are consulting on **five alternative cable route options, three modified routes, nine trenchless drill crossings** and **seven alternative accesses**. They are all referenced on the following pages using the abbreviations above.

Area 2 addresses potential changes to the cable route that we consulted on last year, including some alternative cable routes. However, if you would like to also read about longer alternative cable routes we are considering which start in a similar place but would go further to the east, please have a look at Area 3 and 4 as well.

Remember: Words such as "receptor" and "trenchless crossing" are explained in the Definitions section of this document.

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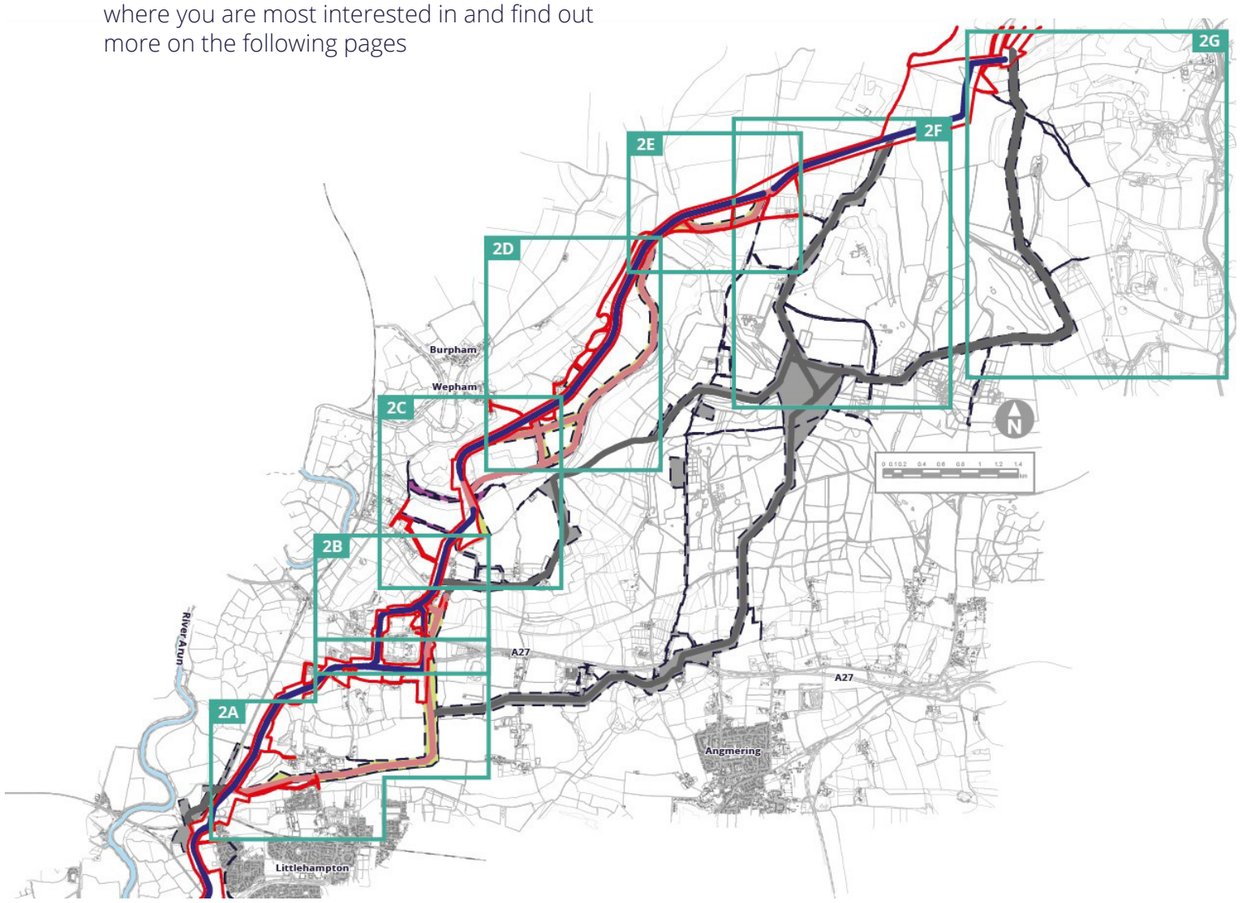
Our Environmental Assessment of Lyminster to Sullington Hill (Modified Route)

On the following pages you can read about our preliminary assessment of potential changes in Area 2. We consider that introducing these changes would be likely to create new landscape and visual, water environment, ecological and historic environment (heritage) effects. You can read more about our consideration of these potential changes in our PEIR SIR at www.Rampion2.com/consultation. Just look for the relevant ACR, MR, AA or TC reference.

We've split this Area into 5 smaller Areas 2a to 2g. You can use the map below to figure out where you are most interested in and find out more on the following pages

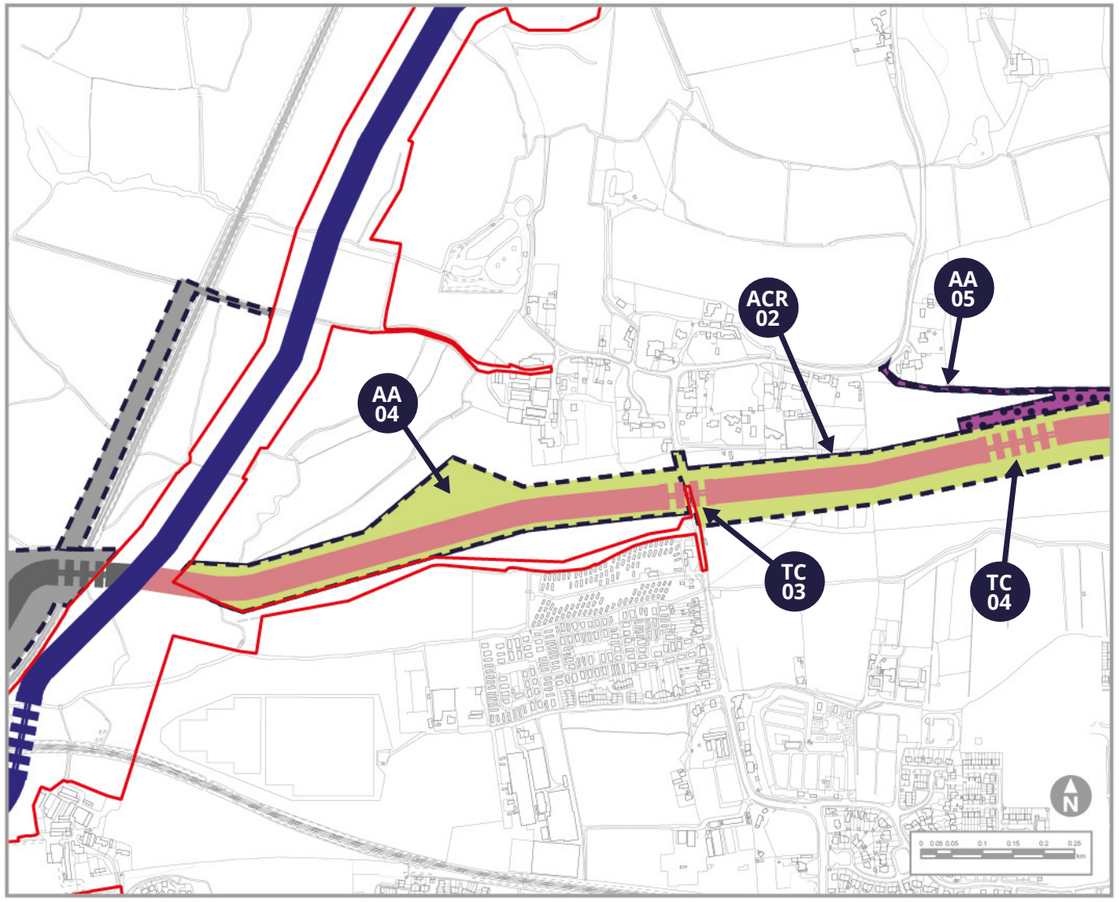


KEY:

- Our previous project boundary (from our summer 2021 consultation)
- Our indicative cable route
- Previously proposed trenchless crossing points
- New areas for cable construction works
- New indicative cable route & trenchless crossing points (see Area Maps for crossing points)
- New alternative accesses
- Route or change in another Area of this booklet

Note: Only 1 cable route is required and indicative cables routes are shown for illustration only

Area 2a: South of Lyminster



Alternative Cable Route ACR-02 & Alternative Access AA-04

ACR-02 has been introduced to avoid potential archaeological interests, specific agricultural issues and difficult or constrained working areas on our existing proposed route. AA-04 has been introduced to stay further away from Brookside Caravan Park when accessing our proposed cable route options to the west. AA-04 would sit in a similar area to ACR-02 from the west to the A284. AA-04 would only be taken forward if ACR-02 is not progressed.

Alternative Access AA-05

AA-05 would provide construction and operational access from the A284 Lyminster Road to ACR-02 and account for the future Lyminster Bypass.

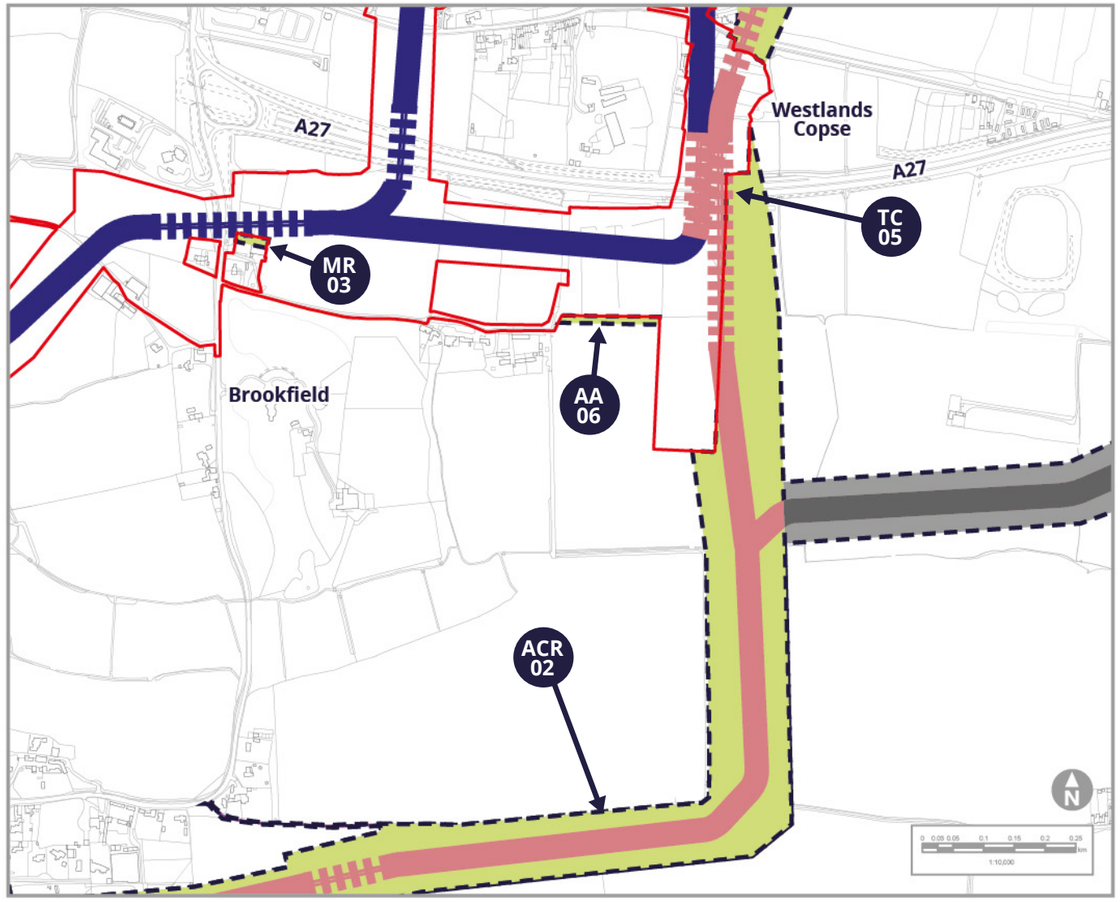
Trenchless Crossings TC-03 and TC-04

For ACR-02 we would need trenchless crossings TC-03, under the A284, and TC-04, under the proposed Lyminster bypass, which is a separate project expected to complete before Rampion 2.

Potential Environmental Impacts

AA-04, AA-05, TC-03 and TC-04, along with the western part of ACR-02, have all been considered together. These would involve crossing public rights of way, bridleways, hedgerows, recreational paddocks, be in the vicinity of residential buildings and affect a different landscape character area. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation landscape and visual, social economic, air quality, noise and vibration, transport and historic environment (heritage) effects.

Area 2a: East of Lyminster



Alternative Access AA-06

AA-06 would provide operational access fromthe A284 Lyminster Road to ACR-02 along an existing track.

Trenchless Crossing TC-05

TC-05 is needed under the A27, whether we use our existing proposed cable route or our new potential alternative cable route ACR-02.

Modified Route MR-03

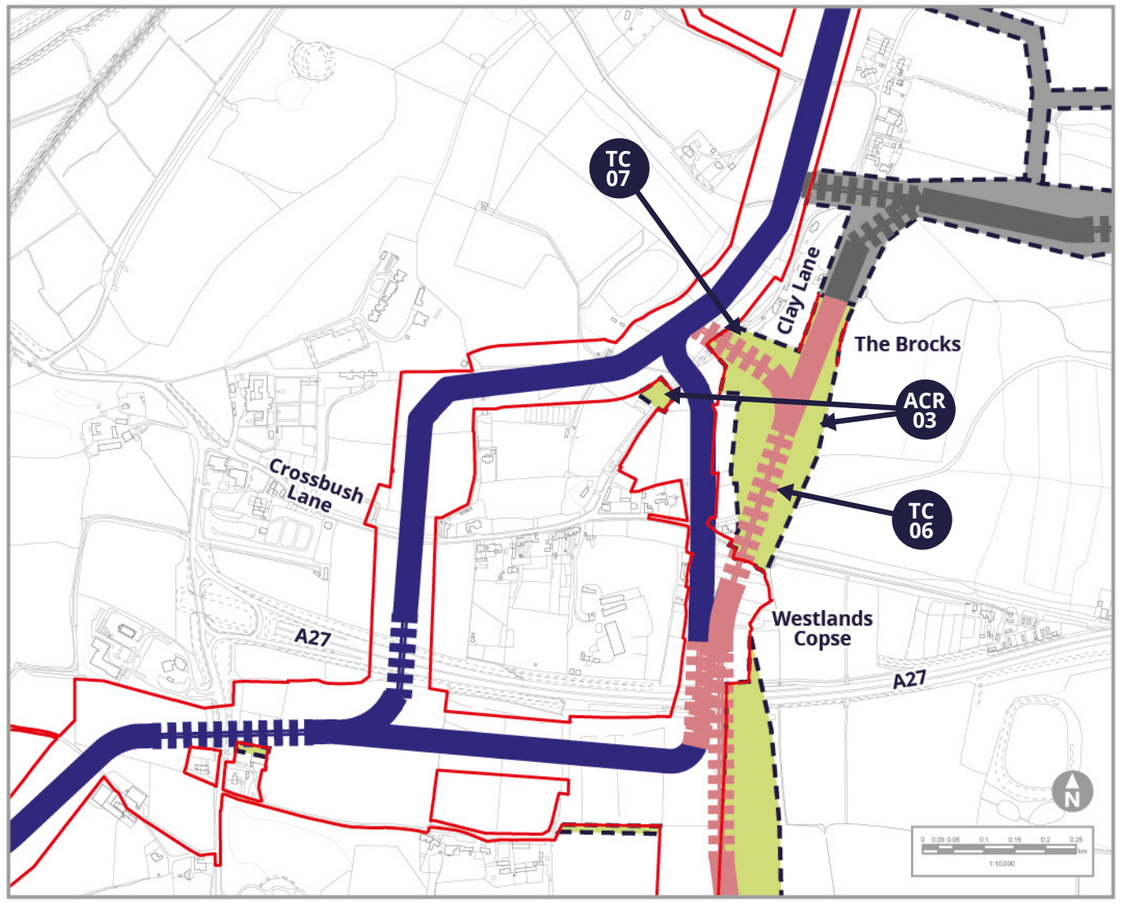
MR-03 is being included to allow for a change to the direction of the trenchless crossing under the A284, to avoid an area that has recently been granted planning permission for built development.

Potential environmental impacts

There are no associated new receptors or changes to impacts for MR-03 compared to those already identified in the 2021 consultation.

AA-06 and TC-05, along with the northern part of ACR-02, have all been considered together. These would involve crossing public rights of way, bridleways, hedgerows, recreational paddocks and be in the vicinity of residential buildings. As noted for the western part of ACR-02, These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, social economic, air quality, noise and vibration, transport and historic environment (heritage) effects.

Area 2b: East of Crossbush



Alternative Cable Route ACR-03

North of the A27, the original eastern cable route option would cross a gas pipeline, which must be done as close to 90 degrees a possible. ACR-03 has therefore been identified, which takes the cable route further east so that it can cross at a better angle. ACR-03 also includes a small area to the west to support construction.

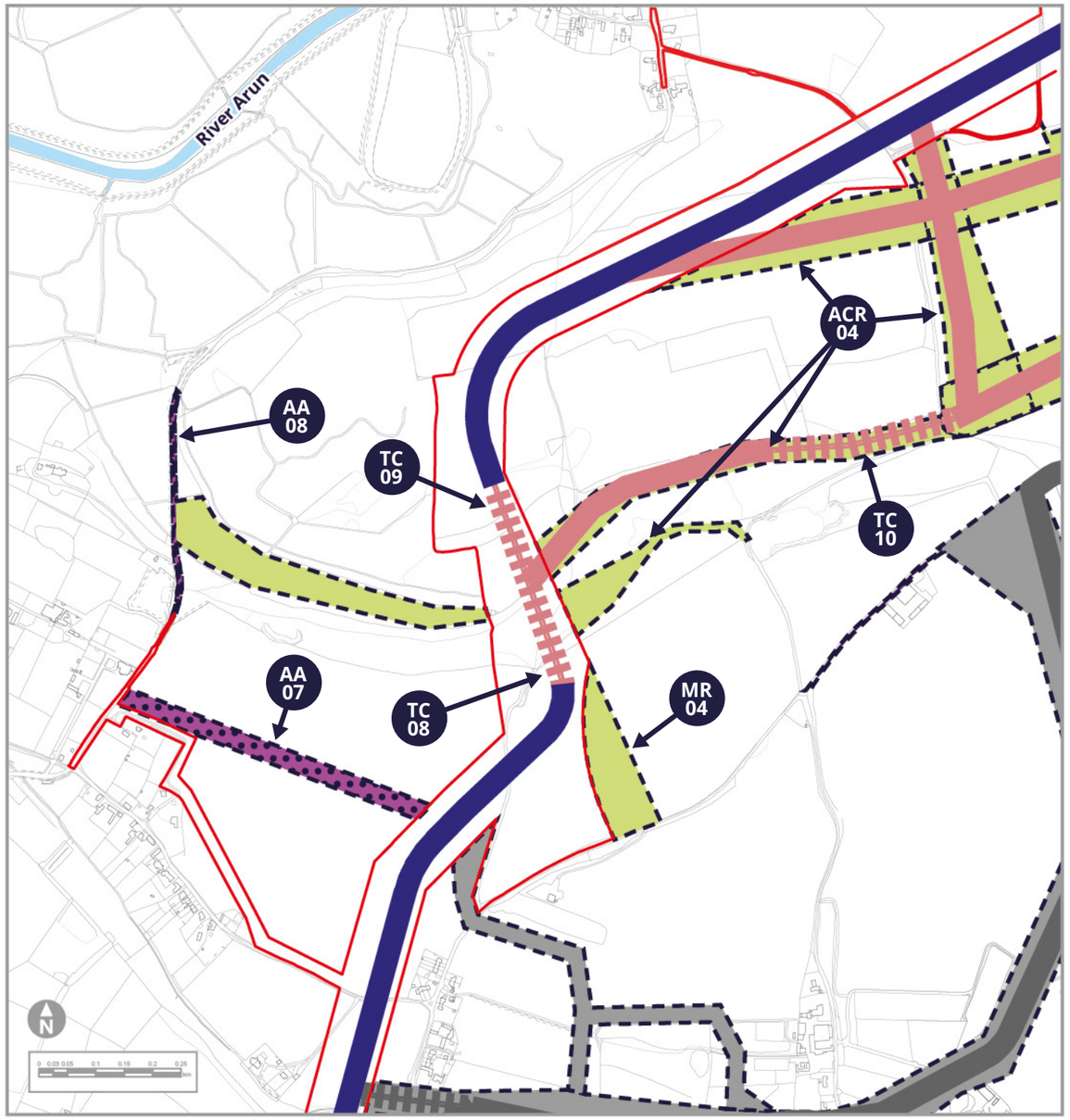
Trenchless Crossings TC-06 and TC-07

ACR-03 moves into an area of designated Ancient Woodland, which means trenchless crossing TC-06 is required under Crossbush Lane and the western edge of the woodland. Trenchless crossing TC-07 is required under Clay Lane and the gas pipeline.

Potential Environmental Impacts

ACR-03, TC-06 and TC-07 have been considered together. TC-06 would run under a replanted Area of Ancient Woodland and a Local Wildlife Site known as Poling Copse. Hedgerows are present within ACR-03 that are linked directly with ponds. One public right of way is crossed by the route and is in an area that is of interest to archaeologists (an Area of Archaeological Notification (ANA). These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, social economic, transport and historic environment effects.

Area 2c: Near the Warningcamp Hill to New Down Local Wildlife Site



Alternative Accesses AA-07 and AA-08

AA-07 and AA-08 would be required from Burpham Road to reach TC-08 and TC-09 and minimise interaction with an environmental stewardship scheme. They would require new stone roads to be installed. AA-08 would be retained for the operational life of the wind farm.

Modified Route MR-04

MR-04 has been added just east of our original cable route to allow space to achieve trenchless crossing TC-08 in the valley at the Warningcamp Hill to New Down Local Wildlife Site.

Trenchless Crossings TC-08 and TC-09

TC-08 (south side) and TC-09 (north side) would allow us to drill on either side of the valley and have been introduced to significantly reduce impacts on the Warningcamp Hilll to New Down Local Wildlife Site and chalk grassland, which is a sensitive and rare habitat in Sussex.

Alternative Cable Route ACR-04 and Trenchless Crossing TC-10

ACR-04 includes many different potential routes where our cable would head east from the Warningcamp Hill to New Down Local Wildlife Site. We would only require one final route for our cables but might join these options up in different ways. ACR-04 also continues into Area 2d, so make sure you check out the proposals on the following pages as well.

One option on ACR-04 would leave our original route at the base of the valley north of TC-08, in a northeasterly direction along the route of the Monarch's Way public right of way. This means that during construction the Way would need to be temporarily diverted. This option would require a further trenchless crossing TC-10 where it would otherwise run through Ancient Woodland in a narrower stretch of the Monarch's Way.

To the east of TC-10, route ACR-04 could continue along the valley floor parallel to the Monarch's Way (see Area 2d on the next page). Alternatively it could head north to rejoin our orignial proposed route on the north side of the valley.

Lastly, in this Area, ACR-04 could also peel off our existing proposed cable route after the bend north of TC-09 to join up with other ACR-04 options.

The area of ACR-04 which does not show an indicative cable route has been included to allow for a diversion of the route of the Monarch's Way.

Remember, ACR-04 continues east onto Area 2d, so please go on to the next page.

Potential Environmental Impacts

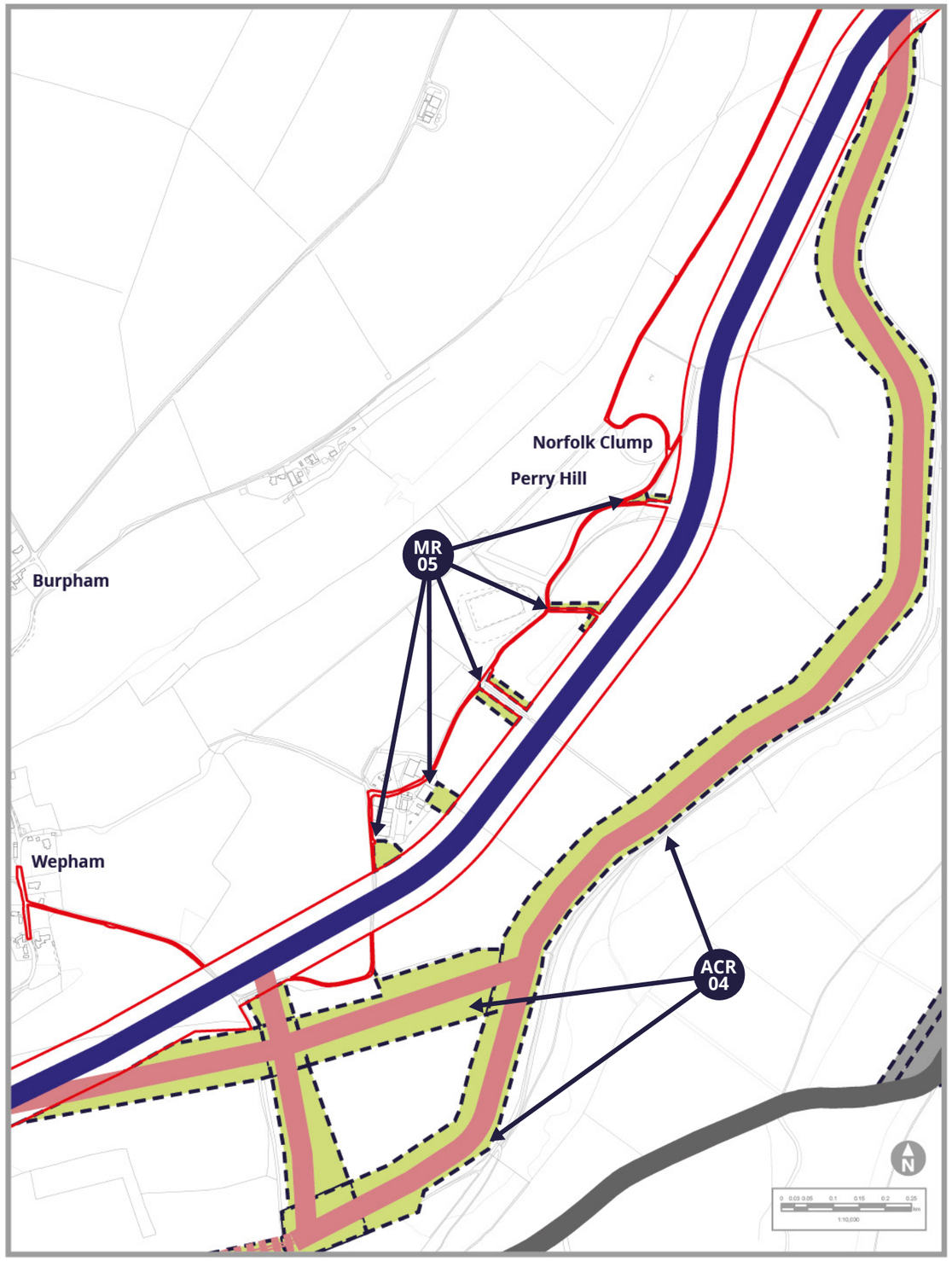
MR-04 does not introduce any new receptors or changes in effects compared to those identified in the 2021 consultation.

TC-10 would pass under the root protection zone of an Ancient Woodland (the Knoll).

ACR-04 and its associated trenchless crossings (TC-08, TC-09 & TC-10) and Alternative Accesses (AA-07 & AA-08) would impact on heritage assets, public rights of way and an aquifer.

These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to socio-economic, traffic, noise and vibration, ecology and nature conservation, historic environment (heritage) and water environment effects.

Area 2d: Southeast of Wepham to Wepham Down



Alternative Cable Route ACR-04

ACR-04 would continue eastwards from Area 2c along two potential routes which quickly join together to run near the base of the valley.

Running near the valley floor, ACR-04 would be parallel to the Monarchs Way public right of way. ACR-04 has been included here to steer away from the middle of the fields to reduce impacts on a local shooting business and an extensive private nature conservation project (the "Peppering Project"). ACR-04 would continue northeast adjacent to the Monarchs Way until it merges with our original proposed cable route at Wepham Down.

Modified Route MR-05

MR-05 covers several areas that would extend the width of our previously proposed accesses. This would be to facilitate better field access for construction vehicles to feed cables under hedgerows. These modifications have been included to reduce disturbance to hedgerows in the Peppering Project and to a commercial business.

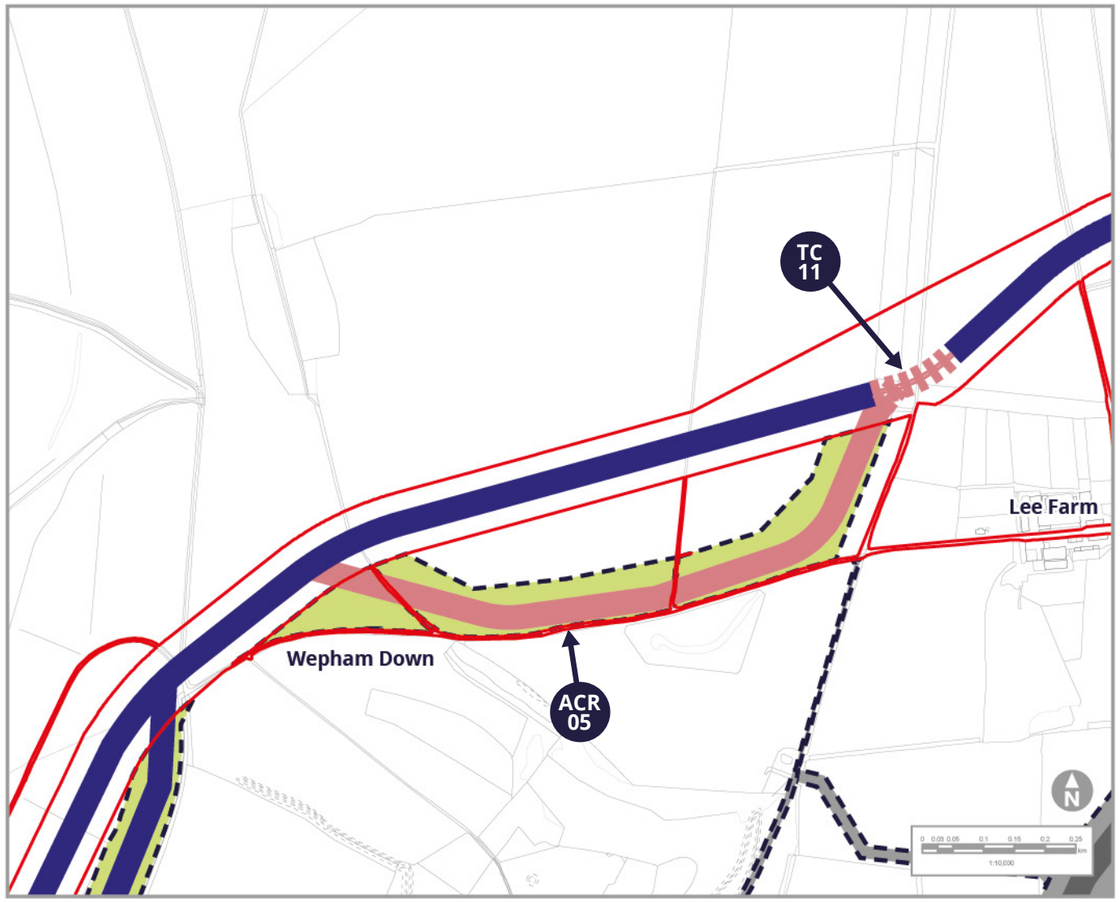
Tell us what you think. Do you have other things you want to highlight to us?

Potential Environmental Impacts

ACR-04 and its associated trenchless crossings (TC-08, TC-09 & TC-10) and Alternative Accesses (AA-07 & AA-08) on the previous pages have been identified in our PEIR SIR as either affecting new, or with the potential for a change to receptors, in relation to socio-economic, traffic, noise and vibration, ecology and nature conservation, historic environment (heritage) and water environment effects.

There are no new receptors for MR-05 compared to those already identified in the 2021 consultation.

Area 2e: Wepham Down to Lee Farm



Alternative Cable Route ACR-05

From Wepham Down, ACR-05 has been introduced to provide a potential alternative route to the south of our original proposal, skirting around the southern edge of the field boundary to protect the Beetlebank Environmental Stewardship Scheme. This alternative would retain a 25m buffer to an adjacent area of Ancient Woodland, to protect the root system.

Trenchless Crossing TC-11

On our original proposed route, just east of where ACR-05 would rejoin if used, we have introduced a proposed trenchless crossing TC-11. This is to pass under a woodland area that is related to a nearby Special Area of Conservation. This means we could help protect the qualities for which the area has been designated.

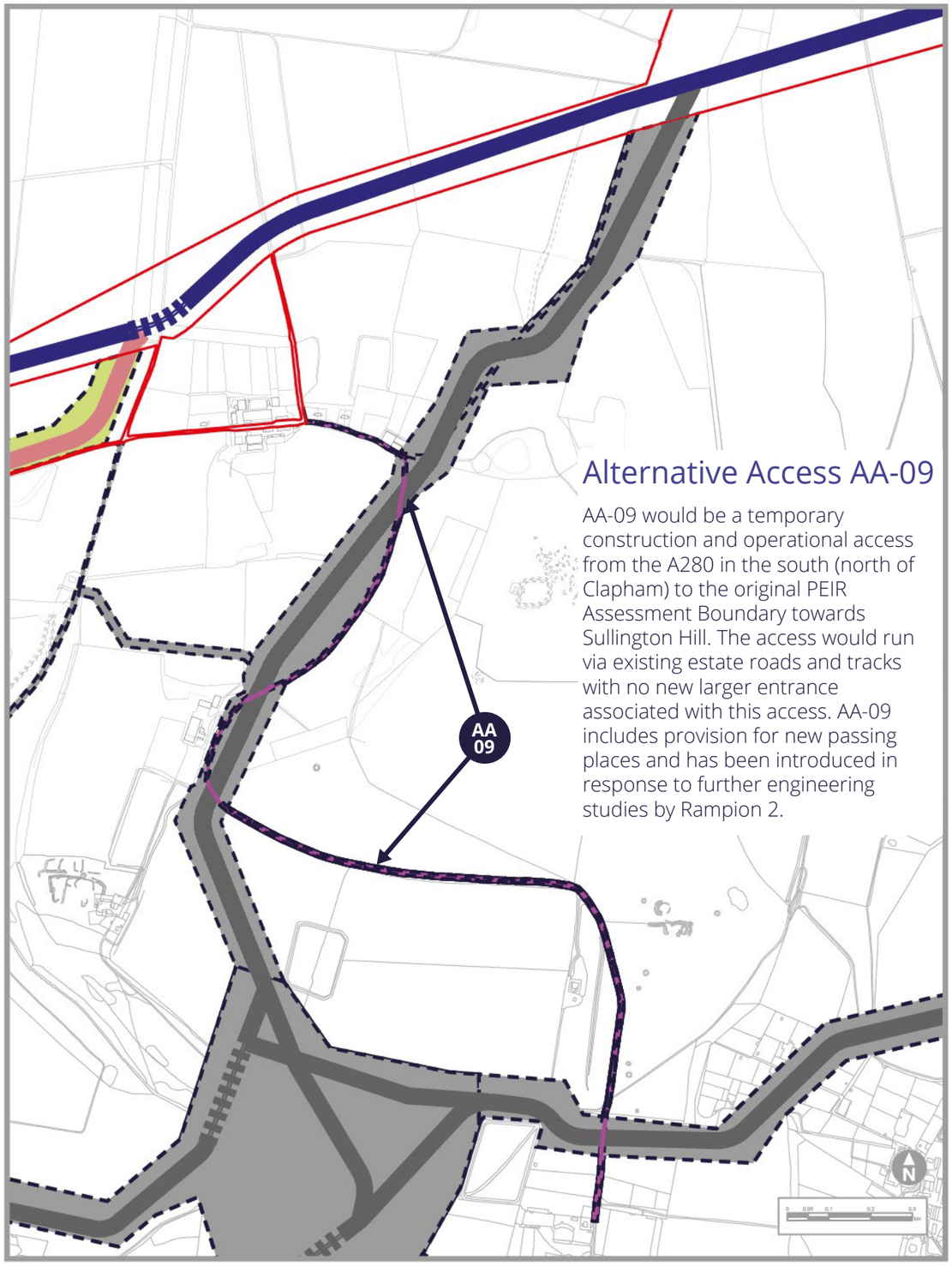
Potential Environmental Impacts

ACR-05 introduces the need for assessment of a new bridleway at Barpham Hill and a former medieval leper settlement, which is a site of historic interest.

These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to socio economic, transport and historic environment (heritage) effects.

Tell us what you think. Do you have other things you want to highlight to us?

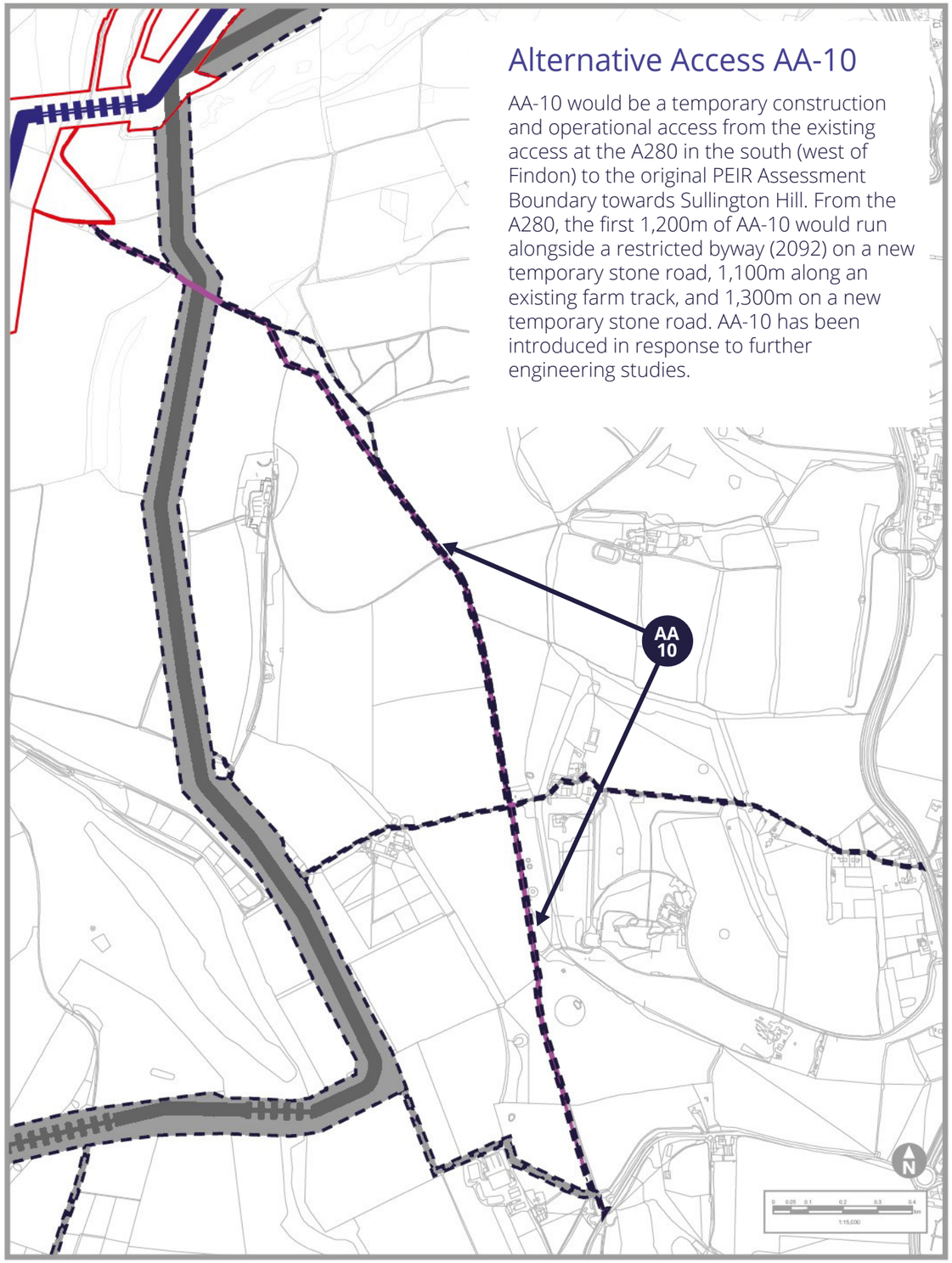
Area 2f: Eastern accesses to Area 2



Alternative Access AA-09

AA-09 would be a temporary construction and operational access from the A280 in the south (north of Clapham) to the original PEIR Assessment Boundary towards Sullington Hill. The access would run via existing estate roads and tracks with no new larger entrance associated with this access. AA-09 includes provision for new passing places and has been introduced in response to further engineering studies by Rampion 2.

Area 2g: Eastern accesses to Area 2



Alternative Access AA-10

AA-10 would be a temporary construction and operational access from the existing access at the A280 in the south (west of Findon) to the original PEIR Assessment Boundary towards Sullington Hill. From the A280, the first 1,200m of AA-10 would run alongside a restricted byway (2092) on a new temporary stone road, 1,100m along an existing farm track, and 1,300m on a new temporary stone road. AA-10 has been introduced in response to further engineering studies.

Area 3

Crossbush to Michelgrove (Central Route)

This area considers just **one Longer Alternative Cable Route (LACR-02)** from Crossbush to Michelgrove, and its associated accesses. We have identified this LACR and another one further east as longer routes, since they go further from our original proposed route than what we have referred to as Alternative Cables Routes.

We refer to this route as LACR-02, running through Areas 3a and 3b. We said at the start of our project that we would keep a buffer to Ancient Woodland and never remove it, as national Government policy provides strong protection for it. However, when we were considering a cable route through this area, we received responses from South Downs National Park Authority, Natural England and the Forestry Commission, suggesting that we should include the route for consultation so that everyone could have their say about it. This will allow consultees to consider whether they think that the limited removal of Ancient Woodland in the eastern part of Area 3a may be justified to avoid going through the "Peppering" environmental project to the northwest.

We will only make a decision on whether to consider LACR-02 any further once we have responses to this and all other potential alternatives and modifications from our consultation.

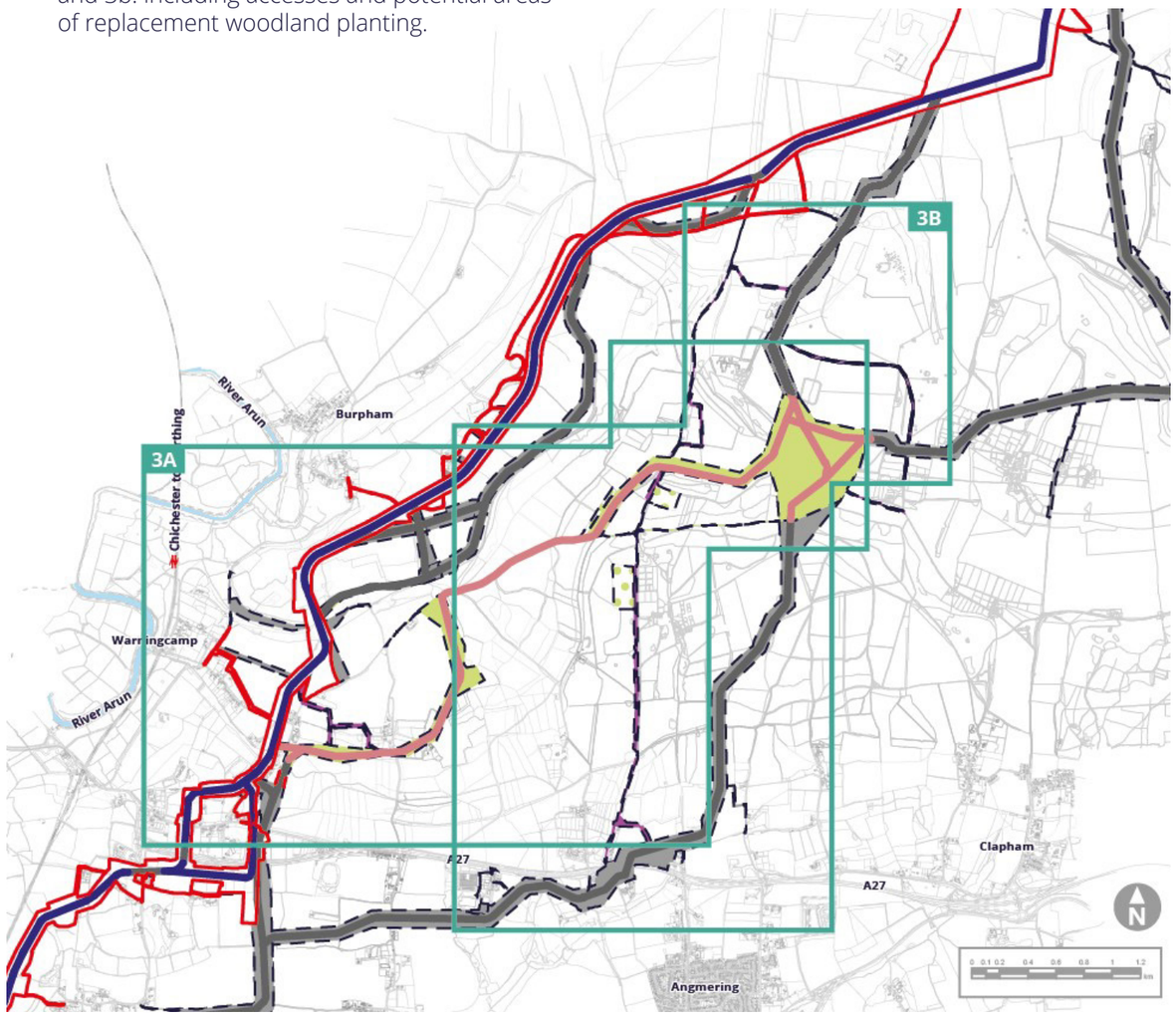
Remember: Words such as "receptor" and "trenchless crossing" are explained in the Definitions section of this document.

Our Environmental Assessment of Crossbush to Michelgrove

On the following pages you can read about our preliminary assessment of LACR-02 in Area 3. We believe that effects presented in our PEIR from summer 2021 will change for landscape and visual, socio economics, soils and agriculture, water environment and ecology as a result of introducing this route.

A-133

We've split this Area into 2 smaller Areas 3a and 3b. including accesses and potential areas of replacement woodland planting.



KEY:

- Our previous project boundary (from our summer 2021 consultation)
- Our indicative cable route
- Previously proposed trenchless crossing points
- New areas for cable construction works
- New indicative cable route & trenchless crossing points (see Area Maps for crossing points)
- New alternative accesses
- Route or change in another Area of this booklet

Note: Only 1 cable route is required and indicative cables routes are shown for illustration only

Area 3a: Our new “central route” LACR-02 from Crossbush

Longer Alternative Cable Route LACR-02

LACR-02 starts to the west at one of 3 locations between the A27 and Crossbush Lane. We use a number of trenchless crossings to pass under Crossbush Lane so that we don’t stop traffic and then to avoid Ancient Woodland at TC-30. We would access this stretch from the north via our cable route or AA-28. After heading north through agricultural land, we would turn sharply to the east and run along an existing private estate road. Going through this area requires us to remove some commercial plantation trees that are on Ancient Woodland soils either side of the estate road. Whilst we have previously said we would avoid Ancient Woodland removal wherever possible, you can read why we are considering this route in the introduction to Area 3 on earlier pages.

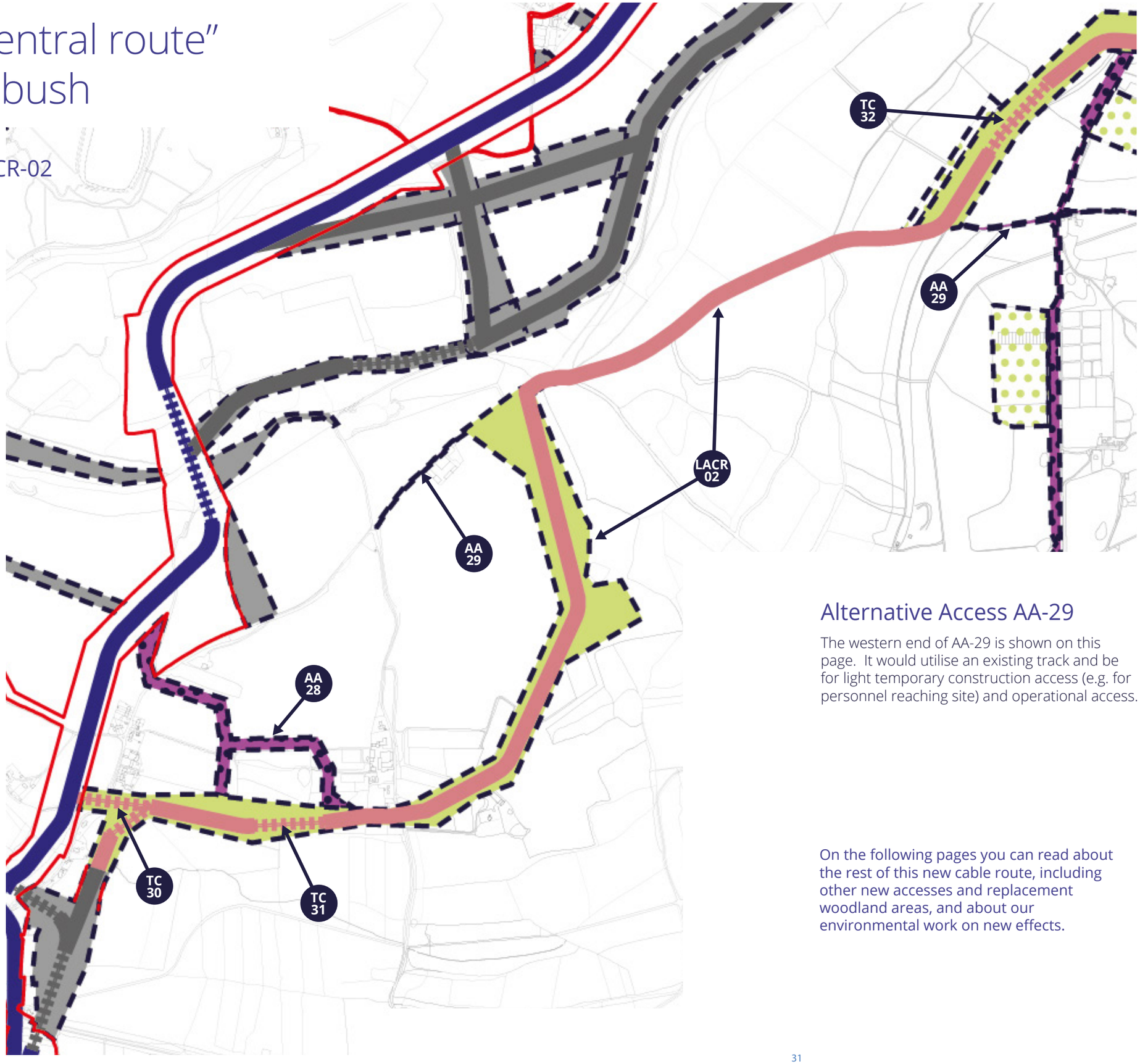
The distance through the Ancient Woodland is too long and narrow for us to drill, which is why we would have to cut some trees down. This area would be more complex and take longer for to build due to the narrow width. It would also conflict with the Monarch’s Way for that stretch which would need to be temporarily diverted.

Alternative Access AA-28

AA-28 would provide light construction (e.g. for site investigation works) and operational access from Blakehurst lane, running along an existing private estate track.

Trenchless Crossings TC-30, TC-31 & TC-32

TC-30 would be approximately 100m in length to pass under mature trees that are connected to Ancient Woodland further south. TC-31 would be approximately 125m in length pass under ancient Woodland to the west of Blakehurst Lane. TC-32 would be approximately 200m in length to avoid Ancient Woodland

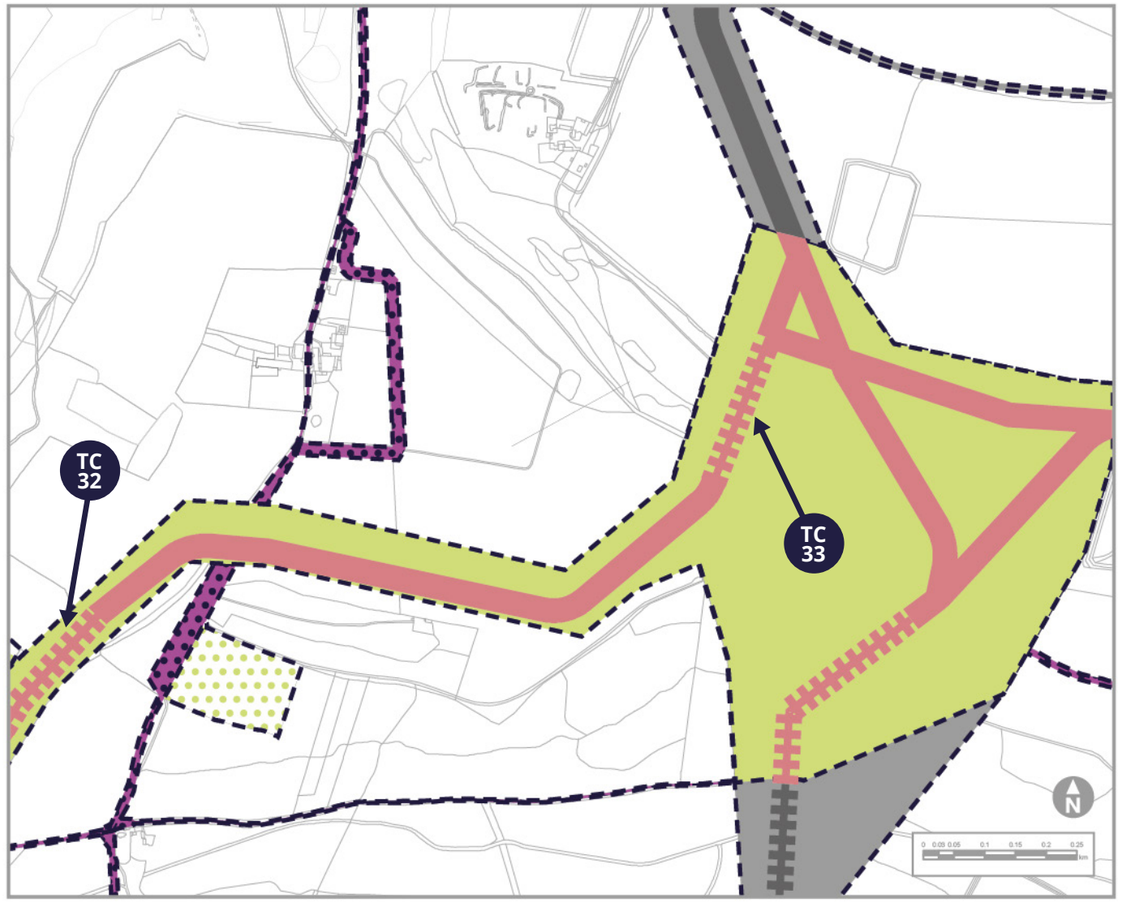


Alternative Access AA-29

The western end of AA-29 is shown on this page. It would utilise an existing track and be for light temporary construction access (e.g. for personnel reaching site) and operational access.

On the following pages you can read about the rest of this new cable route, including other new accesses and replacement woodland areas, and about our environmental work on new effects.

Area 3a: Our new “central route” LACR-02 continued



Longer Alternative Cable Route LACR-02 and Trenchless Crossings TC-32 and TC-33

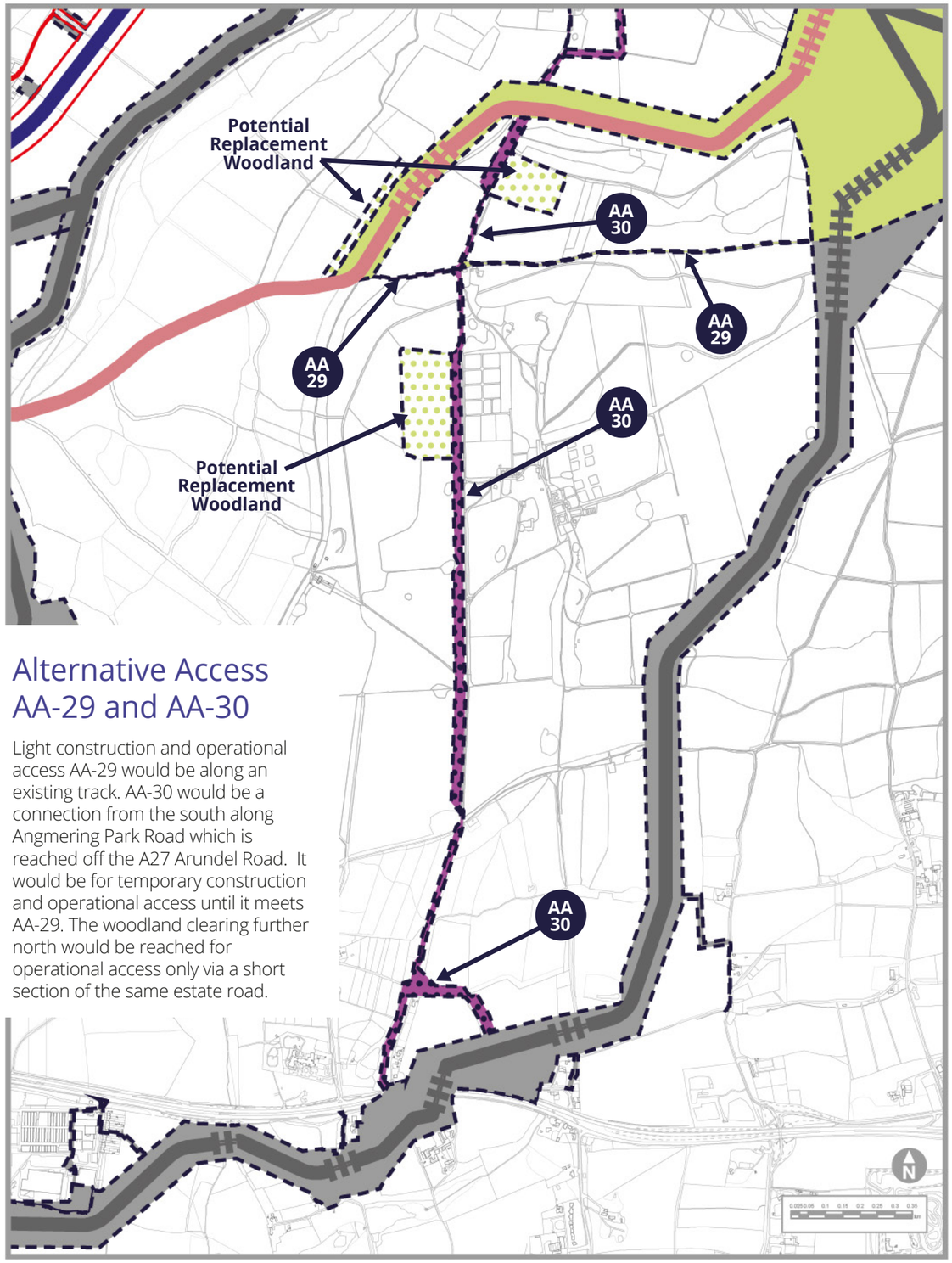
LACR-02 continues from the west through agricultural land with a trenchless crossing TC-32 under Ancient Woodland, a crossing of Angmering Park road with open trenching, and Trenchless Crossing TC-33 on steep ground. A large area is provided to meet other cable options in the east, as this is an area of “karst features”. This means that the chalk below has a lot of cracks and we will need to be careful with the exact location of our final cable route and how we construct it.

Replacement Woodland Areas

If LACR-02 is selected we will provide compensation for the loss of Ancient Woodland. This is likely to take the form of replacement planting in three area areas. We would plant more trees than we remove.

You can see proposed locations for this planting on the opposite page.

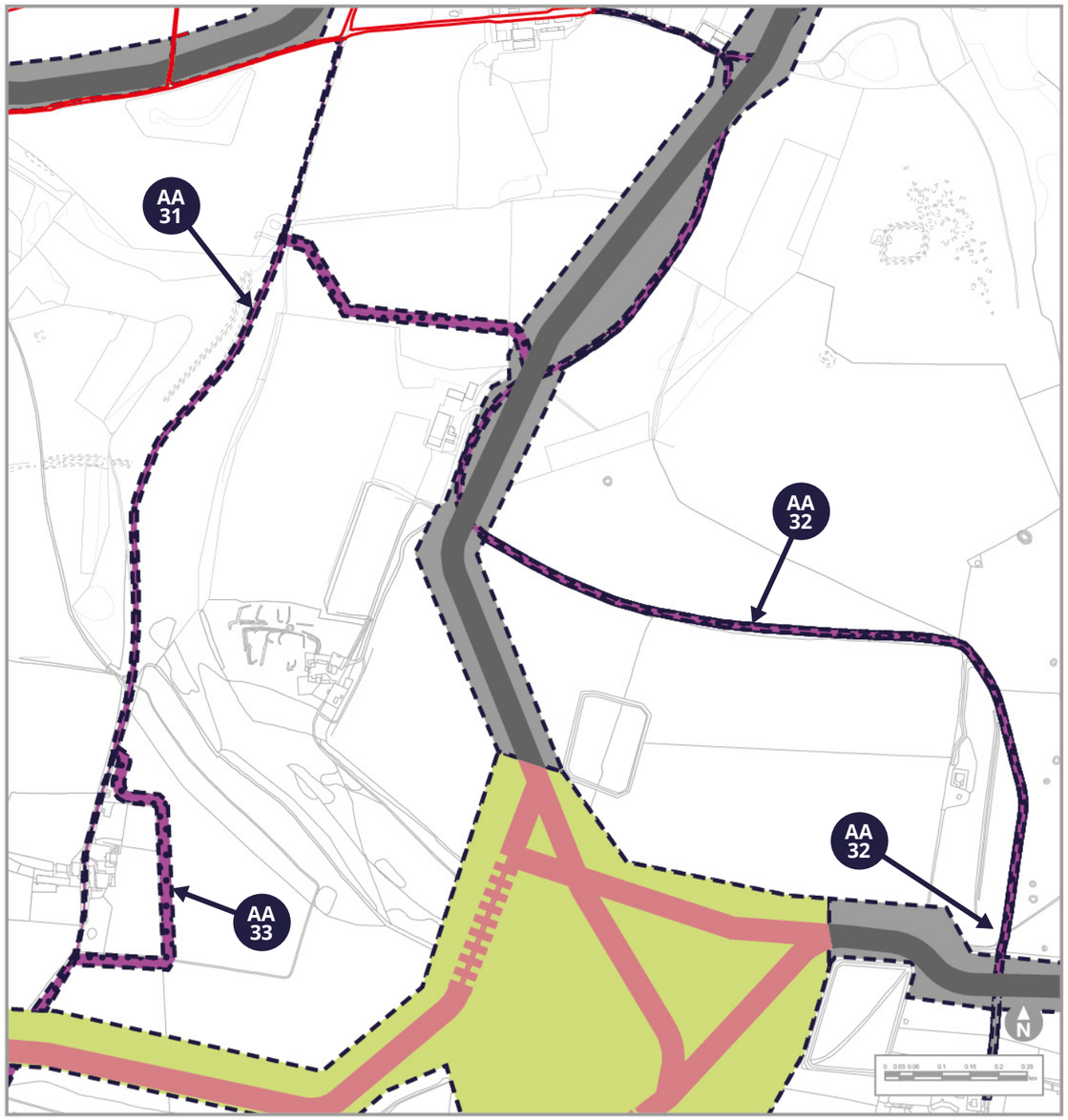
Area 3b: Other accesses and woodland for LACR-02



Alternative Access AA-29 and AA-30

Light construction and operational access AA-29 would be along an existing track. AA-30 would be a connection from the south along Angmering Park Road which is reached off the A27 Arundel Road. It would be for temporary construction and operational access until it meets AA-29. The woodland clearing further north would be reached for operational access only via a short section of the same estate road.

Area 3b: Other accesses and woodland for LACR-02



Alternative Access AA-31

AA-31 would be a temporary construction and operational access along a new temporary stone road south of Lee Farm Copse and would join up with an existing farm track running south up to Barpham Hill. AA-31 might have passing places or other upgrades if needed. A temporary stone road construction access runs would also run for approximately 600m to the east of Upper Barpham Farm before joining back to the existing farm track to join LACR-02.

Alternative Access AA-32

AA-32 would use the existing Michelgrove estate track with the potential for new passing places. A temporary stone construction access would run for approximately 600m east of Upper Barpham Farm before joining an existing farm track.

Potential Environmental Impacts

LACR-02 introduces the potential for new effects on the environment, which are assessed in our PEIR SIR.

During the construction period, some bridleways and footpaths will need to be diverted or temporarily interrupted, including the Monarchs Way, albeit for a limited duration.

The route would pass through the South Downs National Park, and four Landscape Character Areas. The route would also pass through seven hedges or treebelts, which we will replant afterwards.

This alternate route and accesses will introduce new potential receptors into proximity in respect of air quality. Different homes nearby would also have the potential to be affected by noise and vibration caused by construction or construction traffic. This route may affect individual roads differently from our previous assessment in a limited way.

Much of this proposed alternate cable route passes along an existing access track through Wepham Woods. The width of our cable corridor means that around 1ha of plantation trees on ancient woodland soils would need to be felled. We would provide replacement woodland planting areas. There would also be more limited tree loss at the Warningcamp Hill to New Down Local Wildlife Site. Elsewhere, the route passes through arable fields similar to those already assessed in our previous consultation.

The route would also affect woodland soils due to routeing through Wepham Wood, and would result in the loss of agricultural land to compensatory tree planting. Our research has not shown any new sources of ground contamination along this route.

There are no standing historic features along the route of the proposed cable, but there is potential for buried archaeology from all periods of time. If this route is selected, we would undertake further site surveys to help us plan how to address anything we might encounter.

At this stage, we have some concerns about the potential for fluid from our trenchless crossings to contaminate groundwater, due to fractures within the chalk bedrock in this area. Therefore if this route was selected, we would commit to undertake an established detailed process called a Hydrological Risk Assessment to establish ways to minimise potential effects.

All of the above receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to socio-economic, landscape and visual, soils and agricultural, ecological and water environment effects.

Area 4

Lyminster to Sullington Hill (Eastern Route)

This Area considers just **one Longer Alternative Cable Route (LACR-01)** from Crossbush to Sullington Hill, and its associated accesses. We have identified this LACR and another one to its west as longer routes, since they go further from our original proposed route than what we have referred to as Alternative Cables Routes.

We refer to this route as LACR 1. However, you can see from the map on the next page that it splits into two further options as it heads north. In our environmental documents we have referred to the southern section as LACR 1a, the north western section as LACR1b and the north eastern section as LACR 1c.

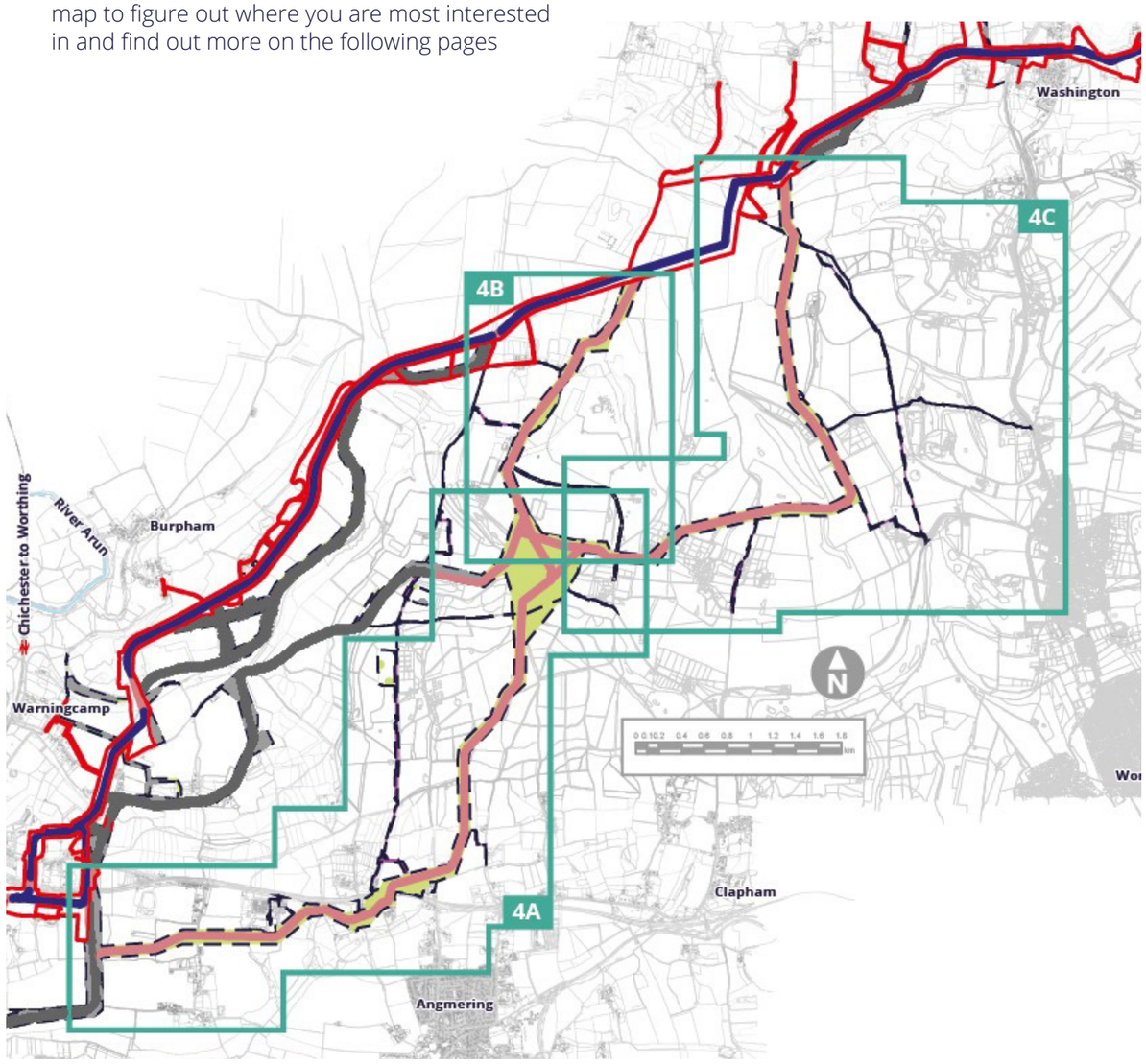
Remember: Words such as "receptor" and "trenchless crossing" are explained in the Definitions section of this document.

Our Environmental Assessment of the "eastern route" from Crossbush to Sullington Hill

On the following pages you can read about our preliminary assessment of LACR-01 in Area 4. We believe that effects presented in our PEIR from summer 2021 will change for landscape and visual, socio economics and water environment as a result of introducing this route.

A-137

We've split this Area into 4 smaller Areas 4a to 4d, including potential accesses. You can use the map to figure out where you are most interested in and find out more on the following pages

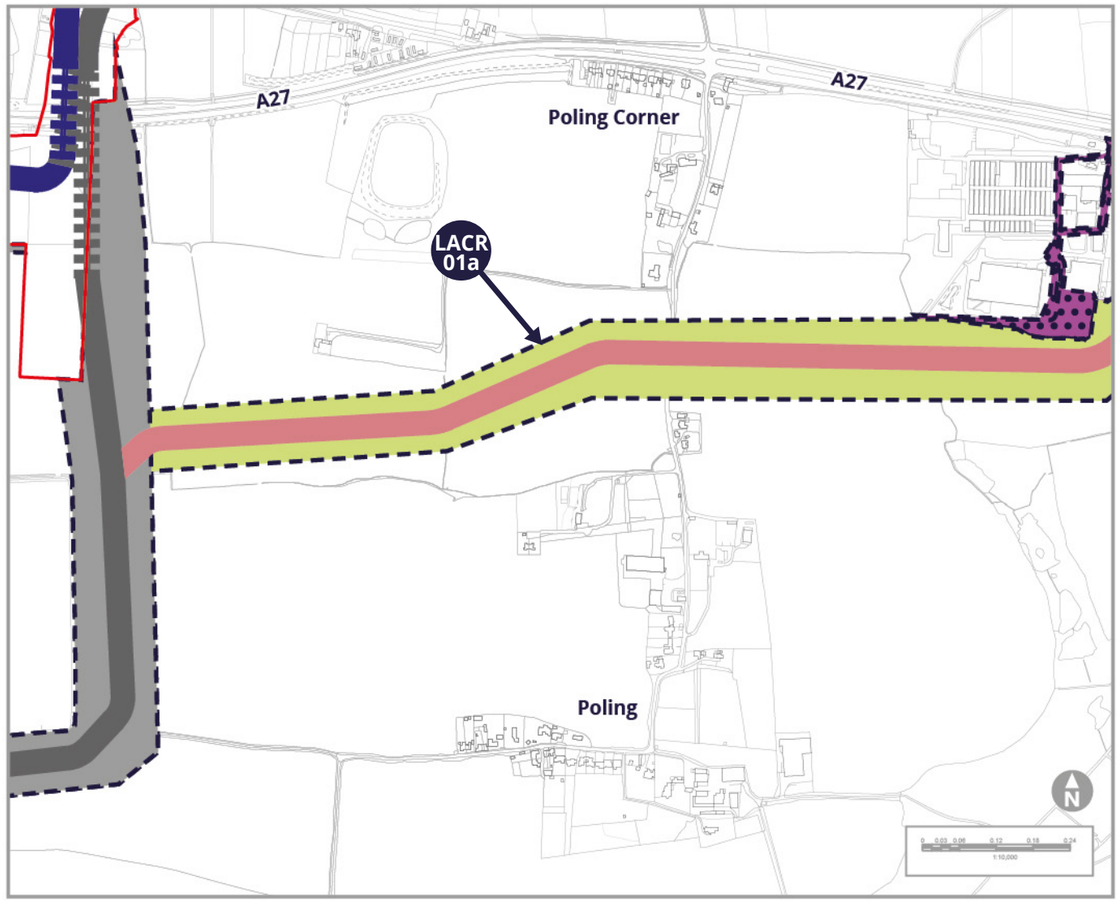


KEY:

- Our previous project boundary (from our summer 2021 consultation)
- Our indicative cable route
- Previously proposed trenchless crossing points
- New areas for cable construction works
- New indicative cable route & trenchless crossing points (see Area Maps for crossing points)
- New alternative accesses
- Route or change in another Area of this booklet

Note: Only 1 cable route is required and indicative cables routes are shown for illustration only

Area 4a: Our new route LACR-01a



Longer Alternative Cable Route LACR-01a

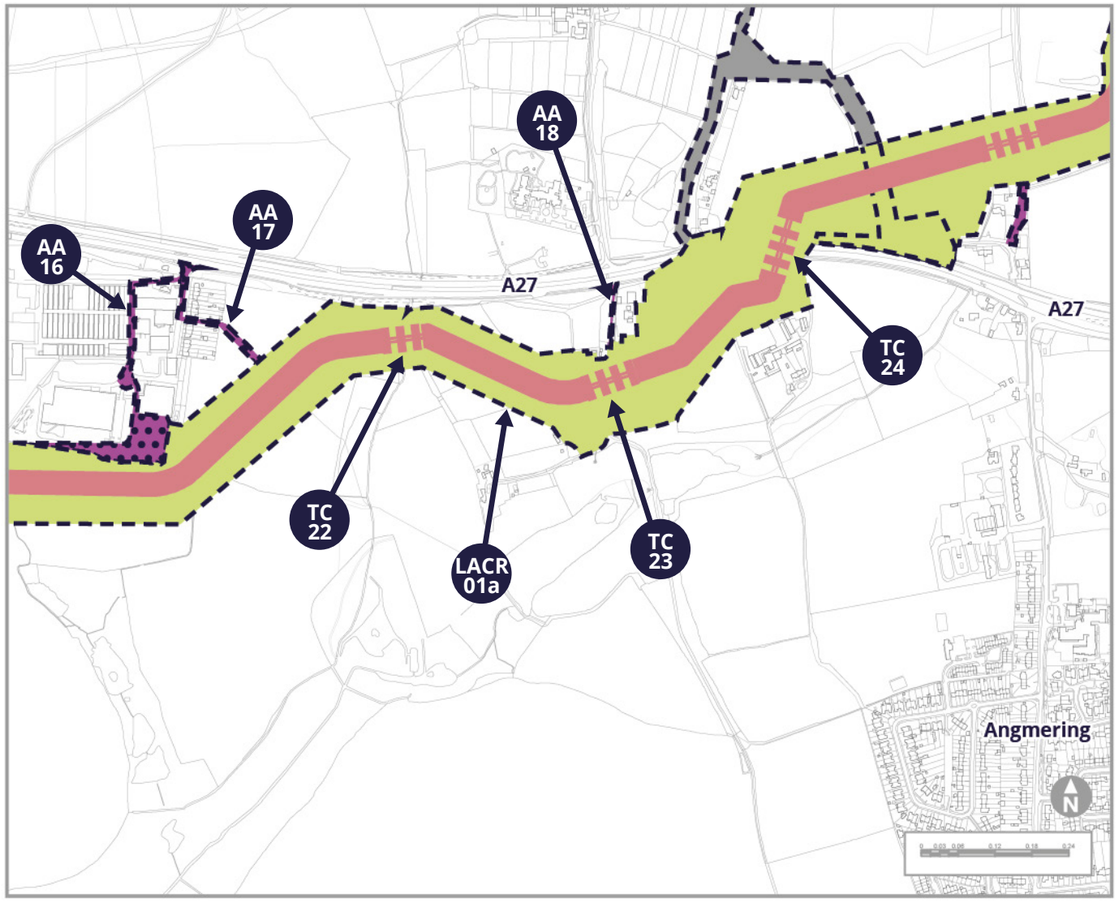
On the following pages you can read about the first part of our Longer Alternative Cable Route LACR-01. Our LACR-01 would split in two to take two potential routes when it gets much further north. If LACR-01 is ultimately chosen over other routes that we are considering, we would only need one of these two potential routes. We've called the southern part of route LACR-01a, before it splits into two routes much further north LACR01b and LACR-01c.

LACR-01a starts by leaving from an Alternative Cable Route ACR-02 which we are also consulting on. You can read about ACR-02 in the Area 2 part of this Consultation Booklet. This means that if we chose LACR-01 for our final cable route, then would also need to use the majority of ACR-02. Therefore, in our consideration of the environmental effects of LACR-01, we have also considered the effect of the relevant part of ACR-02.

After leaving ACR-02, route LACR-01a, would firstly run eastwards across agricultural land where it is reached via Alternative Accesses that you can read about on the next page (AA-16, AA-17 & A-18). As it heads east it would cross Poling Street in open trench, where two operational accesses would be created directly into the footprint of LACR-01a.

A-138

Area 4a: Our new route LACR-01a



Alternative Accesses AA-16 & AA-17

In addition to construction and operational accesses being created from the new Lyminster Bypass further west, we would also require AA-16 and AA-17 through the Vinery Industrial Estate. AA-16 would be for temporary construction access, whilst AA-17 would start at the same point but run east of Lillian Terrace to become an operational access.

Alternative Access AA-18

AA-18 would be used for construction or operational access at the Decoy Lane crossing point. AA-18 would be via an existing entrance from Decoy Lane, although this may need some improvement so that we could use it.

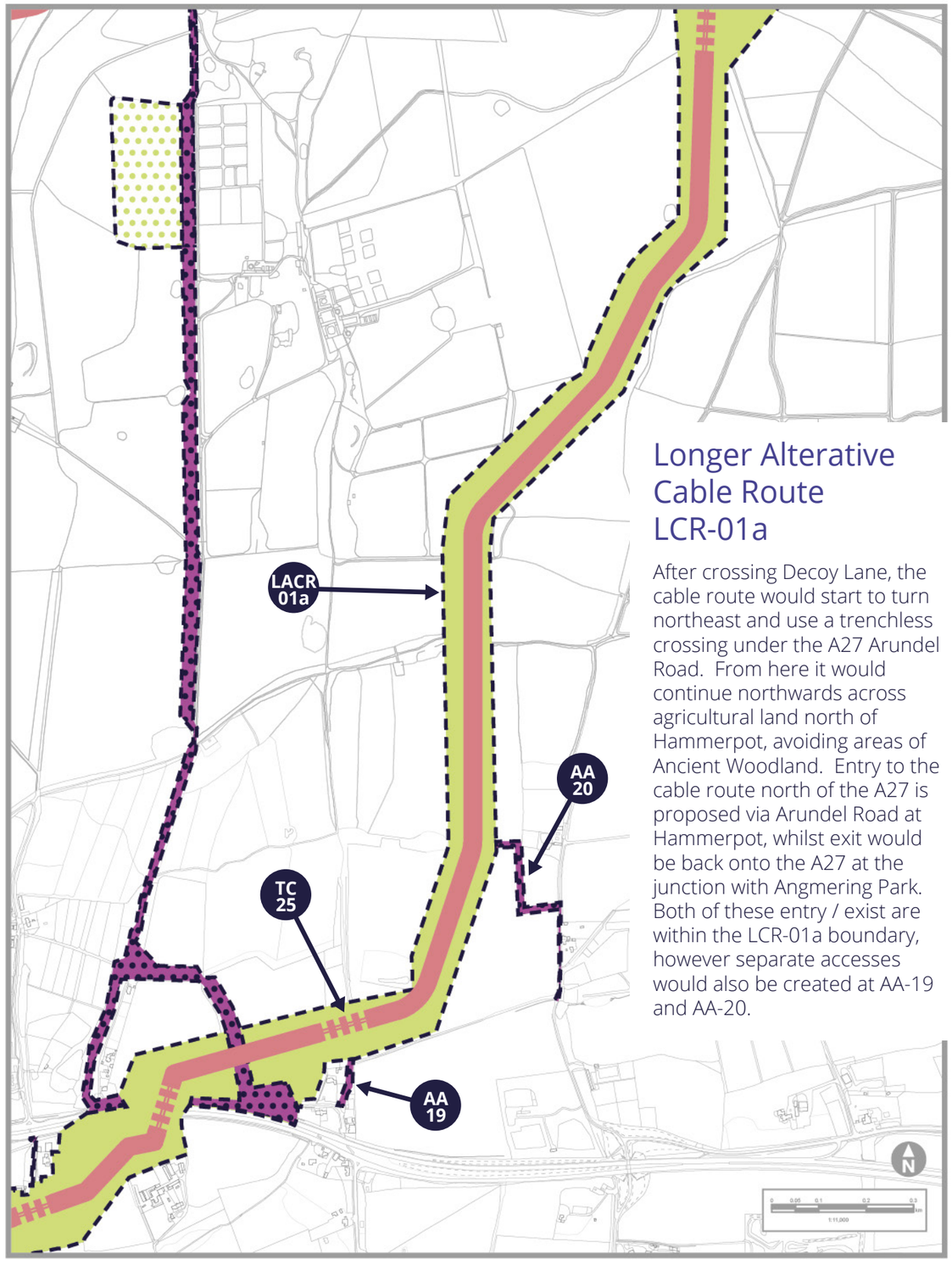
Trenchless Crossings TC-22, TC-23 and TC-24

TC-22 would allow us to cross an existing tree line and ditch without disturbing them.

TC-23 would allow us to cross Decoy Lane without disrupting access or uses there.

TC-24 would allow us to pass underneath the A27 Arundel Road dual carriageway without disturbing traffic above, as it is obviously a key transport route through the area.

Area 4a: Our new route LACR-01a

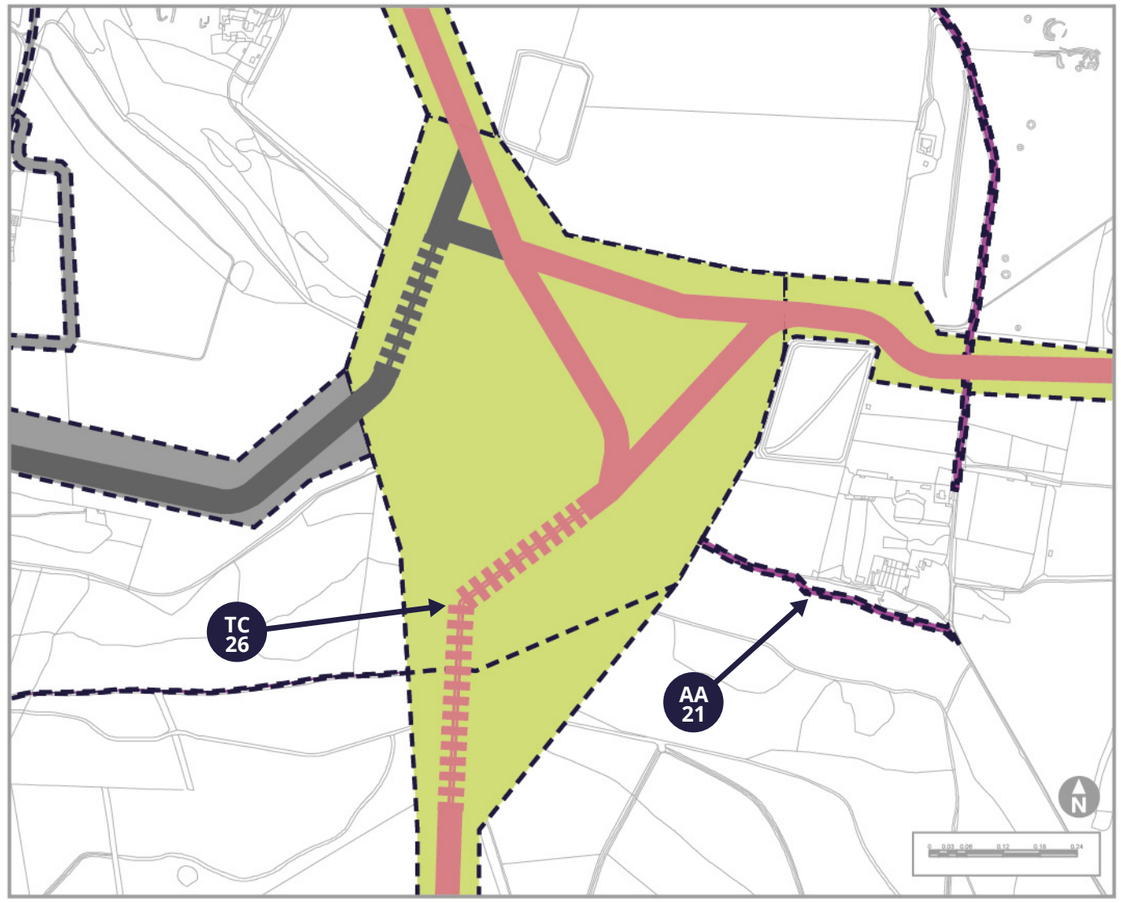


Longer Alterative Cable Route LCR-01a

After crossing Decoy Lane, the cable route would start to turn northeast and use a trenchless crossing under the A27 Arundel Road. From here it would continue northwards across agricultural land north of Hammerpot, avoiding areas of Ancient Woodland. Entry to the cable route north of the A27 is proposed via Arundel Road at Hammerpot, whilst exit would be back onto the A27 at the junction with Angmering Park. Both of these entry / exist are within the LCR-01a boundary, however separate accesses would also be created at AA-19 and AA-20.

A-139

Area 4a: Our new route LACR-01a



Trenchless Crossings TC-25 and TC-26

TC-25 would allow us to cross a mature tree line north of Hammerpot without affecting it.

TC-26 is proposed so that we can take our cable route down the steep wooded slope at Michelgrove and leave the trees unaffected. This trenchless crossing would allow us to get to an existing clearance in the woodland, which we can use existing tracks to access. This means that we would minimise the effect we would have on this area.

Alternative Accesses AA-19, AA-20 and AA-21

AA-19 would provide operational access for the life of the wind farm along an existing path at Hammerpot.

AA-20 would provide operational access for the life of the windfarm from the end of the highway on Swillage Lane, joining the cable route to the west of Norfolk House.

AA-21 would provide temporary construction and operational access west from Michelgrove. The temporary construction access would require a new stone road for the first 300m to move further from Michelgrove Cottages. After this point, the access may run along the existing access or new temporary parallel stone road. Operational access would be on the existing access.

Area 4a: Our new route LACR-01a

Potential Environmental Impacts

LACR-01a introduces the potential for new effects on the environment, which are assessed in our PEIR SIR.

During the construction period, some bridleways and footpaths will need to be diverted for short distances or temporarily interrupted for a limited duration.

The route passes through the South Downs National Park, and six Landscape Character Areas. The route also passes through seven hedges or treebelts, which we will replant afterwards.

This alternate route and accesses will introduce new potential receptors into proximity in respect of air quality. Different homes nearby would also have the potential to be affected by noise and vibration caused by construction or construction traffic. This route may affect individual roads differently from our previous assessment in a limited way.

Most of this alternative cable route runs through arable farmland bordered by hedgerow, which is similar to the landscape already assessed. Areas of Ancient Woodland would be drilled under, and there is a small group of trees (not ancient woodland) that may need to be removed.

We do not think that this alternate route changes our assessment of soils and agriculture. We have not identified any new sources of ground contamination within this corridor. The work area would come close to Swillage Land Landfill and the Vinery Industrial Estate, but we consider the distance from the landfill site, and our usual construction measures will prevent the likelihood of contamination.

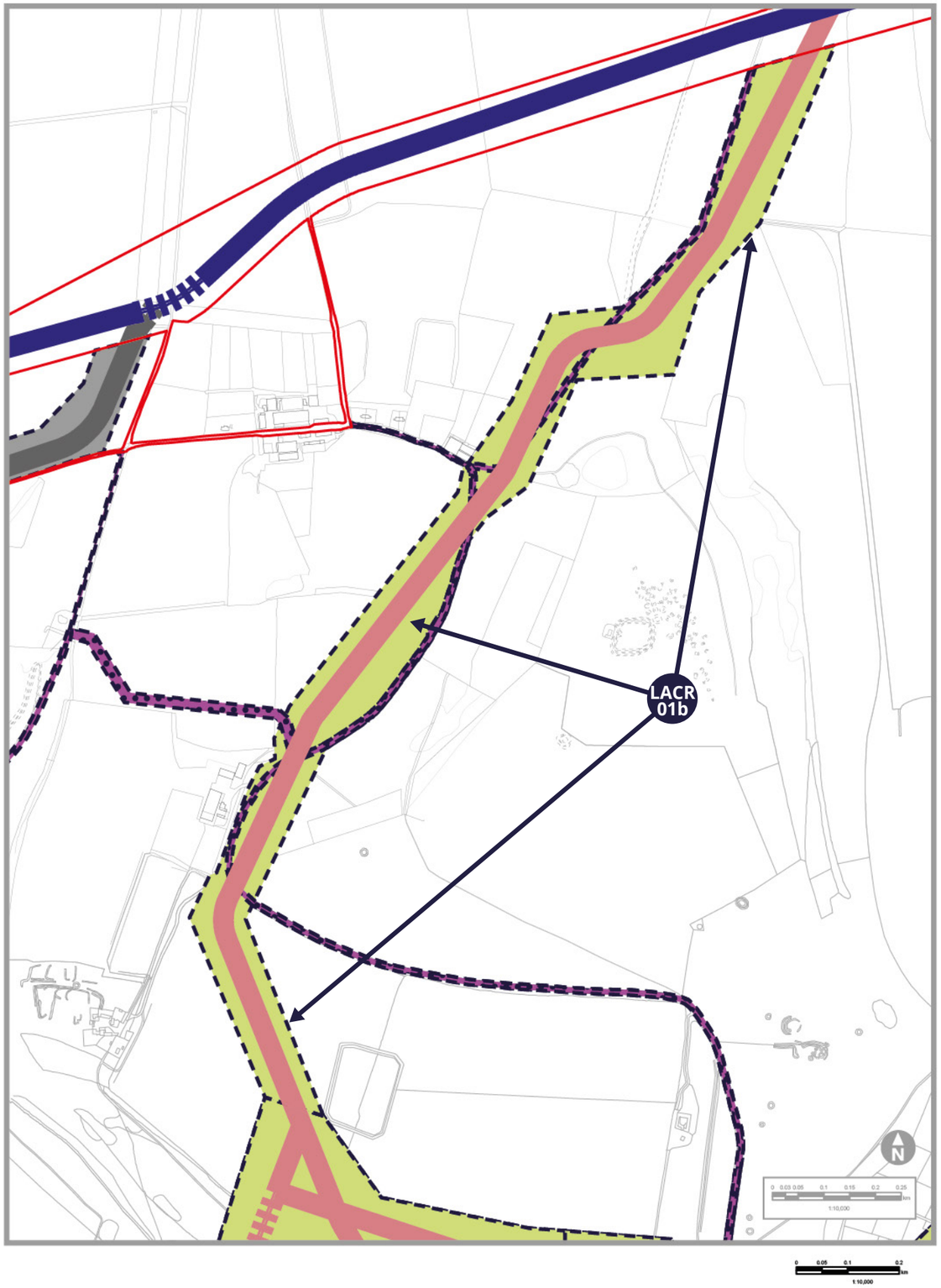
There are no standing historic features along the route of the proposed cable, but there is potential for buried archaeology from all periods, including Bronze Age and Roman. If this route is selected, we would undertake further site surveys to help us plan our mitigation measures. This section of the route could affect the setting of nine listed buildings during construction.

At this stage, we have some concerns about the potential for fluid from our trenchless crossings to contaminate groundwater, due to fractures within the chalk bedrock in this area. Therefore if this route was selected, we would commit to undertake an established detailed process called a Hydrological Risk Assessment to establish ways to minimise potential effects.

All of the above receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual and water environment effects.

Tell us what you think about any proposals in this booklet. Are there other things you want to highlight to us?

Area 4b: Our new route LACR-01b



Longer Alternative Cable Route LACR-01b

As it heads north, our LACR-01 splits into two different potential routes. We would only need one of these routes if LACR-01 is ultimately chosen. We've called the western of these two routes LACR-01b and you can read about it and its potential environmental effects on this page and see a map on the page before. LACR-01b would connect from the north end of LACR-01a, travelling northwest initially and then turning northeast to eventually re-join our existing proposed cable route.

LACR-01b would head through agricultural fields, including through an extensive private nature conservation project (the "Peppering Project"), where new hedgerows are being planted in winter 2022/23.

Potential Environmental Impacts

LACR-01b introduces the potential for new effects on the environment, which are assessed in our PEIR SIR.

During the construction period, some bridleways and footpaths will need to be diverted for short distances or temporarily interrupted for a limited duration.

The route passes through the South Downs National Park, and one Landscape Character Area. The route also passes through five hedges or treebelts, which we will replant afterwards.

This alternate route and accesses will introduce new potential receptors into proximity in respect of air quality. Different homes nearby would also have the potential to be affected by noise and vibration caused by construction or construction traffic. This route may affect individual roads differently from our previous assessment in a limited way.

This route passes through arable and pasture fields, some of which are planned to be included in an extension to the Peppering Project, a Countryside Stewardship scheme. We would using additional mitigations including timing of works and hedgerow management, to reduce effects on ecology.

We do not think that this alternate route changes our assessment of soils and agriculture. Our research has not shown any new sources of ground contamination along this corridor.

There are no standing historic features along the route of the proposed cable, but there is potential for buried archaeology from all periods of time. If this route is selected, we would undertake further site surveys to help us plan how to address anything we might encounter. This section of the route could affect the setting of one listed building during construction.

At this stage, we have some concerns about the potential for fluid from our trenchless crossings to contaminate groundwater, due to fractures within the chalk bedrock in this area. Therefore if this route was selected, we would commit to undertake an established detailed process called a Hydrological Risk Assessment to establish ways to minimise potential effects.

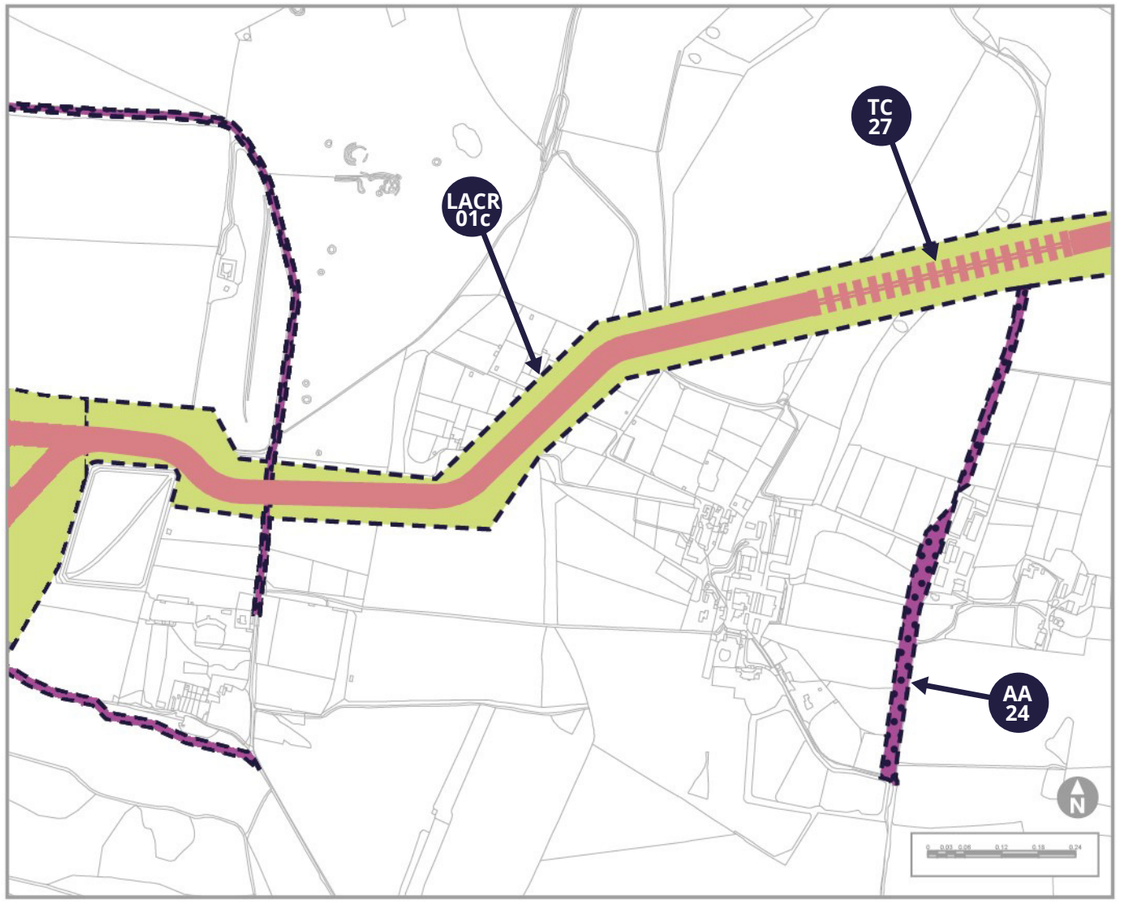
All of the above receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual and water environment effects.

Area 4c: Our new route LACR-01c

Alternative Accesses AA-22 and AA-23

Both AA-22 and AA-23 would be a temporary construction and operational accesses following existing estate tracks from the end of Michelgrove Lane to LACR-01. We have allowed for potential temporary passing places during construction on these acccesses if needed.

Area 4c: Our new route LACR-01c



Longer Alternative Cable Route LACR-01c

As it heads north, our LACR-01 splits into two different potential routes. We would only need one of these routes if LACR-01 is ultimately chosen. We've called the eastern of these two routes LACR-01c and you can read about it and its potential environmental effects on this and the following pages. LACR-01c would connect from the north end of LACR-01a, travelling east initially and then turning northwest to eventually re-join our existing proposed cable route.

LACR-01c would head across agricultural land with an open trench crossing of Michelgrove Lane. Along some of its length it would run parallel to wooded areas and between buildings and a gallops. The boundary of LACR-01c includes width to create an access track beside field edges if the existing track is found to be unsuitable.

You can see the initial eastbound and north-easterly parts of LACR-01c on maps on the following pages.

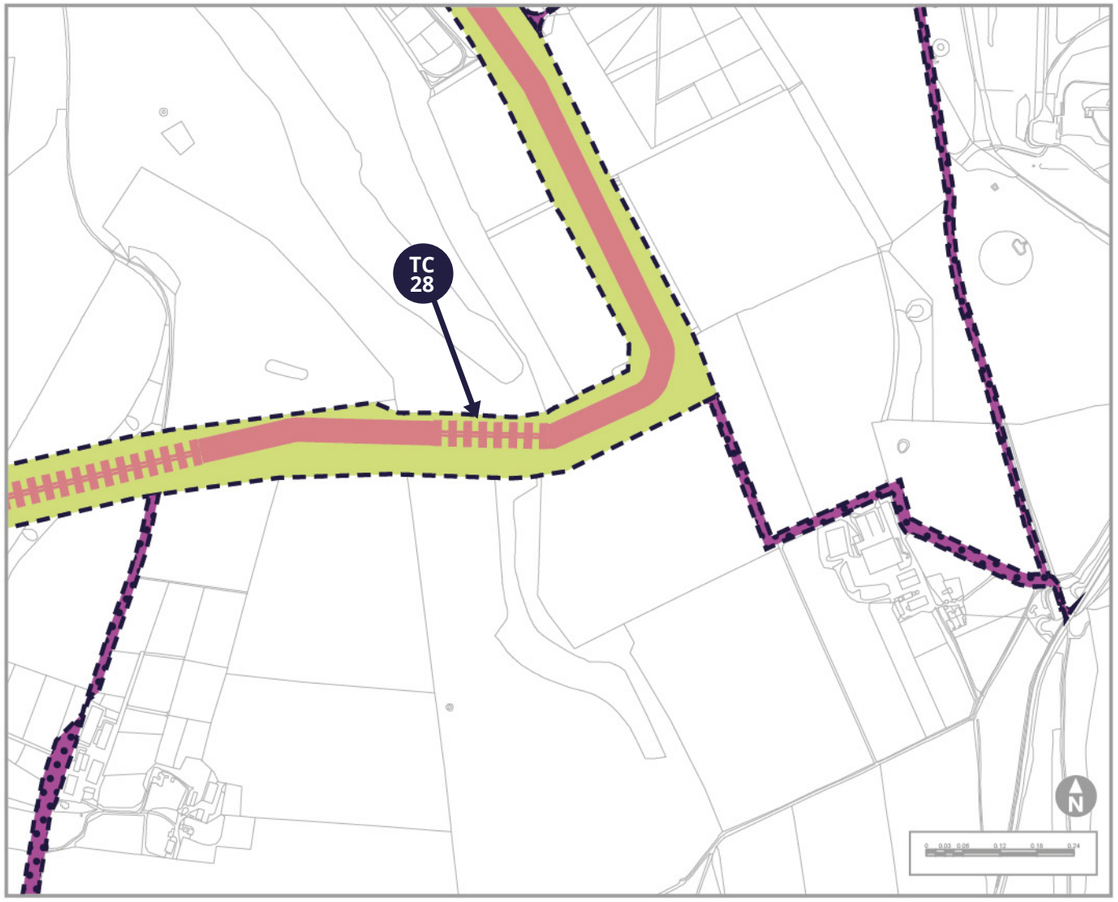
Trenchless Crossings TC-27

TC-27 would be used to reach under the shoulder of Blackpatch Hill.

Alternative Access AA-24

AA-24 would allow access from Long Furlong Lane to LACR-01c for both construction and the operational life of the wind farm.

Area 4c: Our new route LACR-01c



Trenchless Crossing TC-28

TC-28 is required to allow our cable route to pass under the steep east side of Blackpatch Hill.

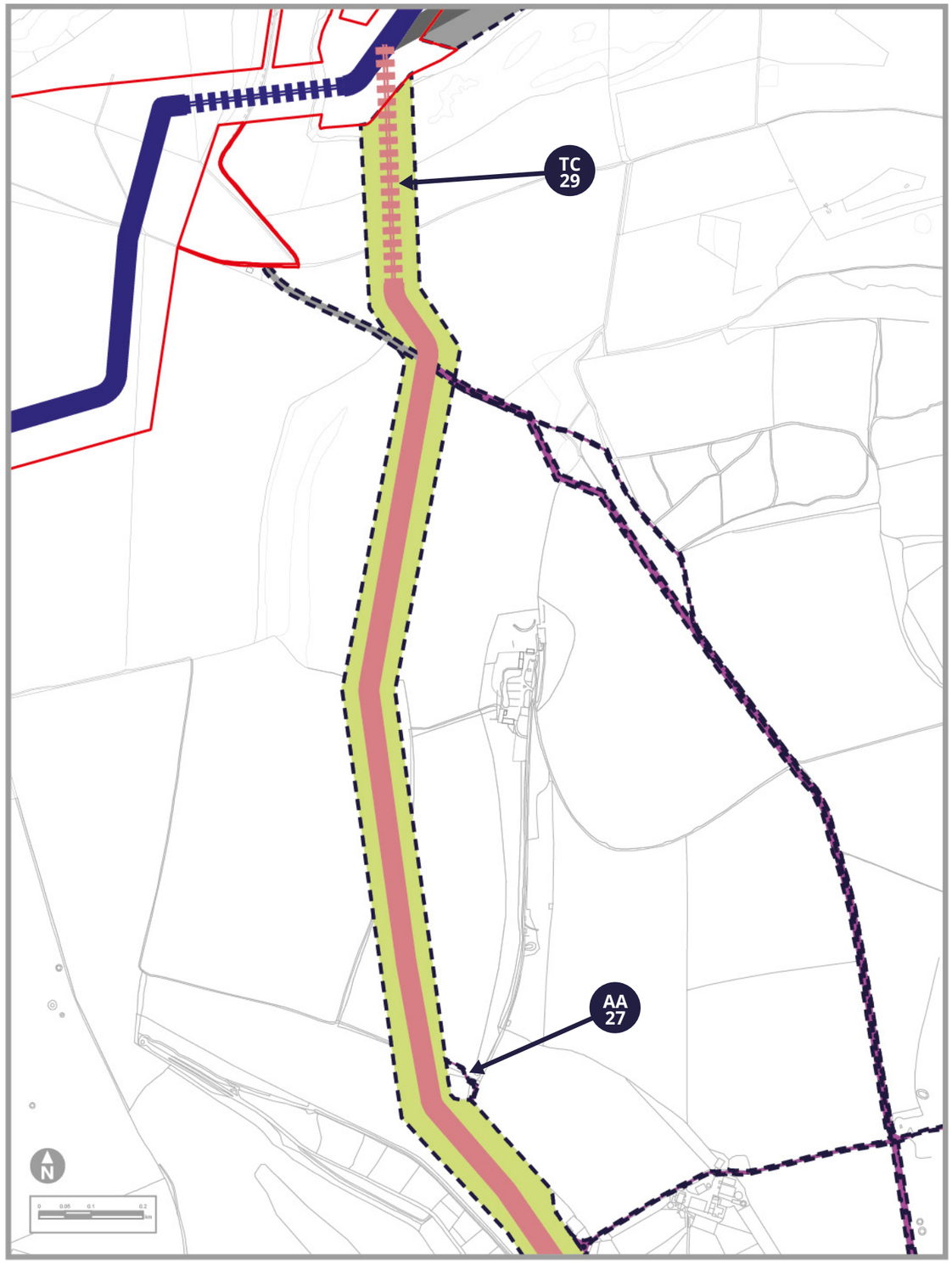
Trenchless Crossing TC-29

TC-29 would be required at the slope down Sullington Hill/Barnsfarm Hill for approximately 400m.

Alternative Access AA-27

AA-27 would be needed during the operational life of the wind farm. Located about 850m South of Cobden Farm, it would run between 2 adjoining fields along an existing farm track.

Area 4c: Our new route LACR-01c



Area 4c: Our new route LACR-01c

Potential Environmental Impacts

LACR-01c introduces the potential for new effects on the environment, which are assessed in our PEIR SIR.

During the construction period, some bridleways and footpaths will need to be diverted or temporarily interrupted, including the restricted byway 2092 to the west of Windlesham, albeit for a limited duration.

The route passes through the South Downs National Park, and two Landscape Character Areas. The route also passes through eighteen hedges or treebelts, which we will replant afterwards.

This alternate route and accesses will introduce new potential receptors into proximity in respect of air quality. Different homes nearby would also have the potential to be affected by noise and vibration caused by construction or construction traffic. We have assessed the transport impacts of this alternate route, which, when combined with LACR-01a, results in the most traffic. This route may affect individual roads differently from our previous assessment in a limited way.

This route passes through pasture and arable fields, including an area of good quality semi-improved grassland and also of lowland calcereous grassland, which are both considered Priority Habitats. We propose to use trenchless crossings to ensure these areas are retained, to reduce effects on ecology.

We do not think that this alternate route changes our assessment of soils and agriculture. We have not identified any new sources of ground contamination within this corridor. The work area would come close to Log Furlough, Findon, Landfill, but we consider the distance from the landfill site, and our usual construction measures will prevent the likelihood of contamination.

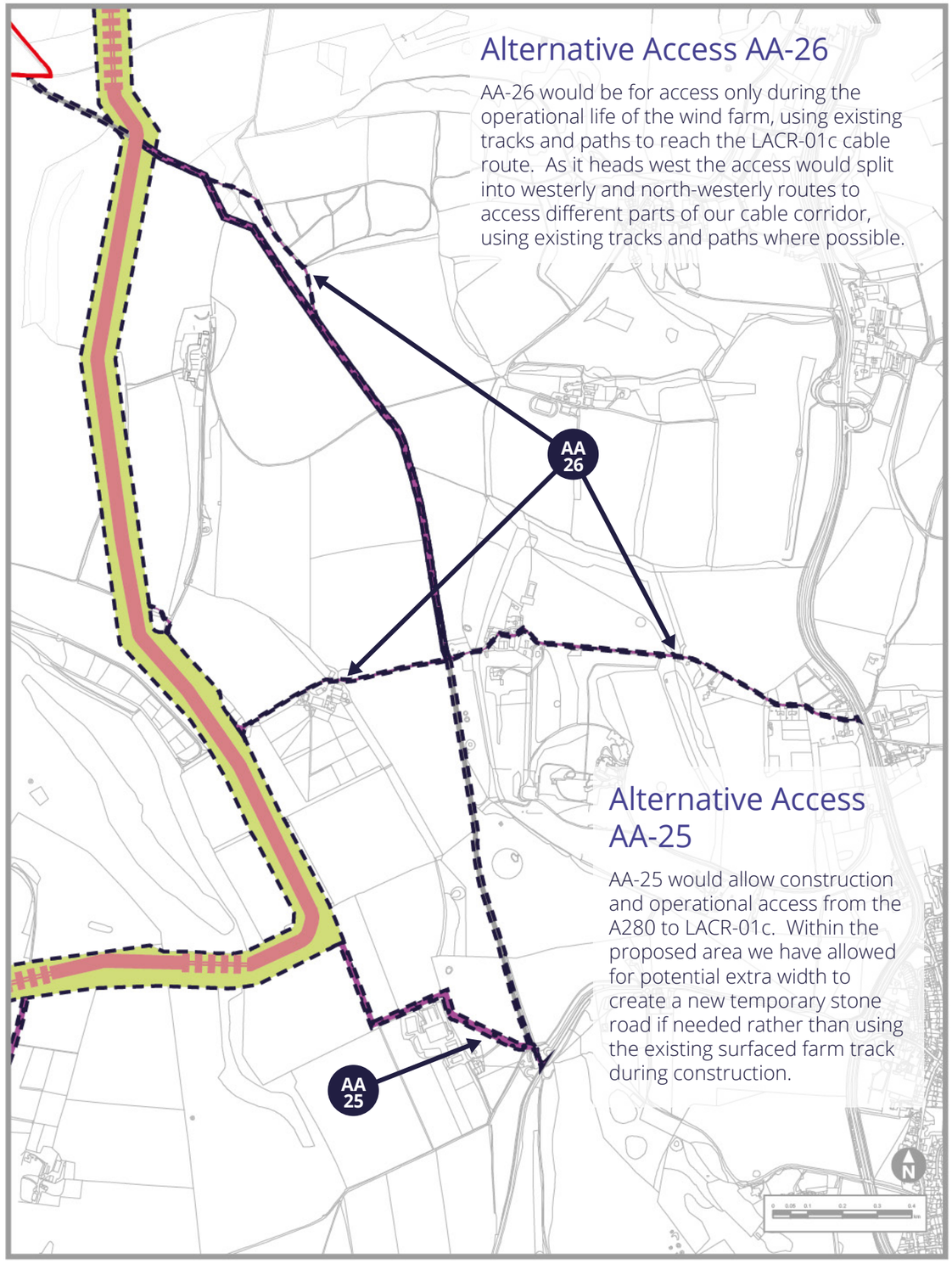
There are no standing historic features along the route of the proposed cable, but there is potential for buried archaeology from all periods, including prehistoric, Roman and medieval. If this route is selected, we would undertake further site surveys to help us plan how to address anything we might encounter. This section of the route could affect the setting of one listed building during construction.

At this stage, we have some concerns about the potential for fluid from our trenchless crossings to contaminate groundwater, due to fractures within the chalk bedrock in this area. Therefore if this route was selected, we would commit to undertake an established detailed process called a Hydrological Risk Assessment to establish ways to minimise potential effects.

All of the above receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to socio-economic, landscape and visual and water environment effects.

On the next page you can read about some accesses we are looking at to reach LACR-01. Since they are only needed if we decide to use LACR-01c as our route, the environmental effects of these accesses have been included overall in the effects of LACR-01c described above.

Area 4c: Eastern accesses to LACR-01



Alternative Access AA-26

AA-26 would be for access only during the operational life of the wind farm, using existing tracks and paths to reach the LACR-01c cable route. As it heads west the access would split into westerly and north-westerly routes to access different parts of our cable corridor, using existing tracks and paths where possible.

Alternative Access AA-25

AA-25 would allow construction and operational access from the A280 to LACR-01c. Within the proposed area we have allowed for potential extra width to create a new temporary stone road if needed rather than using the existing surfaced farm track during construction.

Area 5

West and North of Washington

This Area considers the cable route where it would run west and north of Washington. It includes **three modified routes (MR) and three alternative accesses (AA)**. They are all referenced on the following pages using the abbreviations above.

Remember: Words such as "receptor" and "trenchless crossing" are explained in the Definitions section of this document.

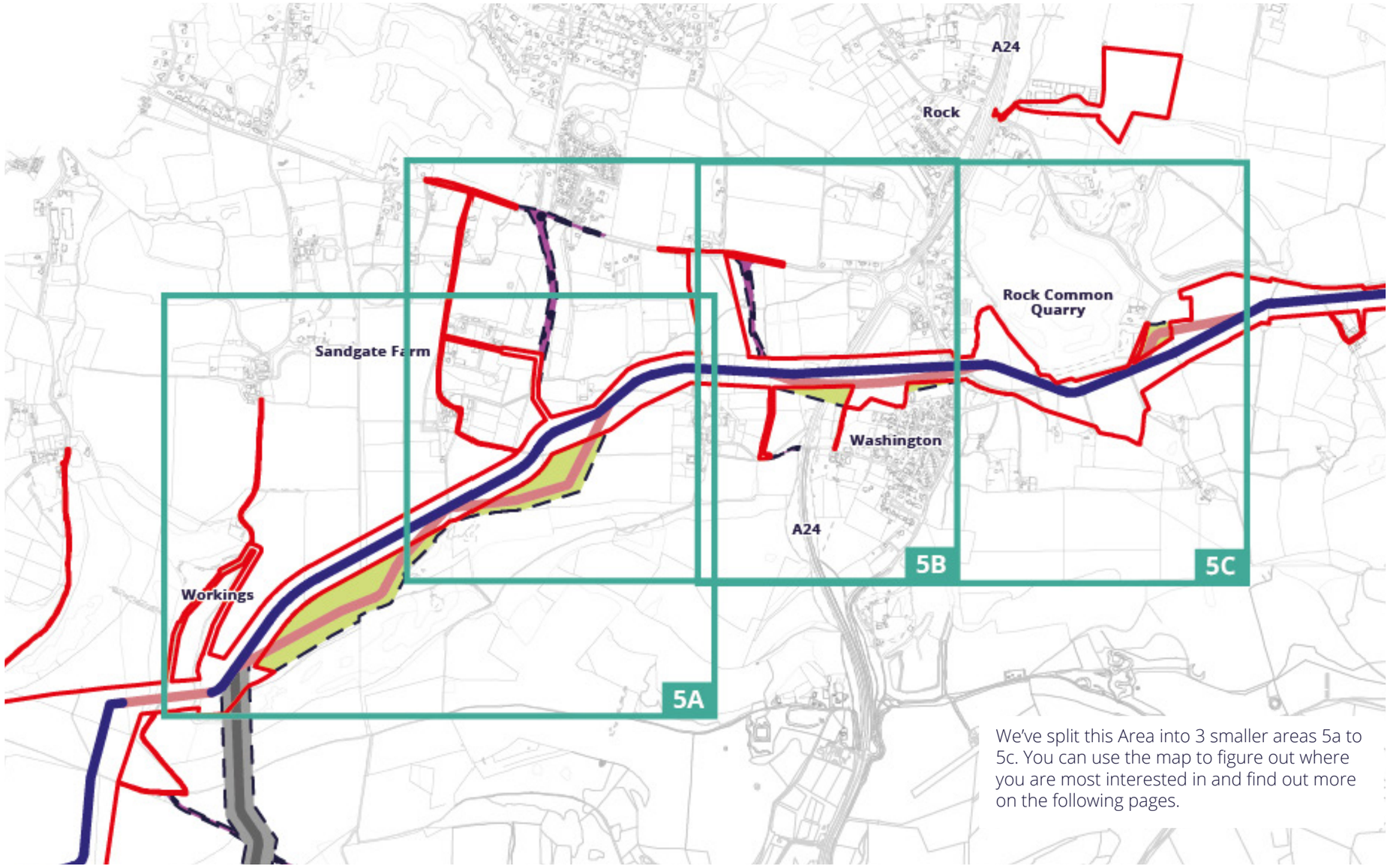
Our Environmental Assessment of West and North of Washington

On the following pages you can read about our preliminary assessment of potential changes in Area 5. We believe that effects presented in our PEIR from summer 2021 will change for historic environment (heritage) as a result of introducing these alternatives. You can read more about our consideration of these potential changes in our PEIR SIR at *www.Rampion2.com/consultation*. Just look for the relevant MR, AA or TC reference.

KEY:

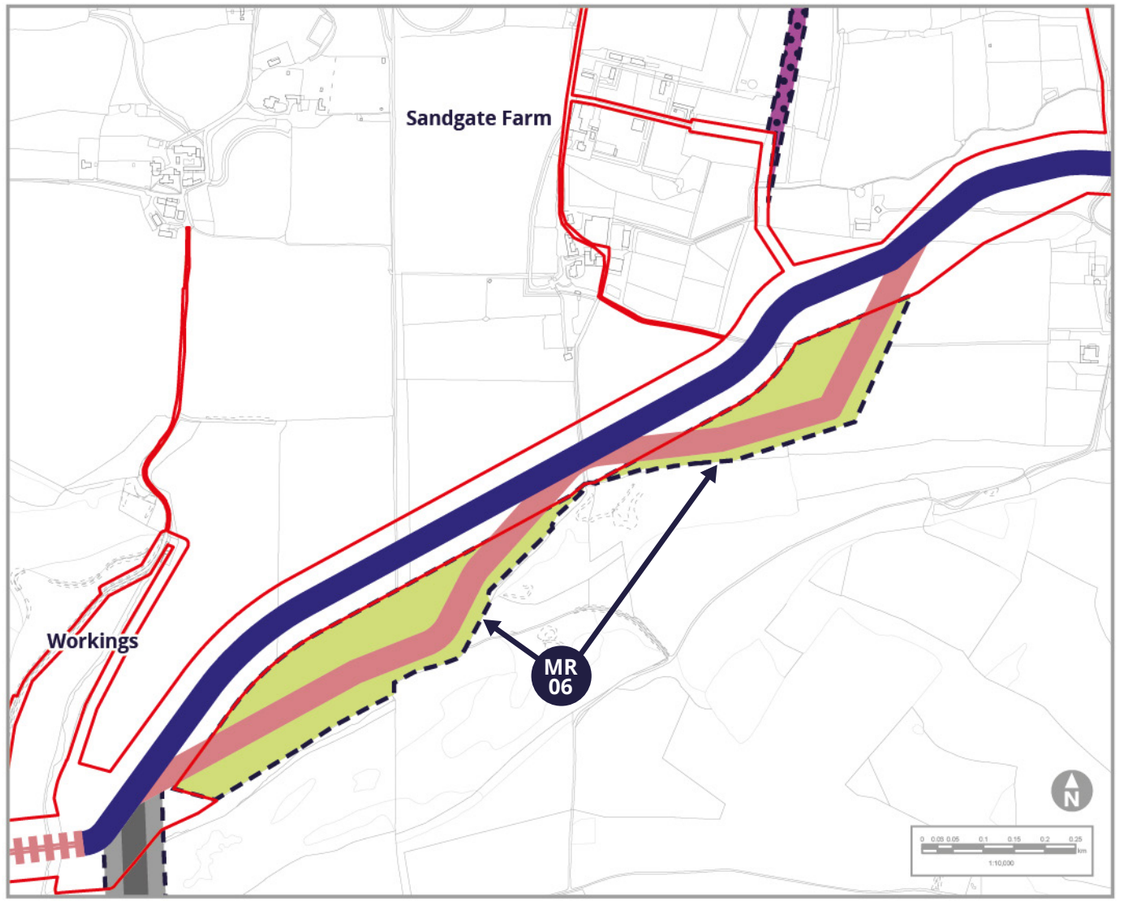
- Our previous project boundary (from our summer 2021 consultation)
- Our indicative cable route
- Previously proposed trenchless crossing points
- New areas for cable construction works
- New indicative cable route & trenchless crossing points (see Area Maps for crossing points)
- New alternative accesses
- Route or change in another Area of this booklet

Note: Only 1 cable route is required and indicative cables routes are shown for illustration only



We've split this Area into 3 smaller areas 5a to 5c. You can use the map to figure out where you are most interested in and find out more on the following pages.

Area 5a: West of Washington (1)



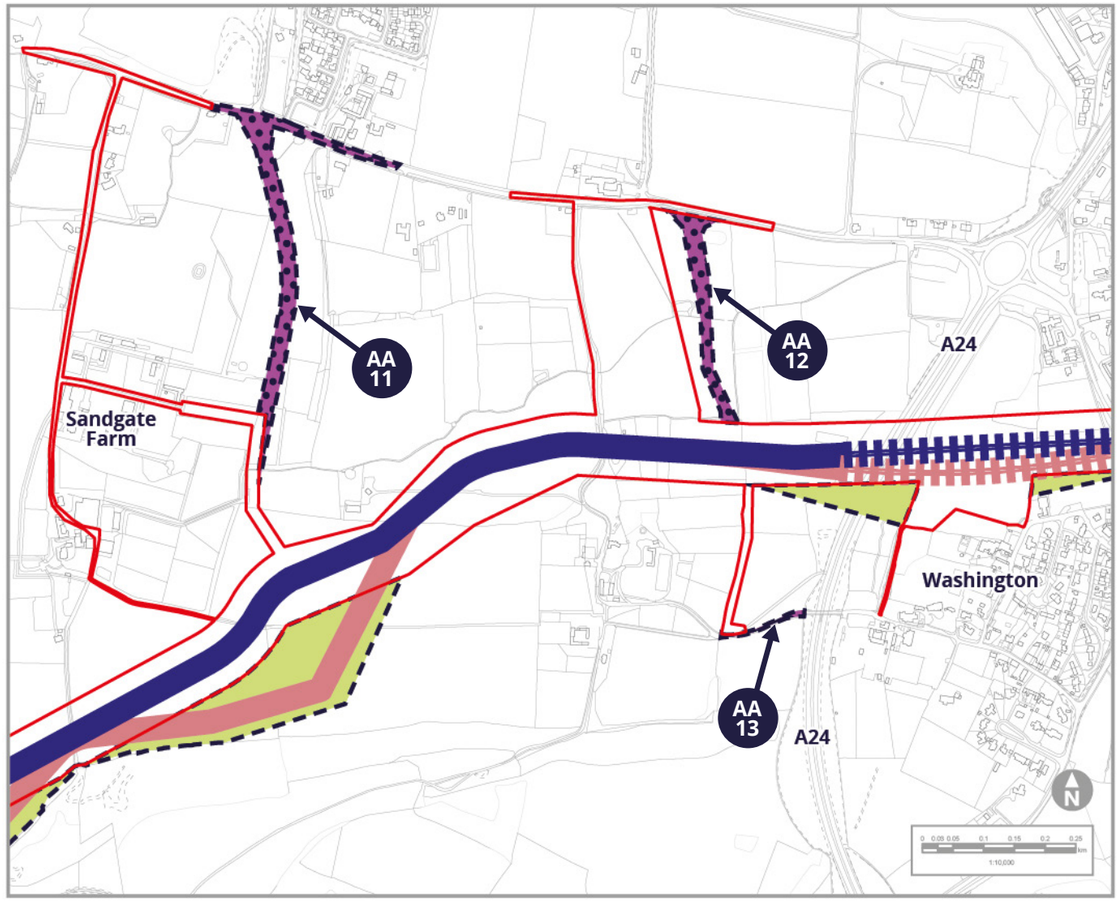
Modified Route MR-06

MR-06 is being included to allow the cable to run closer to a southern field boundary to avoid an artesian well (where water is underground under positive pressure) and equestrian facilities, which will also enable agricultural activities to be less impacted during construction. The modified route would maintain a 15 metre (m) distance from a local wildlife site and woodland to the southeast.

Potential Environmental Impacts

MR-06 would involve hedgerow crossings, be adjacent to a stand of Ancient Woodland and near Sullington Hill Local Wildlife Site. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, ecology and nature conservation effects.

Area 5b: West of Washington (2)

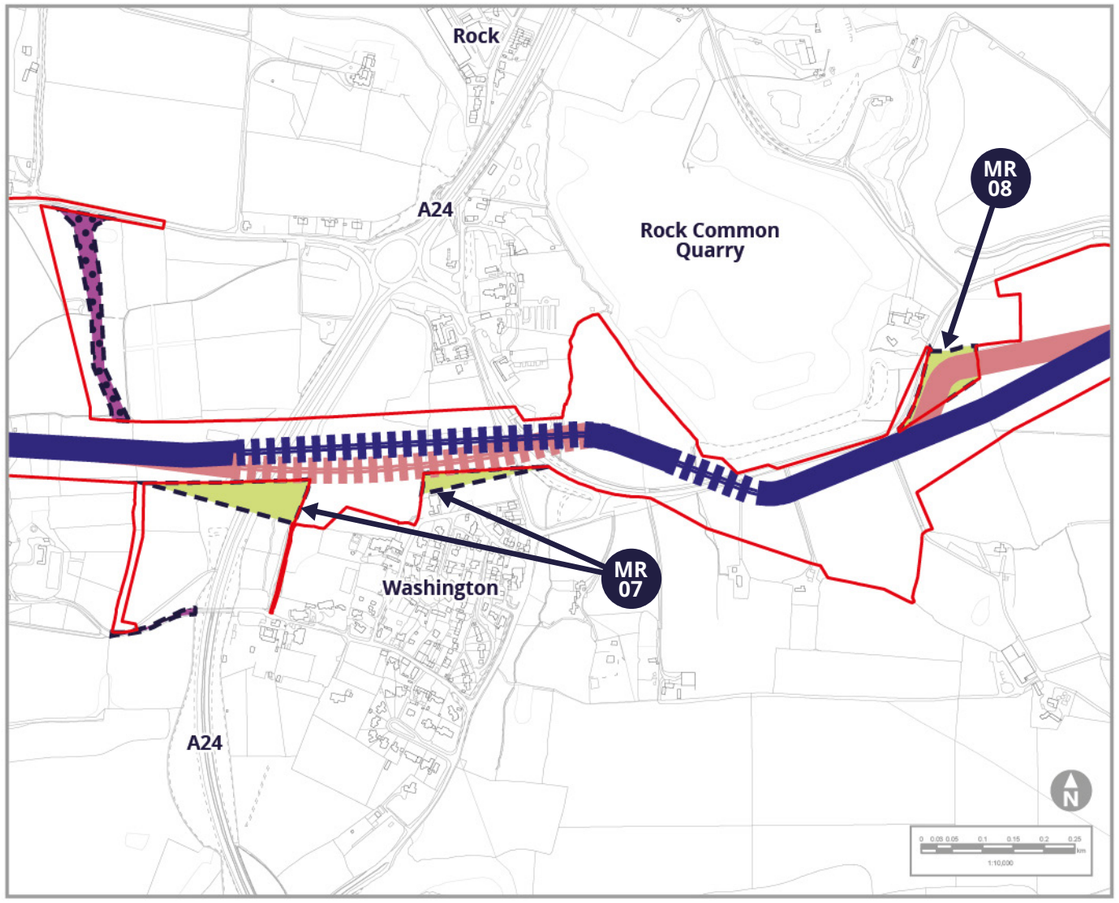


Alternative Accesses AA-11, AA-12 and AA-13

AA-11 is being explored due to technical challenges we found for construction use on our original proposed access route further west, whilst AA-12 is being considered as we identified that our original proposal would be unsuitable due to road safety concerns. Both alternative routes would run on new tracks and maintain a 15m separation distance from adjacent woodland. AA-13 Is an existing private track which we are including to ensure we have rights of access over it.

AA-11 and AA-12 would cross agricultural fields and require new temporary stone roads. Both would cross hedgerows and AA-11 would pass close to listed buildings. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, ecology, nature conservation, historic environment (heritage) and transport effects.

Area 5c: North of Washington



Modified Route MR-07

MR-07 would be an alternative route for the trenchless crossing under the A24 London Road, the recreation ground and roads to the east including the A283. This is being proposed to allow more flexibility for laying out of ducts, to help maintain distance from Ancient Woodland and provide a better angle to cross an existing gas pipeline. Although our trenchless crossing may move slightly into MR-07, this would not change the assessment of effects we consulted on last year.

Modified Route MR-08

Modified Route MR-08 is a slight adjustment of the cable route to minimise severance of agricultural fields.

Potential Environmental Impacts

MR-07 would be mostly underground for the trenchless crossing. Drilling would occur from a similar area to our existing proposed cable route and therefore no new receptors or changes to impacts have been identified.

MR-08 would be closer to receptors including a house and farm to the north. It would also cross two additional hedgerows. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, ecology and nature conservation, and historic environment (heritage) effects.

Tell us what you think about any proposals in this booklet. Are there other things you want to highlight to us?

Area 6

Wiston to Kings Lane

This Area considers the cable route from the west side of Wiston to Kings Lane. It includes **two alternative cable routes (ACR), five modified routes (MR), seven new trenchless crossings (TC) and one alternative access (AA)**. They are all referenced on the following pages using the abbreviations above.

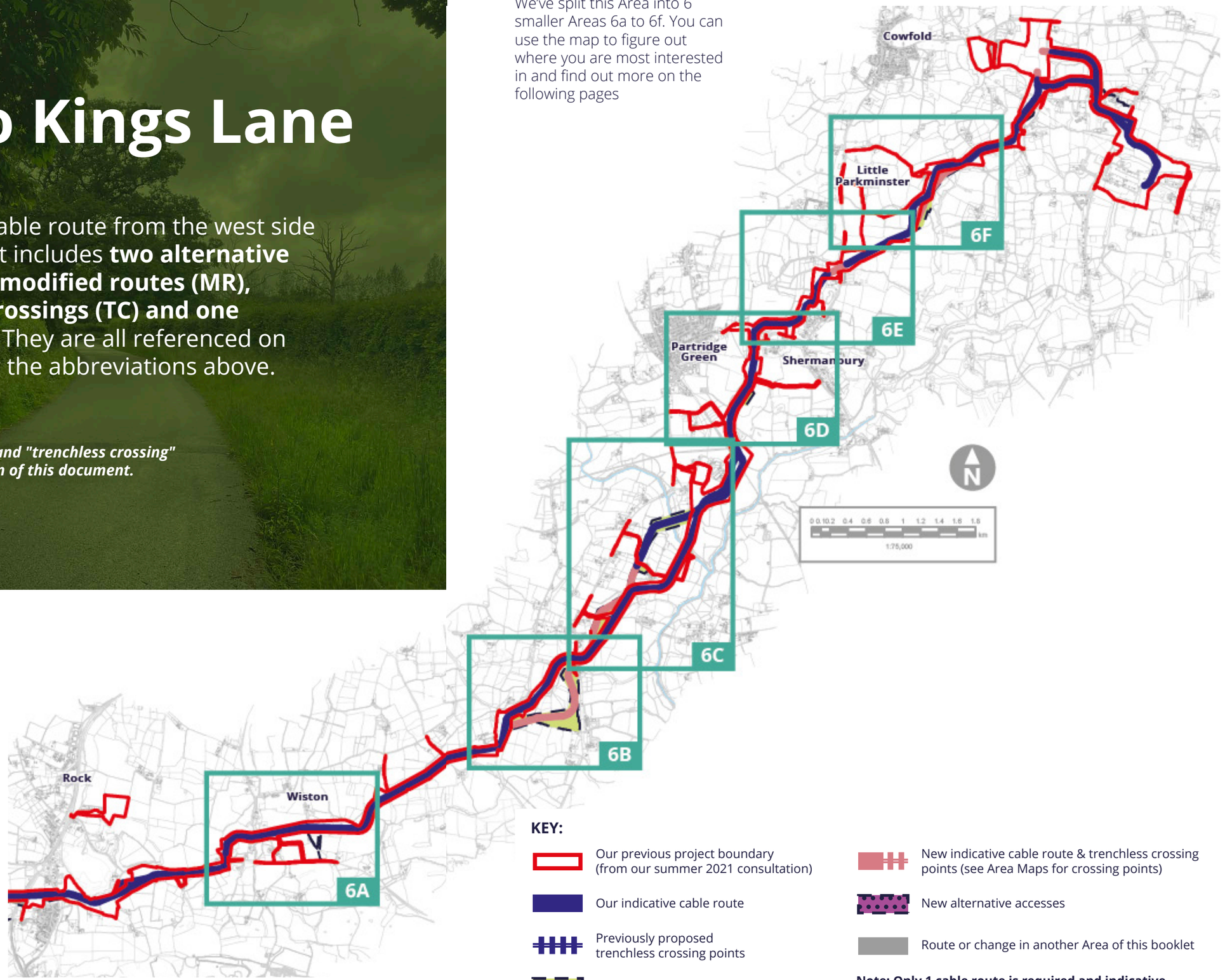
Remember: Words such as "receptor" and "trenchless crossing" are explained in the Definitions section of this document.

Our Environmental Assessment of Wiston to Kings Lane

On the following pages you can read about our preliminary assessment of potential changes in Area 6. We don't believe that introducing these changes is likely to change the overall conclusions of our PEIR from summer 2021. You can read more about our consideration of these potential changes in our PEIR SIR. Just look for the relevant MR, AA or TC reference.

A-148

We've split this Area into 6 smaller Areas 6a to 6f. You can use the map to figure out where you are most interested in and find out more on the following pages

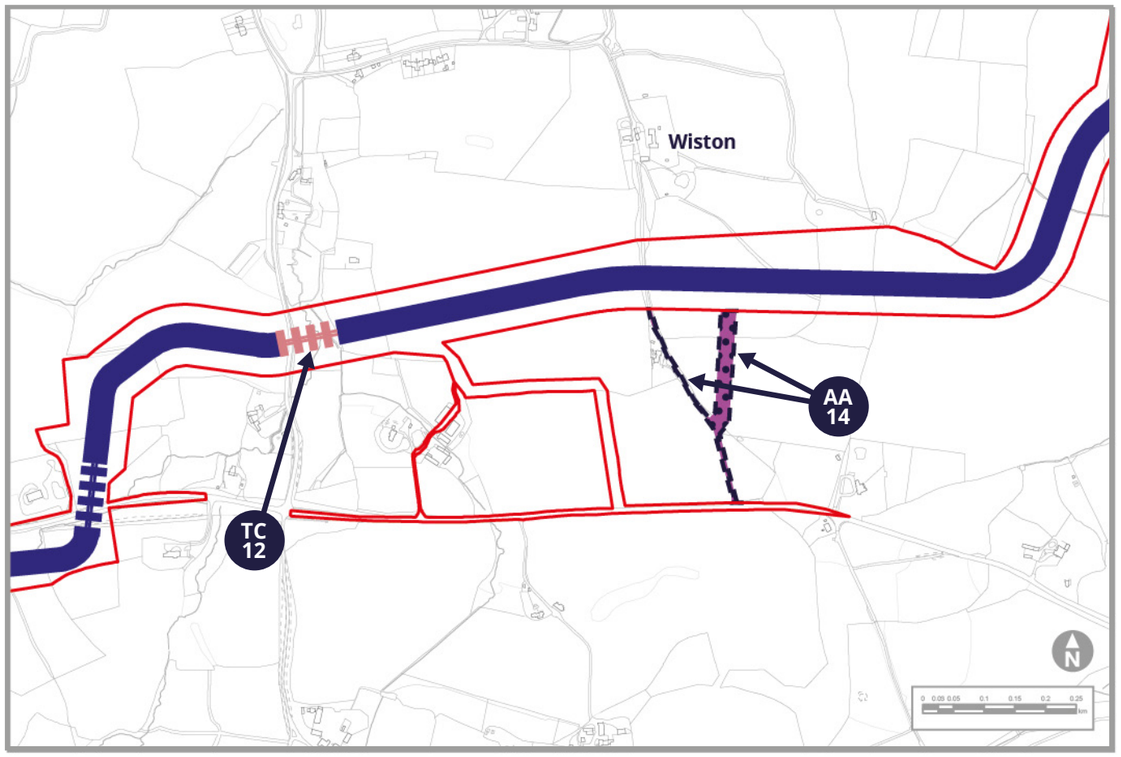


KEY:

- Our previous project boundary (from our summer 2021 consultation)
- Our indicative cable route
- Previously proposed trenchless crossing points
- New areas for cable construction works
- New indicative cable route & trenchless crossing points (see Area Maps for crossing points)
- New alternative accesses
- Route or change in another Area of this booklet

Note: Only 1 cable route is required and indicative cables routes are shown for illustration only

Area 6a: South of Wiston



Alternative Access AA-14

East of Water Lane, our original construction access proposal would run from the A283 passing a residence. We are now exploring AA-14 as an alternative construction access (from the road via the wider northwest section) because it would avoid crossing a gas main and would affect less agricultural land, along with some traffic and minerals protection advantages.

The narrower part of AA-14 may also be used for operational access for the life of the wind farm.

Trenchless Crossing TC-12

TC-12 has been added to pass under Water Lane and a tributary of the Honeybridge Stream without affecting them and would be drilled under Ancient Woodland.

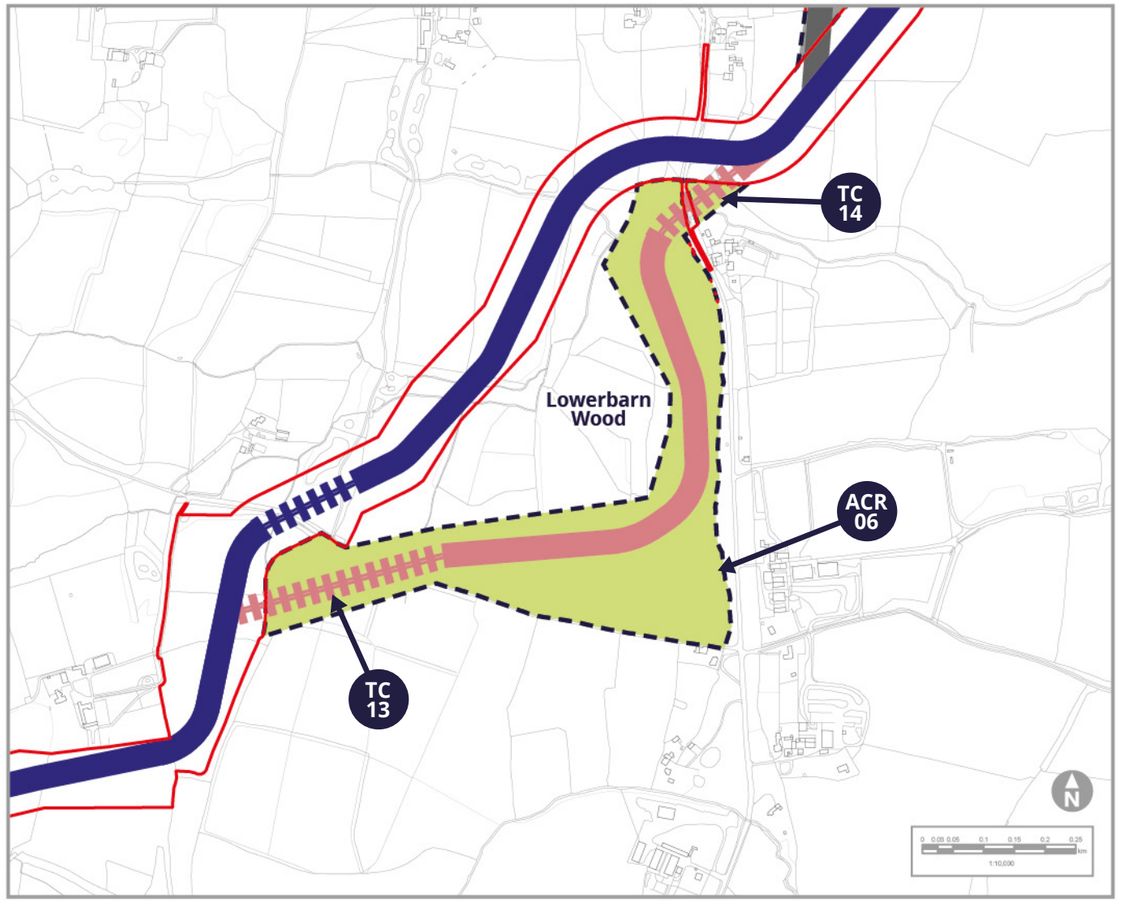
Potential Environmental Impacts

AA-14 would cross a hedgerow, an arable field and pass in the vicinity of two listed buildings. It creates new access to the A283. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to socio-economic, landscape and visual, ecology and nature conservation, and historic environment (heritage) effects on the identified receptors are considered in the PEIR SIR.

TC-12 has been added to pass under Water Lane and a tributary of the Honeybridge Stream without affecting them and would be drilled under Ancient Woodland. Receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, air quality, noise and vibration, ecology and nature conservation and transport effects

A-149

Area 6b: South of Ashurst



Alternative Cable Route ACR-06 and Trenchless Crossings TC-13 and TC-14

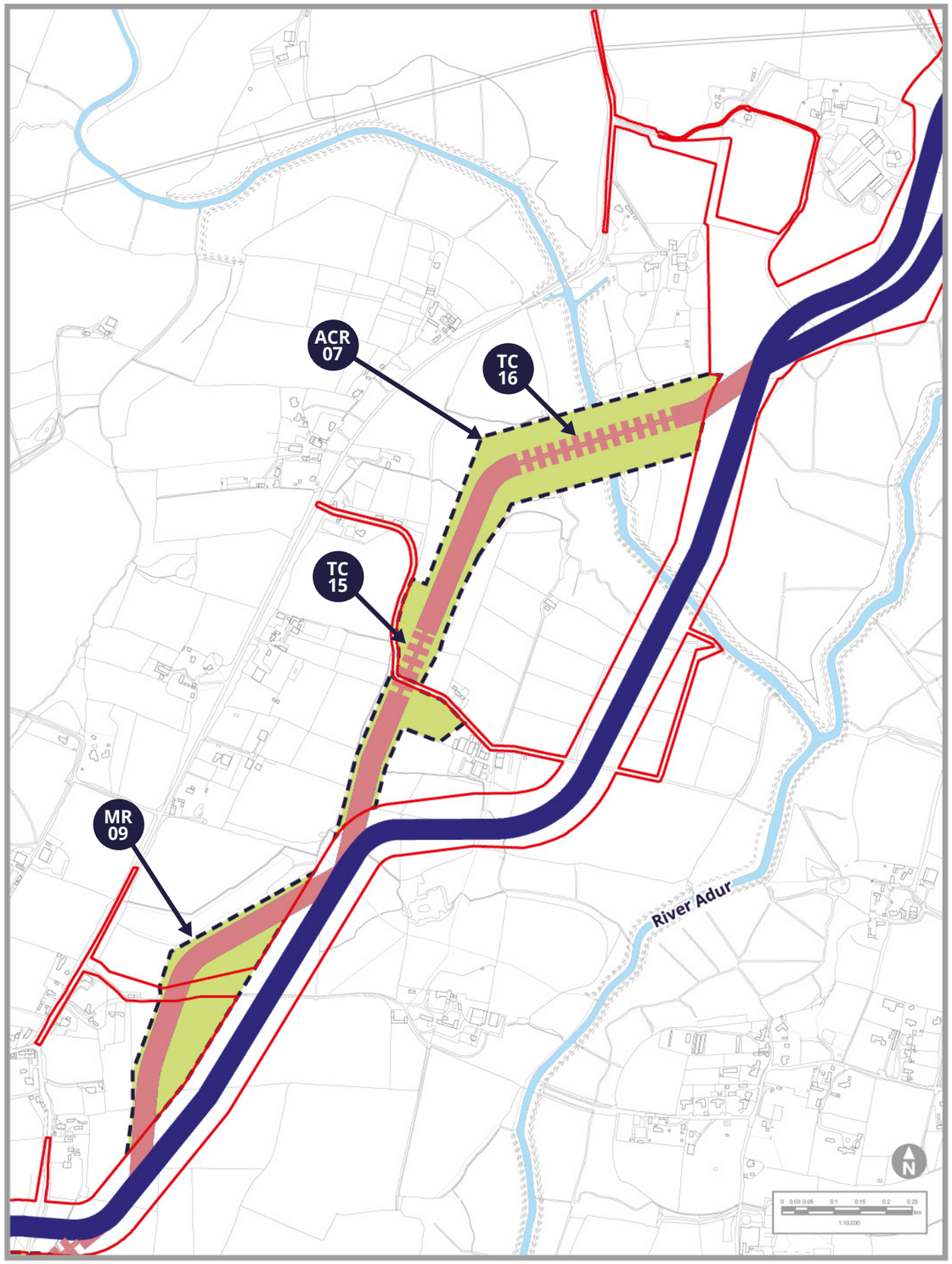
ACR-06 would be located south of Ashurst, running west of Horsham Road and alongside Spithandle Road. ACR-06 is to the east of the original cable route and has been introduced to potentially avoid ponds, environmental and engineering constraints. and impacts on a private nature conservation scheme. ACR-06 would require new trenchless crossings TC-13 to cross Calcot Wood and TC-14 to cross Horsham Road and a tributary of the River Adur.

Potential Environmental Impacts

ACR-06 is in the vicinity of Horsebridge Common, comes within 350m of residential buildings and is in the vicinity of listed buildings. These are new receptors and have been considered by our latest assessments. The cable route will be closer to three listed buildings. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to socio-economic, air quality, historic environment (heritage) and noise and vibration effects.

Tell us what you think about any proposals in this booklet. Are there other things you want to highlight to us?

Area 6c: Ashurst to Partridge Green



Modified Route MR-09

MR-09 extends the potential cable route to the west, bringing it closer to Ashurst. This has been introduced to reduce the severance of agricultural fields and maximise their use during construction.

ACR-07 and Trenchless Crossings TC15 and TC-16

ACR-07 is located approximately 220m east of Bines Green, west of the original cable route. This alternative would cross agricultural fields, including trenchless crossing TC-15 of a farm access track and mature treeline. It would then continue northeast to cross the River Adur via trenchless crossing TC-16, before rejoining the original cable route.

ACR-07 has been introduced to potentially avoid new infrastructure under construction and in response to challenges crossing utilities on the route that we consulted on last year.

Potential Environmental Impacts

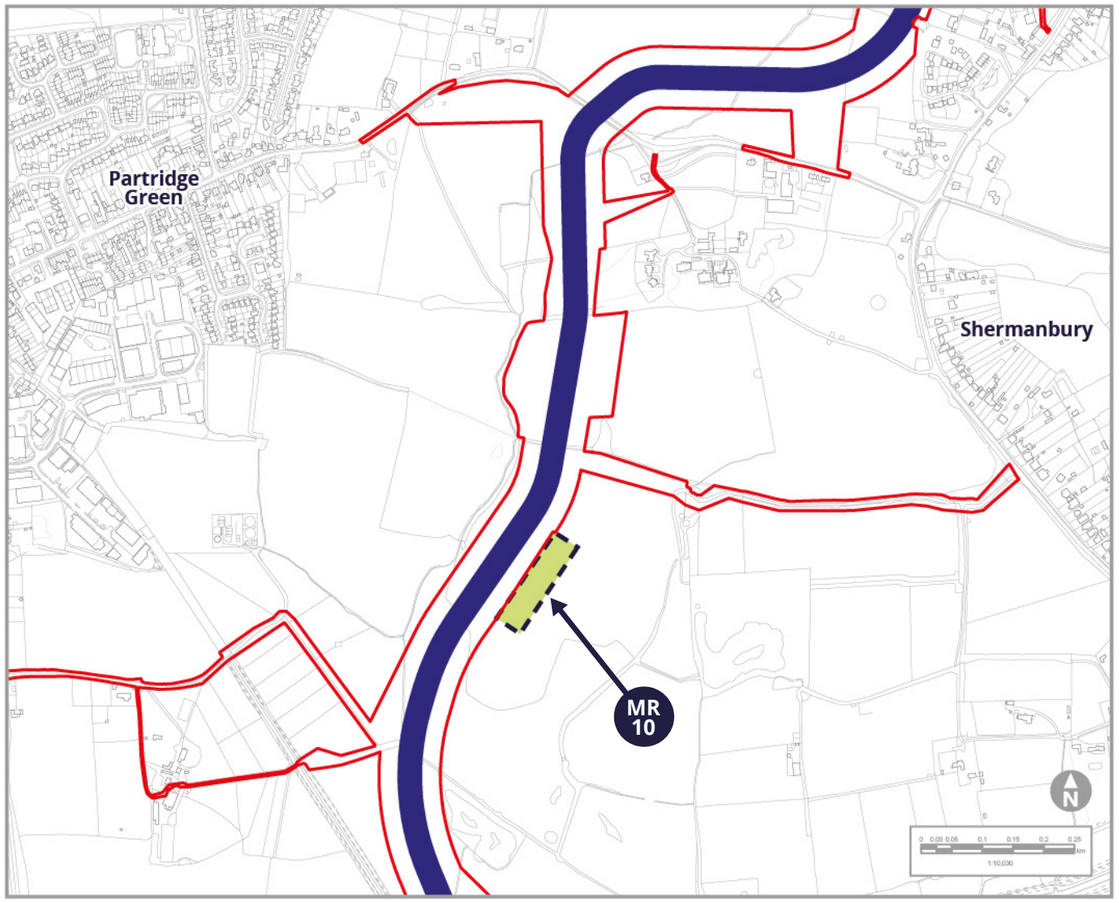
MR-09 would bring the modified cable route marginally closer to Ashurst, with some mature trees on its boundary, and in the vicinity of two listed buildings. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, ecology and nature conservation and historic environment (heritage) effects.

Construction works for ACR-07 would be visible from footpath 2519 and Bines Green Common. The footpath may also be interrupted by works. The change would introduce new residential receptors for air quality and for noise and vibration along the B2135 Bines Road, and could affect the setting of two listed buildings. The works would take place within a Habitat of Principal Importance – coastal and floodplain grazing marsh. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to socio economic, air quality, noise and vibration, ecology and nature conservation, transport and historic environment (heritage) effects.

There are no associated new receptors or changes to impacts from TC-15 and TC-16 compared to those already identified in the 2021 consultation.

Tell us what you think about any proposals in this booklet. Are there other things you want to highlight to us?

Area 6d: Southeast of Partridge Green



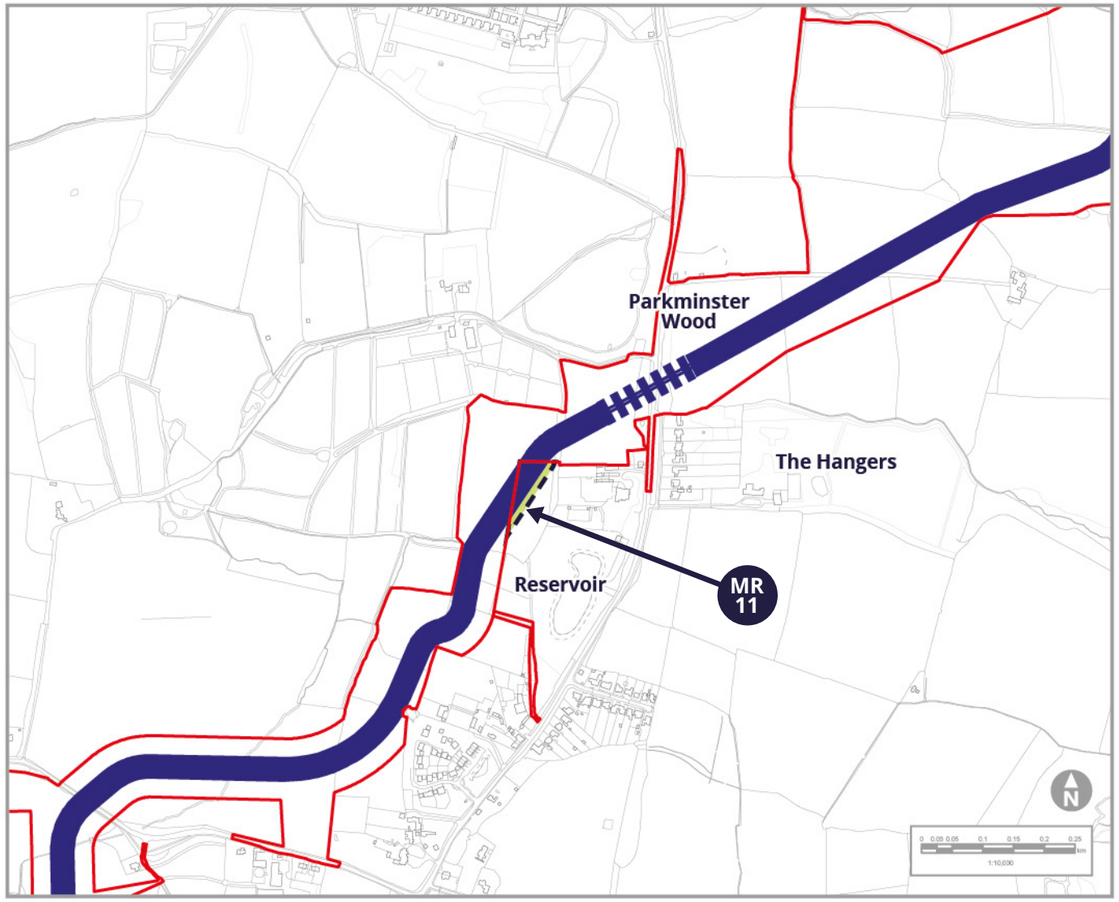
Modified Route MR-10

MR-10 is a proposed extension to the east of our original proposed cable route, to provide a topsoil storage area during construction outside of the nearby floodplain.

Potential Environmental Impacts

There are no associated new receptors or changes to impacts associated with MR-10, compared to those already identified in the 2021 consultation.

Area 6e: North of Shermanbury



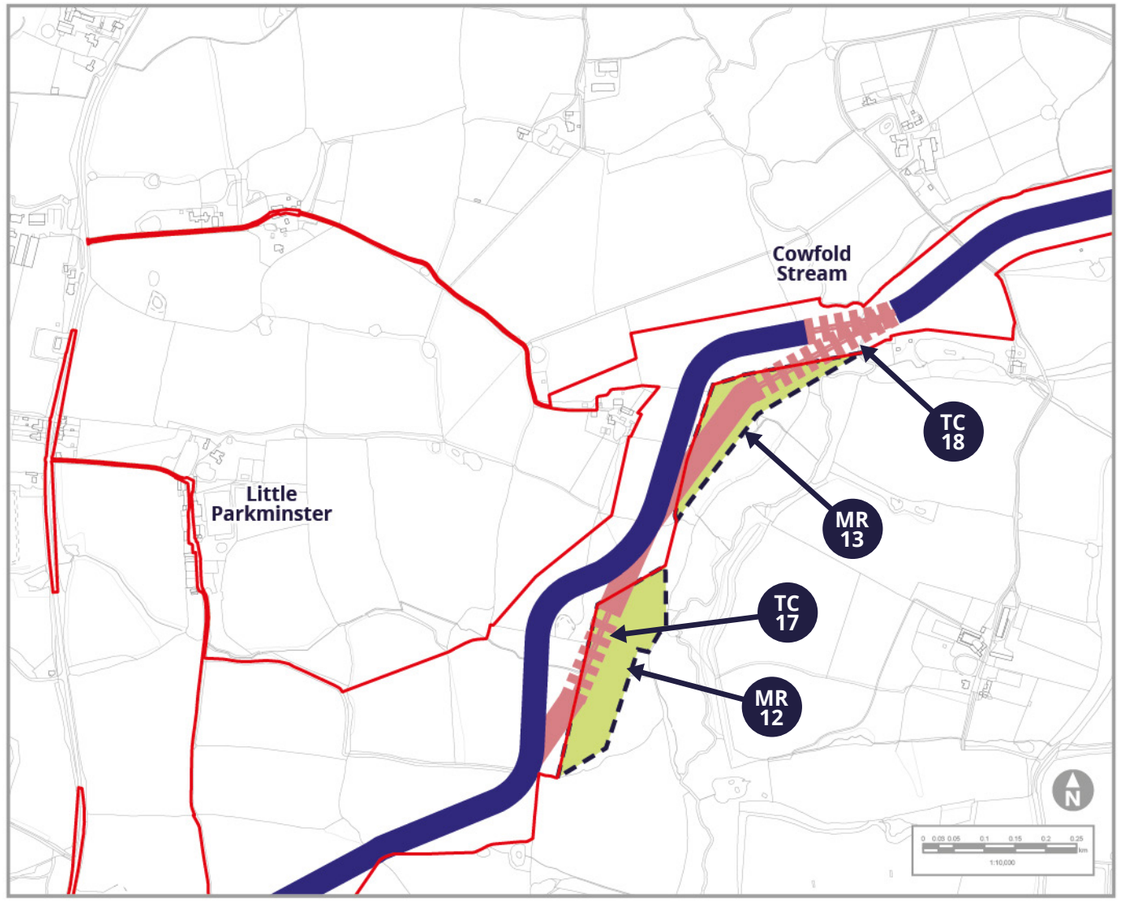
Modified Route MR-11

MR-11 is a proposed eastern extension to our cable corridor to allow the onshore cable working area to run closer to the field boundary. This would reduce severance, maximise the remaining agricultural use during construction and allow a slightly shorter cable route.

Potential Environmental Impacts

There are no associated new receptors or changes to impacts from MR-11 compared to those aready identified in the 2021 consultation.

Area 6f: South of Cowfold



Modified Route MR-12 and Trenchless Crossing TC-17

MR-12 has been introduced to enable the onshore cable corridor to take a more direct route. It includes a trenchless crossing (TC-17) of a tributary of Cowfold Stream and hedgerows classed as Important under the Hedgerow Regulations, so that they are not affected.

Modified Route MR-13

MR-13 has been added to enable a trenchless crossing (TC-18) of hedgerows, mature trees and the Cowfold Stream. This would also move the corridor further east away from residential properties.

Trenchless Crossing TC-18

TC-18 would pass under hedgerows, mature trees and the Cowfold Stream to leave them unaffected.

Potential Environmental Impacts

MR-12 and TC-17 would be in a medium or high risk flood area and would interact with hedgerows and a pond. MR-13 would be in an area of medium flood risk and where there is evidence of three small areas of ground being dug up in the past – which could mean a higher risk of contamination or ground instability. MR-13 would also interact with additional ponds. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation ecology and nature conservation, ground conditions and water environment effects.

Tell us what you think about any proposals in this booklet. Are there other things you want to highlight to us?

Area 7

Substation Approach

This Area considers the cable route from Kings Lane via our new Rampion 2 project electricity substation, to the National Grid Bolney Substation. It includes **one modified route (MR), three new trenchless crossings (TCs) and one alternative access (AA).** They are all referenced on the following pages using the abbreviations above.

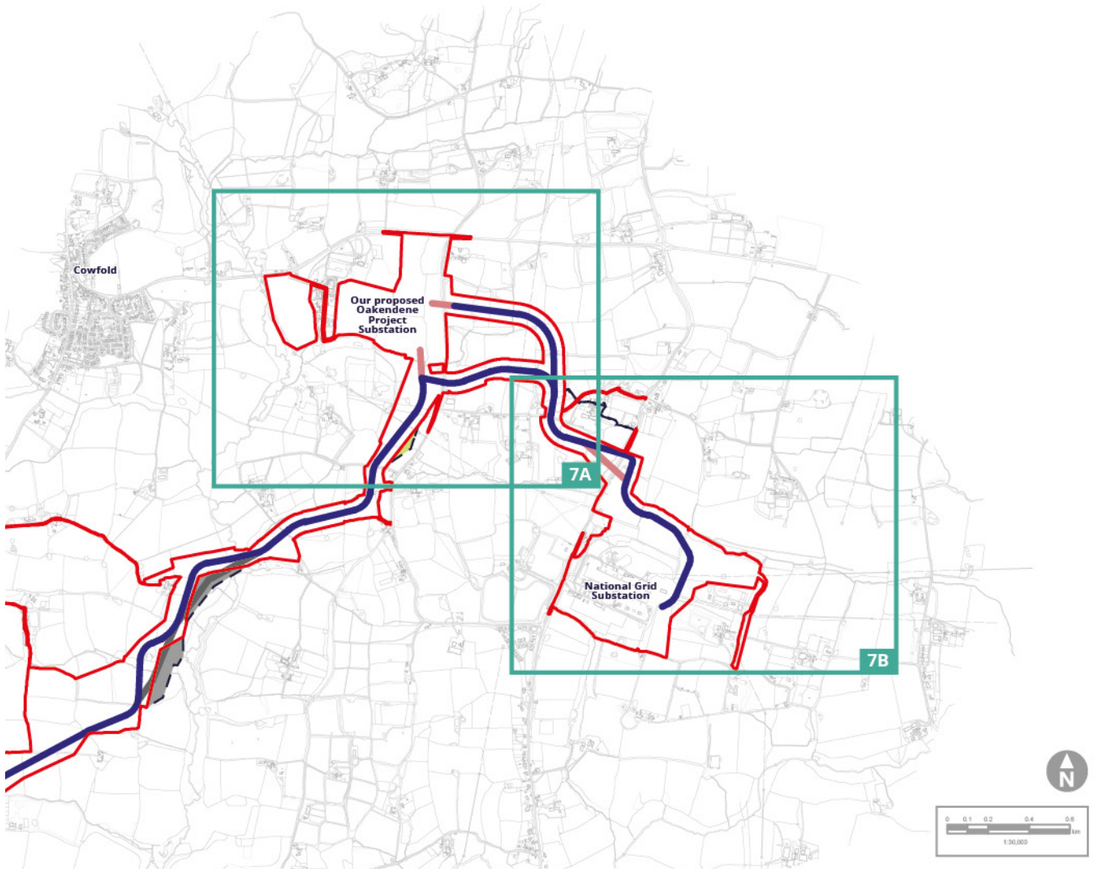
Remember: Words such as "receptor" and "trenchless crossing" are explained in the Definitions section of this document.

Our Environmental Assessment of Substation Approach

On the following pages you can read about our preliminary assessment of potential changes in Area 7. We don't believe that introducing these changes is likely to change the overall conclusions of our PEIR from summer 2021. You can read more about our consideration of these potential changes in our PEIR SIR here *www.Rampion2.com/consultation*. Just look for the relevant MR, AA or TC reference.

A-153

We've split this Area into 2 smaller Areas 7a and 7b. You can use the map below to figure out where you are most interested in and find out more on the following pages

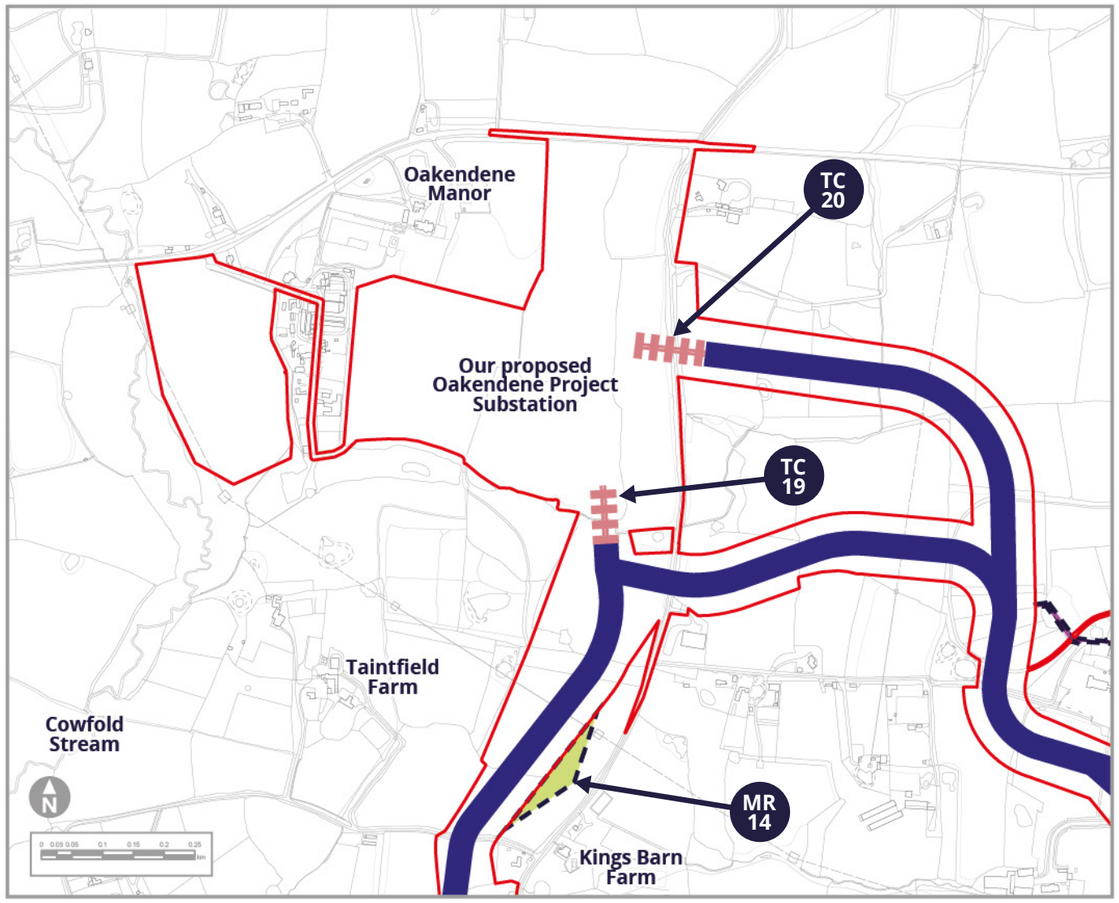


KEY:

- Our previous project boundary (from our summer 2021 consultation)
- Our indicative cable route
- Previously proposed trenchless crossing points
- New areas for cable construction works
- New indicative cable route & trenchless crossing points (see Area Maps for crossing points)
- New alternative accesses
- Route or change in another Area of this booklet

Note: Only 1 cable route is required and indicative cables routes are shown for illustration only

Area 7a: Kings Lane to our Oakendene substation



Modified Route MR-14

MR-14 would extend our original cable route eastwards, to allow us to avoid the root protection area of a veteran tree, which we identified during our tree surveys.

Trenchless crossing TC-19 and TC-20

TC-19 would pass under a tributary of Cowfold Stream, meaning we wouldn't have to dig through it to reach our Oakendene substation site. Hedgerows and a mature treeline could remain intact.

TC-20 would carry the power under Kent Street. It would also allow a woodland strip and hedgerows to remain intact.

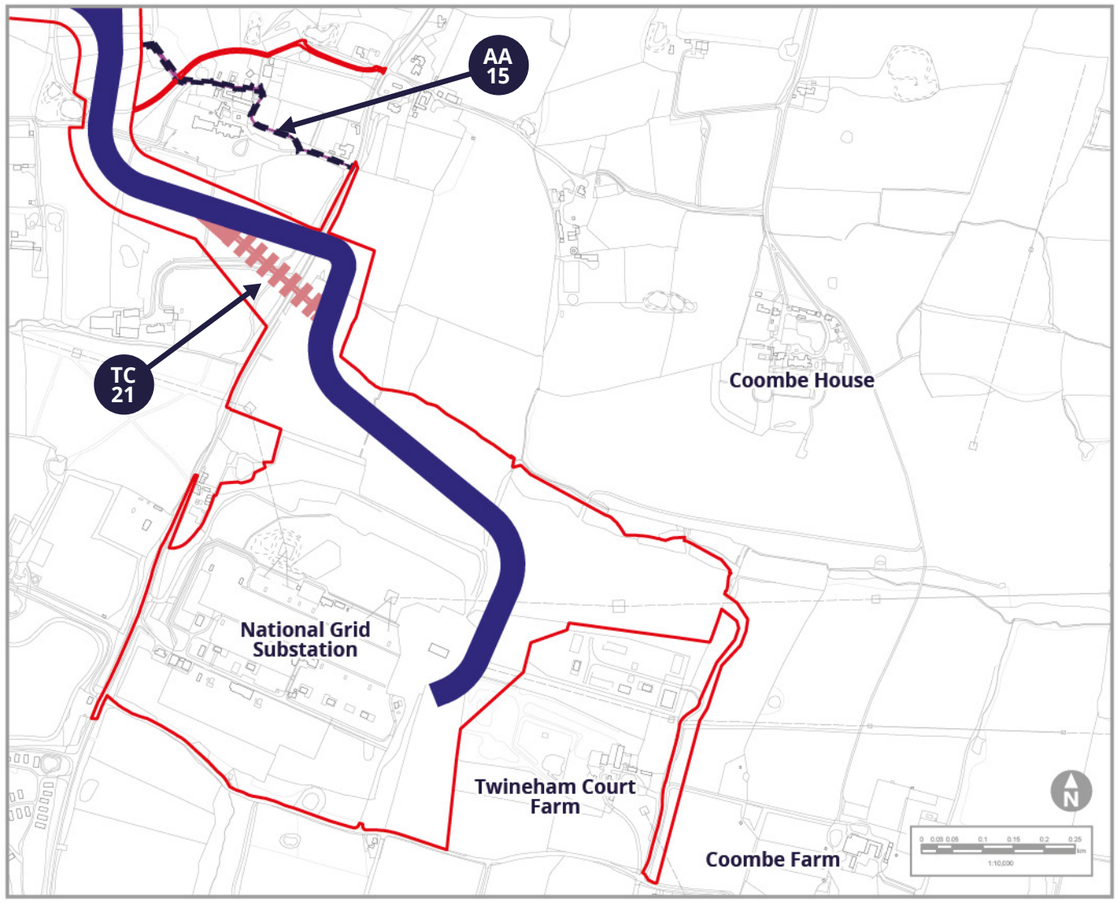
Potential Environmental Impacts

For MR-14 there are no associated new receptors or changes to impacts compared to those already identified in our 2021 consultation.

TC-19 would be in a floodplain and nearby residential dwellings are relevant to these works. TC-20 also has some relevant nearby residential dwellings. These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, air quality, noise and vibration, ecology and nature conservation, and water environment (for TC19) and transport effects (for TC20)

A-154

Area 7b: Oakendene substation to our National Grid connection



Alternative Access AA-15

AA-15 is an alternative operational access to reach our original proposed cable route via an existing track. This is an existing track which is bound by trees in places and is set in an area of Eastern Low Weald landscape character.

Trenchless Crossing TC-21

TC-21 is proposed to enable our cable route to cross under Wineham Lane without having to dig it up. It also allows some mature trees and hedgerows to remain intact.

For AA-15 some mature trees may need pruning for vehicle access visibility. Some residential dwellings along Wineham Lane have been noted as potential receptors.

Residential dwellings nearby to TC-21 have been identified as relevant receptors to this crossing.

These receptors have been identified in our PEIR SIR as either new, or with the potential for a change, in relation to landscape and visual, air quality, noise and vibration, ecology and nature conservation (AA-15) and transport and water environment effects (TC-21).

Tell us what you think about any proposals in this booklet. Are there other things you want to highlight to us?

Next steps

Spring / Summer 2021

Pre-application

Includes early engagement and consultation, followed by a full statutory consultation. Rampion 2 is required to develop a Consultation Report containing the details of our consultation methods, feedback we received, and how this has influenced our proposals

Submission & Acceptance of DCO application

The Planning Inspectorate (on behalf of the SoS) has 28 days to decide whether the DCO application meets the statutory requirements including an adequate consultation. The Planning Inspectorate will consult with local authorities on the adequacy of our consultation

Early 2023

*2023

Pre-examination

The Planning Inspectorate appoints Examining Authority who makes an initial assessment of the application, then holds a Preliminary Meeting to determine for the application should be examined and the overall timetable for the process

Examination

The Planning Inspectorate will complete a full review of the DCO submission within 6 months, There will be opportunities for people or groups to send comments in writing and/or request to speak at a public hearing

*2023

*2024

Decision

The Planning Inspectorate will issue a recommendation to the SoS within 3 months of the examination. The SoS then has a further 3 months to decide whether to issue a Development Consent Order

Post-decision

There is a period of up to 6 weeks for potential Judicial Review

*2024

* We have estimated 15-18 months between DCO submissions and The Planning Inspectorate decision based the typical timeframe on previous NSIP projects

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How to have your say

We welcome all comments and feedback on our proposals, whatever they may be. However, you may find it helpful to think about things that might affect where, how or when we should be building or accessing our onshore electricity cable route for the changes we are asking about in this consultation.

Respond to our consultation

The best way to give your feedback is by using the **Consultation Response Form**.

Please visit *www.Rampion2.com/consultation* and click on '**Have your say**' to submit your consultation response form.

Consultation responses will also be accepted via email at *rampion2@rwe.com*

or post to:

Consultation Response, FREEPOST: Rampion 2

We would greatly appreciate your feedback.

Attend our Drop In Events

We are holding four face-to-face events at these dates, times and venues.

Should you wish meet with members of the project team face-to-face to discuss our latest proposals, please do visit an event convenient to you. You will also be able to view large scale maps.

Venue	Date	Time
Arundel Town Hall Atherley Chamber, Maltravers St, Arundel, BN18 9AP	Tuesday,1st November 2022	1:00pm – 8:00pm
Arun Yacht Club Rope Walk Riverside West, Littlehampton, BN17 5DL	Wednesday, 2nd November 2022	1:00pm – 8:00pm
Ashurst Village Hall The Street, Ashurst, Steyning, BN44 3AP	Friday 11th November 2022	1:00pm – 8:00pm
Arundel Town Hall School Lane, Washington, RH20 4AP	Saturday 12th November 2022	1:00pm – 8:00pm

We will also be running a Virtual Public Forum during the consultation period. Please visit www.Rampion2.com/consultation for up-to-date details of all our events.

Contact us

Even of you are not responding, you can ask questions or seek clarification by:

Emailing us at *rampion2@rwe.com* or

Call us on Freephone 0800 2800 886

We're committed to equality

If you or your organisation need assistance reading or understanding the consultation documents please contact us to discuss your requirements. Translation of key documents to other languages, large print, audio or braille format may be arranged on request.

Rampion 2
WIND FARM

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For all plans:

19th July 2022
Ref: GS/SH/601969

Mr N Abbott
Carter Jonas
3 Royal Court
Kingsworthy
Winchester
Hampshire
SO23 7TW

COPY

Guy Streeter MRICS FAAV
E: [redacted]
DL: +44 (0) [redacted]

Exchange House
Petworth GU28 0BF
T: +44 (0) [redacted]
F: +44 (0) [redacted]

Via email only: [redacted]

WITHOUT PREJUDICE SAVED AS TO COSTS
SUBJECT TO CONTRACT

Dear Nigel

RE: Rampion 2 Proposed Cable; Mr T Dickson, College Wood Farm, Spithandle Lane, Steyning

Further to our meeting of the 15th June and my open letter of today's date.

You are aware of the significant lack of engagement and consultation with my client, it would seem that until your involvement my client had been intentionally ignored, fobbed off or given false promises by the Rampion development team.

Despite this, my client is eager to work with you and your client to agree a mutually acceptable cable route and construction methodology to lay the necessary cables across his property. Mr Dickson's objectives are not to prevent your client's proposed development but to ensure the scheme it is carried out sensitively to prevent significant and unnecessary reckless destruction of the local wildlife and habitat. My client also wants to mitigate any compensation claim concerning his property and business, this will be achieved if matters can be agreed amicably.

This collaborative approach is in the best interests of both our clients, failing to operate in this way (as has been the case until June this year) will give my client no choice but to continue to fully oppose your client's proposals, not only through the formal Development Consent Order (DCO) application process but also via Judicial Review. We have a full account of the failings of the Rampion development team and consider there to be a real risk to your client's project, which will not only cost them financially but also impede their progress.

My client has delayed taking legal action in the hope that we can agree terms that can be recorded in a legally binding agreement. If my client has certainty over how your client will undertake the development on his property he would be willing to not only sign a confidentiality agreement but also withdraw all objections and essentially become a supporter of the scheme. This will enable you and your client to present your plans to The Planning Inspectorate in a much more positive light.

To this end, I look forward to hearing from you as soon as you have further instructions from your client.

Yours sincerely

[redacted]

Guy Streeter MRICS FAAV
Director
RICS Registered Valuer

[redacted]

Rampion 2
WIND FARM

Mr Thomas Ralph Dickson
College Wood Farm
Spithandle Lane
Wiston
Steyning
West Sussex
BN44 3DY

[redacted]

n 2 Project
n Extension Development Ltd
ill Hill Business Park,
ill Way
n
re
B

ew registered office]

[redacted]

24th May 2023

Dear Mr Dickson,

College Wood Farm: Proposed Cable Route in respect of Rampion 2 Project

I write with reference to your letter dated 18th April 2023, with your enclosed plan, and our telephone subsequent telephone conversation related to the same.

Your letter covered the following:

1) cable routeing – woodland and tree constraints and buffer distances used from ancient woodland;
2) cable routeing – proximity to Grade II Listed building (College Wood Farm);
3) potential for a trenchless crossing under the access road to College Wood farm;
4) farming, animal welfare, and health and safety concerns about our proposal
5) prospective development proposals at College Wood farm
6) comments about how you feel you have been treated by Rampion 2.

1. Cable Routeing – Woodland/ tree constraints

My letter dated 14th April 2023 set out the rationale for our cable route decision and the constraints related to the cable routeing through your landholding.

The constraints included avoiding crossing additional treelines, protecting trees and tree roots and ancient woodland. With regard to ancient woodland I confirmed that a 25m buffer is applied.

Notwithstanding the above, I also noted in my letter of 14th April that the project is seeking to use a cable routeing that is economic and efficient and that the additional cable length required by the routeing of the cable northward along the field boundary would need to be justified on environmental or engineering grounds (which the Rampion2 team do not believe it to be). The potential for moving the route closer to the northern tree line has already been considered and rejected by the Rampion 2 team for the reasons previously given. Your proposed route on the plan accompanying your letter, which shows a route 15m from the tree line to the north, does not therefore change the previous conclusion reached by the Rampion 2 team.

[redacted]

[redacted]

Your letter states that Natural England specify a 15m buffer from development to ancient woodland. The guidance (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions) states that a minimum 15m buffer should be used, and in this case, 25m has been deemed appropriate further to discussions with a group of statutory consultees, which included West Sussex County Council and Natural England. West Sussex County Council raised concerns that 15m would not be an adequate distance and therefore 25m was proposed to ensure that impacts from the project, such as surface water run-off and dust, will be reduced. This scheme-wide commitment was published publicly in our Commitments Register (commitment number C-204) and will be secured as an obligation on us through the consenting process.

The Commitments Register is available at:
https://rampion2.com/wp-content/uploads/2022/10/PEIR-SIR-Appendix-F-Commitments-Register-PDF.pdf

or please do let me know if you would like a hard copy sent in the post.

As such, all ancient woodland will be retained with a stand-off of a minimum of 25m from any surface construction works along the length of the cable route. Notwithstanding this commitment, the ultimate alignment of the cable route remains a balance of considerations and factors, in addition to any specific constraints.

2. Cable Routeing – Listed Building Considerations

Our environmental impact assessment process has considered the impact of the project on the Grade II Listed College Wood Farm and concluded that there is the potential for temporary significant heritage effects on the setting of the property during the construction period which are considered acceptable. Whilst moving the route northwards would increase the distance from the Grade II listed College Wood Farm, their assessment is that there would only be a slight reduction in impacts due to the open nature of the land.

3. Trenchless crossing under your access road

As explained in my letter of 14th April, it is not proposed to drill under the access road to College Wood farm by using a trenchless installation technique. Rampion 2's construction management approach means that trenchless installation is not proposed under private access roads with comparably limited traffic flows along the Rampion 2 cable route. We have not identified any environmental or engineering rationale for addressing this location in a different manner. Surface water flooding issues in the adjacent land, as referenced in your site meeting with my colleagues on 15th March 2023, can be managed without the need for trenchless installation.

4. Farming, animal welfare, health and safety

You referred to previous conversations and correspondence referring to how you farm differently at the meeting with my colleagues at College Wood farm on 15th March 2023. I have sight of College Wood farm site visit notes from 22nd June 2021 stating that you were concerned that the soil type on your land (which is used for cattle grazing) is not usually broken, and you also expressed concern that the presence of cable construction works on your land would make it difficult to farm and move your cattle. In addition I have a copy of the letter dated 10th February 2021 from Westpoint Farm vets which states that due to the splitting of fields by the proposed cable route, cattle with calves would be grazing either side of the cable route and that animal injury risks could arise as a result of cattle and calves potentially gaining access to the cable trench area. Concerns regarding your handling of the cattle across the cable construction corridor have also been raised by you on our telephone conversations.

I stated in my letter that specific 'on the ground' measures such as suitable gates and fencing can be discussed and refined with you before construction commences. However, this does not allay your concerns and you remain of the view that it will be unsafe for you to keep cattle in the fields, meaning that over 60% of the working farm will be sterilised.

Carter Jonas and our engineers have identified a range of potential mitigation options such as gated corridors and temporary water bowsers, which can be provided so as not to cut off any water troughs/ supplies to the cattle in fields either side of the construction corridor. Furthermore, we can discuss the possibility of funding a stockperson to manage this when required. An Accommodation Works schedule, incorporating notification and communication procedures, ensuring you are aware of the nature and timing of activities and work, can be agreed prior to construction. Our engineers can facilitate a regular daily communication with you during the works.

With regard to the soil type on your land not usually being broken I confirm that a photographic record of condition can be taken prior to the works and a commitment can be made from RWE that the land will be restored to this condition with specific soil restoration and planting requirements agreed with you.

5. Comments about how you feel you have been treated by Rampion 2

You explain in your letter that you do not feel that Rampion2 has given consideration to your 'circumstances and disabilities'. You have previously identified verbally to my colleagues that your age is a factor in how you specifically farm your cattle. For the avoidance of doubt, I would therefore be grateful if you could please clarify any further, where you are comfortable to do so, what those circumstances and disabilities are. Furthermore, I would be grateful if you could set out your concerns about how the Rampion2 proposals may specifically impact upon them. We have previously discussed your concern about being able to continue running the farm single-handedly, and we have explained the measures that could be adopted, such as those referred to in paragraph 4. However, I do not believe you have expressly raised other circumstances or disabilities with our team. Please provide any response in writing to ensure we have the full information before considering whether any further reasonable mitigation measures may be appropriate.

I am sorry that you feel that Rampion 2 has not dealt with matters in an acceptable way. Throughout the consultation and engagement process we have sought to address you and other affected landowners in a fair and consistent manner. We have also responded to specific requests such as providing printed copies of documents.

As set out in my previous letter, we are unable to adopt your preferred route at College Wood Farm. As my colleagues have set out with you in recent meetings, cable routeing is a balanced decision taking into account many factors, meaning that we are not able to accept all requested alterations or mitigation measures.

Notwithstanding this, I am obviously concerned that you consider that you have been bullied and discriminated against. In the circumstances I have set out the details below of the appropriate person from Rampion 2's associated parent company, RWE, with whom you may raise a formal complaint should you wish to do so.

Jodie Gunn: Head of Onshore Consents for UK Offshore Development:

Jodie Gunn
C/O Adam Blackford
RWE Renewables
Windmill Hill Business Park
Whitehill Way
Swindon
SN1 6PB

[redacted]

6. Development Plans

We consider the weight that should be given to development proposals, based on their status and level of advancement in the planning system. I have checked the Horsham District Council website for new planning applications at College Wood Farm but cannot identify a new or recent planning application at this address. Please can you confirm if these are your development plans or another party's and provide details. Without plans and/or the proposed programme for either the making of an application or the subsequent development programme, we cannot assess the potential effect of Rampion 2. My letter of 14th April requested that any updates on progress on the application be reported and forwarded onto us but we are yet to receive any information.

7. Summary of latest position

Our conclusion remains that the movement of the cable corridor further north is not justified for the same reasons set out in my letter of 14th April.

We believe it would be constructive to arrange a further site visit by our engineers to understand your farm management and requirements in more detail and to discuss mitigation measures that could be adopted during construction on our chosen route. If you are open to this I would be grateful if you would provide some suitable dates for consideration.

Yours sincerely

[redacted]

Vicky Portwain
Land Transaction Manager
Rampion 2