

Application by National Grid Electricity Transmission Plc for an Order granting Development Consent for the Richborough Connection Project

Written Representation submitted on behalf of South East Water

Planning Inspectorate Reference No: EN020017 Richborough Connection Project

**SEW's Comments on the Movement of PC10
UPDATED NOTE FOR DEADLINE 9**

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- 1 SEW have now had the opportunity to review the Applicant's suggested movements for PC10. In summary, SEW's position is that moving PC10 between 45-80 meters is preferable to retaining the existing position from a purely engineering perspective. This movement would eliminate one of the interactions (the clash between pylon PC10 and the footprint of the river diversion fish pass) between the two schemes. However, due to the numerous interactions that would remain, SEW's overall position remains that the RCP would significantly reduce the possibility of the Reservoir being delivered.
- 2 It is noted by SEW that the Panel's clear instructions were for the Applicant to look at options which move PC10 out of the sensitive fish pass area and maintain the clearance heights currently available, i.e. the clearance heights shown on the existing design drawings and the previously prepared Spot Height Plans REP4-056-070.
- 3 Jacobs have discussed the movements of PC10 which are possible within the Order Limits with the Applicant and agree that if PC10 is not able to increase in height then it is not possible to achieve both objectives within the Order Limits.
- 4 None of the options proposed by the Applicant is able to deliver on both of these criteria. Based on the options presented, if the movement is restricted to the Order Limits then when PC10 is removed from the fish pass area, the clearance heights are reduced. A detailed breakdown of the impacts of each option on clearance heights is shown on the PC10 Spot Height Plans and data tables submitted at Deadline 7
- 5 The PC10 Spot Height Plans and data tables have now been approved by the Applicant and are agreed. The data taken from the plans did vary slightly but both parties have agreed that this does not have any material impact on the conclusions to be drawn from the plans and therefore the data remains as presented at the Issue Specific Hearing on 10 November 2016 (**ISH**). However, the plans have been altered slightly since the ISH to include some updated labelling.
- 6 It should be noted, for the avoidance of doubt, that the opinions set out in this note are without prejudice to SEW's overall position, which is, in summary, that the only way to be certain that the RCP will not prevent the Reservoir from coming forward is to adopt one of SEW's Alternatives as detailed in REP2-099 (SEW's Written Representation) paragraphs 226 – 243.
- 7 SEW confirm that the design drawings submitted by the Applicant at Deadline 8 correctly show the relationship between the RCP, the options for the movement of the route of the RCP (presented by the Applicant) and the Reservoir with associated river diversion. To this extent SEW agree the plans submitted at Deadline 8 REP8-021 are factually correct in representing the relationship between the schemes.

- 8 The tables below summarise the impacts of the Applicant's options. Two tables have now been produced to reflect the options a) with PC8 movement and, b) without PC8 movement.
- 9 The difference between options presented by the Applicant is that options a) (with PC8 movement) do remove the PC8 tower and foundations from the river diversion footprint and options b) (without PC8 movement) do not.
- 10 The clearance heights between PC8 and PC9 remain the same or greater for all options in option sets a) and b). Therefore, in relation to the tree clearances between PC8 and PC9 there are no reductions caused by any of the options presented by the Applicant.
- 11 The tree clearances between PC9 and PC10 are reduced, as detailed below. In summary, clearances for options 5 -7 are reduced. The impact on the clearances is the same for option sets a) and b). Therefore, the detailed clearance heights information shown on the PC10 Spot Height Plans and data tables submitted at Deadline 7 by SEW REP7-035 are applicable to both option sets a) and b).

NG Options a) With PC8 movement (Option set evaluated by SEW for Deadline 8)

NG Option	Description	PC8 foundation (& exclusion zone) moved out of river/ fish pass footprint	PC10 foundation (& exclusion zone) moved out of river/ fish pass footprint	Height to clearance zone maintained (PC9 to PC10)	Overall does option meet both objectives
1 a	Current position and height	No – not moved in option 1a	No – not moved in option 1a	Yes	No
2 a	PC10 position unchanged but height increased by 3.7m	Yes	No	Not examined*	No
3 a	PC10 is moved east 18.5m but no height increase	Yes	No	Not examined*	No
4 a	PC10 is moved east 18.5m	Yes	No	Not examined*	No
5 a	PC10 is moved east 30m (height increase 3.7m)	Yes	No	No	No
6 a	PC10 moved east 45m (height increase 3.7m)	Yes	Yes	No	No

7 a	PC10 moved east 80m (height increase 3.7m)	Yes	Yes	No	No
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NG Options b) Without PC8 movement (Additional Option set submitted by the Applicant at Deadline 8 reviewed by SEW for Deadline 9)

NG Option	Description	PC8 foundation (& exclusion zone) moved out of river/ fish pass footprint	PC10 foundation (& exclusion zone) moved out of river/ fish pass footprint	Height to clearance zone maintained (PC9 to PC10)	Overall does option meet both objectives
1 b	Current position and height	No – not moved in option 1b	No – not moved in option 1b	Yes	No
2 b	PC10 position unchanged but height increased by 3.7m	No	No	Not examined*	No
3 b	PC10 is moved east 18.5m but no height increase	No	No	Not examined*	No
4 b	PC10 is moved east 18.5m	No	No	Not examined*	No
5 b	PC10 is moved east 30m (height increase 3.7m)	No	No	No	No
6 b	PC10 moved east 45m (height increase 3.7m)	No	Yes	No	No
7 b	PC10 moved east 80m (height increase 3.7m)	No	Yes	No	No

*Jacobs have not examined the effect of these options on tree clearances as the movement does not address the objective to move the PC10 and its foundation outside the footprint of the river diversion corridor.