

Rampion 2 windfarm proposal EN010117

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In Response to REP5 – 119 TE 2.32

Quality of field surveys, how the irreplaceable habitat at Cratemans Farm can be avoided or reinstated

It is lamentable that the Applicant still will not respond to the evidence of Priority Habitat provided, which has been verified for the county biodiversity records species by species, and is fully described and endorsed in writing by a professional ecologist. The Applicant over and over again relies on the belief that if they say in writing that a thing is so or isn't so, this is what must be, even if the supposition has no factual backing and is clearly incorrect. The evidence of this very special habitat that is critical for a number of red list species including adders, skylarks and nightingales has been provided.

Phase 1 Habitat study Perry Hockin :

5.3 It is the author's professional opinion that the fields surveyed at Cratemans Farm comprise **unimproved grassland** bounded by species rich hedgerows that are '**important**' as per the Hedgerow Regulations Act 1997. Both fields are identified as 'unimproved' grassland under the BAP, DEFRA and Natural England framework for assessing grasslands.'

This is irreplaceable priority habitat. There can be no denial that the Applicant's grassland and hedge surveys, as others have pointed out, have been both woefully inaccurate and, in this case didn't cover the Farm in any detail except one location by the stream. Even there the written description and summary are factually wrong. This is not 'a species poor sward of thick, tussocky grass'

The only defence the Applicant can come up with is to use the Horsham District Council's agreement of data adequacy from back in April (REP3-069 TE 1.5), which was before we presented the new meadow surveys and the ecologist's report. What is missed out is that the District Council followed with a caveat which said that although they thought that there was no priority habitat in Cratemans or Moatfield farms they went on to say 'However, this is not definitive, as many habitat parcels not yet listed on the register are, or can become priority habitat'.

Sadly, Horsham District Council have shown little interest in this Farm since, they have not (to mine or the landowner's knowledge) sent their ecologists to assess the site even when the value of this habit within the district has been drawn to their attention a number of times. The project officers for Wilder Horsham that HDC are seeking funding for in this process will not even reply to correspondence from us as Horsham residents. It is very sad if the only meadows and biodiverse scrub that the District Council are interested in is 'nature recovery' created from scratch in their own designated locations, when there is so much here to protect, which has had decades to establish environmental value and would save so much more work and funds to achieve the same ends, were it better championed. No endorsement of the Applicant's surveys can be taken from the District Authority when they don't know, nor have they made efforts to verify what is here to compare with the Applicant surveys.

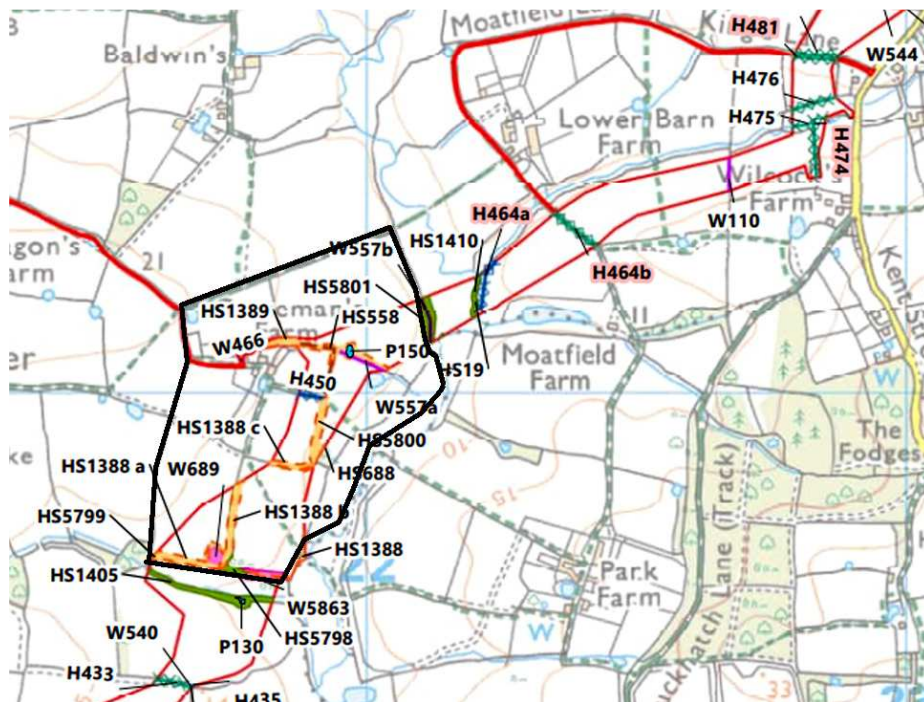
I commend West Sussex County Council for sending an ecologist to the Accompanied Site Visit and subsequently making at least some endorsement of the quality of the grassland at Cratemans in REP5 – 134, with a suggestion of more mitigation than trading BNG units. 'Turf stripping' at least could be preferable to complete loss of meadow or trying to start again with alien seed mixes. An issue here would be how long the turf is set aside before being reinstated and whether it would still be viable. Another issue is that this does not protect the adjacent scrub and trees which give so many more species a home including the nightingales, lesser whitethroats and skylarks. So much interconnected scrub and hedge is destroyed all around and between the meadow boundaries here.

In Response to REP5 – 119 TE 2.11 correcting the inconsistencies of scrub/hedge loss – the true picture

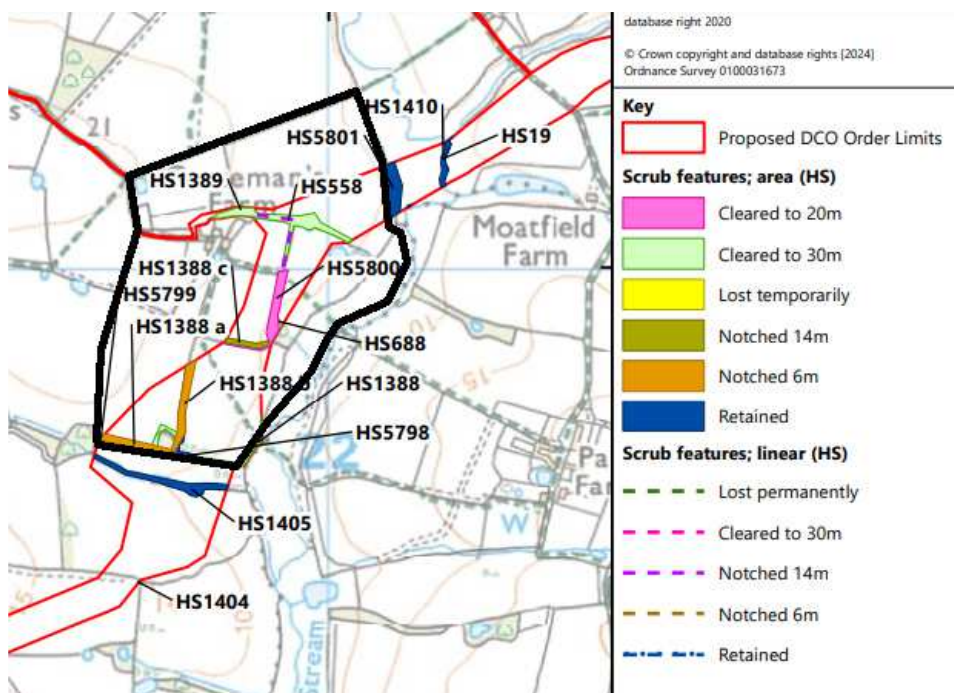
Phase 1 Habitat study Perry Hockin:

'3.19 Furthermore, all hedgerows on site have a minimum of 4 features of connectivity (other hedgerows or pockets of woodland / scrub), comprising a minimum of 2 other hedgerows. DKS/1194.2 PEA 11 3.20 As such, all hedgerows on site are classified as 'important' under the Hedgerow Regulations Act 1997.'

4.15 The impact of the proposals on nesting and scarce bird populations is unacceptable in its current state. The presence of four red-listed bird species recorded during the survey undertaken by Arborweald is indicative of the fact that these species are regularly present on site, and this is further reinforced by the results gathered by the client and their representative from the Sussex Ornithological Society.'



From REP5 – 125 figure 7.2.6n Crateman's Farm outlined in black – hedge loss



From REP5 – 125 figure 7.2.3j Crateman's Farm outlined in black – scrub loss

These images show the disproportionate damage to Crateman's Farm unnecessarily incurred if this project goes ahead. The accurate picture of this level of destruction has been hidden in the process until this final stage. The large retained scrub area across the centre on previous vegetation retention maps gave an illusion of compensation for all the surrounding loss but it was never true when this scrub was the middle of the open cut trench.

I still cannot believe the justification for the clearance of HS1389 and HS558. The quality is not ecologically poor, but it makes up the tapestry of different vegetation that Knepp Wilding project consider essential for wildlife as well as being critical to the privacy and setting of Cratemans Farm. There is still no explanation why H1388b is cut through when there is tractor access freely available just north of this. The landowner is still questioning the logic of this and we have asked so many times with no rational response.

The context of this wildlife haven is that either side either side the farms have cleared big fields of hedge and scrub and the ground has been turned over destroying all chance of meadow quality for the foreseeable future. The use of selective herbicides is the norm on adjacent land. The recent blackthorn clearance right down the Cowfold Stream either side has allowed Himalayan Balsam to flourish as never in previous years, further destroying the opportunity for blackthorn and native wildflowers to reestablish by the stream banks. I don't believe that it is being understood by the authorities how unique the wildlife quality is at Cratemans Farm within this District. It is not just the fields we have picked out to survey but the whole site is treated much the same (without the use of artificial fertiliser, pesticides or herbicides for over 60 years), and each has heightened biodiversity in slightly different ways partly depending on slopes and flooding habits. There is absolutely no 'improved' grassland as marked on the Applicants phase 1 habitat survey maps for here (Fig 22.3.1k).

The reason why the losses are so great here is because there is so much undisturbed vegetation packed into such a small area and that is its irreplaceable quality, because it connects so many wildlife areas in small quiet connected spaces. You can never put this back at the same quality but at least there needs to be proper written out plans put forward to minimise the ecological damage now that it is so apparent.

No answer has been given to the suggestion of extending the trenchless crossing from Gratwicke. The real answer is of course the route should never have come this way in the first place had the consultation in 2021 been listened to or the surveys been accurate and made before the location was chosen. This must be taken into consideration.

REP5 – 119 TE2.7

Planning Inspectorate suggestions for mitigating against severing the THE GREEN LANE G35/W110

As in the last deadline any mitigation for this Green Lane is dismissed and no justification is given by the Applicant. There is no assessment or appreciation of the irreplaceable value of this historic track, bank and ditch, category A trees, wildlife corridor and continuous tree canopy. Trenchless crossing is dismissed against **'additional cost, and minor negative noise impacts'** and the impact on terrestrial ecology is still dismissed as 'minor' without any assessment to back up the judgement. We have presented an assessment from a professional arboriculturalist at the last deadline which stated 'The mature oak element includes veteran trees that are exhibiting numerous ecological and habitat features, including decay pockets, dysfunctional wood and larger diameter dead wood, all of which significantly increase the ecological importance of these trees.' The badger survey presented in April identified the honeycombed network of setts connected through this track. None of this has been acknowledged.

This Green Lane W110 does not even show up on the vegetation retention maps as if it were one line of no significance with no impact discernible. It is not flat land with a fence to be taken down as it appears.

Above this entry in the document, the Planning Inspectorate have asked for the justification of the loss of category A trees in TE2.6 a), b) and c) Each is met with the reason, 'Engineering complexity and increased cost' twice and

'the avoidance of the remaining category A trees is not reflected in policy and the cost'. Surely this is just part of the project cost when ecology is a national concern and these trees and their ecosystems cannot be reinstated in hundreds of years whereas the turbines last only 25. Why should the project cost trump everything when there are less damaging alternatives?

REP5 – 024 and 041 substation views from PRow 1786 and 1787

The viewpoints SA3 and SA12 just bring heartbreak at the loss of the panoramic view of Oakendene manor and parkland for the 'likely unavoidable' industrialised views shown from PRow 1786 and 1787. For 19 years the walks along these footpaths have been a psychological balm, as well as being the practical route for getting me to and from my car when it is left at the Oakendene Industrial estate for servicing. Once Taintfield wood was full of nightingales making a surround sound of song in April until the scrub was cleared by the owners some years ago. This year a few not only set up territories in the scrubby copse south of Taintfield wood, but some are at last re-establishing nesting sites in the Southern edge of the woods. That too will be blighted by the years of construction noise and disruption, and then the grim prospect of industrial views from these same paths make this walk completely off the agenda to local people for many years to come. A huge loss of rural amenity to so many across the county who use these paths. We cannot look at the landscape even today without the terrible feeling of loss. The same could never be said about locating the substation as an extension of Bolney substation in Wineham Lane. Yet it was only a marginal preference to choose Oakendene.



Original view of Oakendene Manor



From PRow 1786 SA3

REP5 – 041 Kent Street from SA2

The only new visualisation/viewpoint update that is relevant to users of Kent Street is SA2 which is still using old photos with out-of-date trees even if the post box has now been relocated. The passing place shown at the north East side will be a problem as it will threaten a significant oak not only by the roots being compromised during the passing place construction but it likely would be cut down because the visibility down into Kent Street is so blocked by it. There is not enough space here where the post box used to be to pass an HGV and a horse lorry so it would have to be enlarged. How would anyone be able to pull out from this passing place if they cannot see

what is coming? This is very dangerous especially so close to the main road where others may pull up behind. Yet no more trees must be lost or it changes the nature of the lane for ever, and with this passing place so visible from the main road it changes the rural character of Kent Street immediately as it is.

How can we understand what vegetation loss there will be for the other new passing places and Access points A61 and A64 in Kent Street when the maps in REF 5 -125 show Woods retained (fig 7.2.7h) yet scrub and hedge is marked as cleared to 20m (figs 7.2.6o, 7.2.1k)? There is no distinction in a location like this between scrub, hedge and small trees. Where I would describe patchy scrub or copse, with borrowed views of the parkland, these documents have a hedge number as if it was a neat dense boundary. The high banks and essential drainage ditches dictate how the vegetation grows and connects, which is not visible on these maps. The full catastrophe of this would be revealed by viewpoint visualisations and detailed structural plans including vegetation, but there are none given here. We needed to see these now, before our opportunity for responding and defending all this ecology and rural landscape is over. It cannot just be put back after the road structure has been added, trees are lost for access and ground levels are so altered. There must be a better solution than this.

REP5 - 119 Ref: 2.32

I have to conclude by drawing attention to the Applicant's response to the suggestion of rerouting the cable to avoid damage to the Priority Habitat at Cratemans Farm:

'There are a myriad of constraints in the vicinity of the onshore cable route in this location including residential dwellings, flood zone, ancient woodland and the Cowfold Stream.'

This statement is an own goal and the proposed substation should never be located here - in the River Adur catchment and floodplain area; amongst the whole mesh of tributaries, next to ancient woodland, in the parkland of a listed building, incurring the unnecessary loss of over a hundred mature trees and many metres of scrub, causing untold destruction to ecology for decades to come, just because of a 'marginal' engineering preference. This has been pointed out by residents since 2021 when the consultation began. But the Applicant did not listen or respond and the consequences are obvious, not just to engineering complexity but also to the massive costs the mistake will incur in trying to work round the 'constraints'. This is so unnecessary.

How does the mistake of ignoring this irreplaceable habitat and category A trees throughout the substation section support the Secretary of State for Environment's July statement that 'Nature underpins all the Government's missions. Without Nature there is no economy, no health, no food and no society.'? Yet for the wrong choice of project, can that all be thrown out of the window for a 'marginal' preference of a commercial energy company? There are clearly alternatives that provide the same or better renewable energy, so surely we must not throw the baby out with the bathwater in this way?



Talbot and Baker II survey location July 2024