Submission ID: 17927

RR-095a: I estimate the R&W Environmental recycling centre has grown over the past ten or so years it has been in operation, rising in land profile during that time from an original hollow lower than the surrounding road levels to the current situation where the recycling centre surface is above the level of spur road and main line of the motorway. Stockpiles, heavy plant and machinery are now easily visible above the vegetation line and I suggest there could be a limited remaining life for those 'essential services for soils and water treatment' simply due to physical capacity issues of that yard. Therefore, I suggest that the R&W Environmental recycling centre as part of the construction compound allocations be properly considered on the basis the 'essential services' may well have a short and finite life in that specific location and an opportunity to lower the environmental impact on the surrounding area including the South Downs National Park is seemingly being avoided for commercial reasoning that may be limited in time and scope.

I wonder who is the registered landowner of the R&W Environmental recycling centre land parcel?

To the Applicant's second point, I do not see a reason why the proposed construction compound is required to be a single enclosed area. If use of the R&W Environmental recycling centre could reduce the proposed construction compound in the South Downs National Park by say c.50% that would ameliorate the impacts to the east of the junction 9 quite considerably by reducing land take outside the Applicant's existing estate and reducing haul route movements by keeping construction cabins and lay down areas closer to the main construction site. It appears in the Works Plans (2.3) that the proposed haul road indicated for the current proposed construction compound in the South Downs National Park will join the spur road opposite the existing entrance of the existing R&W Environmental recycling centre, so logistical changes by deploying my suggestion could be minimal, if not beneficial to the scheme.

Finally, Sch 4 of the Infrastructure Planning (EIA) Regs 2017 requires a description of the reasonable alternatives studied by the developer – if the R&W Environmental recycling centre has been considered and "deemed not to be a viable option" it ought to have been recorded in the Alternatives chapter of the Environmental Statement submitted with the DCO application, or otherwise be fully assessed and reported in something like an addendum to the Environmental Statement perhaps.

RR-095b: Not including improvements to the 'Cart and Horses junction' is a missed opportunity. I suspect it may be by choice of the Applicant not to include improvements to the 'Cart and Horses junction' within Order Limits of this draft Development Consent Order. It would be both a more efficient use of taxpayers' purse and reduce the overall impact on local residents and businesses to have the much needed (and long mooted) improvements on this local road junction included in this draft Development Consent Order – it is after all adjacent to the Applicant's existing estate. I would like to believe the Secretary of State deciding upon whether to grant development consent, as well as local elected representatives, would be interested in these aspects and National Highways funding/jurisdiction justifications might not be reasonable enough reason for omission given all the issues raised on this point during the consultation events leading up to Development/uploads/system/uploads/attachment_data/file/431389/strategic-highways-licence.pdf, states in paragraph 5.23 bullet point d. "Where appropriate, work with others to develop solutions that can provide increased environmental benefits over those that the Licence holder can achieve alone, where this delivers value for money;" which I take to be relevant here.

I would like to see this issue revisited during the Examination process, with the aim to have appropriate safety, design and operational improvements included in this draft Development Consent Order before it goes to the Secretary of State for decision.

RR-095c: Will the Applicant's commitments to manage and monitor the new structures, drainage and pavement surfaces associated with the M3 J9 Improvements be similarly restricted to 25 years from the completion of the scheme? Given the content of the National Highways Environmental Sustainability Strategy,

why does the Applicant determine responsibilities set out in a draft DCO for the engineering aspects of a scheme and those on the soft estate ought to be treated differently in terms of the length of commitment? Why a reduced commitment to the management of the soft estate where essential mitigation will be situated and relied upon in this draft Development Consent Order compared to the Applicant's other business-as-usual commitments?