

Rampion 2 windfarm proposal EN010117

Response to Deadline 1 submissions from Rampion 2

Janine Creaye IP no 20045132

REP1 – 021 Action point 4 Alternatives, Wineham Lane North

Cowfold residents have waited since July 2022 for a comprehensive and convincing explanation of why Oakendene was chosen over the Wineham Lane North option of substation site, and were relieved that this has been asked again in this examination process. Yet there is very little here. The answer given by Rampion in this submission is cursory and dismissive, giving none of the clarity we have been waiting for.

The document quite arrogantly quotes that 'there is no general requirement for assessing alternatives, nor is it necessary for the project to choose the best option from a policy perspective'. But how can this justify the very public industrialisation of so much unspoilt historic landscape, the permanent loss of so many mature oak trees, the great loss of habitat and threat to red list species, the disruption to main road traffic as well as very rural access lanes, the threat to adjacent businesses, and the maximum disruption to local residents' way of life. All that is set against this is a 'marginal' engineering preference. Even in this document the engineering requirements are only elevated in a vague retrospective way to a 'clear preference' for Oakendene. Yet it is also stated that both sites have enough space (15.8 hectares for Wineham and 21 for Oakendene, when the substation itself only requires 6 and adding in other aspects only rising to 9 including vehicle turning space). The issue of turning vehicles is put forward here but it is only deemed that it 'appeared unfavourable at the Wineham Lane site'. This is such a weak justification for the disproportionate harm this project is set to do if it comes through Oakendene to get to Bolney .

Much of this harm is well set out in the West Sussex County Council and Horsham District Council's Local Impact reports, but from a resident's perspective there are aspects which are still being underplayed which destroy so much joy people have experienced in all the years we have been in this location. One Kent Street resident described where he has lived for over 30 years as 'a bit of magic'. This has mostly been unrecognised by wider authorities to date. We have been custodians of much wildlife, historic and characterful buildings and historic landscape. To turn this into a noisy industrial area without good justification is indefensible.

This document puts some weight on the responses from the first consultation in 2021, when it has been pointed out already by many people in this process that the impacted residents did not hear about the proposal until some months after it had been chosen. The evidence speaks for itself in the magnitude of the Cowfold opposition since November 2022, and being almost entirely absent before this time. One has to ask the purpose of not informing the very people who live within 3 km of the proposed substation, when others further away were directly sent very specific detail from the outset. Inappropriately run consultation justifies nothing.

It is declared that the biodiversity at both sites is the same. We have said elsewhere why there was little to be found in 'desk study' of the biodiversity in this location, but a brief look at a satellite image will show that it is a patchwork of small fields, few houses and many hedge boundaries containing mature oak trees. It also covers the furthest distance, disrupting the most habitat. A glance at a flood map shows that this route follows the tributaries of the river Adur and particularly the Cowfold Stream which should alert any ecologist to the value of biodiversity here even before surveys were made (the increased flood risk in this option is detailed elsewhere including by WSCC). The presence of a large lake right next to the site and connected to the water courses, would imply the possibility of otters and water vole. With the evidence of Rampion 1 surveys and the visual assessment of maps it would not have been a difficult to realise the potential biodiversity at the Oakendene is likely to be greater than Wineham long before the decision was made in July 2022. Does this statement that as 'standard industry measures' are complied with mean that nothing else is taken into account in deciding the option at the time or subsequently, as long as the 'Desk Study' box has been ticked? Is this really an ethical or balanced way to decide?

Rampion's own biodiversity surveys had started in 2021 before the option was chosen and the Crateman's Farm land agent had already written about the quality of 'Species Rich Grassland' in the cable path, in a letter to Rampion. The ecologists employed walked through these fields as they were buzzing with insects and rich in wildflowers yet chose not to survey them for the comparison of the two options. They turned to the poor area at the stream edge instead when they later had to complete more detailed grassland surveys. One has to ask: Why this underplaying of biodiversity quality at this site when UK BAP Priority habitat (Unimproved Lowland Meadows) can be found directly in the cable construction route, and would have been obvious to trained ecologists? Assessing desk study only in 2021 may be compliant, but is ignoring other information at the time and since, appropriate or ethical for decision making? Now more biodiversity evidence is available it should be reviewed again to avoid irreversible destruction.

In Issue Specific Hearing 1, I asked for a comparison of tree and scrub loss for the two options (see recordings). Again this is not provided here. I applaud West Sussex County Council who are questioning the amount of hedge and tree lost in this option in their LIR, asking about other options and recognising that there are not just 19 trees marked to be lost at Oakendene as stated. I want to emphasise that the losses including these adjacent cable areas here add up to a total loss of well over 100 trees and 46 of 'high quality' mostly mature oaks. It is not just at Oakendene substation site itself, so many boundaries are either made up of trees or contain mature trees which are marked for removal and which we see on daily walks, rides and car journeys. As WSCC has pointed out that this tree loss is a 'lifetime' impact and as HDC points out no replacements can be made on the cable route as there is no depth for replanting. These removals also have a knock-on impact on the flooding issues and surely an impact on the carbon losses incurred by the project, but above all this historic landscape is lost for ever, and this should have been given far more weight in the choice of option.

In all this process I cannot even raise a discussion over the polo field boundary off Moatfield Lane, which is being called a Green Lane by ecologists. The trees along this double boundary (G35) are marked as 'High Quality'. This could be drilled under rather than cut straight through with open trench, but no discussion ever comes back. WSCC have asked for more consideration of retaining trees. If these remain marked to be cut down, this adds between 11 and 22 trees lost, another historic landscape lost and an ancient wildlife corridor severed for ever. It is not a temporary cable construction issue to be dismissed. Please look into this and take it seriously.

WSCC have detailed the value of the historic landscape surrounding Oakendene Manor and I am so glad to have a recognised authority champion that. I want to emphasise that the history of this landscape extends further into the cable

route in this option including Kent Street, Dragons Lane and Kings/Moatfield Lane. Cratemans is listed as 17th century with older elements, Lydford Farm grade II listed 16th C is connected to the equally old converted farm buildings of Lower Barn Farm and the Granary on Moatfield Lane, 'Kings' is Grade II listed 15th C and Vadgers is 17th C both on Kent Street. A silver half groat dating from 1493 was recently found on a track next to Moatfield Farm and adjacent to Cratemans fields along with many coin weights and musket balls (photo evidence can be provided). This added to the nature of the flood meadows indicates that little changes over the centuries here. There is so much historic landscape to be considered in this option and it cannot just be put back if the trees are gone and no replanting can be made over the cables. This is permanent loss.

Noise issues are deemed less of a problem here to Rampion because it is not already giving out the sounds that Bolney substation does (which would require an engineering solution to be compliant), yet it is deemed preferable to permanently introduce 24 hour alien sounds to a completely new, very quiet rural area. How can that be justified? In April people walk along the footpath by (Taintfield Wood PRoW 1787) and listen to the surround sound of nightingales at night and in October/November courting tawny owls dominate the soundscape around the area at night. This proposal would mean the hum and clicks of a substation will dominate the landscape instead. People who sleep nearby at night, or enjoyed riding, walking or being out of doors by day in this quiet area, will newly experience the relentlessness of industrial sound at noticeable decibels. If the linked battery storage farm in this same field also passes planning, the compressors from that with add industry in stereo to ruin any rural walk. Many people live here because they need the quiet, others come here to exercise and get away from town and traffic noise. How is this preferable to inflict this noise on so many new people?

Visibility and screening - Much is made of reinstatement and screening but residents of Wineham, Kent Street and the 10 properties of Kings/Moatfield Lane are looking at this land every time we come and go using the Kent Street/A272 junction. It is winter and all tree and hedge lines for these months have no leaves. We can currently see right across the parkland at Oakendene from the A272 and will be able to clearly see the substation on Kent Street. All the thousands who travel on this stretch of road each day will be aware of the substation first for the 4 years of construction (especially with further traffic disruption and the many times when it is stationary from Cowfold centre to Kent Street), for the following decades after the newly planted trees are struggling to establish, and throughout every winter throughout when there are no leaves. How is this comparable to the impact at Wineham Lane when it is so tucked away from general public view?

Rep1-034 Applicants Response to Janine Creaye's commenting on submission by Horsham District Council

2.13.3

My submission is only copied across in part in this document which misrepresents the point I was making about the water quality of the Cowfold Stream being shown by the annual presence of Beautiful Demoiselle which require high levels of oxygen and high water quality to breed. It leaves the text implying that I am endorsing that the water quality is poor which is unfair and incorrect.

The response that 'the impact on breeding birds from reduction in habitat connectivity, disturbance and displacement will not be significant' is derisory, when over 100 trees are lost in this area, 46 of 'High Quality' and 622m of native hedgerow is removed (nearly half the total loss for the entire project). When this area has been noted as the densest for breeding birds in the whole cable route the impact is incredibly high and cannot be mitigated if it is not acknowledged in the first place.

I can see no meaningful other responses to my comments in this document and I refer to Cowfold v Rampions submission for further details.

REP1-017 Applicants Response to Relevant Representations Janine Creaye RR164 table LI27

The response seems to be focussed on context and transport when my representation focussed on detailed points about biodiversity. No meaningful responses are made to answer my representation

REP1- 023 Action Point 20 Oakendene Substation Flood Risk

There is nothing in this document to assess extra flood risk due to construction activity in the floodplain leading towards to Oakendene (including 2 HDD sites) or during construction at the substation when a large materials compound will add to the issue. It does not address the impact of tree and hedge loss on flooding in this river Adur catchment area as well as around the substation.