

**From:** [EIP Internal Correspondence \(Energy Security\)](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Post Examination Submission for Rampion 2 Windfarm DCO; New Information  
**Date:** 28 October 2024 14:27:42  
**Attachments:** [Attachment 1 CVR Letter to Ed Miliband and Steve Reid.docx](#)  
[Attachment2 Alternatives letter Final version.docx.docx](#)

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[REDACTED]

[REDACTED]

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[REDACTED] @energysecurity.gov.uk>

**Sent:** 28 October 2024 12:27

**To:** [REDACTED] @energysecurity.gov.uk>

**Cc:** EIP Internal Correspondence (Energy Security) <EIP-correspondence@energysecurity.gov.uk>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** SpAds Office (Energy Security) <[Spads.Office@energysecurity.gov.uk](mailto:Spads.Office@energysecurity.gov.uk)>

**Sent:** 28 October 2024 12:13

**To:** [REDACTED] @energysecurity.gov.uk>; Energy Infrastructure Planning Team <[energyinfrastructureplanning@energysecurity.gov.uk](mailto:energyinfrastructureplanning@energysecurity.gov.uk)>

**Cc:** [REDACTED] @energysecurity.gov.uk>

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

Hi David, team,

Please see attached correspondence from Meera Smethurst of CowfoldvRampion

(Cowfold Residents' Action Group), regarding the Post Examination Submission for Rampion 2 Windfarm DCO.

This was sent to Jonty Leibowitz, Special Adviser to the Secretary of State. Jonty has no role in this planning decision and will take no action off the back of this correspondence.

I will go back to Meera to outline that this has been shared with the Energy Infrastructure Planning Team.

All the best,  
George

**George Whelan** | Senior Private Secretary and Head of SpAds' Office | **Department for Energy Security and Net Zero** | [REDACTED] | [SpAds.Office@energysecurity.gov.uk](mailto:SpAds.Office@energysecurity.gov.uk) | You can find guidance on our submission and briefing templates [here](#).

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**From:** [REDACTED]@gmail.com>  
**Sent:** 27 October 2024 19:26  
**To:** [REDACTED]@energysecurity.gov.uk>  
**Cc:** SpAds Office (Energy Security) <[Spads.Office@energysecurity.gov.uk](mailto:Spads.Office@energysecurity.gov.uk)>  
**Subject:** Post Examination Submission for Rampion 2 Windfarm DCO; New Information

Dear Mr Leibowitz,

I write to you in your capacity as Special Advisor to Mr Miliband.

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 wind farm 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)

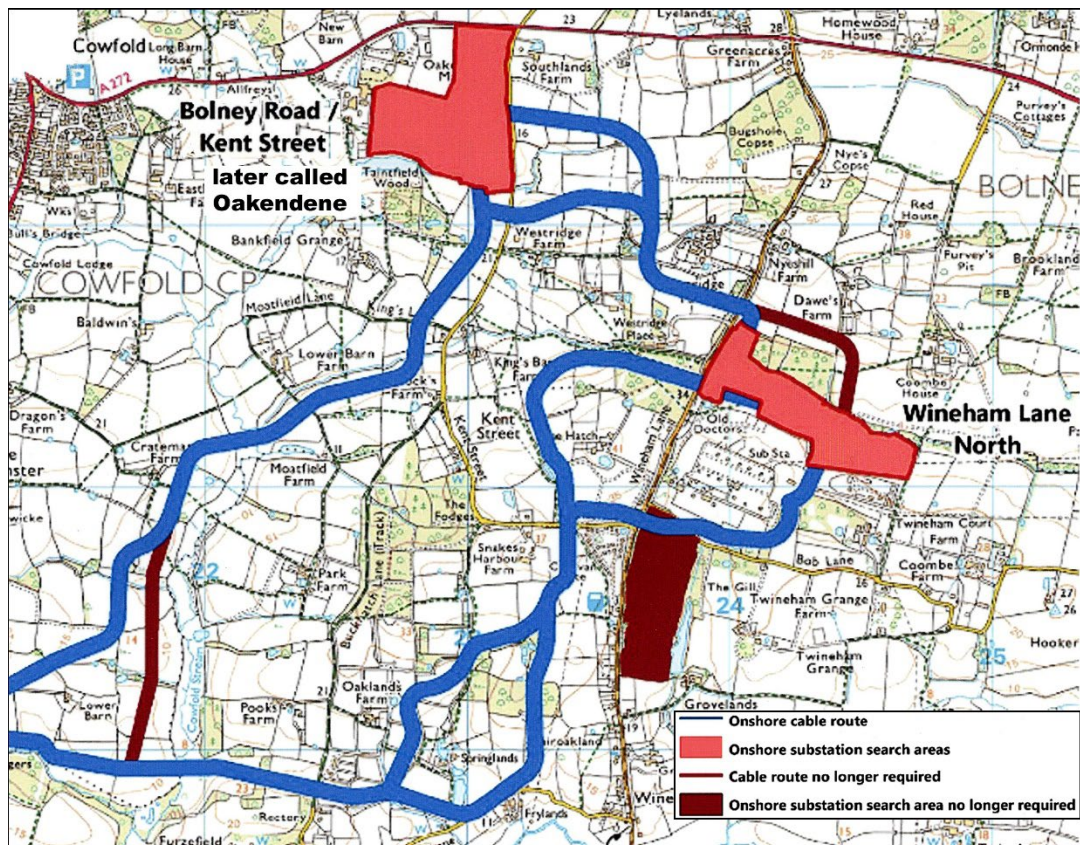
## Rampion 2 Windfarm Proposal: Reconsideration of Alternatives to the Substation Site

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 <b>all</b> '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 of 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.

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