Submission ID: 27104

Responses from Interested Parties to the Applicant’s Deadline 1 responses.
Topics included.
1. Alternative Sites. Document Library References: Applicant's Post Hearing Submission –
Issue Specific Hearing 1Appendix 1 - Further information for Action Point 3 – Fawley and Dungeness (REP1-019) and Applicant's Post Hearing Submission –Issue Specific Hearing 1 Appendix 2 - Further information for Action Point 4 – Wineham Lane North (REP1-021.)
2. Impact on villages in Cowfold, Shermanbury and West Grinstead parishes. Document Library reference REP1-010.
3. Impact on Kent Street and Wineham Lane. Document Library reference: Outline Construction Traffic Management Plan REP1-010.
4. Impact on King’s Lane (restricting access). Document library reference. Outline Code of Construction Practice. APP-224
See attached Word document.

Responses from Interested Parties to the Applicant's Deadline 1 responses.

1. Alternative Sites.

The applicant has responded to Issue Specific Hearing Actions Points 3 and 4 in the following documents:

Applicant's Post Hearing Submission – Issue Specific Hearing 1 Appendix 1 - Further information for Action Point 3 – Fawley and Dungeness (REP1-019)

Applicant's Post Hearing Submission –Issue Specific Hearing 1 Appendix 2 - Further information for Action Point 4 – Wineham Lane North (REP1-021.)

Both REP1-019 and REP1-021 are reformatting and repeats of much of the information provided previously in a biased way. The evidence seems to be biased to suit the predetermined, preferred outcome. It has still not justified its selection of Oakendene as the best option for the onshore substation. The environmental impacts associated with this site particularly in terms of permanent damage to the setting of the Oakendene manor house and its adjacent parkland, meadowland at Crateman's farm and Wilcox farm, flora: veteran oak trees and hedge rows and fauna in terms of rare habitats are quantitatively far more adversely significant than the Wineham Lane North option, selected by the applicant's own admission "on balance" rather than by following a full life-cycle impact analysis. Both options in the Bolney substation area should have should be discounted in favour of offshore undersea cable routes to grid connection points closer to the coast which would negate the need to adversely impact the South Downs National Park. The Planning Inspectorate is further urged to require the applicant to revisit these less significantly impacting options and discount Oakendene.

When the Bolney substation was originally built Wineham Lane was upgraded to provide access for construction and maintenance traffic. This lane served adequately the construction work associated with Rampion1. Using this purpose-built existing access road and the existing industrial setting of the existing Bolney substation site on Wineham Lane, rather than creating a new substation, close to the village of Cowfold would contain and reduce the impacts on additional greenfield land of the Oakendene estate. These arguments are further supported by the selection of Wineham North as the best and least environmentally damaging option.

The applicant's arguments against offshore cable access to the 5 alternative grid connection points between Dungeness and Fawley is still not convincing. Several have not still not been fully evaluated including Lovedean and Botely Wood.

1. Impact on villages in Cowfold, Shermanbury and West Grinstead parishes

The current traffic management plan (Document Library reference REP1-010) states that the B2116 - Shermanbury Road/Partridge Green Lane; the main access road between the A281 and Partridge Green village, will be severed by an open cut cable trench – traffic management required – single carriageway (one lane in each direction). This option will further unnecessarily increase traffic congestion in adjoining villages. The planning Inspectorate should instruct the applicant to use HDD where the cable crosses the B2116.

The traffic management plan states that 25% of traffic required for work in the Cowfold/Shermanbury/Partridge Green areas will pass through Cowfold village which already suffers

heavily from traffic pollution and is designated an air quality management area (AQMA). The applicant has made no attempt to mitigate the additional impacts from this increased traffic. The 'notes' in REPR-010 say:

C-157 – The proposed HGV routing during the construction period to individual accesses will be developed to avoid major settlements such as Storrington, Cowfold, Wineham, Henfield, Woodmancote and other smaller settlements **where possible**; (No mention of Partridge Green)

C-158 – The proposed HGV routing during the construction period to individual accesses will avoid the Air Quality Management Area (AQMA) in Cowfold **where possible**;

HGVs used during construction, including their routing which should avoid the Air Quality Management Area in Cowfold and the A24 through Findon **wherever possible.**

In Table 5-2 Issues and constraints management of REP1-010 Issue/Constraint column it states,

"built-up areas (villages, towns) to be avoided by temporary construction traffic due to impacts on congestion, highway safety and air and noise pollution.

The Mitigation is stated to be "

"The HGV Access Strategy and selection of temporary construction accesses, complemented with onsite haul roads so that several key settlements will be avoided by construction HGV traffic. These key settlements include Washington, Storrington, Findon, Littlehampton, Angmering, Steyning, Henfield, Woodmancote, Wineham, Partridge Green and Cowfold. Construction HGVs have also been routed in the HGV Access Strategy away from the AQMA in Cowfold **as far as possible**. Embedded environmental measures: C-157, C-158 and C-159 Commitments Register (Document Reference: 7.22)

In Table 5.2 of REP1-010 it refers to "the HGV Access Strategy" and states "The HGV Access Strategy and selection of temporary construction accesses, complemented with onsite haul roads so that several key settlements will be avoided by construction HGV traffic. These key settlements include Washington, Storrington, Findon, Littlehampton, Angmering, Steyning, Henfield, Woodmancote, Wineham, Partridge Green and Cowfold. Construction HGVs have also been routed in the HGV Access Strategy away from the AQMA in Cowfold *as* **far as possible**. An HGV strategy is not included in the library of documents so cannot be scrutinised.

The caveat "Where possible" is used extensively in mitigation statement as an opt out from stating and committing to any evidence based effective measures that will prevent both the identified, and yet to be identified, impacts. Therefore, there is little assurance that these impacts have been considered seriously, evaluated for impact significance with specific mitigations and measures designed to eliminate them. It implies that the applicant has little regard for the wellbeing and health of the residents in villages, particularly Cowfold and its AQMS.

When selecting Oakendene, ("on balance" – as stated by the applicant,) instead of Wineham North (or another alternatives,) its access from the A23 would avoid absolutely the village of Cowfold during the construction of the onshore substation.

If the Planning Inspectorate recommends granting the DCO, it should include a condition on the consent that no construction vehicles should pass through AQMSs. Any unavoidable traffic should be electric vehicles. If the DCO is granted, by the time the construction project reaches Cowfold and nearby villages, electric vehicle technology will have moved on significantly making this obligation a realistic requirement.

2. Impact on Kent Street and Wineham Lane.

Document Library reference: Outline Construction Traffic Management Plan (REP1-010)

The proposal to use Kent Street as a construction traffic access to the construction site and haul roads at access point A61 is not feasible because of the configuration of Kent Street - a single track lane, with no passing places, and already subject to subsidence because of its weak substructure and thin metalling. This subsidence has been exacerbated by the poor quality reinstatement work carried out when the National Grid's fibre duct was installed in 2016. Widening it is not an option because of the roadside ditches and close proximity of hedges and trees. The PI should instruct the applicant to remove A61 as an access point and if construction work were to go ahead in this area, access should be via alternative means. Wineham Lane was reconstructed when the original Bolney substation was constructed in the 1970s. It is a therefore a purpose bult substation access road which served adequately the construction of Rampion1 substation. It is another argument why the existing industrial site at Boney should have been the preferred site for the Rampion2 on shore substation

3. Impact on King's Lane (restricting access)

Outline Code of Construction Practice. Document library reference APP-224.

The applicant has still not demonstrated how 24/7 access will be maintained for residents of King's Lane at crossing points 48a and 28b and 50a and 50b. Despite a commitment at the issue specific hearing (ISH1) in February to provide more clarity, this action has still not been documented and addressed. This is indicative of the poor regard given to residents, who will be impacted by construction work.

The crossing points on King's Lane e.g. RX-1de-11, are still referred to as "Private Tracks" not as Private Means of Access.

The construction plan lists all public highways and private means of access (PMA lanes) to be crossed by the cable route. Most public highways will be crossed using HDD technology and some PMA lanes are also being crossed using HDD; others being open trench cut. The applicant has not documented any criteria used to determine its means of crossing PMAs on a location by location basis. Some of the PMA lanes such as Michelgrove Lane (off the A280 near Clapham) will be crossed using HDD and has a similar density of dwellings and traffic usage, including farm traffic as do other PMAs; particularly King's Lane which is not currently scheduled for HDD cable crossings.

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