

Deadline 5 comments regarding the Applicant's proposals for alternative cable routes, traffic management and road crossing construction methods.

The route to Oakendene

The examination process is nearing its latter stages but the applicant has still not justified the selection of its preferred on shore cable routing option between Climping and a new substation near Oakendene industrial estate via a mainly open trench across the South Downs National Park and then connecting to the grid at Bolney substation. It may be the least costly in monetary terms but it is clearly not the best environmental option. However, RWE/RED continues to suggest it is and promote it accordingly.

Its justification in Document APP-075 and the follow up responses, including Document REP1-018, relies mainly on cost minimisation with little or no account of the environmental impacts and those consequential 'environmental costs'. Although Environmental Impact Assessments (EIAs) have been carried out and documented, other representations; numerous submitted by the South Downs National Park Authority (Document REP1-049 and others) and Cowfold v Rampion (Document REP4-112) in particular, clearly point out that these EIAs are, in many cases, superficial and do not recognise the true environmental impacts, many of which are significant, including irreversible ecological damage, that will occur. Cost/Impact assessments have not been presented which compare the true monetary costs of the alternatives, particularly using the alternative grid connection points at Dungeness, Ninfield or Fawley. These alternatives have been dismissed as too expensive or too difficult without full justifications and monetary – environmental cost comparisons.

Construction site accesses and crossing points

When considering the applicant's justification for its preferred access and construction methodologies at local levels, several examples have not been evaluated, based on cost and inconvenience. This representation asks the Planning Inspectorate to consider three illustrative examples, which are indicative of other similar examples along the route.

B2116 (Shermanbury Road)

Access, Rights of way and Streets Plan Sheet 29. Street works BE – BF (Document APP-012) shows where the cable crosses the B2116 (Shermanbury Road) via an open trench. The cost of delays to residents and businesses is disproportionate to the additional cost to the applicant if the cable was installed using HDD.

Kent Street, Cowfold: Site access point A61 (Access, Rights of way and Streets Plan Sheet 32) (APP-012).

The revised outline construction management plan (Document REP4-045) is still incapable of demonstrating a sensible approach to managing local traffic on Kent Street, which will conflict with construction traffic using access point A61. An indicative additional cost of £1,000,000 has been mentioned if an alternative access point from the A272 was adopted instead. The applicant has not considered the significant costs it will have to bear if it

persists with its stated, but unjustified preference, to use access point A61 on Kent Street. These additional costs include:

- modifications along Kent Street to install passing places,
- upgrading the existing fragile and damaged road surface and existing under-road fibre cable ducting, before it is fit for purpose for construction vehicles, and reinstating it afterwards,
- the cost impact due to hold-ups to construction traffic that will have to wait for local traffic to pass, particularly equestrians, which need to have sole use of the lane, while transiting. Horses and heavy goods vehicles do not mix; horses tend to bolt when frightened. Hence construction traffic could not be allowed to travel along the 1000m length of Kent Street while equestrians were in transit. This would hold up construction traffic for up to 10 minutes per horse; causing significant backup between the holding compound at Oakendene and the entrance to Kent Street on the A272. (This cost for this appears not to have been considered by the applicant).

King's Lane. Crossing points 48a – 48b and 50a – 50b (Access, Rights of way and Streets Plan Sheet 32) (APP-012).

The applicant has rejected all requests from residents to cross this private access lane using HDD but it appears not to have considered the additional costs it will have to bear to provide 24/7 access to residents. There are 23 vehicle owners/users living or working on this lane, which amounts to about 50 vehicle movements a day along this lane. The cost to the applicant to cease work and lay trench covering plates each time a vehicle approached the crossings would incur significant delays and cost to the work programme. The applicant's offer to "provide reasonable access on request" is not acceptable to the residents, the operators of the working farm, or visiting contractors and couriers/delivery companies. It will be impossible to plan in advance precisely the times at which access between their homes and the main highway will be required. The time taken to stop work, provide means of access and redeploy will be considerable: several hours lost working time per day.