

**Bolney Parish Council's
Post-hearing submissions
For Deadline 1 - 28th February 2024**

Bolney Parish Council IP No: RAM2-EIA021

Following the Issue Specific Hearing on Wednesday 7th February 2024, Bolney Parish Council wishes to summarise the oral representations made by the Chair of the Parish Council at the hearing on the following issues:

APP – 224 Outline Code of Construction Practice (Document Reference 7.2)

Bolney Parish Council objects to the applicant's proposed core working hours in **paragraph 4.4.1**:

- 07.00 to 19.00 hours Monday to Friday; and
- 08.00 to 13.00 hours on Saturday.

In the Rampion 1 project, the planning permission to extend the Bolney National Grid substation to accommodate Rampion 1 was granted by Mid Sussex District Council (MSDC) on 22nd August 2013 with reference 13/02342/FUL. The hours granted for construction including the use of plant and machinery were limited to:

- 08.00 to 18.00 hours Monday to Friday; and
- 09.00 to 13.00 hours on Saturday.

The reason given by MSDC for the construction hours was 'to safeguard the amenities of nearby residents and to accord with Policy B3 of the Mid Sussex Local Plan'.

In its Principal Area of Disagreement Summary Statement submitted in this Examination on 9th November 2023, MSDC expressed its concern about the applicant's proposed core working hours and 'the impact on the residential amenity of neighbouring residents who live close to the construction areas' and suggested the hours be amended 'to more closely reflect the working hours applied to all development by MSDC'.

Bolney Parish Council would ask that the consented hours for all construction and related works in **Works No. 13, 17, 19 and 20** all within the District of Mid Sussex therefore be limited to:

- 08.00 to 18.00 hours Monday to Friday; and
- 09.00 to 13.00 hours on Saturday.

If the Examining Authority is not persuaded to limit the construction hours for **Works Nos. 13, 17, 19 and 20** to reflect those implemented previously by MSDC, then Bolney Parish Council would ask that the core working hours granted for these four Works Numbers should follow the precedent set in the Rampion 1 project when 'quiet' shoulder hours were incorporated into the core working hours. The shoulder hours were:

- 07.00 to 08.00 hours and 18.00 to 19.00 hours Monday to Friday

During these 'shoulder hours' only quiet setting up and closing down of the construction sites was permitted and no loading or unloading of HGVs or other deliveries. The reason for the quiet hours was to protect the amenity of local residents.

Bolney Parish Council would ask that within **Works Nos 13, 17, 19 and 20** the use of generators be limited to consented construction hours and that all vehicles working on or visiting a site must avoid reversing where practicable and be fitted with low noise or white noise reversing beepers for the amenity of local residents.

APP – 228 Outline Construction Traffic Management Plan (Document Reference 7.6)

Bolney Parish Council objects again to the proposed core working hours for the construction work and any construction-related traffic movements to or from onshore elements of the proposed development set out in paragraph 3.6.4 as:

- 07.00 to 19.00 hours Monday to Friday; and
- 08.00 to 13.00 hours on Saturday.

Instead the Parish Council would ask that the hours be restricted as set out above.

The Parish Council would ask that **Figure 7.6.8** drawn 01/08/2023 showing the Exit Points from the Transport Study Area should be amended to reflect the acknowledgement by the Rampion team at the Issue Specific Hearing that the proposed exit point off the northbound A23 carriageway will be at the junction with the A272 and not as currently shown on **Figure 7.6.8**.

Likewise, the Parish Council would ask that **Figure 7.6.9c** drawn 12/01/2024 showing Routes from Compounds to Sites be amended to reflect the acknowledgement that Kent Street and Bob Lane off Wineham Lane will not be used as proposed routes for HGVs and LGVs.

Bolney Parish Council disagrees with **paragraph 6.5.6** that no routing restrictions should be applied to LGV construction staff traffic travelling to and from construction compounds and the onshore substation sites. In the Rampion 1 project, the Construction Traffic Management Plan ('CTMP') for LGVs specifically **included** construction workers and workers could not use the rural back roads or the prohibited routes close to the A272 and Wineham Lane (see next paragraph).

Bolney Parish Council would ask that the CTPM be amended to reflect the wording of the Rampion 1 CTMP that specifically prohibited the use of several rural roads in the Parish of Bolney by construction traffic. The Parish Council would ask that the following roads in the Parish be prohibited from use in the Rampion 2 project by any vehicle associated with or part of the construction project whether private car, construction worker, LGV or HGV:

- The Street, Bolney
- London Road north of the exit roundabout from the northbound A23
- Bolney Chapel Road
- Foxhole Lane
- Spronketts Lane

The Parish Council is concerned that without prohibiting the use of the rural back roads in the Parish, vehicles related to the Rampion 2 project could use alternative junctions from the A23 to avoid queues of traffic at the junction of the A23 and A272 or in the event of an obstruction on the A272.

The Parish Council would ask that **paragraph 8.4.13** proposing that HGVs be permitted to arrive at construction sites one hour before or one hour after the agreed construction working hours be **removed** from the Outline Construction Management Plan. As explained at the Hearing on 7th February, Rampion made multiple applications during the construction of the Rampion 1 project to extend the consented working hours to enable work at weekends including over several Bank Holidays. For example, during 2017 weekend working took place almost every weekend between the middle of January and the end of November between 0.800 and 18.00 hours every Saturday, Sunday and Bank Holiday. During that 10 month period, Rampion also obtained permission to work further extended hours on the cable route close to the new Rampion 1 substation in Twineham from 07.00 to 21.20 hours for six weeks in May and June 2017 and for 10 days at the new substation between 0.700 and 22.00 hours also in May and June 2017. If HGVs were permitted to arrive one

hour before and after these extended hours then residents living near construction sites would potentially have to put up with HGVs arriving from dawn till dusk. The Parish Council does not believe this is acceptable.

Bolney Parish Council is concerned about uncertainty in **paragraph 8.4.1** and the possible use of multiple traffic lights on the A272 for access to Kent Street for access A-64, for access A-63 to the Oakendene site and access A-62 to the construction compound adjacent the the Oakendene Industrial Estate. Any temporary traffic lights on the A272 result in queues of traffic along the road which according to the last traffic count by the Department for Transport in 2022, has a daily traffic flow of 18,546. Even without the use of traffic lights, queuing traffic can sometimes back up from Cowfold to the junction with Wineham Lane in the Parish of Bolney. The resultant effect is that drivers use the unsuitable narrow rural back roads to avoid the queues which impacts on residents and local road users. This is another reason why the Parish Council would ask that the five roads in the Parish identified above are prohibited from use by any vehicle associated with the construction project in the Construction Traffic Management Plan.

APP – 064 Volume 2, Chapter 23: Transport (Document Reference 6.2.23)

Re-assessment of Highways Link 26 Wineham Lane

Bolney Parish Council asks that the environmental effects of transport on Highways Link 26, Wineham Lane, South of the A272 be re-assessed. Based on Table 23-41, paragraph 23.9.26 states that ‘the overall significant of residual effects on Highways Link 26 and associated receptors’ is Not Significant in EIA terms. But Table 23-41 fails to acknowledge that there are 25 residential properties and 5 Public Rights of Way which enter Wineham Lane between the A272 and the entrance to the Bolney National Grid substation and Access A- 69. Table 23-37 shows the percentage increase for Wineham Lane in the peak week of construction as being 237.8%. This cannot be ‘Not Significant’ for the residents and ProW users of Wineham Lane.

Signalisation of the A23 northbound exit and A272 T junction

Bolney Parish Council would also ask that any future transport assessments on the impact of construction traffic take into account the signalisation of the junction of the northbound exit slip road from the A23 with the A272. This is part of the Northern Arc project at Burgess Hill - see the MSDC Decision Notice dated 6th October 2019 in planning application DM/18/5114.

Implementation of an HGV Holding Area in the CTMP

Bolney Parish Council asks that the applicant consider the implementation of a Holding Area for HGVs as it did for the Rampion 1 project. In the Rampion 1 project, the Holding Area was to proactively control the flow of construction traffic along the A272 and Wineham Lane. The Holding Area was sited adjacent to the northbound exit from the A23 at the junction with the A272. All HGVs were required to report to the Holding Area before continuing along the A272 towards Wineham Lane. The Holding Area was open and manned during construction hours and was large enough to allow several HGVs to be held at any one time as well as provide off-site parking for construction staff and the storage of non-valuable material. The purpose of the Holding Area was to:

- Log registration and drivers name for all HGVs
- Track daily HGV numbers (which were then included in the weekly Construction Update sent to all Parish Council’s impacted by the construction project)
- Provide verbal briefings to drivers on the route, speed limits and prohibited routes
- Hold individual HGVs in order to prevent HGVs travelling to construction sites in convoy.

The applicant predicts in excess of ten thousand of HGVs required for the construction of:

- the new substation at Oakendene;
- The Cowfold sections of the connecting cable route from Climping to Oakendene;
- the connecting cable route from Oakendene to the Bolney National Grid substation; and the extension of the National Grid substation.

All these HGVs will be required to use the A23/A272 exit from the northbound A23 and travel along the A272 to Accesses A-62, A-63, A-64, A-66, A67, A-68 and A-69. Bolney Parish Council would suggest that a Holding Area is imperative for the safety of other road users along the HGV route from the A23 along the A272 and Wineham Lane.

APP - 44 Environmental Statement Volume 3 Chapter 3 Alternatives (Document Reference 6.3.3)

If the Examining Authority is minded to re-open the decision to select the site at Oakendene for the new onshore substation instead of the alternative site at Wineham Lane North, then Bolney Parish Council would ask to be involved in any discussion or reassessment and be invited to comment again on the two alternative site options. The Wineham Lane North site lies partially within the Parish of Bolney.

**Bolney Parish Council
February 2024**