

Rampion 2 windfarm proposal EN010117

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RE: Secretary of State Request for Interested party responses to last submissions to DCO Planning Process

The overwhelming impression that comes out in this planning process, particularly in this latest submission of documents and letters, is that interested parties, landowners and impacted businesses have been ignored from the outset of this Proposal if at all possible, right up to the latest Land Rights Tracker, unless a legal reason has been pointed out by Planning Authorities as requiring negotiation or agreement by a specific deadline.

This has been stated by both landowners (ie Winkworth Sherwood LLP on behalf of Susie and David Fischel, Tim Facer in the last submission), and impacted business owners (Richard Clifford in the last submission) and other interested parties throughout. The Applicant has been called 'bullying' 'economical with the truth' and the Post Office scandal has been cited as similar in approach to Rampion's dealing with normal working people. As set out by Winkworth Sherwood for the Fischels: RWE have made 'no genuine or meaningful attempt to try to reach agreement with them'. And 'After months of waiting for meaningful engagement, an undertaking, or documents from the Applicant' there is sudden 'action from the Applicant shortly after being specifically requested to do so by the Examining Authority'

In this context how can ecological priorities get a hearing, where inconvenient legal obligations are barely fulfilled even when facing articulate landowners and their lawyers?

I have no direct land interest to negotiate in this process but have been trying to be a voice for the unique but threatened ecology in this northerly section of the onshore construction route, since it was just one of 6 options which then came down to 2 in 2021. I have personally been promised copies of comparative ecological survey material, write ups of site visits and phone conversations, copies of the inclusion of ecological data supplied by myself, and because there has been no legal compulsion I have never received any of these, nor found my submissions in any coherent form in the Applicant's published Examination Documents.

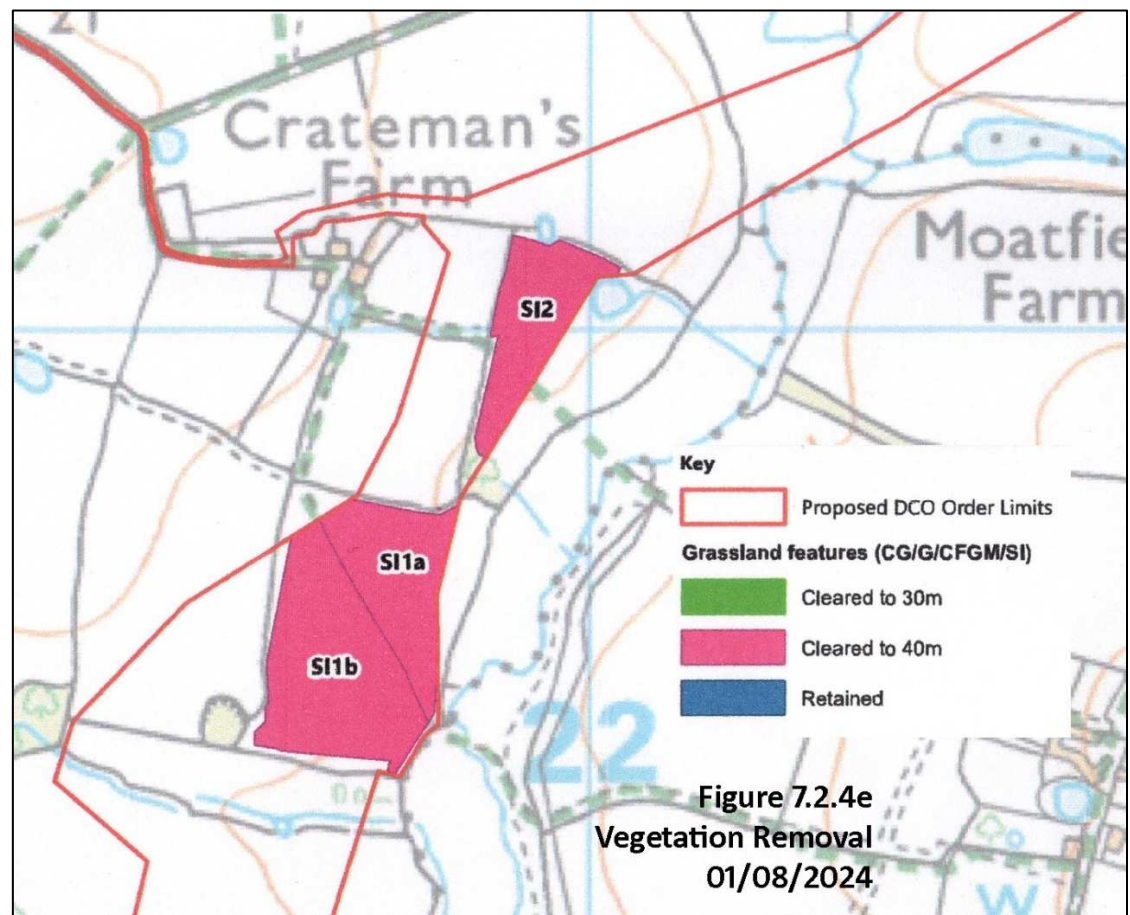
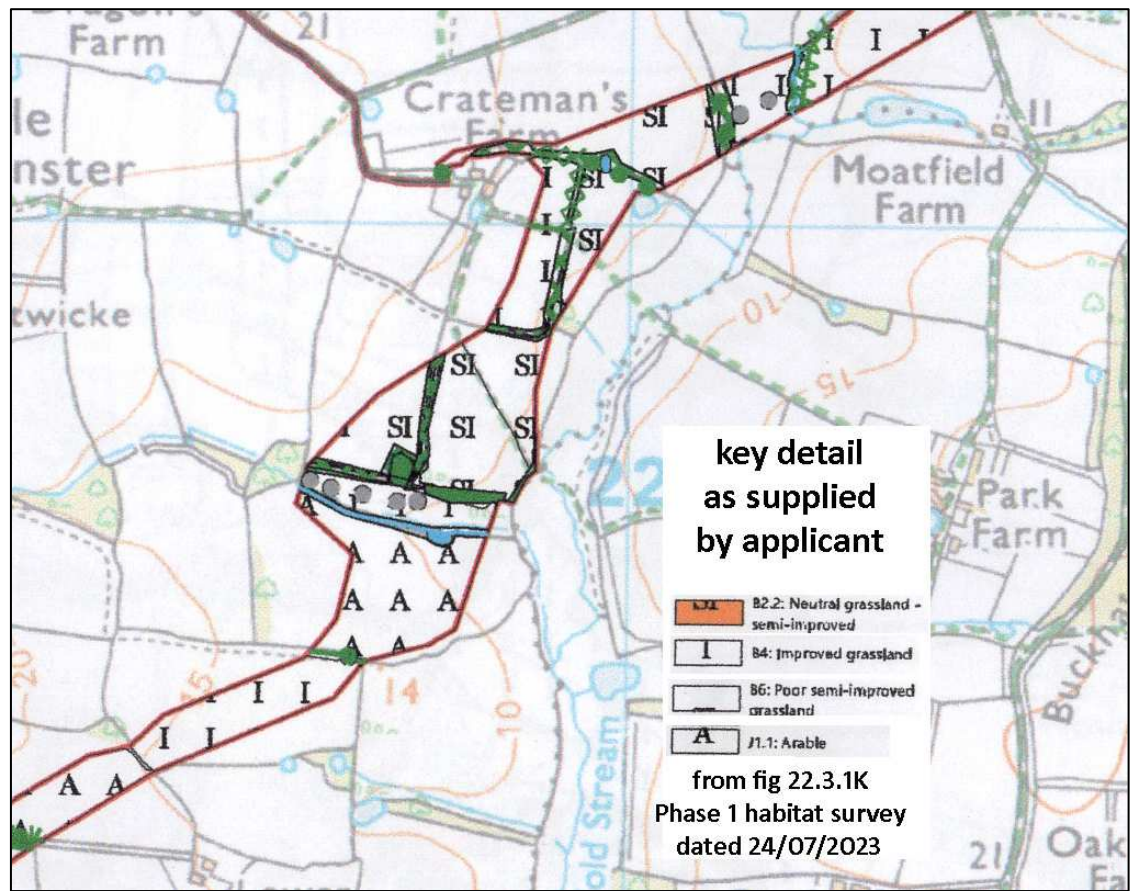
If the experience of humans who can speak, write and engage legal help is this poor, how likely is it that red list species, mature trees and hedges, meadows and other ecology are fairly assessed in this process? The truth is they haven't been, and the evidence of this continues to stack up, despite being held back by the failure of the Applicant to release their own data until the Examination.

From 18th December Natural England accepted our evidence and classification that Crateman's Farm meadows (directly in the cable route) are Priority Habitat of Lowland meadow, and are now being put forward for inclusion in the National Priority Habitat Inventory.

The first Map following here shows the Rampion habitat survey classifications dated 2023 (long after the selection of substation site in July 2022) but likely from survey data in 2021.

The second map was drawn up by the Applicant towards the end of the Examination process after evidence was given and is still marked for removal to 40m, but these fields shown in pink are now being taken forward by Natural England as Priority Habitat of Unimproved Lowland Meadow, not Improved (fertilised) or poor semi-improved as marked in these critical Phase 1 surveys for Rampion. The whole farm is of similar quality habitat as it has all been treated the same way with minor variations only because of soil and flooding habit differences. The fields were my selection when allocating time to survey, as most accessible by public footpath but also severely under threat. I later surveyed the most northerly field (nearest Moatfield Farm) which proved to be

species rich lowland meadow as well, which was also confirmed by ecologist Perry Hockin. This meadow will be destroyed by a trenchless crossing compound and vehicle turning point. It is clear that this should never have been the selected route if the Rampion surveys were accurate in the first place.

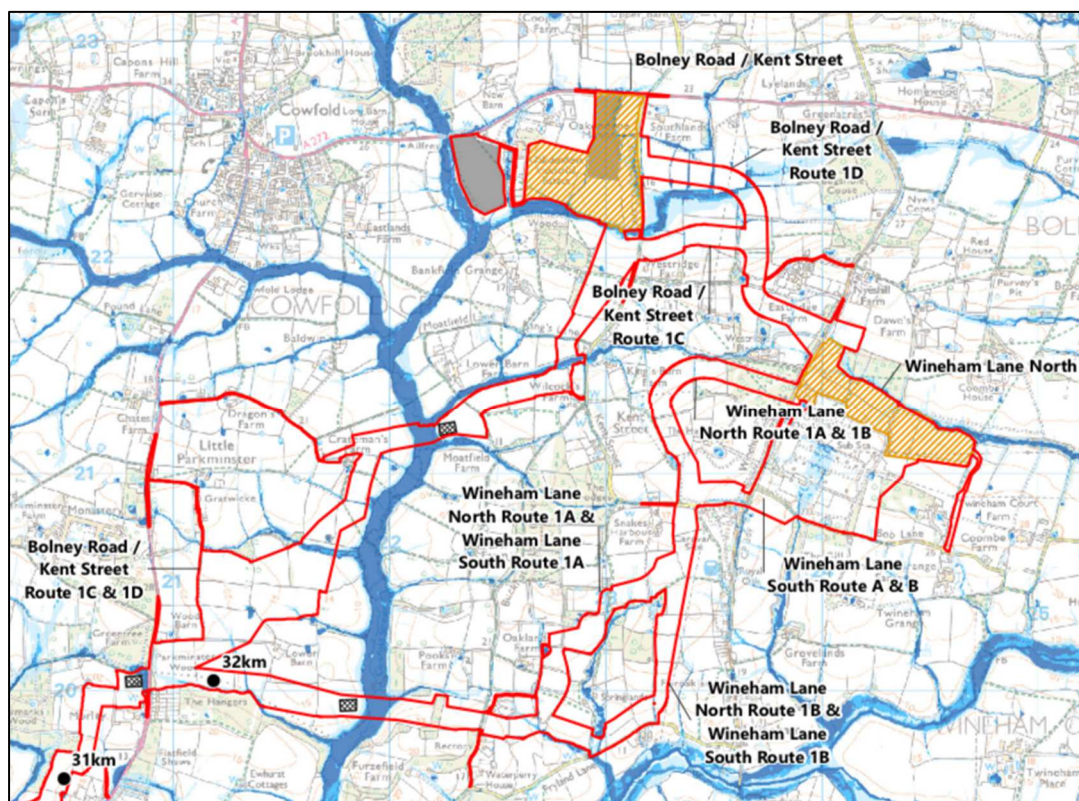


Again I will quote Ecologist [REDACTED]: **‘The most environmentally favourable option for the development is for the cable route to cross land of less ecological value and to avoid sensitive features in their entirety.**

This was never fairly assessed to select the least ecologically damaging route. At best it was negligently not considered important, at worst it was deliberately underplayed to reduce the liability for Biodiversity Net Gain and the costs to the Applicant. Where other landowners have challenged the survey assessments for their land, they were blatantly told that it didn't change anything as there would be further surveys completed just before the construction and that would only mean slight increases to the BNG units, as none of it was priority habitat. This is in the applicant's documentation. This was, and is blatantly not true. The whole route mapping and particularly the Oakendene substation site selection is undermined by this new endorsement of evidence. Were any of the surveys commissioned (and quoted) by the Applicant accurate?

It adds to the fact that the colossal tree, scrub and hedge loss in the approach to Oakendene (detailed in many submissions including in my last) only came to light in the final stages of the examination process as the construction access routes had not been decided until deadline 4 and the vegetation loss maps not made until the last deadlines. We began to realise as we started to make our own tally of significant trees in the cable path. The County Council have also commented that avoiding tree loss was obviously 'not a priority' to the Applicant. How can this be justified? There are viable alternatives and the trees cannot be replaced or new ones ever planted on the cable trenches. Boundaries, and vistas are lost for ever, ecosystems and carbon storage lost for hundreds of years unnecessarily.

As an addition to this, our very current experience of local flooding, shows up the increases caused by erratic weather conditions due to climate change, yet this seems to be dismissed in the application as unimportant. What logic is it to construct a cable route miles inland, taking out many water absorbing trees, scrub and hedge and then building a large substation specifically located in a flood area, which is exacerbated by the underlying water-retentive clay soil? Especially when the alternative was not. This map says it all. [There are 9 properties in the centre of the map in Kings/Moatfield Lane alone.]





Cable crossing flood off Moatfield Lane. 5th January 2025. Cowfold stream runs behind the trees out of view



Running surface water at King's Lane cable crossing point, 5th January 2025. The Oakendene substation is located just up to the right and construction will inevitably add to these floods running off the saturated and clogged clay fields, cutting off access to properties and making its way to the A281 where it habitually floods.

National Assessment of flood and coastal erosion risk in England 2024 published in December stated that:

‘With climate change the total number of properties in areas at risk from rivers and the sea or surface water could increase to around 8 million by mid-century. In other words, 1 in 4 properties in England will be in areas at risk of flooding from rivers and the sea or surface water by mid-century.’

- ‘total properties in areas at risk of flooding from surface water is around 4.6 million - a 43% increase on our previous assessment’
- ‘properties in areas at high risk of flooding from surface water increases to about 1.1 million - 3 times greater than our previous assessment’

Quantities of aggregate will be added to all the haul roads in this section alongside the cable to stop the construction vehicles sinking in the clay, so that the ecology and soil structure will be destroyed for decades and established flood patterns will be altered unpredictably, and likely catastrophically to properties and roads.

This project has been ill planned and arrogantly pushed forward, with little regard for clear evidence provided by Interested Parties, valuable ecology, historic landscape, impact to local businesses, or irreversible damage to farmland.

Surely renewable energy need not incur this much destruction just for the profit of a commercial company? The remaining special qualities of this small, intensely populated country must be worth more than this. We as residents deserve a hearing and the dwindling ecology desperately needs better protection than this.

I hope that the Secretary of State will listen to us, as this Applicant to date has not.