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To: new.case@beis.ecase.co.uk
Subject: FW: Rampion 2 DCO decision
Date: 29 October 2024 12:59:01
Attachments: [image001.png](#)
[Rampion 2 Views of Residents.docx](#)

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From: Secretary of State [REDACTED]@energysecurity.gov.uk>
Sent: 29 October 2024 11:50
To: DESNZ Correspondence <correspondence@energysecurity.gov.uk>
Subject: FW: Rampion 2 DCO decision

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From: [REDACTED]@parliament.uk>
Sent: 29 October 2024 08:57
To: Secretary of State [REDACTED]@energysecurity.gov.uk>
Subject: FW: Rampion 2 DCO decision

From: [REDACTED]@parliament.uk>
Sent: Monday, October 28, 2024 7:45 PM
To: [REDACTED]parliament.uk>
Cc: [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 6th 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 Minister for 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

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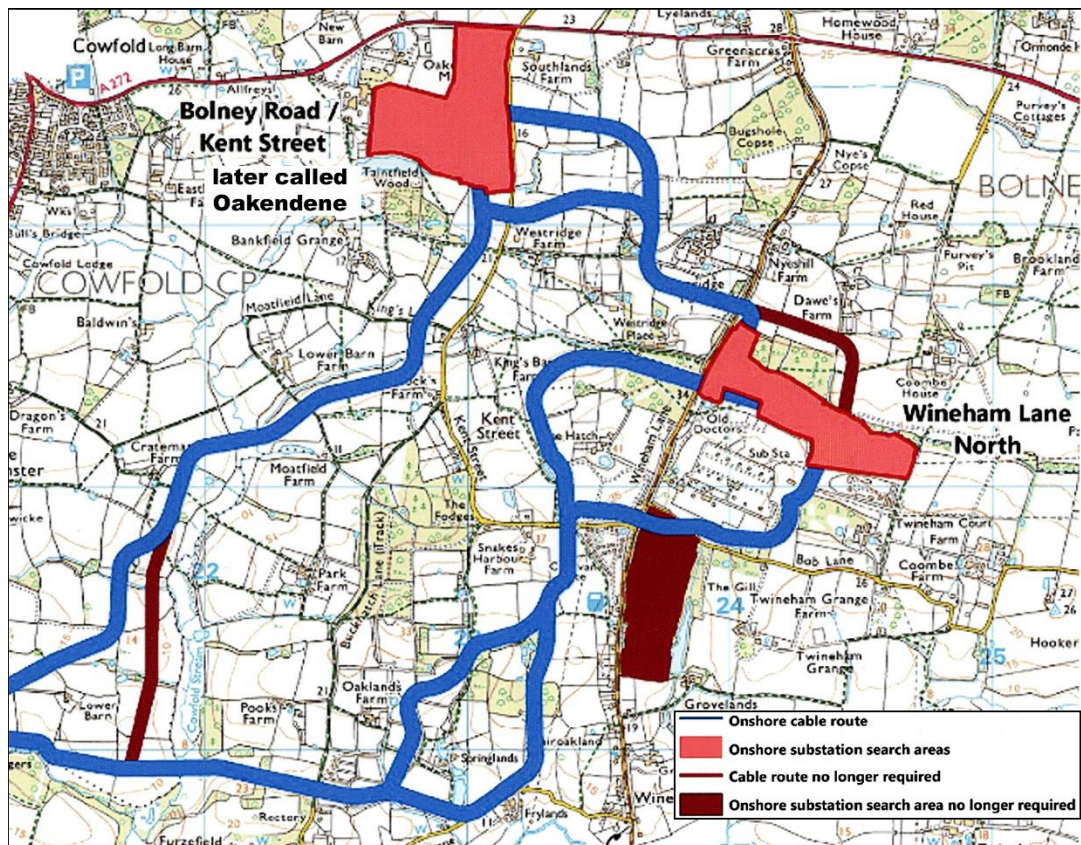
Rampion 2 Windfarm Proposal: Reconsideration of Alternatives to the Substation Site

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 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.