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Sent: 06 September 2024 12:03
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Subject: FW: Rampion2 offshore windfarm : the unnecessary environmental harm

From: REED, Steve <steve.reed.mp@parliament.uk>
Sent: Thursday, September 5, 2024 10:19 AM
To: SM-Defra-Correspondence Section (MCU) <Correspondence.Section@defra.gov.uk>
Cc: Secretary.State (DEFRA) <Secretary.State@defra.gov.uk>
Subject: FW: Rampion2 offshore windfarm : the unnecessary environmental harm

From: Meera Smethurst <meera.smethurst@gmail.com>
Sent: Thursday, September 5, 2024 10:02 AM
To: ed Miliband <secretary.state@energysecurity.gov.uk>; REED, Steve <steve.reed.mp@parliament.uk>
Cc: MILNE, John (MP) <john.milne.mp@parliament.uk>; FARRON, Tim <tim.farron.mp@parliament.uk>; Lynn.Lambert <lynn.lambert@horsham.gov.uk>
Subject: Rampion2 offshore windfarm : the unnecessary environmental harm

Dear Mr Miliband and Mr Reed,

I write as a representative of the community in Cowfold, who, if the Rampion 2 wind farm 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 wind farm, 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 6th 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 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 wind farm 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

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