

Introduction

This document addresses multiple issues raised in the applicant's response (REP5-025) to earlier submissions on cumulative traffic impacts, temporary use and socio-economic impacts.

Cumulative traffic

I will respond to the applicant's responses in REP5-025 but first I wish to refer back to previous submissions regarding cumulative effects. I will start with my submission at REP1-104. I made several points on details (e.g. that the applicant had made false assumptions about the proposed Wellingore BESS and it should be included in the consideration of cumulative impact; the applicant's response in REP2-030 ignored the point made specifically about the Wellingore BESS). In addition to the detail, in REP1-104, I raised concerns about not considering a reasonable worst case scenario and in REP2-030, the applicant avoided the question of the need for a reasonable worst case and dismissed it saying "To assume all the cumulative developments will be constructed at the same time would overestimate the impact on traffic and transport". I challenged this in REP3-083. The applicant's response at REP4-018 evaded the issue by saying "A reasonable worst case cumulative assessment, based on information available at the time, was undertaken by the Applicant and was accepted by LCC". REP4-019 was the applicant's Interrelationships Report continued to be selective in what was presented (a minor example, but one which indicates a lack of responsiveness by the applicant, there is no consideration of the Wellingore BESS raised by me at deadline 10. REP4-019 had other deficiencies - for example, the proposed BESS at Coleby is considered in paragraph 2.2.17 and refers to a "Brent (sic) Valley Node C substation". It is curious that the applicant does not seem to know anything about Trent Valley Node C substation as this should surely have been something the applicant examined further, particularly as elsewhere the applicant offers insights into NESO thinking (e.g. page 56 of REP5-025).

It would be helpful if the applicant could respond on the specific points relating to my comments prior to deadline 5.

In relation to the response at REP5-025, I will first address the response on the cumulative traffic impact traffic. I note that on page 67, in response to Barry Smith, the applicant says the "application has reported on the worst-case effects which result in the event that projects are built simultaneously". However, I have not yet seen any worst-case effects produced on traffic. The applicant continues to assert (e.g. on page 57) that this approach has been adopted on traffic. However, the applicant states on page 56 that, for example, Springwell has been screened out as construction is 2027-2030 and so no temporal overlap with the applicant's timing of 2031-2033. Any reasonable worst-case assessment would

allow for a temporal overall for several reasons, including the applicants stated intention to seek an earlier connection date from the National Grid and potential delays to Springwell (for example the possibility of Judicial Review). The applicant tries to buttress their position by stating that "NESO will likely spread out the connection dates to avoid multiple developers carrying out modification works at the proposed substation near Navenby simultaneously"; as I have pointed out previously, whilst I accept this point, it does not follow that the absence of temporal overlap at the point of connection to the substation means there will be no temporal overlap in the wider construction programme. There are many other factors that do not appear to have been considered into the cumulative traffic impact assessment (for example, the mooted works to replace the current A15/B1202 junction). In summary, I do not believe a reasonable worst-case assessment has been made of the cumulative traffic impact and it likely that an unrealistic worst case cumulative assessment was presented to LCC Highways. I therefore repeat my request that the applicant list what, if any, temporal overlaps have been assumed in their discussions with LCC Highways and why others have not been assumed in what is, allegedly, a worst-case scenario.

A similar worst-case cumulative impact assessment should be produced for worker accommodation to inform the cumulative transport impact (e.g. numbers and routing of shuttle buses).

Public transport

The applicant continues to maintain the impact on public transport is negligible, I am sure the Examining Authority would be reassured if that view had been informed by discussion with Stagecoach, the local bus operator.

LGVs

Whilst the applicant may feel it unnecessary to avoid any extra LGV construction traffic through the village, the view of village residents (as articulated by the Parish Council) is that any extra construction traffic, however small, is unacceptable.

CTMP

The applicant has not given any reasons why the framework CTMP should not be strengthened beyond saying issues can be addressed should the scheme be approved. The view of the local parishes is that the framework CTMP should be strengthened now as they are concerned that the applicant will oppose strengthening after approval.

DCO traffic

The applicant has responded with an explanation of “partial” but avoided the substantive issue - i.e. not responded to why the draft DCO (page 55 of REP2-005) has different wording for the A607 and B1202 and explained what specific powers are sought for both and what differing powers are conveyed by the differing wording and what is the justification for the difference.

Temporary use

The bulk of the applicant's response refers to the question of permanent sealing which was not raised by me. My point is that the Examining Authority will have to consider what weight to give any temporary loss of agricultural land in comparison to permanent loss and would the applicant accept that, applying government guidance on social time preference, means the loss of agricultural land for 60 years shows an insignificant difference to a permanent loss.

Socio economic factors - agriculture

It is regrettable that the applicant refuses to answer the question asked (the annual value of the crops produced by the land) saying it "is not possible to robustly identify financial values, such as for agricultural commodities, given uncertainties associated with future construction timing, market conditions and cropping decisions". This is disingenuous as elsewhere the applicant has made more speculative assessments (e.g. in relation to decommissioning). It would be acceptable, for example, to provide an assessment of agricultural value based on recent years (with caveats future uncertainties). The applicant has instead resorted to rephrasing the question in terms of no loss of employment by local landowners (however, the applicant provides no indication of the number, if any, of agricultural workers that the landowners currently have on their payrolls). The applicant should answer the question asked.

Socio economic factors - steel

The applicant's REP5-025 cuts off part of my submission but I assume this was merely a cutting and pasting error into REP5-025 and that the applicant read the full text.

I regard the applicant's response as very weak. The applicant says "Whilst the Applicant is keen to support the UK steel industry, at this stage it is not possible to guarantee that use of UK steel will be feasible at procurement stage". Can the applicant not be more specific - for example, by offering an ambition to have a minimum percentage of steel poured in the UK and by designing the procurement exercise so that weight is given to the benefit to the local economy of using UK steel.