

From: [REDACTED]
To: [Rampion2](#)
Subject: Secretary of State Request for Information
Date: 06 December 2024 18:17:55
Attachments: [DKS1194.2 Green Lane Janine Creave - Letter Report.pdf](#)

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Rampion 2 windfarm proposal EN010117

Janine Creave IP no 20045132

RE: **Secretary of State Request for Information – Response to Question 9** Rampion Windfarm's final plan for Securing Trenchless Crossings underneath Irreplaceable Habitats

I am very concerned to elaborate on the critical impacts of the cable route and Trenchless Crossing positions on irreplaceable ecological habitat in the approach to the proposed new substation at Oakendene. These crossings and cable location were questioned during the examination process by the Examining Authority and ourselves as Interested Parties, with a further crossing suggested at the Green Lane in Cowfold, but these were not finalised by the time the examination closed.

I feel compelled to draw attention to three crossing locations which are in sites that I surveyed in detail (survey data published in submissions to deadlines 1, 4 and 5 of the planning process, REP1-106, REP4-112 and REP5-163). Professional Ecologist [REDACTED] and Principle Arboriculturalist [REDACTED] of Arborweald Environmental Planning Consultancy wrote reports confirming the ecological value and suggesting the cable route should be altered because 'priority habitat' quality meadow, 'important' hedge/scrub habitat, Category A trees with veteran features and established wildlife corridor will be destroyed in this process. The damage cannot be restored in our lifetimes, yet the turbines last only 25 years. The impacts of tree and hedge loss, 'unimproved lowland meadow' loss, red list species nesting sites (skylarks, cuckoos and nightingales), snake hibernation sites and hazel dormouse habitat loss cannot just be reversed or relocated elsewhere, and there are viable alternatives. However, no coherent proposals to minimise this damage were put forward by the time the examination closed. In fact, the Trenchless Crossing at the 3rd Site was dismissed on cost grounds without any acknowledgement of the historic or ecological value lost.

Site 1 is trenchless crossing **TC25/25a** at Cratemans farm, Dragons Lane, Cowfold. There was a possibility to extend the cable further underground here to avoid the field which I labelled as 'field A' being destroyed by a TC depot, open trench and haul road. This is the site of the highest quality of meadow (Ecologist report and plant species lists published in submission 1 and 4). Yet we keep hearing that 97% of these wildflower meadows have been lost in this country since World War II. The scrub edges of this field are home to the largest density of nightingales in the area (more than RSPB Pulborough Brooks this year) and at least 3 pairs of skylarks each year which nest on the ground exactly where the construction work is proposed to go. It is teeming with insect life and the plant

species include orchids, sedges, meadow grasses and vetches which all indicate the exceptional soil quality which will be destroyed by cable trench and haul road.

Ecologist [REDACTED] wrote of this site:

‘The most environmentally favourable option for the development is for the cable route to cross land of less ecological value and to avoid sensitive features in their entirety.

Failing this: **‘The most desirable option would be for the impact of the development to be reduced by undertaking the cable laying with Horizontal Directional Drilling (HDD) ... this would reduce the environmental impact on Cratemans Farm, particularly with regard to disturbing the valuable soil layers which have formed over decades of grazing and no-improvement’**

None of this habitat quality was acknowledge by Rampion Windfarms before the cable route was chosen despite submissions of data at the consultations from 2021 and only in the final August 2024 Grassland Features map were the meadows at last marked as notable (SI 1a and SI 1b on fig 7.2.4e Vegetation Retentions and Removal – Grassland). It has taken over 60 years to establish these fields and their scrub boundaries to this quality of wildlife haven and it can and should be avoided completely, not ‘cleared to 40m’.

Site 2 is Trenchless Crossing compound for **TC26** also at Cratemans Farm

This is in the most serious flooding area for the Cowfold Stream and where the whole section over the trench is underwater on and off all year, even to above the level where this crossing’s exit was marked in Moatfield Farm. The Cratemans meadow which will be destroyed by vehicles and equipment for this compound has also proved to be Priority Habitat of ‘unimproved lowland meadow’ as surveyed in June this year. Construction activity is adjacent to where a snake habitat will be destroyed by disturbance and vibration (photos and data submitted at deadline 1). The Rampion dismissal of reptiles being something that can be ‘trapped and translocated’ as a common construction site practice is a nonsense. Adders are now thought likely to become extinct in this country in the next 20 years and disturbance and loss of habitat are put forward as the main reasons for their critical decline. They establish territory over many years and long-term vibration and construction activity, let alone trapping and translocation, will be a disaster particularly for this endangered species.

Site 3 is the Green Lane G35/W110 on Vegetation Retention and Removal plans. Between Moatfield Lane and Kent Street in Cowfold.

This is a well-used wildlife corridor made up of ditch, bank, mature oak trees, hawthorn and field maple which show many veteran features. It also inter-connects to the historic tree canopy and copse of Woodcock Shaw (see professional report attached). There are badger setts all around (a report by badger recorder was included in deadline 1) and a heavily marked track with prints and clear claw marks runs right through this double tree boundary, deer are often seen using the track at any time of day. The historic value is clear and the footpath that it joins is noted as being repaired in 1649. There are many listed properties in this area. Yet this is marked to be cleared for both haul road and open cable trench destroying the corridor for ever. The Examining Authority suggested a Trenchless Crossing to avoid its destruction in their Further Questions, but to date this has

been dismissed by Rampion as too expensive and the value of the Green Lane dismissed as 'minor' with no justification given. A trenchless crossing would at least minimise the damage to only the 6m width of the haul road. It must be considered, but the wildlife corridor would still be severed. The alternative substation site avoids the issue completely.

There are 4 trenchless crossings in this small area around the proposed substation site of Oakendene which would cause all the engineering disruption, oil leaks (as occurred in Rampion 1) vehicle movements and destruction which this entails. It is landscape which until now has been saved from housing, proper roads and intense farming by the River Adur, and this proposal centres on the major flood areas of river catchment around the Cowfold Stream and tributaries. On a satellite image it looks like there is nothing here. In winter the water table is at ground level or above, but this is also why it is such a special and undisturbed habitat for so much critical ecology. A simple map of the river and flood zones can tell you why it is the wrong place for this construction. Why risk changing established flood patterns, risk water contamination and above all destroy habitat for all this endangered wildlife? At over 114 mature oak trees and 647 metres of hedge of over 200 years old marked to be cleared in this section alone, this cannot possibly be the right option.

If ecology matters in this country at all, which the public are crying out that it does, and the new government also claims that it does, then this project must be completely reviewed with this in mind. Renewable energy can go ahead without this poor level of research at the outset, and blatant dismissal of any mitigation for ecology during the planning process. There are alternatives. The substation and its cable route are in the wrong place but this can still be reviewed and this irreversible damage avoided.

Janine Creaye



Mrs Janine Creaye



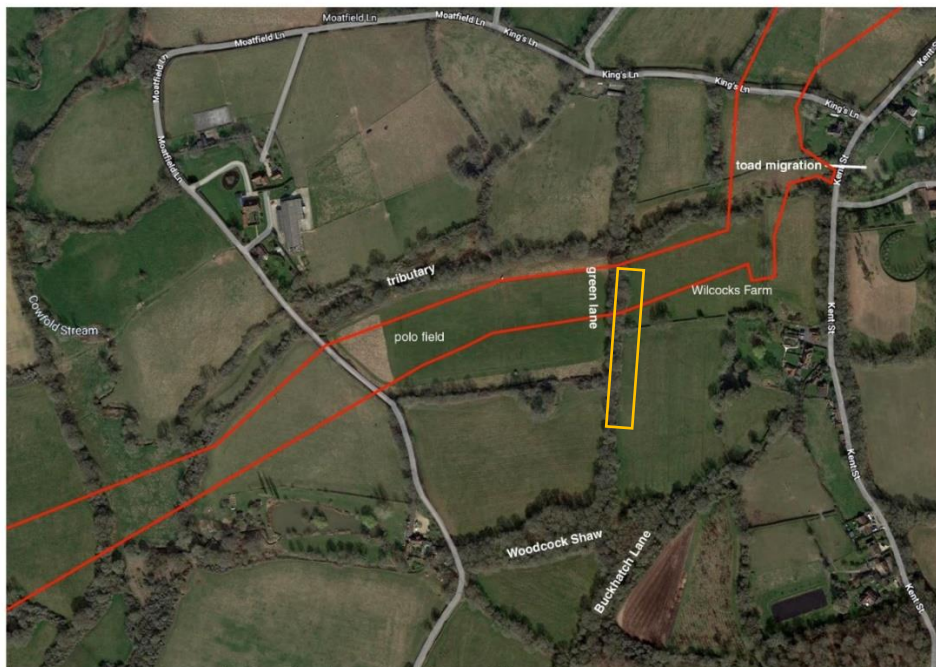
Arborweald Environmental
Planning Consultancy
Woodland Enterprise Centre
Hastings Road
Flimwell
East Sussex
TN5 7PR

Dated: 05/07/2024

Dear Mrs Creaye,

I am writing in response to the concerns raised about the proposed removal of trees and habitat at 'Green Lane' to facilitate the construction of infrastructure for the Rampion wind farm project, namely a 6m wide service road and associated cable trenching, which will result in up to 14 metres of this area being removed.

Thank you for providing your report of survey findings and map included below for this area (outlined yellow) and for showing myself and my colleague Perry Hockin the Green Lane site during our visit on the 9th of May 2024.



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

The following sections include my initial observations of the Green Lane site, and largely reflect your findings within your report for that area.

Ecological Value of Trees

Green lane comprises historic field boundary mature English oak with native understorey including field maple, hawthorn, blackthorn and hornbeam. 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 oak trees within the Green Lane area have been surveyed as part of the arboricultural impact assessment for the Rampion project and are grouped as G35 within that report, these trees have been classified under British Standard 5837: Trees in Relation to Design, Demolition and Construction as category 'A' trees, a classification that assigns a high level of arboricultural value. A full assessment of the ecological importance of these trees does not seem to have been included as part of the arboricultural assessment for the site.

All trees within the Green Lane area provide valuable habitat for numerous species. Birds will be using these trees as food sources and nesting sites birds, including the possibility of Schedule 1 species, that would be using Green Lane as part of the wider habitat network. Bats are highly likely to be utilising the mature oaks as foraging and commuting corridors, furthermore habitat features within the trees such as decay pockets and lifting bark could be used as roosting sites for bats. The oak trees also provide potential habitat for herptile species that could be using basal decay pockets and lying deadwood as hibernacula.

Therefore, it is my professional opinion that the overall impact of the removal of these trees to facilitate the proposed development especially regarding their ecological value has not been fully explored.

Habitat Links and Networks

The smaller native understorey trees within the Green Lane area provide a stratified and structurally diverse field edge habitat as well as providing a valuable continuous habitat link between both the mature oak trees within Green Lane and the wider countryside landscape, including the tributary to the north and Woodcock Shaw to the south. These links would be significantly compromised if not completely severed if the proposed tree removals take place.

Green Lane is also an integral part of the wider habitat landscape consisting of smaller grassland areas bounded by shaw woodland and native hedgerows, accordingly the proposed removal of sections within Green Lane would significantly impact the wider habitat network, by fragmenting these links.

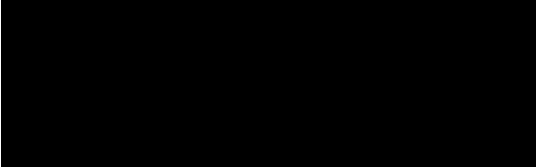
Historic Significance

Green Lane is a historic field boundary shaw feature with map evidence dating back to 1843-1892 and is likely to have been a part of the local farmed landscape for centuries. Green Lane includes a defined bank and ditch feature that indicates potential historic significance that should be further explored before elements are removed to facilitate the proposed development and its historic significance is destroyed forever.

Conclusion

It is my professional opinion that the arboricultural, ecological and historic importance of Green Lane has not been fully explored as part of the proposed Rampion Windfarm development. Should removal of sections of Green Lane take place to facilitate development it is my concern that this valuable and irreplaceable habitat feature will be significantly degraded and accordingly the arboricultural, ecological and historic value of Green Lane will be totally compromised.

Sincerely,



Alex Livingstone, BA hon, ND arb. NC forestry – Principal Arboriculturalist
Arborweald Environmental Planning Consultancy.