

Cowfold v Rampion Post Examination Submission 23 Mar 2025

Introduction

We wish to bring to the attention of the Secretary of State new information concerning the Rampion 2 wind farm application, which, we believe, should be taken into account in the decision-making process, even at this late stage.

The Substation Site

Priority Habitat:

In our response to the Secretary of State on 13th January, we wrote that Natural England has accepted two fields at Cratemans Farm on the cable route as Priority Habitat Lowland Meadow, based on our evidence and a survey from Arborweald Environmental Planning Consultancy. Rampion's own reports had classified the meadows as of *'low ecological value, which did not pique the interest of their surveyors'*. At the time the two fields were all we could afford to survey, although the extraordinary wildlife across the whole farm is well known and enjoyed locally.

The owner of Cratemans Farm has now commissioned a survey of *all* the farmland, which he has farmed in the same way as the Priority Habitat fields for many decades. As surveys of this kind have to be done at the appropriate time of year, you will understand that this information will not be available until June at the very earliest. However, local knowledge, together with the previous evidence we have submitted, means it is highly likely, as we have said throughout the Examination, that the whole site will be of similar quality and therefore Priority Habitat also. I remind you of the fact that the surveyor from Arborweald commented that the site was 'better than a SSSI site he had recently surveyed'

Trenchless crossings will not mitigate the damage done at Cratemans as the haul road and turning circles will still be needed due to the absence of any existing tracks or lanes.

We remind you that the survey findings at Cratemans also cast doubt on the validity of *all* the Rampion 2 surveys provided to the Examination.

Damage to any of these Lowland Meadows could be avoided by choosing the less ecologically sensitive substation site at Wineham Lane and associated cable route.

Otter:

The only place where Rampion found incontrovertible otter evidence across the whole DCO (feeding evidence and spraint) was at Oakendene. Evidence of probable otter was also noted at nearby Gratwicke. **This March, further evidence of otters has been entered into the biodiversity records, for both a feeding site and stream side footprints at the Cowfold Stream within the cable route.** The loss of this species in Sussex has been down to disturbance as well as destruction of habitat. The otters of the Cowfold stream would suffer on both these counts.

Our otter findings provide further evidence of the high value and balanced sensitive nature of the whole ecosystem in this precious, though currently undesignated, area between the A281 and Oakendene, with its profusion of ancient hedges, hundreds of mature oaks, nightingales, snakes, toads, and insects. Paying into a Nature recovery plan to replant scrub and saplings elsewhere cannot possibly reproduce such a complex balance in the lifetime of the wind farm and substation. Nature is here because it wants to be and is happy here. A far less damaging location exists at Wineham Lane. To unnecessarily and

irremediably devastate such an environment as exists at Oakendene and its surroundings would be an act of wanton vandalism, yet in the 2024 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."** We urge you, therefore, to reject the substation site at Oakendene.

Kent Street:

In the past few weeks, surveying has been taking place at Oakendene by Rampion. It has also been carried out on Kent Street. Markings on the road and in the verges would appear to suggest that Rampion may be looking at widening *the whole of Kent Street* from the A272 to access point A61.

If this is so, such a proposal was NOT part of the Examination. The plan has gone from '*Kent Street is unsuitable for HGVs*' in the consultation documents, to recognising during the Examination that it would in fact be needed to access the haul road, and now it seems to finally accepting that as it stands, it is simply not capable of taking such traffic. If such widening is indeed planned, it must require re-examination.

Even more than the passing places suggested at the Examination, this would be completely unacceptable to residents, and ecologically highly damaging. The wider road would result in a radical change to the landscape, massive loss of trees, and of hedge and scrub, all important habitat for nightingale and hazel dormice, and the loss of verges full of summer wild flowers. In addition, in order to actually carry out such widening, construction access needs to be even wider, which would be considerably more destructive to the hedges and trees along the sides.

If in fact the road and verge markings are instead related to the rerouting of the UKPN high voltage cable along Kent Street, then similarly, this has not formed part of the Examination. Indeed, the Applicant has so far chosen to ignore all our concerns regarding this. This would also cause unacceptable disruption to residents and wildlife, which would be threefold: first to lay the cable would require major work to the lane, secondly to upgrade the road to ensure the safety of the cable underneath the road, or in the unstable verges, and thirdly the use of the lane by the traffic accessing the haul road.

Again, like the ecological destruction of Cratemans and Oakendene, we remind you that this is *unnecessary*, as the road to the Wineham Lane site was already widened to take the construction traffic for the main substation sixty years ago, and indeed, has just been resurfaced from the A272 to the entrance of the main substation.

Offshore impacts

By the end of the last century, 96% of the kelp along the Sussex coast had disappeared, along with the marine life it supported. Thanks to the work of the Sussex Kelp Recovery Project (SKRP), and championed by Sir David Attenborough, in 2021 the Sussex Nearshore Trawling Byelaw came into being, protecting 304km² of seabed on the Sussex Coast from this fishing practice. As they celebrate the fourth anniversary of the trawling ban, the Sussex Kelp Recovery Project have just announced positive signs of recovery of the sea bed, including an increase in the populations of lobster, brown crab, short-snouted seahorse and many others.

How desperately sad therefore that their achievement in creating this remarkable success story may be completely undone in many areas by the devastating impact of the piling for Rampion 2's vast wind turbines, if consented, and the cables which will bring the power onshore. Though the main activity will be further offshore than the kelp beds, trenching and cable laying will take place closer to the shoreline. Much focus during the Examination and afterwards has been on the Kingmere MCZ, but if the SKRP records are showing rises in populations in the conservation zone of the nearshore trawling ban, surely this needs due consideration by the Secretary of State also?

When RWE were granted their licence from the Crown Estate this byelaw did not exist. It makes no sense to recognise the need for this law and yet to grant the go ahead on the wind farm construction at this site.

A statement from the Crown Estate at the end of 2023 regarding the seven Extension Projects it had granted licences to, including Rampion 2, provides clear evidence that the environmental impacts were to remain under review; the statement says that *"The Crown Estate will balance the economic and clean energy potential of these projects with its commitments to nature and biodiversity and duty to make the most effective and efficient use of a valuable, but increasingly busy, seabed. **Any decision taken will be subject to a 'Plan-Level Habitats Regulations Assessment' (HRA) to understand the collective environmental impact of the additional capacity across all seven projects"***

<https://www.thecrownestate.co.uk/news/the-crown-estate-sets-out-plan-to-unlock-enough-new-offshore-wind-capacity>

Where is the evidence to show that they have shown such commitments to 'nature and biodiversity' with respect to the sea bed?

Sussex IFCA has had some input into the Examination, but not since July 2024. In November, the Secretary of State asked for post examination submissions regarding impact on seahorse and black sea bream regarding piling for the turbines. No mention was made of the cable route to the shore or the kelp beds themselves which have enabled these species to thrive, merely the timing of the piling to limit impacts on breeding:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-002282-Information%20Request%20Letter%2025.11.24%20Rampion%202.pdf>

From the SKRP Sussex Sediment Monitoring and Adaptive Workshop Report of 18th May 2023, it is clear that there are many data gaps regarding the impact of wind farm construction, from piling to trenching, cable laying and spoil rock dispersion. The new data from SKRP must therefore be shared before it is too late.

The Natural England responses to Deadline 6 of the Examination in August 2024 show they believed many of their concerns about benthic impacts to be unresolved by the Applicant or the Examination, but again, no mention is made of the kelp beds specifically.

We call on the Secretary of State to act to protect the Kelp Recovery Zone Conservation area; Rampion have not provided adequate, convincing reasons for why alternative sites for either the windfarm or landfall were rejected.