

# Stonestreet Green Solar

## Responses to Deadline 6 Submissions

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# 1 Introduction

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## 1.1 Purpose of the Report

- 1.1.1 This report provides the Applicant's responses to submissions from Interested Parties received at Deadline 6 in respect of the proposed Stonestreet Green Solar project (the Project).

## 1.2 Structure

- 1.2.1 Section 1 of this report sets out the purpose, structure and approach taken in the report.
- 1.2.2 Section 2 provides the Applicant's responses to the Interested Parties' submissions made at Deadline 6.

## 1.3 Approach

- 1.3.1 A total of 5 submissions were made by Interested Parties at Deadline 6. These were submitted by:
- Kent County Council (KCC) [\[REP6-015\]](#)
  - Aldington & Mersham Support Group (AMSG) [\[REP6-016\]](#)
  - Louise Jessup [\[REP6-019\]](#)
  - Dentons UK and Middle East LLP on behalf of Network Rail Infrastructure Limited [\[REP6-017\]](#)
  - Southern Water Services Limited [\[REP6-018\]](#)
- 1.3.2 Southern Water Services Limited's [\[REP6-018\]](#) and Network Rail Infrastructure Limited's [\[REP6-017\]](#) responses related to the withdrawal of their objections and therefore have not been included in this report.
- 1.3.3 This report does not seek to duplicate the Applicant's responses to the previous submissions at Deadlines 1 [\[REP1-061\]](#), 2 [\[REP2-034\]](#), 3 [\[REP3-046\]](#), 4 [\[REP4-029\]](#), 5 [\[REP5-023\]](#) and 6 [\[REP6-014\]](#) or **Responses to First Written Questions (Doc Ref. 8.11)** [\[REP3-047\]](#) and **Responses to Examining Authority's Second Written Questions (Doc Ref. 8.16)** [\[REP5-024\]](#). Where appropriate to avoid repetition the Applicant has sought to cross-refer back to responses provided in those documents, supplemented by additional information that has been entered into the Examination since those documents were prepared.

## 2 Response to Deadline 6 Submissions

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### 2.1 Overview

2.1.1 This section of the report contains responses to the Deadline 6 submissions made by the following parties:

- KCC [[REP6-015](#)]
- AMSG [[REP6-016](#)]
- Louise Jessup [[REP6-019](#)]

## 2.2 Responses to KCC Deadline 6 Submission

Table 2-1 Responses to KCC Deadline 6 Submission

Ref	Summary of Interested Party's Comments	Applicant's Response
<i>PRoW</i>		
1	<p>In respect of the use of the PRoW network a survey was undertaken by the applicant. 8 survey points were used and those locations agreed in advance. In-situ cameras were used for a period of 7 days.</p> <p>I think that it would be fair to say on the basis of the survey and our interrogation of data available to us, that the network is relatively lightly used in comparison with networks that fringe on more urban areas or include routes that are actively promoted.</p> <p>However, the level of use of PROW in a given period is largely irrelevant:</p> <p>Use can be sporadic, weather dependent and fluctuate as a result of numerous additional factors – e.g. the timing of vegetation clearance (Highway Authority responsibility) , promotion of a walk, local events etc, the use of preferred local alternative alignments. You can readily deviate from PROW in a way that you can't from a road.</p> <p>Irrespective of the above the area is set to change significantly over the life of the development. Otterpool would introduce approx. 8000 new homes and 20000 people on the “doorstep” of the scheme.</p> <p>Aldington and Sellindge will also, no doubt, expand. To the west Ashford is set to expand further and sits</p>	<p>The Applicant welcomes the acceptance in KCC’s submission that:</p> <ul style="list-style-type: none"> <li>a) the location to user surveys for PRoW has been agreed; and</li> <li>b) it is agreed that the network is relatively lightly used in comparison with networks that fringe on more urban areas or include routes that are actively promoted.</li> </ul> <p>The Applicant notes that KCC state that the level of use of PROW in a given period is largely irrelevant. The Applicant disagrees with this statement on the basis that the user survey and the timing for it to be undertaken was consulted in advance with KCC as noted in Table 13.2 of <b>ES Volume 2 Chapter 13: Traffic and Access</b> <a href="#">[REP3-012]</a>).</p> <p>The Applicant notes that – in terms of the consideration of cumulative effects (relating to Otterpool) – as set out in the Applicant’s <b>Written Summary of Oral Submissions from Issue Specific Hearing 3 and Responses to Action Points (Doc Ref. 8.14.1)</b> <a href="#">[REP4-030]</a>: <i>“The Project will deliver six new routes and enhancements to the existing network ... It will also improve connectivity in the north of the Site, providing better links between the Otterpool Park development and Ashford, a strategic route that KCC and ABC had made clear was important”</i>. These enhancements are set out and secured by the <b>Outline RoWAS (Doc Ref. 7.15(A))</b> <a href="#">[REP1-056]</a> at Section 3. The Applicant considers that it has therefore fully complied with paragraph 2.10.44 of NPS EN-3 in this regard. An assessment of cumulative effects on PRoW – including consideration of Otterpool (Cumulative scheme ID No. 10) – is set out within <b>ES Volume 2, Chapter 12: Socio-Economics (Doc Ref. 5.2(B))</b> <a href="#">[REP1-024]</a>. This does</p>



Ref	Summary of Interested Party's Comments	Applicant's Response
	<p>in close proximity to the scheme. The network will therefore no doubt see a growth in use as it becomes a recreational resource close to a significantly larger population.</p> <p>Strava is a running , cycling and hiking app that maps the routes taken by users, the data from which we are able to access by agreement.</p> <p>ActiveXchange is a software provider that is able to provide movement data derived from phone geolocation. (Similar to strava but drawing from a far greater number of apps.</p> <p>Strava figures were just for 2024 .Looking at the network of paths across site, there were 395 trips, focussed mainly during the summer months (April to September), made by 80 people. These were predominantly earlier in the day (6am to 9.30am). We know that Strava accounts for around 8-9% of total journeys made for busy areas, such as Medway Towpath in the middle of Maidstone, and is probably more representative of around 6-7% of total use in more rural areas, either of which would create a significant uplift in number of people/ trips made.</p> <p>ActiveXchange, backs this up. I've used the available 100m data squares, across the network of paths on site(broadly the same network area as above). Data is for the last three years and shows a higher level of activity (see below). This is most likely down to the different demographic</p> <p>ActiveXchange draws upon i.e., the user-base is</p>	<p>not include a consideration of speculative assertions of potential development that do not fall within the remit of the EIA Regulations.</p> <p>The Cumulative Schemes that have been considered in the ES were agreed with both ABC and KCC and are set out in <b>ES Volume 4: Chapter 6: Appendix 6.1: List of Cumulative Schemes (Doc Ref. 5.4)</b> <a href="#">[APP-068]</a>.</p> <p><b>ES Volume 2, Chapter 12: Socio-Economics (Doc Ref. 5.2(B))</b> <a href="#">[REP1-024]</a> at paragraph 12.10.10 then concludes that the cumulative schemes affecting PRow are in a significant distance from the Project, so the Project would not result in adverse effects on recreational amenity or connectivity.</p> <p>KCC has also submitted new evidence not previously included within representations, the Local Impact Report <a href="#">[REP1-087]</a> or other submissions to the examination on the usage of the PRow utilising data from Strava and ActiveXchange. KCC states that:</p> <ul style="list-style-type: none"> <li>- <i>“Looking at the network of paths across site, there were 395 trips, focussed mainly during the summer months (April to September), made by 80 people”</i> – The Applicant notes that this suggests extremely light usage.</li> <li>- <i>“We know that Strava accounts for around 8-9% of total journeys made for busy areas, such as Medway Towpath in the middle of Maidstone, and is probably more representative of around 6-7% of total use in more rural areas, either of which would create a significant uplift in number of people/ trips made”</i> – The Applicant considers that this claim is not evidenced or supported by quantitative data and therefore appears to be an assertion.</li> <li>- <i>“Data [from ActiveXchange] is for the last three years and shows a higher level of activity”</i> – The Applicant notes that the data presented appears to show an average of between 1-2 trips per hour over all of</li> </ul>

Ref	Summary of Interested Party's Comments	Applicant's Response
	<p>from a wider range of applications, than the self-selecting Strava demographic.</p> <p>Please refer the data figures from Strava and ActiveXchange in KCC's submission.</p>	<p>the routes within the figure provided, which again suggests extremely light usage when spread across the site.</p> <p>The Applicant notes that the data sources presented by KCC have limited relevance due to their sample size and distribution between individual links compared to in-situ camera surveys which were agreed between the Applicant and KCC.</p> <p>Overall, the Applicant considers the data survey presented by KCC is not relevant to the Examination given that the scope, timing and methodology of the Applicant's PRow User Survey has been agreed with KCC as set out in paragraph 13.4.51 of <b>ES Volume 2, Chapter 13: Traffic and Access (Doc Ref. 5.2(D))</b> <a href="#">[REP3-012]</a>. All the matters in relation to PRow and traffic surveys are also agreed with KCC as recorded in Table 2.2 of the <b>Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(D))</b> <a href="#">[REP6-006]</a>.</p>

## 2.3 Responses to AMMSG Deadline 6 Submission

Table 2-2 Responses to AMMSG Deadline 6 Submission

Ref	Summary of Interested Party's Comments	Applicant's Response
<i>Introduction</i>		
1	<p>The success of the Examination process relies upon the Applicant answering questions and concerns in good faith. Unfortunately, the strategy employed by EPL001 Ltd is either to ignore our questions or concerns or refer continually to documents such as the Battery Safety Management Plan that don't address the questions adequately. This failure means that it is impossible to "follow the thread from one deadline to another". We have therefore highlighted some of the key issues that we consider remain unanswered. We have for the most part included in the schedule below responses taken from REP 5-023.</p>	<p>The Applicant considers that it has comprehensively responded to all material submissions made by Interested Parties, including AMMSG.</p>
<i>BESS</i>		
2	<p><b>NFCC and KFRS can only provide guidance not approval</b></p> <p>The KFRS guidance does not absolve the Applicant from thinking for themselves. They must surely justify the key decisions in the context of the guidance, not rely upon it as a crutch. This is particularly so for the storage of water, which if incorrect, will have potentially catastrophic health</p>	<p>The NFCC guidance is the most relevant and up to date guidance that pertains to battery and fire safety. The guidance is also referenced in the Planning Practice Guidance for Renewable and low carbon energy (Paragraph: 034 Reference ID: 5-034-20230814). The Applicant considers that it has had appropriate regard to all relevant guidance and standards available. The controls set out within the <b>Outline BSMP (Doc Ref. 7.16(A))</b> <a href="#">[REP5-019]</a> reflect current best practice and incorporate advice and input from two independent subject matter experts.</p>



Ref	Summary of Interested Party's Comments	Applicant's Response
	and safety consequences, particularly for those that live nearest.	
3	<p><b>Insufficient volumes of water for firefighting</b></p> <p>The Applicant has taken the NFCC minimum guidelines as an absolute requirement, with potentially drastic consequences. There is absolutely no evidence that the Applicant has considered global experience to determine how much water might actually be required to treat a BESS fire as per KFCC guidance.</p>	<p>The <b>Outline BSMP (Doc Ref. 7.16(A))</b> <a href="#">[REP5-019]</a> secures a number of Project commitments, including in Table 2.1, to ensure the Project complies with the NFCC Guidance.</p> <p>In relation to water supply, Table 2.1 confirms that each BESS compound will include a hydrant that is connected to an on-Site water tank that will be capable of delivery in line with NFCC Guidance.</p>
4	<p><b>Insufficient supplementary supplies of water</b></p> <p>There is no evidence that the Applicant has taken proper account of the NFCC guidance on the paucity of supplementary supplies in determining the amount of water to be stored on site, particularly in the context of the Handen Farm Fire. The implication is that they believe that a BESS fire will be extinguished in 2 hours? A competent operator should be making their own assessment as to the volumes of water required and the means of supplying them. This has not been done.</p>	
5	<p><b>Inadequate firewater containment</b></p> <p>Because the Applicant has not taken proper account of the quantities of water required to treat a BESS fire, the proposed containment of fire water will be overwhelmed. If a BESS fire comparable to that in Merseyside in 2020 occurs, then the volume</p>	<p>Section 4.4 of the <b>Outline BSMP (Doc Ref. 7.16(A))</b> <a href="#">[REP5-019]</a> confirms that the BESS is designed to ensure firewater is contained such that there will be no leakage of polluted water into the surrounding area following a fire event, with firewater pumped to a tanker and removed from Site for treatment and disposal at a suitable licenced facility. Section 4.8 of the <b>Outline OSWDS (Doc Ref. 7.14(C))</b> <a href="#">[REP4-013]</a> relates to firewater storage, and sets out the measures that would be put in place to prevent</p>

Ref	Summary of Interested Party's Comments	Applicant's Response
	of firewater containment would need to be 6,000 litres (14 times larger than that proposed).	impacts to waterways. These measures have been discussed and agreed with both the Environment Agency and KCC (the Local Lead Flood Authority), as set out in the <b>Signed Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(C))</b> <a href="#">[REP4-015]</a> and the <b>Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(D))</b> <a href="#">[REP6-006]</a> .
6	<p><b>The NFCC guidelines do not cover a distributed BESS design as proposed.</b></p> <p>There is no evidence that the Applicant has considered the greater risk posed by grass fires. Great reliance is put on the NFCC guidelines, yet these guidelines don't cover the distributed design case – how can this be acceptable?</p>	<p>The NFCC Guidance states that it “relates specifically to grid scale (typically 1MW or larger) BESS in open air environments, using lithium-ion batteries”. As such it is fully relevant to any BESS design, distributed or centralised. The BESS, whether distributed or centralised, are located within non-grass specific compounds. In this case the BESS is co-located with inverters within specific Inverter Stations to allow the benefits of the distributed BESS approach to be realised.</p> <p>Please refer to the Applicant's responses on the distributed BESS approach in <b>Written Summary of Oral Submission from Issue Specific Hearing 4 and Responses to Action Points (Doc Ref. 8.14.2)</b> <a href="#">[REP4-031]</a> at paragraph 1.4.29 to paragraph 1.4.39 for further details.</p>

### Alternative Land

7	<p>The Applicant's response on this item is incredible and speaks volumes about its land assembly strategy.</p> <p>It is not good enough to rely on project landowners to talk to other landowners about their potential involvement.</p> <p>Firstly, there is an obvious conflict of interest in relying on someone who has land inside the project to talk to someone outside the scheme.</p>	<p>The Applicant considers the site selection process that has been used for the project is appropriate and is in accordance with the EIA Regulations. This has been detailed in <b>ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2(A))</b> <a href="#">[AS-010]</a> and the Sequential and Exception Test Report of the <b>Planning Statement (Doc Ref. 7.6)</b> <a href="#">[APP-151]</a>.</p> <p>The Project originally included a single landowner but there was a need to expand the Site to ensure full and efficient use of the grid capacity and deliver the full project benefits. The original landowner was incentivised to assist the Applicant in negotiating other land to ensure the Project progressed and it was efficient to utilise his local relationships to provide</p>
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Ref	Summary of Interested Party's Comments	Applicant's Response
	<p>Secondly, it is for the applicant to make such approaches since it alone can evaluate, through discussion and negotiation, the possibilities such land might offer and the corresponding terms.</p> <p>We say, as we have maintained throughout this process, that this failure to properly assess other land within the stated 5Km radius of the PoC is a fundamental (and now irremediable) flaw in the evolution of this scheme.</p>	<p>an initial introduction for the Applicant. The Applicant followed up with interested parties that did not have an in-principle objection to their involvement with the Project to evaluate the land and negotiate agreements.</p> <p>The Environment Agency and Ashford Borough Council have confirmed that the Project has passed both the Sequential and Exception Tests, as set out in the <b>Statement of Common Ground with Ashford Borough Council (Doc Ref. 8.3.1(B))</b> <a href="#">[REP6-004]</a> and the <b>Signed Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(C))</b> <a href="#">[REP4-015]</a>.</p>
<b>Biodiversity</b>		
8	<p>Nothing worthwhile or meaningful has been agreed. At pages 74 and 75 of the Statement of Common Ground with KCC indicates that it remains concerned when it states - <i>“However, the reduction of land where skylarks can breed cannot be ignored. The submitted information has detailed that ongoing monitoring will be carried out but if the submitted information demonstrates there has been a reduction in skylark numbers within the wider area, it’s not clear how this will then be subsequently addressed”</i>.</p>	<p>Section 5.2 of the <b>Outline LEMP (Doc Ref. 7.10(B))</b> <a href="#">[REP3-020]</a> provides details on the mitigation that will be in place for breeding birds (particularly skylark). Further details will be provided within the detailed LEMP(s) and the detailed landscape drawings, as secured by Requirements 8 and 4 in Schedule 2 of the <b>Draft DCO (Doc Ref. 3.1(F))</b> <a href="#">[REP5-003]</a>.</p> <p>As set out in Section 5.5 of the <b>Outline LEMP (Doc Ref. 7.10(B))</b> <a href="#">[REP3-020]</a>, the mitigation measures will be monitored to critically assess whether they are proving effective, which will then inform adaptive site management if needed. The monitoring programme, its objectives and remedial actions will be developed in consultation with KCC and set out in the detailed LEMP(s). This is a matter of agreement with the KCC Ecologist as stated in Table 2.7 of the <b>Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(D))</b> <a href="#">[REP6-006]</a>.</p>
9	<p>AMSG referred to the Outline LEMP and Annex 3 of the document (Indicative Mitigation and Enhancement Measures).</p>	<p>The principles of the skylark mitigation strategy and other bird mitigation strategies are not deferred. They are set out, and therefore secured, in the <b>Outline LEMP (Doc Ref. 7.10(B))</b> <a href="#">[REP3-020]</a>. <b>Appendix 1: Skylark Mitigation and Management Strategy</b> of the <b>Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(D))</b> <a href="#">[REP6-</a></p>

Ref	Summary of Interested Party's Comments	Applicant's Response
	How can the statement of deferring the issue of skylark plots/bird strategies for discussion and decision at the detailed LEMP be considered satisfactory? How is someone suddenly going to resolve the issue in the LEMP when they cannot do so now?	<a href="#">006</a> provides further explanation behind the principles of the skylark strategy which has been agreed with KCC. Paragraph 5.5.5 of the <b>Outline LEMP (Doc Ref. 7.10(B))</b> <a href="#">[REP3-020]</a> states that “ <i>Skylark plot effectiveness is to be monitored during the operation of the Project. Further monitoring may be undertaken for specific species to monitor the success of habitat establishment measures. The results of such monitoring may result in additional or revised management recommendations, which will need to be incorporated into revisions of future detailed LEMP(s).</i> ”
10	The Applicant has been privy to its own badger survey report and is therefore presumably aware of badger set locations relevant to its own application. The detail we have provided is merely adding (potentially) to what it knows already.  We request that our comments are therefore released to them for comment.	The Applicant has not received the un-redacted version of AMSG's previous submission: <b>Aldington and Mersham Support Group Submission for Deadline 4 (11<sup>th</sup> March 2025)</b> <a href="#">[REP4-036]</a> .
11	It was the Exa himself that suggested in his EXQ2 25.3.25 that the EKBG President might care to write to the Applicant requesting a copy of the badger survey results.	Natural England's 'standing advice' for badgers <sup>1</sup> states that “ <i>Surveys should be kept confidential to avoid ill-treatment of badgers</i> ”.
12	Don't they mean “ <i>if, as seems possible, we have missed a badger set, even if on private land, it doesn't matter because under our DCO Order powers we will gain access to carry out all such work as may be necessary (including relocation of badgers from any such set) i.e. we can rectify those things we should have considered more carefully much earlier</i> ”.	Badgers are a mobile species. Therefore, as stated in the <b>Responses to Deadline 4 Submissions (Doc Ref. 8.15)</b> <a href="#">[REP5-023]</a> , further badger surveys will be undertaken prior to construction to ensure any new badger setts are identified, as secured by the <b>Outline LEMP (Doc Ref. 7.10(B))</b> <a href="#">[REP3-020]</a> . Should new badger setts be identified and it is determined that a Natural England mitigation licence or species mitigation strategy is required, applications for these will be submitted and reviewed by the relevant statutory body (e.g. Natural England).

Traffic

Ref	Summary of Interested Party's Comments	Applicant's Response
13	<p>The statement on Page 17 of the Statement of Common Ground with KCC (REP4-019) states - “As indicated in the Applicant’s email dated 27th August 2024, the Applicant will have full control of who can access the Site, to the extent that <b>only workers travelling by a vehicle needed for their trade, such as transit vans/trucks containing tools, being allowed on-site</b>”. (bold font our emphasis).</p> <p>This statement seems clear - no worker cars are to be allowed on site.</p> <p>Page 28: Under the heading “minibus incentives”, we note that these will be “promoted and encouraged”.</p> <p>How does this aspiration of getting workers out of their cars and into minibuses fit with the statement in the email dated 27th August 2024? Surely the Applicant can’t be on the one hand hoping to encourage staff to use the two minibuses and on the other turning away staff cars if they are not transit vans/trucks containing tools?</p> <p>And yet, based on the Applicant’s responses, apparently the professional officers at KCC Highways have approved these contradictory statements.</p>	<p>The Applicant notes that KCC Highways has confirmed it has no objection to the proposals and that this matter was examined in detail as <b>Written Summary of Oral Submissions at Issue Specific Hearing 2 and Response to Action Points (Doc Ref. 8.5.5) [REP1-075]</b> .</p> <p>The objectives of promoting and encouraging opportunities to travel to/from the Site by sustainable modes, particularly via the mini-bus and car / van sharing is referenced in the Worker Travel Plan, which will be set out as part of the detailed CTMP(s), preparation, approval and implementation of which is secured in the <b>Draft DCO (Doc Ref. 3.1(F)) [REP5-003]</b>. The appointed Principal Contractor/the Applicant is responsible for working in accordance with the Worker Travel Plan as part of the detailed CTMP(s).</p> <p>The statement on page 17 of the <b>Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(D)) [REP6-006]</b> states that, if necessary, the Principle Contractor/the Applicant will have full control of who can access the Site to ensure that the worker transport arrangement is in accordance with the detailed CTMP(s).</p>
14	<p>We have taken measurements on site. From the end of the taper of the ghost lane (west end) which is the first point at which it can accommodate the width of a vehicle, to the centre line of Church Road/Station Road is exactly 44.8 metres. Three</p>	<p><b>ES Volume 2, Chapter 13: Traffic and Access (Doc Ref. 5.2(D)) [REP3-012]</b> referred to the ghost island at paragraph 13.7.41 as having an effective length of 50m. This includes the section of the taper that vehicles could use for queueing without blocking ahead movements and contained both the lined storage area and the hatched area in front of the traffic</p>

Ref	Summary of Interested Party's Comments	Applicant's Response
	<p>HGVs bumper to bumper requires 49.5 metres. They categorically cannot fit in it.</p> <p>The ghost lane is therefore at least 5 metres too short. Two HGVs is an absolute maximum and even then, the trailer of the second lorry is likely to be causing an obstacle to fast moving traffic eastbound. Even one extra car turning right will cause eastbound traffic to queue or try and mount the pavement to get round the obstruction.</p>	<p>island. It was stated that this length provides sufficient storage for up to 3 x 16.5m long articulated lorries, primarily for illustrative and comparative purposes. These are the longest heavy goods vehicles (HGVs) typically used in the UK and it is noted that 16.5m long articulated lorries constitute only a small proportion of the forecast construction traffic (see Tables 13.11 and 13.12 of <b>ES Volume 2, Chapter 13: Traffic and Access (Doc Ref. 5.2(D))</b> <a href="#">[REP3-012]</a>).</p> <p>Whilst articulated lorries do occasionally already use the ghost island to turn right at the junction the existing numbers are very low and it is highly unlikely that there will ever be a period where 3 x 16.5m long articulated lorries, or shorter HGVs, are waiting to turn right at the same time.</p> <p>As stated in paragraph 13.7.41 of the <b>ES Volume 2, Chapter 13: Traffic and Access (Doc Ref. 5.2(D))</b> <a href="#">[REP3-012]</a>, only 2 right turning HGVs per hour are forecast at the junction. It is unlikely that they will be arriving at the same time with this frequency being equivalent to one trip every 30-minutes, or arriving at the same time as more than 1 existing HGV.</p> <p>The <b>Outline CTMP (Doc Ref. 7.9(C))</b> <a href="#">[REP3-018]</a> commits to the timing of deliveries as a traffic management measure so the arrival of HGVs can be managed to minimise impact at the junction or any other location on the construction traffic route.</p> <p>The cumulative construction traffic figures in conjunction with other local developments, traffic growth and baseline traffic flows were considered in the <b>ES Volume 2, Chapter 13: Traffic and Access (Doc Ref. 5.2(D))</b> <a href="#">[REP3-012]</a>.</p> <p>The Applicant notes that KCC Highways has confirmed it has no objection to the proposals and that this matter was examined in detail in Section 1.5 of the <b>Written Summary of Oral Submissions at Issue Specific Hearing 2 and Response to Action Points (Doc Ref. 8.5.5)</b> <a href="#">[REP1-075]</a> .</p>



## 2.4 Responses to Lousie Jessup Deadline 6 Submission

Table 2-3 Responses to Lousie Jessup's Deadline 6 Submission

Ref	Summary of Interested Party's Comments	Applicant's Response
<i>Archaeology and Heritage</i>		
Page 1	<p>I have commented and spoken at the Open hearing on the archaeology and heritage of this area.</p> <p>I noted and went to visit several of the new areas of trenching that was being done at the request of the inspector due to the paucity of previous archaeological trenching and research commissioned by the developers in the original instance.</p> <p>Even with the new trenches that have been done, this site is now a complete outlier due to its lack of archaeological assessment with sites like this having a recommendation of 4 - 5% of the land assessed.</p> <p>The total number of trenches done up to now is well below this.</p> <p>Where is the updated report on the new trenches, where were they put on site. How were the areas selected for sample trenches and what was found and recommendations for expanding those trenches due to things found.</p> <p>With the pile driving going up to 3m into the ground, any archaeology present and not found due to the sheer lack of sampling, will destroy</p>	<p>The additional trial trenches were undertaken following ongoing discussions with KCC.</p> <p>The Applicant will submit an Archaeological Technical Note at Deadline 8 which confirms the findings that no significant effects in the Environmental Statement. The <b>Archaeological Management Strategy (Doc Ref. 7.17)</b> <a href="#">[APP-162]</a> will also be updated at Deadline 8 to include the results of the investigative works completed to date and the future approach to management of risk to potential archaeology within the Site.</p>

Ref	Summary of Interested Party's Comments	Applicant's Response
	any evidence of people who have inhabited our precious countryside over generations and hundreds, indeed possibly thousands of years before us.	

## References

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<sup>1</sup> Natural England Guidance. Badgers: advice for making planning decisions. Last Updated 7 April 2025. Available at: <https://www.gov.uk/guidance/badgers-advice-for-making-planning-decisions> (Accessed 6 May 2025)