

**From:** [Meera Smethurst](#)  
**To:** [Rampion2](#)  
**Subject:** CowfoldvRampion Interested Party Number 20045099  
**Date:** 05 December 2024 12:02:22  
**Attachments:** [CvR response to SoS 6th Dec 2024.pdf](#)

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Dear Sir,

Please find attached the letter from CowfoldvRampion, Interested Party Number 20045099, in response to the letter from the Secretary of State to the Applicant and various Statutory Consultees.

The responses relate to questions for the 6th December deadline.

Please kindly ensure the letter is seen by the Secretary of State, Mr Wheadon and relevant people at the DESNZ.

Thank you.

yours faithfully

Meera Smethurst  
CowfoldvRampion

# Cowfold v Rampion

## Response to the Secretary of State Request for Information on the Rampion 2 DCO.

5<sup>th</sup> December 2024

Dear Mr Miliband,

In response to Mr Wheadon's request for further information dated 25<sup>th</sup> November 2024, I write on behalf of the community in Cowfold, who, if the Rampion 2 windfarm proposals in West Sussex go ahead, will be severely affected by the onshore substation, and who have concerns that the choice of substation site is highly environmentally damaging, far more so than the alternative sites which were supposedly considered.

I will address questions relevant to the affected community of Cowfold in the order in which they are asked:

### **Securing trenchless crossings underneath Irreplaceable Habitats and SSSIs**

9. *The Applicant, NE, and SDNPA should provide views on the following possible drafting for a new Requirement 46 'Crossing Schedule', of the DCO:*

*"(1) No stage of the authorised development shall commence until a trenchless crossing plan showing the final locations and extent of each trenchless crossing in that stage and its compound has been submitted to and approved by the relevant planning authority.*

*(2) The trenchless crossings in the relevant stages shall be undertaken in accordance with the approved details."*

We have throughout the Examination highlighted the unmitigable environmental harms of the northern end of the cable route, through Cratemans Farm and the Cowfold Stream area. This area is a natural flood plain, and because of this has been left largely untouched and unfarmed for many decades. As a result, though undesignated, it is a priority habitat for many critically endangered species who live undisturbed among the meadows and surrounding dense scrub, hedges and ancient oaks. A trenchless crossing is required in order to pass the cable under the Cowfold Stream, but the haul road required to bring the equipment to the site and the compounds to be used to store it will cause irreparable harm to the ecology of the area. Claims by Rampion that the compacted meadow can quickly be resown or the scrub can easily be recreated elsewhere are unrealistic and against all professional advice submitted during the examination including from the Knepp Rewilding Estate, the Sussex Ornithological Society and even posts from Sir David Attenborough. This matters, not just locally, but nationally, as the cumulative impact of repeating this pattern across proposals of this sort is resulting in the country facing a Nature crisis.

In addition to this, even though the need for the haul road means that so many hedges, areas of scrub and trees will be lost, Rampion make the situation even worse by refusing trenchless crossings beneath most of the hedges and scrub across this area, and beneath the Green Lane, another irreplaceable, ancient habitat and wildlife corridor.

There also remain numerous anomalies where Rampion's plans still have hedges marked for retention, yet retaining them is simply not possible if the haul road is to go through.

We urge you to think again about allowing this proposal in this location and refer you the response to this letter to be submitted by local resident Janine Creaye, and to our Post Examination Submission to you and the Secretary of State for the Environment, see Appendix 1 below.

### **Plot 33/18**

*11. The Applicant and SoSfT should confirm whether SoSfT is the administering body for Plot 33/18 and, subsequently, whether consent under s.135 of PA2008 is required.*

Landowners on the north side of this part of the A272 were approached in 2023 by Rampion about the ownership of the verges on the north side of the road in question, incorrectly described in the Land Rights Tracker as Plot 33/19: *"The Land Interest's title borders an A road which is adopted highway. The Applicant identified the Land Interest as **a presumed owner of part width of the subsoil of that highway comprising plot 33/19.**"*

The landowners highlighted to Rampion early on that it was unclear who owned the verges. So, it could possibly be owned by Highways, SoSfT or Crown land, but no action appeared to have been taken to investigate this, as Rampion still include these same properties in the land rights tracker.

No attempt to contact residents was made before this time, ie until long after the application was submitted. PA 2008 makes clear that discussions between applicants and the appropriate Crown authority should start as soon as it is clear that such land or interests will be required, and that, as it may be possible that the project as a whole will not get development consent if a voluntary agreement with the Crown authority is not reached, the aim should be to ensure that agreement is in place *no later than the time that the application for the project is submitted to the Planning Inspectorate.*

Under Section 135 of the Planning Act, it is important that such consent is obtained at the earliest opportunity as the development consent order cannot be made by the Secretary of State until the consent of the Crown authority is in place. The applicant for a project should ensure that any discussions with the Crown authority are started as soon as it is clear that an interest in Crown land will need to be acquired – i.e. before their application is submitted to the Planning Inspectorate for acceptance. The aim should be to ensure that Crown consent is in place before the application for the development consent order is submitted. If consent is not granted by the time an application is submitted, then the applicant should give an indication of when they expect consent to be received. *At the very latest, this should be by the time the examination phase of the project is completed.* This will allow the Examining Authority's recommendations to the Secretary of State.

It does not appear that the Applicant has sought to comply with any of these deadlines. This is a good example of the hall marks of this application, ie the cavalier lack of attention to detail and the lack of any reasonable engagement with communities or affected parties. This has resulted in their failure to act in accordance with the environmental, social or economic principles of sustainability; instead, they have ridden roughshod over communities and Nature.

## Land rights

*15. The Applicant should provide an update on the progression of Heads of Terms with Affected Persons in relation to the compulsory acquisition of land by voluntary means, and to submit an updated Land Rights Tracker.*

It is clear that many of the Land Engagement Reports submitted by Rampion bear little resemblance to the difficult, sometimes traumatic, lived experience of most of the landowners and Affected Parties.

Many landowners will be unaware that they are able to respond to the questions from the Secretary of State as this is not explicitly stated in the email from the Planning Inspectorate. They will have no other opportunity to put the record straight following the rosy tinted picture of progress Rampion will no doubt paint in their response to this question.

The experience locally is that there has been no or very little contact from Rampion or Carter Jonas since the end of the Examination. The Compulsory Acquisition Hearing made clear the unprecedented level of dissatisfaction and dismay from Affected Parties genuinely trying to engage constructively with the Applicant.

Indeed, in many cases, the Applicant has failed even to demonstrate, as required under Section 122 of PA2008, any “compelling case in the public interest for the compulsory acquisition.” See REP5-152, Section 5: Engagement with Affected Parties.

It has very recently come to our attention that Carter Jonas may no longer be acting as the land agents for Rampion 2. If this is indeed the case, none of the affected parties we have contacted, some of whom are badly affected by the proposals, are as yet aware of this fact. If Rampion had any genuine wish to facilitate engagement with landowners and ease progress towards a mutually agreed way forward, they would surely have let them know as soon as possible.

*16. The Applicant, NH, NR, and NGET are requested to provide an update on whether any agreement has been reached regarding respective Protective Provisions. The Applicant should provide an update if any other Protective Provisions have been agreed by way of Side Agreement.*

The following relates to the closely linked UK Power Networks (UKPN) rather than NGET. NGET owns the electricity transmission system in England and Wales, UKPN then distributes the electricity through high voltage cables. Despite repeated requests from CowfoldvRampion during the Examination, there were no responses from the Applicant about the UKPN high voltage cable which runs through the proposed substation site. There was no discussion of the potential impacts on landscaping, the ability to use the land as a compound or the site location of the substation itself or the potential serious impacts on roads such as the A272, or Kent Street of any necessary diversion of the cable. Indeed, Rampion have provided no evidence that they had even approached UKPN about this. We therefore find it hard to believe that Rampion have so far engaged in meaningful discussion with any part of the energy network provider system.

## New Information since the end of the Examination

We wish to draw your attention to information which has come to light or changed since the end of the Examination:

Availability of alternative substation sites:

Please see Appendix 3 below: "Post Examination Submission for Rampion 2 Windfarm DCO; New Information 27<sup>th</sup> October 2024"

Britain remade:

At a recent meeting held by Britain Remade in Shoreham, we witnessed the misguided conclusions which can be drawn when people, passionate about renewable energy but completely lacking in the details of a particular proposal, decide to champion it; this is a dangerous combination. The panel, consisting of CEO of Britain Remade [REDACTED], MP Tom Rutland and Adur Councillor [REDACTED], were determined to ask you to push through the Rampion 2 proposals as quickly as possible, but without any understanding of the actual proposals themselves. They admitted that none of them had *actually read any* of the documents submitted during the Examination. This means they were just conflating the general idea of wind turbines with Rampion 2.

Again, as with the Wineham Lane alternative sites, we wish to pre-empt and challenge any lobbying you may receive from Britain Remade in favour of the Rampion 2 proposals:

*Efficiency:*

Mr [REDACTED] claimed the proposals 'could power more than 1million homes'. However, they will probably not be Sussex homes, and there are far windier, and therefore more cost-effective places to build. On the day the meeting was held, the output from Rampion 1 was just 21.5% of predicted. As an audience member pointed out, in a better location, perhaps the same money could buy power for 1.6m homes. **Surely, we have a responsibility to ensure the nation gets the best value for money for the public purse?**

The panel argued that to meet our national targets BOTH schemes were needed. This makes no sense at all if your objective is to provide Cheaper Energy. There is enough space allocated on the Dogger bank to meet National Wind-Power Targets, and by prioritising placing wind generation there the greater economies of scale and proximity and the smaller number of turbines required to meet the generation targets because of the far higher wind power density would give an optimal return on investment.

*Carbon emissions:*

Sam Richards said that the project 'could save up to 2 billion tons of carbon emissions'. What about the emissions from producing the turbines, and installing them, including the disruption to carbon stores of kelp on the sea bed, and the manufacture of all the concrete and steel for the massive substation? Or the vast amounts of carbon released from the destruction of previously untouched meadowland, hundreds of metres of ancient hedges, and hundreds of mature oaks, when a clear, less destructive alternative exists. Has there been an independent calculation of the return on total carbon loss v gain during the 25-year lifespan of the turbines? We are sceptical that there will be any overall benefit from this, especially given the poor efficiency of location in the channel, the extraordinary destruction on the cable route and substation site, and the failure of Rampion to adequately assess the baseline when calculating mitigations.

*Ecological Harm:*

We gave the panel evidence that Rampion have sought to downplay the unmitigable ecological harms of the routes and sites they have chosen, even though less damaging options exist. This has been extensively catalogued during the Examination by CowfoldvRampion, Janine Creaye and many others, including Statutory Consultees.

All the panel could say was that any project of this size will do some damage to the environment but that the environment's biggest danger was from climate change. We do not dispute this statement, but it is a naïve and misguided view: yes of course we need green energy, but **surely, we have a responsibility to tread as lightly as possible on the environment, minimising the ecological harm, not just accepting whichever option maximises Rampion 2 shareholder profits.** If we do not adopt this key principle and ensure proper joined up thinking between government departments on this, we will have no wildlife left to protect from climate change. Please see Appendix 2 below and our Local Impact Statement (REP1-089 in the Examination Library) for more information. When the poor return in terms of carbon emissions is added to the destruction of irreplaceable habitats, the disruption of wildlife connectivity and the loss of so many critically endangered species, plus the impacts on the South Downs National Park, it is hard to accept that the benefits outweigh the harms in this instance.

We do not disagree that there must be a focus on decarbonisation and a rapid move to renewables but to do this at the expense of the natural environment is contradictory and wrong. The climate crisis cannot be solved by destroying our environment.

Shockingly, over half of the total hedgerow loss across the whole project actually occurs in the small area around the proposed substation, resulting in an irremediable destruction of habitat. The area remains mediaeval in layout with small fields surrounded by dense hedges and scrub. A reasonable, far less damaging, alternative site exists. It cannot be right to permit the project to go ahead in its current form.

[REDACTED], CEO of the Council for the Protection of Rural England, makes the following comment in a communication to CowfoldvRampion after the Examination ended *"We certainly need a rapid and fair transition to net zero clean energy sources, but the details of how we do that are so important and shouldn't be at the cost of nature. And as you rightly point out, we need to balance the promises made by governments across different departments. Too often these commitments are viewed in isolation."* See Appendix 5 below for the full text.

#### *Jobs:*

Tom Rutland and Becky Allinson were particularly keen on the job creation opportunities the proposals would create locally, but they had no idea how many that might be.

From Rampion's own documents, submitted to the Examination, the project locally *"is estimated to support around 80 FTE jobs over the construction phase of Rampion 2"*, and almost none during the operation phase. The rest of the 4040 construction jobs will not be met locally. (Rampion's Deadline 6 submission "Socioeconomics" REP6-135 Section 17.9 and Table 17-25).

Mr Rutland's answer, when challenged about this, was *"well that's 80 better than no jobs at all"*, but again, this shows a lack of understanding of the vastly greater numbers of jobs potentially lost in tourism along the coast, and the 150 or so **businesses** facing closure in Cowfold alone if the onshore substation is built where planned. A poor return indeed.

REP6-135, para 17.9.25 goes on to say:

*" In addition, the analysis presented in Appendix 17.3: Socioeconomics technical baseline, Volume 4 of the ES (Document Reference: 6.4.17.3) states that visitors and tourism related businesses recognise the potential for positive impacts associated with the increase in local expenditure arising from construction activity."* However, on looking at this evidence (Doc ref 6.4.17.3 para 1.4.2), it mainly appears to be based on an ex-ante study i.e. a forecast which means that there may well be a difference between what the interviewee believes it will look like and what they find the reality

actually is after construction. This is particularly relevant given Rampion's failure to provide visual representations during the consultation.

In fact, the evidence from the Examination is clear:

- There is next to no input in the supply chain by British Industry or Manufacturing
- There will be no returns to Britain from either Capital or Operation
- Local Industries will be negatively impacted - particularly Tourism and Leisure in seaside areas and areas of Natural Beauty
- There are strong arguments to suggest this will not produce low-cost energy

Another claim by Britain Remade, which does not stand up to scrutiny, is that *"when asked in 2022, 84% of local people said the proposed wind farm's advantages outweigh any disadvantages."* This comes from the Yonder Survey, commissioned by Rampion in 2022.

However, this is another example of the perils of not fact checking the information they receive, and of taking Rampion's conclusions at face value. The Yonder report was very effectively critiqued by Protect Coastal Sussex in their Local Impact Statement. The main issues which cast doubt on the credibility of the 84% claim are:

- The survey then goes on to say only *"two-fifths are aware of the Rampion 2 proposal"*. Meaning, most respondents did not actually know any details of Rampion 2 and were therefore just speaking in general terms about Renewable Energy being a good thing, or perhaps thinking of the very different, far less impactful, Rampion1.
- Most of the people surveyed were from Brighton, and Lewes, a town not impacted at all by the proposal. Only 11.8% were from Littlehampton and Bognor, the most visually impacted area apart from Cowfold.
- Nobody at all from Cowfold/Horsham area was surveyed.
- It was purely a telephone survey, so no visuals were provided, so participants could have no idea of how large and intrusive the turbines *actually* would be and how much bigger than Rampion1, or any understanding of the ecological devastation.
- percentages of support for Rampion 2 are NOT reflected in the Relevant Representations, including most who say they are in favour of renewable energy, but cannot support the Rampion 2 Application, ironically, for environmental reasons.

All of this illustrates the dangers of supporting something without knowing the details. We urge you, as the Secretary of State, not to make the same mistake.

### [Previous Post Examination Submissions](#)

CowfoldvRampion has submitted several Post Examination Submissions to the DESNZ, which have been accepted as such by DESNZ. We include them here as Appendices 1-3 below to ensure all are considered in context. For the same reason, I include a copy of a letter from Cowfold's MP Mr John Milne to you as Secretary of State (Appendix 4), as the attachment referred to in his letter is Appendix 2 below.

Mr Milne's letter makes clear the **irrationality** of persisting with the use of the Oakendene location and the need to use Kent Street, when, during the Examination, the scale of devastation which would result to lives, landscapes and the environment as a result, became increasingly clear to everyone. It should have led them to rethink, not doggedly persist in retrofitting reasons for the choice, especially when a clear alternative existed; an alternative with access expressly constructed in the 1960s for that very purpose, and manifestly fit for purpose as it had been so used for the Rampion 1 substation construction without any alteration. Even before being forced to hear this evidence during the Examination, they had expressed only a 'marginal preference' for the Oakendene site. Unless the DCO is rejected altogether, which we urge you to do, the choice of substation site and attendant cable route should be revisited.

Your sincerely,

Meera Smethurst

CowfoldvRampion (Cowfold Residents' Action Group)



## Appendix 1 – Cowfold v Rampion Letter to the Secretary of State for Energy Security and Net Zero and the Secretary of State for The Environment 5<sup>th</sup> September 2024

Dear Mr Miliband and Mr Reed,

I write as a representative of the community in Cowfold, who, if the Rampion 2 windfarm proposals in West Sussex go ahead, will be severely affected by the onshore substation, and who have concerns that the choice of substation site is highly environmentally damaging, far more so than the alternative sites which were supposedly considered.

The Rampion 2 offshore windfarm, if consented, will have turbines higher than the Eiffel tower, higher than any previously built in this country. It is technically *inshore*, and therefore will have a far greater visual impact, both by its height and proximity, than existing turbines, affecting the heritage coast, the Isle of Wight and the South Downs National Park. The cable route passes through the SDNP, destroying ancient landscapes, and connects to the main grid substation via a new six hectare, 12m high substation.

They have chosen a site at Oakendene in Cowfold, a small village 5km away from the main substation which is on Wineham Lane in Bolney, despite the two alternative locations being immediately adjacent to the main grid site and therefore able to connect directly in. Almost all the ecological 'evidence' used to inform the substation site choice was desk-top, despite the fact that Natural England warned them that these are often not accurate. This was definitely the case in this instance, as there has never, until now, been any reason to survey this ancient, untouched meadowland and hedges and fields which remain medieval in their lay out. Wineham Lane, on the other hand, was extensively surveyed relatively recently for Rampion 1; no particularly special habitats were found there, as sadly the area has already been damaged by the main substation site.

They were reminded by Natural England of the importance of local knowledge, but the detailed written and photographic evidence they did get from a local resident, showing just how ecologically important this area was, they chose to ignore.

A letter, shortly to be sent to you from our MP, John Milne, will detail evidence of the failure of the consultation process and the decision-making process in choosing the substation site.

In essence, we believe the evidence examined during the recent DCO process shows that the site was chosen not for its ability to tread most lightly on the environment and precious habitats, or to cause least disruption to communities and the economy. Quite the opposite; it is the most ecologically harmful of all the alternatives, and the most damaging to communities. Owing to the failure to consult adequately, most people in Cowfold were unaware of the proposals until *after* the site was chosen. They therefore had no opportunity to influence the decision in any meaningful way. Not only is this manifestly unfair, it means that crucial local knowledge was not used in making the decision. As a result, Rampion either did not know, or in some cases chose to ignore, the damaging consequences of the choice. This has become ever more apparent during the Examination phase, which ended on 6<sup>th</sup> August.

The comparison between the Wineham Lane sites (next to the existing substation) and Oakendene is stark; details will follow in the letter from Mr Milne, but some of the key points, which were not considered when the site was chosen, are summarised below:

- The new substation requires the removal of almost 650m of mature hedges and over 100 important oaks on the substation site and Kent Street. The Wineham Lane sites do not require this.
- Wineham Lane was widened in the 1960s specifically to take the construction traffic for the main substation. It is therefore already adequate to act as the access road to substation and cable route. Oakendene, whilst accessed directly off the main A272, requires the creation of a new access with the removal of several hundred metres of tree and hedge, and the widening of almost 1km of the adjacent Kent Street Lane, a tiny lane, which, along with the scrub and hedges along its edges forms an important wildlife corridor connection to the High Weald to the north. Having originally said that it was unsuitable for HGVs, it became obvious they would need to use it to access the cable route.
- Their own ecology studies, mainly completed *after* the substation site was chosen, despite having major failings disproportionately in regards to this location, still showed that many of the important or protected habitats and species occur either highly significantly, or exclusively, at this location. Eight of the fourteen Important Hedgerows they have identified are in this area, three of the seven veteran trees, plus three near-veteran, it is the only location to have hazel dormice or otters, a high proportion of the Great Crested Newts, even though a large number of local ponds were not surveyed, and one of the few to have water voles.
- The cable route passes through Cratemans Farm, the site of undesignated meadowland, which was proven during the Examination to be better quality than a SSSI site not far away. This is also rich in reptiles, a highly endangered species, which will lose their habitats.
- Cratemans, Kent Street and Oakendene form a richly diverse habitat, home to one of the most significant nightingale habitats in Sussex, denser even than at the famous rewilding centre, the nearby Knepp Estate.
- The Oakendene site floods, the others do not.
- The traffic impacts of the Oakendene site are dramatically different from the Wineham Lane sites, because of the proximity to the congested mini roundabouts at the AQMA in Cowfold.
- Approximately 150 businesses in Cowfold will be affected by the severe delays, along with the many thousands who use the A272 daily, compared to around 5 businesses on Wineham Lane

Chosen for what they perceived as an easier, more profitable option, with little apparent opposition, they themselves admitted in the DCO submission that there was only a 'marginal preference' for Oakendene. That was before the detailed evidence for the ecological sensitivity of both the substation site and the northern end of the cable route became impossible to ignore.

Rampion respond to this by either downplaying the significance, as in the case of much of the ancient trees and hedges, or by saying that 'if meadowland, reptiles and other sensitive species are found post consent they will apply for licenses, or agree with the relevant authority, measures to mitigate the harm. This is unacceptable downplaying of the baseline, when assessing the apparent harm done against the claimed benefits.

Local councils have voiced major concerns about the landscape and visual impacts of this choice and the failure to take hedge and tree loss or meadowland destruction into consideration.

Costs can also no longer be less when the engineering for the flooding is factored in, and the total reconstruction of Kent Street, or the additional environmental mitigations they will have to make.

Their 'marginal preference' for Oakendene should be revisited. It makes no sense that a site which isn't even in the best interests of the applicant after all and is definitely the most environmentally damaging, should be allowed to be carried through, when alternative sites exist which could provide the same infrastructure in the same time frame or less.

We believe the same pattern has been repeated across the whole DCO from sea to substation, and the **whole project should be rejected**. It cannot be in the National Interest to destroy wildlife habitats, communities and economies. **However, if you are minded to allow it, in the quest for green energy, rapidly delivered, then at the very least, this highly ecologically destructive substation could very easily be moved to a different location, with very little delay and far less ecological damage. This wanton destruction is so unnecessary.**

We understand the need for green energy but it cannot be right to allow companies to choose their sites on the basis of perceived ease of access and maximising of profit. If we do not give proper consideration to the environment in the process, we will have no habitats or species left to protect. By destroying their habitats, we make already struggling species *less* resilient to climate change, not more.

It is no coincidence that we are the most nature depleted country on earth. The latest King's speech highlighted the importance of halting biodiversity loss as well as tackling climate change, "***unlocking a win-win outcome for the economy and for nature,***"

In the recent Green Belt debate, Steve Reed stated: "**Nature underpins all the Government's missions. Without nature, there is no economy, no health, no food and no society. Nature is at crisis point. The Tories left Britain one of the most nature-depleted countries on Earth. A third of our bird and mammal species face extinction....**

**...This Government are committed to the legally binding environmental targets set under the Environment Act 2021—targets that this Government will meet by working in a new partnership with the nature non-governmental organisations".**

Last week the Institute for Public Policy Research have published a report saying that we must protect 30% of land and sea for nature and that **nature recovery must be embedded in government policy.**

If this new Government truly means what it says about protecting nature, you cannot reasonably permit this proposal, which is in direct conflict with these aims.

The Hornsea project four offshore windfarm was consented last year amid a storm of protest from the RSPB and Wildlife Trusts who said **the decision was "a damning indictment of the UK Government's commitment to halting species decline, ignoring the consensus of evidence from leading scientists who have unequivocally stated that this development risks causing further declines to nearby populations of Amber-Listed seabirds such as Gannet and Razorbill, while putting faith in unproven mitigation for Guillemot and in untried and untested compensation scheme for Red-Listed**

*Kittiwake. "Our globally important seabirds are in a precarious state. Decisions like this push already vulnerable species closer to the edge."*

We hope this government does not make the same mistakes in its enthusiasm for green energy. Otherwise, history will look back on this era as just as environmentally destructive in its own way as fossil fuels. At the very least it should not be the applicant who provides the ecology surveys as there is evidence of serious downplaying of the baseline.

Thank you for your consideration of this matter.

Kind regards

Meera Smethurst  
CowfoldvRampion Cowfold Community Action Group

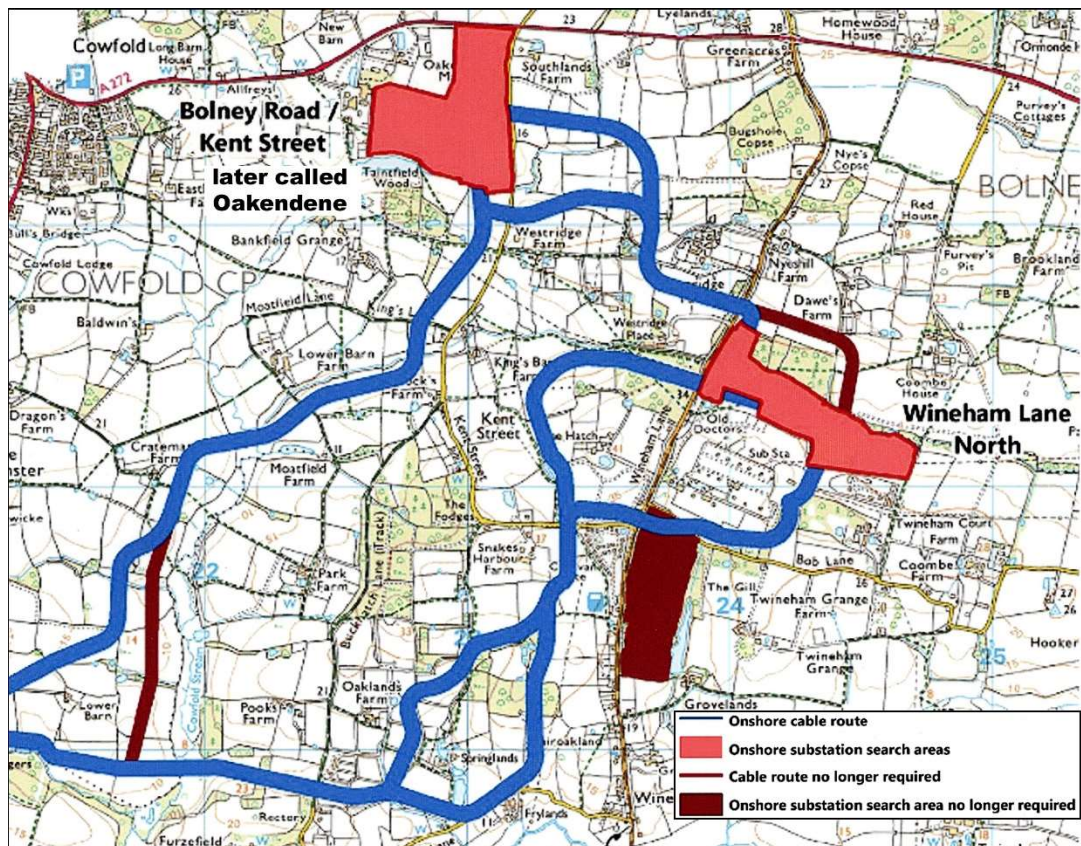
## Rampion 2 Windfarm Proposal: Reconsideration of Alternatives to the Substation Site

We do not believe that the Rampion 2 DCO Application has been made in a way which has properly considered the viable alternatives of windfarm location, cable route or substation site. The driving factors which have emerged in the planning process have been profit and perceived engineering convenience.

As a result, the substation site which has been chosen is the most environmentally harmful, both at the substation location itself, and the cable route approach to it, destroying priority habitats, hundreds of metres of ancient hedges, and over 100 mature oak trees. It disrupts the catchment/floodplain areas of the River Adur around the Cowfold Stream and destroys irreplaceable habitat for endangered species such as nightingales, skylarks, cuckoos, and adders. There is an alternative.

We ask that, should you approve this DCO application, you consider prevention of the *unnecessary* destruction of so much wildlife by the removal of the substation site to the far less harmful alternative put forward on Wineham Lane, along with the alteration of the cable route which would result from this. This could be achieved easily, with little delay to the project, and likely less cost to the Applicant, as the Examination has almost certainly shown them. It is after all 5km shorter.

### Alternative Sites initially under consideration



Three substation sites were initially brought to the consultation: Wineham Lane South, Wineham Lane North and Oakendene. All are considerably greater than the 9ha declared by Rampion to be adequate. The Wineham Lane sites were actually ear-marked for such use since the construction of the main Substation site 60 years ago. Wineham Lane is a two-lane road widened in the 1960s, *to take the construction traffic for the original Substation*. It is accessed from the busy A272 but at a point a mile further away from the congestion point in Cowfold than the Oakendene site. The Oakendene site requires two additional construction access points, and all three are very close together coming directly from the busy road. Even the Rampion ecology surveys, which significantly downplay the importance of the Oakendene site and cable route, confirm that Wineham Lane is a far less ecologically sensitive site and that far less mature tree and hedge loss would be required. Due to failure of the consultation process, these factors were ignored before the proposals were submitted. (See comparison table of information received in Supporting Evidence below)

Rampion's own documents, submitted to the Examination say that "In order to meet National Grid Code reactive power requirements, dynamic compensation electrical equipment **should be installed ideally as close to the grid connection point as possible.**" And yet they chose a site 5 km away.

We believe that the evidence is overwhelming, that by failing to consult properly with the population of Cowfold, they have not properly considered the alternatives to genuinely identify the most suitable option. Rather, they have openly stated that they have chosen the 'path of least resistance' in choosing the substation location because they had no objections from this area, as so few people here were aware until after the substation site was chosen. They have then had to 'retrofit' the reasons to justify this. In reality, they have dug themselves into ever deeper environmental holes with regards to traffic, ecology, access etc because they did not consult at the appropriate time, and were therefore unaware of key facts until too late.

The details of why the failure to consult resulted in a highly inappropriate choice is available in the CowfoldvRampion Adequacy of Consultation document-see Supporting Evidence below.

Paragraph 4.2.22 of the overarching National Policy statement EN-1 2023 states that "The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) **in the same timescale as the proposed development.**"

The alternative sites at Wineham could deliver this in the same or even less time. (See Supporting Evidence on Alternatives for details)

EN-1 also says that consent should be refused if there is harm to habitats and species **unless there is no alternative.** There is, for both the cable route and the substation site.

#### **Mitigation hierarchies:**

Rampion make much of their plans for biodiversity net gain, much of it off site. However, before even considering this, they **must** show that they have properly addressed the mitigation hierarchy designed to protect the environment and biodiversity in the first place, before trying to replace it.

The urgent need for critical national policy does NOT relieve them of this obligation. The first part of the mitigation hierarchy is to seek first to **avoid**. By not putting themselves in a position to adequately understand the site they had chosen, they failed in this obligation.

## Comparison of Oakendene and Wineham Lane North Substation Sites

Oakendene	Wineham Lane north
Massive tree and hedge loss. Hedges down middle of substation site to be removed (over 647m hedge lost here, 8/14 of all 'Important Hedgerows' on proposed development are at Oakendene). Over 114 mature trees in this section would be removed, at least 46 'high quality'.	5km shorter cable route vastly reduces tree and hedge loss. No trees or hedges in centre of substation site to remove. No Important Hedgerows (1997 criteria) More open landscape with far less boundary hedge and no floodmeadows
Jubilee wood bisected by cable and haul Road	Jubilee Wood unaffected
Flood risk greater both to site and impact on adjacent properties. Extensive water disruption/pollution to the catchment area and floodplains of the river Adur.	Not in flood zone. Water drains away from Wineham Lane sites, not towards as for Oakendene Desk top study over-reliance failed to show this before site chosen
Destruction of undisturbed and irreplaceable Priority Habitats: 'Unimproved lowland meadows', dense blackthorn scrub, and historic parkland. Much professional evidence has been put forward in this process.	Far more open fields. Habitats are already compromised by Bolney substation and Rampion 1 construction
High density of nightingale territories (detailed evidence added to records over last 3 years)	Nightingale territories not significant, dense scrub habitat not present.
Adjacent lake with unique ecology/bird life	No lake
132kv cable to cross running across site	No cable
Proximity to high weald AONB; just 500m from A272 access point	3km from AONB
Irreversible destruction of Parkland setting of Grade II listed manor. [Flooding assessments may mean the substation is raised higher than 14 metres indicated, worsening the landscape views from the footpaths.]	Nature and magnitude of change is far less as the substation is already screened and this site is not positioned in the historic parkland of a Grade 2 building.
Requires an extensive new access road onto A272 with loss of hedges and veteran trees to create both the road and visibility splay	Access onto Wineham Lane with suitable visibility splays already existing since 1960s when original substation built.
Kent Street (single track) required for cable route construction access. 3m wide requiring new structure and new HGV passing places. Further ancient scrub, hedge and tree loss for widening; loss of important wildlife corridor.	Wineham Lane is already widened, 2 track and suitable. Therefore no verge or tree destruction is required for HGVs. No extra ecological destruction likely for access
Over 100 businesses in Oakendene industrial area and along A272 opposite, directly impacted with traffic delays, dust and noise of construction. Significant economic impact.	On Wineham Lane; Royal Oak, caravan park and a few others only partly impacted as further South of HGV accesses.
A272 Traffic impact: standing traffic regularly reaches this point on A272. As there are 3 access points to the construction proposed in this part of the main road, queues and delays will be significant, many businesses effected.	No standing traffic on A272 at Wineham lane so less disruptive, fewer delays. Temporary traffic lights not needed on the main road. Not raised as issue for Rampion 1
Kent street single lane access requires both carriageways of the A272 for HGV turning into such a small Road. At peak this is one per 12 minutes which will cause gridlock.	Rampion 1 did not cause gridlock on the A272 as access is a lot further down and on a 2 lane road where HGVs can pass without new passing places or new visibility splay.
Impact on AQMA at Cowfold by traffic backing up and extra use to access cable route	No AQMA impact
Dips on A272 mean very poor visibility for multiple HGV access. Accident history here	A272 at Wineham Lane straight, view clear

Rampion's own documents, *available only since the examination began*, prove the special ecological importance of this area, as, despite disproportionate inadequacies in the surveys of this area, their surveys still show that many of the important or protected habitats and species occur either highly significantly, or **exclusively**, at this location. Eight of the fourteen Important Hedgerows identified in the whole cable route are in the Oakendene option area, three of the seven veteran trees, plus three near-veteran, it has the highest concentration of nightingale territories (higher than the RSPB Pulborough Brooks site), it is the only location to have hazel dormice or otters, a high proportion of the Great Crested Newts, even though a high proportion of local ponds were not surveyed, and one of the few to have water voles.

They did not complete the ecology studies before choosing the site or put themselves in a position to understand the engineering constraints

### **Lack of consultation**

See evidence laid out in the Adequacy of Consultation documents detailed in the Supporting Evidence below.

### **Consultation timeline**

- **Jan 2020: Informal consultation** - As a result of feedback, one of the Wineham Lane sites was removed.
- **July 2021: First round of Consultation**-at this stage the Wineham Lane North site and Oakendene were put forward as possible substation locations.
- July 2022: the decision to use the Oakendene site was announced.
- **October 2022: Second Round of Consultation** - this was only about alterations to the cable route. The substation site was not included. Cowfold was not directly consulted (see table below).

### **When studies were completed:**

**The viewpoint surveys** were not completed until May 2023 making it impossible for them to be used in the assessment of which site to choose

**Flooding:** the full extent of the flooding at Oakendene was not realised by the Applicant until the Examination, because local people were not consulted

### **Ecology surveys:**

- **Breeding Birds: not completed until 2023**, long after the decision was announced to use Oakendene in July 2022. Access stated as restricted at Oakendene and Cowfold Stream area
- **Reptiles:** Full survey for Wineham done for Rampion 1. Field surveys done at Oakendene Sept-Oct 2021 not at optimal time of June-August and October. None were completed where it had been pointed out that adders were present on the cable route.
- **Bats:** Figures 2.17.2 a-h show large amount of Oakendene land was not surveyed and there were a high number of passive detector faults at Oakendene in 2021



- Dormouse: surveys **not started until October 2022**. Oakendene was the only place they were found
- Otter and vole: **not done until 2023**. Oakendene was the only location where otter was found, and one of the very few to have water voles.
- Great crested newt: a large part of Oakendene land deemed **not accessible until 2022-2023**. Large number of degraded or inconclusive samples at Oakendene, yet even so, 18 of the 36 positive results across the whole survey were at Oakendene, Kent Street and Cowfold Stream area on the route.
- Hedgerows: The phase 1 habitat survey was done **between 2020 and 2023**, a number of hedges here were not accessed properly, yet 8/14 'important hedges' are here, and 647m of hedge are to be lost at the Oakendene substation site alone
- Surveys for grassland classification were not completed in the most significant impacted sites in this section and those that were only in June 2022 just before the decision was announced. The classification has since been shown to be significantly incorrect. 'Species poor' semi-improved fields have been re-assessed as UK BAP Priority Habitat 'unimproved lowland meadows' by an independent ecologist, and others marked as 'improved' have not been farmed using fertiliser or pesticides for over 60 years. They are adjacent and contain much the same species as the Unimproved lowland meadows.

This list does NOT support the Rampion statement that adequate comparative surveys were carried out.

Even so there is an admission that the preference is **MARGINAL**: "*Oakendene was preferred in terms of engineering (NO EVIDENCE) and land interests. On balance, there is a marginal preference for the Oakendene site.*"

The 'marginal difference' statement was made **before** the full impact of this site was understood by Rampion on ecology, economy and traffic. They had not completed many of the surveys at this stage and failed in their responsibility to ensure adequate input from local residents with local knowledge. This is one of the main points behind consultation, not to manipulate the evidence and take the path of least resistance.

## Consequences

- There was over reliance on desk top studies to inform their early ecology comparisons even though they were warned that there had been no reason to record data for this area before, unlike the Wineham Lane sites, which were thoroughly surveyed during Rampion 1. Unsurprisingly therefore, there were no records for all the private land at and around Oakendene.
- One local resident *did* give them detailed written and photographic evidence of the extraordinary biodiversity of this site, from July 2021, ie first round of consultation, which they chose to ignore.
- Actual surveys were not done/completed until after closure. (see above)

As a result, they have chosen a site which floods and which will require the destruction of significant nightingale nesting sites, toad migrations, reptile habitats and, because of the constraints on the substation site, 650m of hedges, mostly over 200 years old, and over 100 veteran or near veteran

oaks will have to be removed on the substation site alone, plus many more on adjacent Kent Street to widen it for access to the cable route.

### **Conclusion:**

It is now clear (see Addendum to Alternatives Chapter in Local Impact Statement below) that many of the key studies on areas such as flooding, ecology, economy and general impact on the health and wellbeing of populations were not done by the time the decision to choose Oakendene was made, and that the decision was based largely on the opposition from the Wineham Lane area, whose residents had been consulted, unlike in Cowfold. The DCO Consultation Reports (doc refs 5.1, 5.1.1, 5.1.2, 5.1.3) now clearly show a lack of engagement with Cowfold residents in 2021 when the substation site was being considered (See Section 13 of this report; Assessment of Consultation Responses).

The sites at Wineham Lane do not flood, do not cause so much disruption to so many road users or businesses and it is clear from the ecological studies Rampion *have* done that it is far less environmentally sensitive. Add to this the admission that in fact there was little to choose between them, even before they understood these additional issues, there really is no justification for the choice, other than they thought nobody had noticed and they believed they would not face protests. This is not a sound basis on which to try to justify so much destruction and disturbance.

## Supporting Evidence:

### Alternatives:

The evidence for the lack of adequate consideration of the alternatives and the reasons why Oakendene is the wrong site can be seen in:

- 1) The CowfoldvRampion Local Impact Statement, visible on the Planning Inspectorate website at

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-000855-CowfoldvRampion\(Cowfold%20residents%27%20action%20group\)%20%20Written%20Representations%20\(WRs\)%20including%20summaries%20if%20exceeding%201500%20words%20Appendix%201-%20Residents%20Impact%20Statement%20on%20Rampion%20.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-000855-CowfoldvRampion(Cowfold%20residents%27%20action%20group)%20%20Written%20Representations%20(WRs)%20including%20summaries%20if%20exceeding%201500%20words%20Appendix%201-%20Residents%20Impact%20Statement%20on%20Rampion%20.pdf)

See in particular Sections 1-3 and 9

- 2) The CowfoldvRampion responses to applicant deadline 2, visible at

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-001086-submissions%20received%20by%20Deadline%201%20\(2\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-001086-submissions%20received%20by%20Deadline%201%20(2).pdf)

See in particular Response to REP1-021, Applicant's post-hearing submission Wineham Lane North, and Response to REP1-033, Applicant's post hearing submission ISH1.

- 3) Janine Creaye's response to Rampion Deadline 4 (contains Arborweald survey):

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-001473-submissions%20received%20by%20Deadline%203.pdf>

- 4) Janine Creaye's response to Rampion Deadline 5 (further survey evidence):

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-001634-submissions%20received%20by%20Deadline%204.pdf>

### Adequacy of Consultation

The evidence for the failure of consultation and the ignoring of the evidence they *were* given early in the consultation can be seen in:

- 1) The CowfoldvRampion Adequacy of consultation Document, visible on the Planning Inspectorate Website at

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-000414-230811%20AoC%20Response%20CowfoldvRampion%20on%20behalf%20of%20the%20residents%20of%20Cowfold.pdf>

The comparison of documents received during the consultation by Cowfold and Wineham/Twineham residents (Item 14 attachment 1) gives a simple summary of some of the consultation failings in the crucial early stages of the consultation process:

Comparison consultation with residents at alternative site.

Date	Twineham Residents	Cowfold Residents
Jul 2020	Rampion letter. Not very comprehensible, no clear proposal. Significance understood by previous experience not by clarity of literature	Either not received or significance not recognised due to lack of meaningful information
Nov 2020	Carter Jonas letter. Not clear, no substation mentioned, again not clarity	Nothing received
Dec 2020	First Feedback forms available to Twineham	Nothing received
7/1/21	Detailed letter from RWE to make aware of proposals and provide opportunity to share their views. Includes detail on substations and very clear maps, not greyed out.	No residents of Kings Lane, Moatfield Land, Kent Street, Picts Lane or A272 received this. If they had, there could have been no doubt of its importance
21/6/21	Rampion at their own request organised meetings with Twineham and Bolney PCs 'to tick a box'	No meeting scheduled with Cowfold PC
6/7/2021	Carter Jonas letter to Residents, discussing Routes and relevant structures. Very clear set of maps not greyed out.	Nothing received
14/7/21	Carter Jonas sect 42 notice accompanied by greyed out maps	Nothing received
7/21	Not sure if received	A low-key leaflet mentioning a substation at 'Bolney in Twineham'. No clear direct relevance to Cowfold and only received by very few people.
9/2/2022	Update letter from rampion 2.	Nothing received
24/8/2022	Update letter from rampion 2.	Nothing received
14/10/2022	Carter Jonas sect 42 notice accompanied by greyed out maps dated Oct 2022.	Carter Jonas sect 42 notice accompanied by greyed out maps. Including 2 sets of maps: dated Jul 2021 (PEIR) and Oct 2022 (PEIR with cable amendments). Received by a very limited number in the immediate vicinity, but even then, not all.
Nov 2022	Rampion Leaflet, no mention of substation	Rampion Leaflet, no mention of substation, received by only a few households. No clear relevance to Cowfold.
23 Nov 2022		First ever Cowfold meeting held.

Appendix 3 – Post Examination Submission for Rampion 2 Windfarm DCO; New Information 27<sup>th</sup> October 2024

**For Ed Miliband and advisors**

**Post Examination Submission for Rampion 2 Windfarm DCO; New Information**

**FAO Mr Jeremy Pocklington Permanent Secretary DESNZ**

Dear Mr Pocklington,

I write to you in your capacity as Permanent Secretary to the DESNZ.

On 5<sup>th</sup> September I wrote an email to Mr Miliband and to Mr Reed, entitled “Rampion2 offshore wind farm: the unnecessary environmental harm”.

I received a reply from your department to say that this would be dealt with as a post examination submission, when you receive the Examining Authorities recommendation in early November. A copy of the original letter is attached for your convenience (Attachment 1). This letter was intended to demonstrate that the Applicant had not chosen the onshore substation site in a rational manner, with improper use of the Rochdale envelope, and that a suitable, far less environmentally damaging alternative, at Wineham Lane, exists.

I wrote back to your department on 3<sup>rd</sup> October, thanking them and explaining that the letter was setting the scene for a second letter, which I attached, and requested that this also be considered as a Post Examination Submission, in order to ensure context of the second letter, and to ensure that the two are viewed together. I trust that this will be so. Again, for your convenience, this letter is attached here also (Attachment 2)

**I write now because a new situation has arisen, since the closure of the Examination. On 18<sup>th</sup> October 2024 Mid Sussex District Council approved the construction of a 264 MW battery energy storage system by One Planet on part of the Wineham Lane North site (Planning Ref no DM/23/0769)**

<https://pa.midsussex.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=RRTUYFKT04L00>

We at CowfoldvRampion wish to pre-empt and challenge any response from Rampion that this consent makes the alternative site unviable. Our argument for this is as follows:

The Government’s own Compulsory purchase and compensation guide 4, paragraph 26, clearly states that *“the law specifies that the compensation to be paid where land is compulsorily acquired shall reflect what that land might be expected to realise if it were sold in the open market by a willing seller at the valuation date. In other words, compensation is based on the **market value** of the land which is to be acquired.”*

The market value of the site would be based on the market value of the land itself (around £80-100,000 for 3.5 hectares of prime arable land in West Sussex, less for the lower quality of this particular land) plus the estimated rental income from the site over the lifetime of the battery storage facility, likely to be 40 years at most.

The market standard rate for battery storage developments is around £2,000 per megawatt (MW). That means  $40 \times 264 \times £2000 = £21,120,000$  over the lifetime of the facility. Even allowing for significant inflation over that time, standard measures of present and future value give a current value of this entire plot of only a few tens of millions at most. Rampion would no doubt seek to reduce this by the cost of restoration of the site at the end of the 40 years, plus the fire and contamination risks of the batteries which, if they occur, would be costly to clean up.

Against this must be set:

- The fact that around a third of the site is needed *anyway* with the currently proposed substation location at Oakendene in order to connect the new substation into the main substation which is adjacent to the battery site. The consent was granted to One Planet by the council in full knowledge of the Rampion proposals and with the reasonable expectation that they could obtain the land for the cable route by compulsory acquisition of the site if their application is successful.
- The significant Heads of Terms Rampion have had to offer at Oakendene in order to secure the Oakendene substation site without Compulsory Acquisition
- During the Examination it became clear that Rampion had seriously underestimated i) the costs of either avoiding Kent Street or making it into a viable route for their construction traffic, and ii) the ecological impacts and the extent to which they will need to be compensated for.
- Proximity of the Wineham Lane substation site to the main substation will increase profitability when compared to the current Oakendene proposal, by reducing the drop off in efficiency from the current plan which requires a 4km high voltage cable to connect the substations.

The cost of the construction of the windfarm and associated infrastructure has been estimated by the Applicant as around £3bn. Shareholder profit on such a venture is likely to be at least double that. Extra costs of a few million pounds would be allowed for in any rational financial plans for a venture of this scale.

**It is therefore not credible that the need to acquire the battery storage site by compulsory purchase in whole or part could jeopardise the viability of the Rampion 2 project.**

**We would be grateful if Mr Miliband could also consider this as a post examination submission.**

Thank you for your attention in this matter

Kind regards

Meera Smethurst

CowfoldvRampion (Cowfold Residents' Action Group)

## Appendix 4 – Letter from MP John Milne to Mr Miliband and Mr Reed 28<sup>th</sup> October 2024

**From:** MILNE, John  
**Sent:** Monday, October 28, 2024 7:45 PM  
**To:** MILIBAND, Ed [REDACTED] <[\[REDACTED\]@parliament.uk](mailto:[REDACTED]@parliament.uk)>  
**Cc:** REED, Steve [REDACTED] <[\[REDACTED\]@parliament.uk](mailto:[REDACTED]@parliament.uk)>  
**Subject:** Rampion 2 DCO decision

### Problems with Oakendene substation site in Rampion 2 DCO

Dear Sirs

I write with regard to the construction of an onshore electricity substation to serve the Rampion 2 offshore windfarm development which is currently with the Inspector for decision under a DCO process, due shortly. The Examination phase ended on 6<sup>th</sup> August.

The cable route associated with Rampion 2 is proposed to pass through the South Downs National Park and connect to the main grid substation via a new 6 hectare, 12m high substation.

A number of sites were considered for the substation. The site recommended for approval is at Oakendene in Cowfold, a small village in my constituency of Horsham. This is 5km away from the existing substation which is on Wineham Lane in Bolney.

The proposal to build at Oakendene has received very significant public objection. While I am very supportive of the government's renewable energy agenda, and I accept that sacrifices may be required to advance it, I agree with local residents that the Oakendene site has many flaws and should not have been shortlisted:

- Consultation as conducted under the DCO process was inadequate because it misnamed the site in question. Residents in Cowfold were given the impression that the sites under consideration were at Bolney, 5km away. As a result they largely did not engage with the process. By the time residents understood that the favoured site was in Oakendene/Cowfold, the decision was too advanced to affect. Ironically, one of the reasons for choosing Oakendene was the apparent lack of local objection.
- 5k is a considerable distance from the existing substation. As a result it creates an additional, unnecessary connection challenge from Oakendene to Bolney.
- Almost all the ecological evidence used to inform the site choice was desk-top, although Natural England cautions that these are often not accurate. This is particularly important in this case because the area of land affected by the route has never been surveyed. It consists of ancient, untouched meadowland and hedges and fields which remain medieval in their

layout. Of all the sites considered, Oakendene is the most negative from an ecological point of view.

- The developer's own ecology studies were mainly completed *after* the substation site was chosen. They showed that a majority of the important or protected habitats and species are associated mainly or exclusively with Oakendene. This includes 8 of the 14 Important hedgerows, and 3 of the 7 veteran trees plus 3 near-veteran. It is the only location to have hazel dormice or otters, together with a high proportion of the Great Crested Newts, and one of the few to have water voles. It is home to one of the most significant nightingale habitats in Sussex, denser even than the famous Knepp Estate rewilding centre which is also in my constituency.
- When Oakendene was first proposed it was assumed the site could be accessed directly off the main A272, rather than by Kent Street which was assessed as unsuitable for HGVs. But after they had committed to the site it was realised the A272 access was not practical. Instead of revisiting the decision to select the site, as should logically have happened, it was decided to use Kent Street against their own advice.
- Kent Street is a tiny one-way lane, barely more than a track. To make it usable by HGVs will require the removal of several hundred metres of tree and hedge and the widening of a 1km stretch. Overall, the Oakendene site requires the removal of almost 650m of mature hedges and over 100 important oaks.
- Oakendene is the only site with a flood risk, which again was not factored in at the start and is likely to raise costs unforeseeably.
- Lastly, the traffic implications for nearby Cowfold are significant because this is an AQMA location, the only one in my constituency.

No clear proposals have been offered to mitigate the harms that have been identified. Local councils have voiced major concerns about the landscape and visual impacts of this choice and the failure to take hedge and tree loss or meadowland destruction into consideration.

Rampion themselves have said they have only a 'marginal' preference for Oakendene. Given the negative evidence that has emerged since, this decision should be revisited.

The Secretary of State for Environment, Food and Rural Affairs has stated that: "Nature underpins all the Government's missions. Without nature, there is no economy, no health, no food and no society. Nature is at crisis point. The Tories left Britain one of the most nature-depleted countries on Earth. A



third of our bird and mammal species face extinction....this Government is committed to the legally binding environmental targets set under the Environment Act 2021—targets that this Government will meet by working in a new partnership with the nature non-governmental organisations".

It would be unnecessarily damaging to the government's overall environmental agenda, which I strongly support, to do so much ecological harm in the very act of developing a new renewable energy project.

If the Inspector is minded to approve the Oakendene site, I urge you to use your authority as Secretary of State for Energy Security and Net Zero to reconsider the environmental and practical implications of such a choice.

I attach a file giving more detail of the environmental impact supplied by local residents.

Best regards

John

**John Milne MP**

Member of Parliament for Horsham  
House of Commons | London | SW1A 0AA | 020 7219 7331  
Constituency Office: 2nd Floor | Afon Building | Worthing Road | Horsham | RH12 1TL

## Appendix 5-Correspondence with Roger Mortlock CEO CPRE November 2024

**FAO: Mr Roger Mortlock CEO CPRE.**

Dear Mr Mortlock,

I write as a representative of CowfoldvRampion, the Cowfold residents' action group against the Rampion 2 wind farm in West Sussex.

I recently heard you on Rare Earth discussing how we can build green infrastructure without harming the countryside, given the pressing need to reach net zero by 2030 and to better distribute the energy we produce.

Participants' comments ranged over the building of 620 miles of overhead cables and thousands of miles of cable under the sea. The affected public would have to be 'brought on board' and the planning process 'streamlined'. The government expects this to be paid for by £40bn of largely foreign investment.

We completely agree with you that speed of rollout and local democracy are in opposition currently. Getting local people 'on board' and 'streamlining the planning process' are two diametrically opposed aims; one requires their needs and concerns to be properly understood, the other pushes them to one side and ignores their voices.

The lady from Builth Wells, who was interviewed about the Bute Energy proposals from Builth, clearly felt helpless. Her experience of the enormous scale of the project which was being pushed through based on profits, with little local benefits, exactly mirrors the experiences of people in West Sussex with Rampion 2. Rampion have treated local communities and landscapes with contempt 'in the national interest'.

There is no joined up thinking on where these cables, substations and energy storage units go; it is currently left to companies to pick the cheapest, easiest sites for maximum profit. Until this is sorted out, there can be no bringing of communities on board. When wind farms, substations and energy storage units are built, local people already often face huge drops in the value of their homes, and watch precious habitats being destroyed for profit, in the name of environmental progress and climate protection.

The government is not bringing in foreign investment; we are sending out profit to foreign shareholders. It is a myth that green energy will be cheaper, as companies demand higher incentives to invest in these infrastructure projects, as they already have, holding Mr Sunak to ransom over this last year.

The Government's own departments are in direct conflict with each other: whilst DESNZ is driving green energy ruthlessly forward, to the detriment of everything in its wake, Steve Reed the environment minister, said in the recent Green Belt debate: "**Nature underpins all the Government's missions. Without nature, there is no economy, no health, no food and no society. Nature is at crisis point...A third of our bird and mammal species face extinction....**

**...This Government are committed to the legally binding environmental targets set under the Environment Act 2021—targets that this Government will meet by working in a new partnership with the nature non-governmental organisations".**

And recently, the Institute for Public Policy Research published a report saying that we must protect 30% of land and sea for nature and that **nature recovery must be embedded in government policy.**

Until they can work together in a joined-up way, there is no hope for our catastrophically depleted wildlife.

CPRE has signed up to support the Climate and Nature Bill, which seeks amongst other things to *“ensure that all activities in the United Kingdom which affect the health, abundance, diversity and resilience of species, populations and ecosystems prioritise avoidance of the loss of nature, through adherence to the Mitigation and Conservation Hierarchy; “*

One of the Rare Earth participants definitely felt people needed to be ‘less nimby’, but this is to misunderstand the true concerns local people often have, which are often more altruistic and nothing to do with nimbyism. It is absolutely crucial that local people are heavily involved in the decision making; not just to ensure they are ‘on board’ but for the environment as well.

I illustrate this with our own experience with the Rampion 2 wind farm onshore substation:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010117>

Often, as in our case, biodiversity records do not reflect what is actually there; there has often been no need to survey places which have been untouched for decades. So only local people know just how rich the wildlife is. Even with the present system it is an uphill struggle, as, to paraphrase Mr Bates, ‘we are fighting a multibillion-pound organisation supported by the British Government. We’re just [skint] little people’

Reducing the amount of local say and ‘streamlining the planning system’ would be a national wildlife catastrophe. It shouldn’t be left to those with the biggest PR budgets to call the shots.

There is no obligation on these companies to choose the sites and routes which are the least damaging to communities and the environment. Their only obligation is to shareholders, so they pick the easiest and cheapest sites, and they then spend huge sums on greenwashing to justify their choices on retrofitted environmental grounds, or on downplaying the true impacts:

The site they have chosen for the substation is full of mature oaks and will require the destruction of 647m hedges over 200 years old. The alternative sites were much less biodiverse, leading the County Council to say that “It is felt this demonstrates that the retention of important arboricultural features was clearly low on the agenda when considering suitable substation locations and associated constraints.” Clearly not following the mitigation hierarchy.

Shockingly, over half of the total hedgerow loss across the whole project actually occurs in this small area, resulting in an irremediable destruction of habitat. The area remains mediaeval in layout with small fields surrounded by dense hedges and scrub.

From the outset, we explained that because of all the undisturbed scrub and tree boundaries it was a hotspot for many critically endangered species including nightingales, (now found to be a greater density than the nearby RSPB site of Pulborough Brooks) sky larks, crested newts, adders and grass snakes, and also has incredible rare wildflower meadows, with sedges and orchids. It is a parallel habitat to the well reported Knepp Wilding project on the other branch of the same river, but preserved purely by being undesirable land for anything else. In all the consultations this ecology was ignored. We later found that no actions were included in the documentation as a result of all the information provided, and that there are serious flaws and major omissions in the biodiversity surveys commissioned for the project. Rampion continued to downplay their importance throughout the Examination. The options were never weighed up with ecology or tree loss as a consideration and worse issues arose during the final stage of the planning process due to

construction access constraints, which result in the loss of many more mature oak trees and whole stretches of historic parkland hedge. The damage is irreversible in our lifetimes.

Rampion's own surveys, which were not actually completed until *after* the site was chosen, prove the special ecological importance of this area, as from their surveys, many of the important or protected habitats and species occur either highly significantly, or exclusively, at this location; more than in actual designated habitats. Eight of the fourteen Important Hedgerows they have identified are in this area, three of the seven veteran trees, plus three near-veteran, it is the only location to have hazel dormice or otters, a high proportion of the Great Crested Newts, even though many of the local ponds were not surveyed, and one of the few to have water voles.

And yet they insist adequate ecological surveys were carried out prior to choosing the Substation site.

I would like to make one last comment from our experience: whilst over ground cables are visually more intrusive, underground ones are extremely damaging unless a genuine attempt to choose the route is carefully made to avoid habitats and endangered species. In Rampion's case it is clear that the route has been chosen for perceived cost and engineering reasons, not environmental preservation.

Having been involved in every stage of the planning process we can supply the detailed evidence to back up the above points.

No wonder we are the most nature depleted country on earth. The decisions should not be made by profit-seeking companies with big PR budgets.

Emma Pinchbeck was apparently happy to have a wind turbine on the hill opposite her home in an AoNB. Would she, I wonder, be happy to have a 12-acre 12m high substation outside her home as people in Cowfold will have if Rampion is successful? She also makes no consideration of where would be the least damaging place to put it.

She said that the current renewable technology drive is different from the last time when we saw rapid expansion of energy, ie coal and gas, because this time it is not in conflict with the environment. As you can see from the above this is clearly misguided and naïve.

We do not know what the Examining Authority will recommend or whether Ed Milliband will care. But to think you can bring about a switch to green energy whilst riding roughshod over nature, is like killing the patient to cure the disease.

Thank you for your kind attention,

Yours sincerely

Meera Smethurst  
CowfoldvRampion (Cowfold Community Action Group)

Dear Meera,

Thanks so much for your email and so sorry for the delay in getting back to you.

And thanks for your feedback on the interview. We certainly need a rapid and fair transition to net zero clean energy sources, but the details of how we do that are so important and shouldn't be at the cost of nature. And as you rightly point out, we need to balance the promises made by governments across different departments. Too often these commitments are viewed in isolation.

I agree with so much of what you say – and am copying in Paul Steedman from the local CPRE in Sussex who I know has been involved in the case. We don't work on individual cases in the national team – but it's always great to hear examples like this.

We are active supporters of the Climate and Nature Bill as you point out – and engaging with Roz Savage MP closely who I know understands the nuances in this debate. We are also pressing government hard to share their work on a land use framework to try and join up government departments on land use issues. You might also be interested in the recent work we have done with the [Aldersgate Group](#) and RenewableUK to provide guidance to the industry on how to deliver clean energy targets while at the same time protecting nature, climate and communities' rights to shape the proposals.

The main thrust of our campaigning on green energy will be around a rooftop first approach for solar – and issue where Sussex are doing some amazing work as I'm sure you know.

Thanks again for getting in touch.

All best

Roger