

Natural England have now included the Cratemans meadows in their Priority Habitat Inventory. Whilst this does not give them the same status as a Site of Special Scientific Interest, for example, the surveyor did say the site was *better than* a nearby SSSI site he had just surveyed. However, it does recognise its importance as critically endangered habitat. As the UK has lost 97% of our wildflower meadows since World War II, it makes no sense to choose this route. The trenchless crossing at Cratemans mentioned at the 6<sup>th</sup> December deadline [REDACTED], its attendant compound and the haul road through the farm will do irreparable harm to this habitat and the many critically endangered species within it.

This meadowland does not exist in isolation; rather, it is a reflection of the ecological importance of this small area between the A281 and Oakendene. Around 60% of all of the hedges to be lost are here, and most of the trees. Eight of the fourteen veteran trees Rampion identified are here also, and so many red list species thrive in abundance. Of all the alternative substation sites under consideration, Rampion have chosen the most ecologically damaging, and for reasons of self-interest, not the National Interest. They failed to consult Cowfold in the crucial early stages, and, in their own words, 'took the path of least resistance'. This desperate loss of nature is unnecessary, as a perfectly reasonable alternative exists at Wineham Lane.

At least as important however, is the fact that Rampion consistently tried to rubbish the findings, describing the area as 'poor semi-improved or improved grassland' which 'did not pique the interest' of their various ecology surveyors who had apparently been to survey the site on several occasions and found nothing of interest!

**This discredits Rampion's surveys-not just at Cratemans, but *any of their surveys*, especially the ecology ones, *but in fact any of them at all*.**

- **Ecology Surveys**

We already know there are big flaws in the ecology surveys, particularly regarding the red listed species at Oakendene and the cable route through the Cowfold area. Casting doubt on their surveys lends weight to the arguments provided by residents that Rampion have seriously downplayed the findings. It means it is much more likely that community evidence about nightingale breeding site numbers, sky larks, insect populations, badgers, reptiles and so many others, is right and Rampion are wrong.

- **Tree and hedge loss:**

Residents and WSCC have had serious concerns about the extent to which Rampion have down played the importance of the ancient trees and hedges in this area and the extent to which they will be destroyed and their ecological value lost. Also, the loss of scrub land; important and rare habitat for nightingales to breed in. All of these are impossible or very difficult to replace, and certainly in the 25-30 year lifetime of the substation. The discrediting of Rampion's surveys at Cratemans makes it far more likely they have also been economical with the truth about this too.

- It means their estimates of the extent to which they can compensate for these losses are also likely to be overoptimistic and should not be automatically believed.

- **Traffic surveys:**

It calls into question their assessment of the impact of the traffic on the A272 and the AQMA in Cowfold, and the effect that their huge vehicles will have on Kent Street, including their ability to successfully manage the traffic, pedestrians or horses on the lane. Indeed, can we even believe the traffic data they provided to the Examination at all? Perhaps it explains why what we all know will happen is so drastically different from what Rampion have been claiming.

- **Flooding**

When Rampion began the consultation, they had no idea that Oakendene flooded. Local people have provided clear photographic and other evidence of the significant extent to which it does flood. Rampion have attempted to rubbish and undermine this evidence. As we all know, the flooding in this country is getting more frequent and more severe as each year goes by. We cannot now trust Rampion's promises that the flooding will be adequately accounted for at Oakendene and that the nation will not be faced with expensive re-siting of the substation in years to come. The government is beginning to wake up to the importance of not building on flood risk areas, especially national infrastructure such as this; please do not make this mistake here as a site which does not flood exists at Wineham.

- **Landscape and visual impacts**

Rampion have been very selective with the viewpoints they have chosen and very much over emphasised their ability to screen the substation from the A272, Kent Street and the beautiful walks around the lake and Taintfield Wood. So many people have written saying the impact will be far more terrible than Rampion say. The discrediting of their meadowland surveys makes it far more likely that local residents are right and they are wrong.

- **Other issues**

In fact, this discredits any of their reports and surveys, from noise, air pollution, light pollution, the impact on the Grade 2 listed Oakendene Manor, jobs at Oakendene industrial estate and Cowfold. Their RVAA was very dubious with ludicrous comparisons equating the level of 'noise' from birdsong and dog barking to that of the construction. They attempted to convince the Examination that even the people living at the entrance to the western compound in Cowfold would hardly be affected!

- **Alternatives**

The discrediting of their meadowland surveys casts doubts on the evidence Rampion provided as to why they chose this site. It means we cannot believe the reasons they gave, which the people of Cowfold have always suspected were retrofitted to support

a site they thought would be easier and cheaper to use, and hoped they could get away with because we were not consulted before the site was chosen.

In addition, and importantly, Rampion are meant to show that in choosing the site, they looked at the harms done by the alternative sites and routes and chose the least damaging. If their surveys and data are not accurate, how can they claim they did this? The first priority of this assessment is to avoid the most harmful, which is clearly Oakendene and the route through Cratemans. Instead, they have tried to play down the value of these areas to get what they wanted.

- **Benefits do not outweigh the harms**

This is one of the key parts of the decision-making process; Rampion are meant to prove that the benefits to the nation outweigh the harms.

If you don't have any faith in the baseline findings of what is there, how is it possible to judge what will be lost, how important that loss is, how easily it can be replaced and whether the benefits of the proposal outweigh the harm. It would seem from the Cratemans reports that *Rampion have been trying to conceal the extent of that harm*. This country is the most nature depleted in the world. It makes no sense to destroy habitats and wildlife unnecessarily.

It is not just the harms which have been underestimated, **but the benefits have been hugely over exaggerated by Rampion, both to the nation in terms of efficiency of output, and specifically regarding the benefits of putting the substation here at Oakendene as opposed to alternative sites.**

The whole proposal should be rejected, as little attempt has been made by the Applicant to act in the National Interest, more probably, just their own financial one. If the Secretary of State is not minded to do this, at least the substation end of the plan should be reviewed, where it is obvious the harms outweigh any benefits, and a clear, less damaging alternative exists.