

**From:** [REDACTED]  
**To:** [Cleve Hill Solar Park](#)  
**Subject:** Deadline 4 Submission  
**Date:** 29 August 2019 18:20:39  
**Attachments:** [REDACTED]

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Dear Hefin,

Please find attached my submission for Deadline 4.

Please let me know if you need any more detail.

Kind regards,

Tom King

26 August 2019



Mr Hefin Jones  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6 PN

**BY EMAIL**

**CLEVE HILL SOLAR PARK – DEADLINE 4 SUBMISSION**

Dear Hefin,

Following my submission at the Open Floor Hearing on 22 July, I wish to challenge a number of statements made in the Outline Construction Traffic Management Plan, Document reference: 6.4.14.1, Revision B, submitted by the Applicant for Deadline 3:

- Paragraph 1.1.6 states “Construction is anticipated to commence in spring 2021 and last up to 24 months”.
- Paragraph 2.2.3 states “Subject to the final development design and potential environmental constraints, phase 1 of the development construction is anticipated to last 24 months.”
- Paragraph 2.2.5 states “Phase 2 of the development construction will run for approximately 3 to 6 months, which is expected to be contained within the overarching construction programme.”
  - **The duration was queried with the Applicant and, on 19 Jun 2019 @ 08:55, James Senior (via email from [info@clevehillsolar.com](mailto:info@clevehillsolar.com)) advised:**

*“The candidate design for Cleve Hill Solar Park assumes that both phases of construction would happen within an indicative 24 month period. However, the construction of the energy storage facility has been separated into a six month ‘Phase Two’ construction phase, to allow for the flexibility to deliver this six month construction phase at a later date. If this was to happen, the construction phases would then be undertaken within an indicative 24 months for phase one and a further indicative six months for phase two at a later date.”*

**When will this decision be made? It is essential that all stakeholders are aware of the duration of the proposed development and be in a position to comment / assess accordingly.**

- Paragraph 1.2.3 states “This Outline CTMP will inform Officers at Highway England (HE), Kent County Council (KCC), Swale Borough Council (SBC), Canterbury City Council (CCC) and other relevant transport stakeholders with regards to the suitability of the proposed construction traffic route and the highway access matters associated with the Proposed Development.”
  - **I cannot see how this document, and the accompanying Environmental Statement Chapter 14, Access and Traffic, can adequately inform these authorities when there are so many inaccuracies and untruths included.**
  - **These authorities should be provided with a final, validated version of these documents to comment on and disregard the spurious information provided to date.**
  
- Paragraph 1.3.2 states: “As part of the preparation of the final CTMP, the following transport stakeholders will be consulted regarding the traffic and transport elements of the Proposed Development: Highways England; Kent County Council; Swale Borough Council; Graveney Primary School; Graveney Parish Council; and Graveney Residents Environmental Action Team.”
  - **As at the time of writing, Graveney Parish Council and the Graveney Residents Environment Action Team have met once on the subject of traffic and transport elements of the proposed development. This meeting cannot be considered as ‘consultation’ in any sense.**
  - **As these groups are most familiar with the road network it would seem sensible that these were consulted at an early stage to advise on the true situation. Could the Applicant please explain why this has not happened?**
  
- Paragraph 2.4.2 states: “A large proportion of the construction staff will stay in accommodation local to the site and travel to the site together by mini-bus.”
  - **Requirement 15 of the dDCO states that “local skills supply chain and employment which requires that a skills, supply chain and employment plan is submitted ahead of construction.” If the supply chain was being fulfilled by locals then I fail to understand why ‘a large proportion’ of the construction staff would require local accommodation. Could the Applicant please explain?**
  
- Paragraph 2.6.4 states: “The size of the abnormal loads to be transported to the site will be similar in size and weight to the abnormal loads that have previously been transported to the London Array substation. These loads were up to 143te nett.”
  - **Could the Applicant confirm the number of abnormal loads that were transported during the London Array substation construction and the anticipated number of abnormal loads for the proposed Cleve Hill development?**
  - **I do not believe there will be any comparison on numbers, as there were very few for the London Array site yet this paragraph suggests it will be comparable. I have been unable to find any evidence of what volumes and load sizes were used during the London Array substation construction and would like to see this.**
  
- Paragraph 2.6.6 states: “A key constraint is the road bridge over the railway at Graveney. Discussions have been undertaken with Network Rail who own the structure and permission has been given to move the loads over the railway bridge subject to a number of conditions.”
  - **I have been unable to trace any documentation from Network Rail on the portal. Could the Applicant please provide this together with the list of conditions stated by Network Rail?**

- Paragraph 2.6.7 states: “Abnormal loads will be transported to the site during off-peak periods (typically at night). As well as the statutory obligations, agreement with relevant stakeholders will be sought prior to any abnormal load movement being undertaken.”
  - **The unacceptable traffic movements taking place from 6am to 8pm during the week and from 6am to 2pm on Saturdays will severely impact residents without their nights being disrupted too.**
  - **It is essential that this additional disruption is considered during the examination process, it is unacceptable for this detail only to be available once the application is approved when the Applicant states the final CTMP will be delivered.**
- Paragraph 2.7.6 states: “To ensure a robust prediction of the number of construction vehicles, it has been assumed that all vehicles arrive loaded and depart empty. In reality, exiting vehicles would remove waste/materials from the site.”
- Paragraph 2.7.7 states: “Of the 80 two-way HGV vehicle movements, 20 account for waste removal per day.”
  - **This seems to contradict paragraph 2.5.2 which states: “It is proposed that all of the excavated material generated by construction will be used within the site for roads, landscaping, drainage, reinstatement and otherwise as required to deliver the Proposed Development”.**
  - **Could the Applicant clarify what ‘waste material’ is being referred to here please?**
- Paragraph 2.7.8 states: “Peak daily total construction traffic is expected to occur in week 100 of the construction programme. This comprises of 222 two-way vehicle movements (111 vehicles). This breaks down as 162 two-way LGV movements (81 vehicles) and 60 two-way HGV movements (30 vehicles).”
  - **I am confused about this statement. Figure 2.2 shows a Construction Vehicle Profile which covers 24 months. This shows there will be daily construction traffic in excess of 200 movements from August 2022, meaning this will continue for around 8 months. This will be extremely disruptive for local residents and businesses and the additional noise, pollution and other impacts are unacceptable.**
  - **Could the Applicant advise how they propose to manage this to ensure that local residents and businesses are not delayed in their journeys through the village?**
- Paragraph 2.7.10 states: “An average of 62 two-way HGV movements (31 vehicles) and 90 two-way LGV movements (45 vehicles) will generated per day throughout the 24 month construction period.”
  - **Based on the highest level of HGV’s recorded in the traffic data analysis presented by the Applicant at Deadline 3, this represents a 100% increase in HGV’s (the number identified in the Applicant’s traffic raw data was 32 which they have not provided any further comments on).**
  - **This is considered to be an unacceptable increase in HGV movements through a small village approached by narrow country lanes which pass in close proximity to a primary school and other sensitive receptors.**
  - **Could the Applicant advise how this impact will be mitigated?**
- Paragraph 3.2.8 states: “Head Hill Road/ Seasalter Road is formed of a single carriageway ranging in width between 4.5m and 7.5m.”
  - **I have undertaken my own measurements of this stretch of road from the junction between Whitstable Road and Head Hill Road to the entrance of the London Array Substation on 7 August 2019. A total of 25 random measurements were taken and**

are included in Table 1 below. Photographs of each measurement point are included in Appendix 1.

Measuring point	Maximum width (m)
1	5.4
2	4.4
3	4.6
4	4.5
5	5.1
6	4.8
7	6.1
8	4.9
9	5.1
10	5.4
11	5.6
12	5.4
13	5.5
14	4.8
15	5.2
16	4.8
17	5.1
18	4.7
19	5.0
20	5.0
21	5.0
22	4.2
23	4.9
24	4.7
25	5.4

Table 1. Measurements taken on 7 August 2019 of Head Hill Road and Seasalter Road

- As can be seen, the minimum width measured was 4.2m and the maximum 6.1m, both of which are outside the parameters provided by the Applicant.
- Additionally, the Applicant stated in their Written Summaries of Oral Submissions, Document Reference 11.1.1, Revision A, that “a bus is expected to be able to pass an HGV, as can occur in the existing baseline scenario when HGVs utilise the same route.” Anyone who uses these roads knows that this statement is completely untrue and misrepresents the reality of the situation which will occur should this proposed development go ahead. Based on my measurements of the local bus (2.8m including wing mirrors) and the Hilderbrands Removal lorries (2.6m including wing mirrors) this makes a total of 5.4m WITH NO GAP BETWEEN.
- Out of the 25 measurements I took, these vehicles would only be able to pass in a maximum of 3 places (12%) with a gap ranging between 0.1m and 0.6m.
- Figure 1 below demonstrates a situation experienced on 23 August 2019 where it was not possible for a Mini car to pass an HGV at the top part of Head Hill Road.

Figure 1. 23 August 2019 at the top part of Head Hill Road (close to the junction with Whitstable Road) showing it was not possible for a mini car to pass an HGV.



- Paragraph 4.2.1 Section 4.2.1 states: “An initial assessment of Head Hill Road and Seasalter Road was undertaken using OS mapping to identify the locations where the carriageway width is restricted, or where a corner or obstacle is present, that means a large vehicles may have difficulty passing an oncoming vehicle.”
  - **This method of assessment was clearly invalid and the Applicant should be required to re-assess using physical measurements that accurately reflect the road network.**
- Paragraph 4.2.2 states: “In total four locations were identified whereby a large HGV and a large car may experience difficulty in passing each other.”
  - **This does not include the location shown in Figure 1 above which again calls into question the accuracy of the Applicant’s assessments.**
  - **When asked, the local removal company also stated that, when going over rough ground and having to pull up to the edge, high vehicles will lean which effectively makes them wider.**
- Paragraph 4.2.3 states: “In all instances, there is available carriageway width for a vehicle to wait to allow another to pass. Furthermore, in all situations a good level of forward visibility is maintained meaning that vehicles have early sight of approaching vehicles.”

- **This is completely untrue. Currently, the only places where it is possible to wait for large vehicles to pass are on private property, e.g. wide driveways and the privately owned layby along Seasalter Road. Additionally, the road is narrow with many bends which cannot be seen around due to high verges.**
- **Could the Applicant please accurately represent this situation to ensure the necessary authorities can accurately assess the impact?**
- Paragraph 4.2.5 states: “In order to ensure the assessment was accurate, KCC Highways requested that topographical surveys were undertaken at these locations. In addition, two further locations were requested to be surveyed, these include: North of St Bartholomew’s Church access road; and 350m north of Whitstable Road junction.
  - **Could the Applicant advise if these have been completed and, if so, where the surveys can be located?**
- Paragraph 6.7.7 states: “There are laybys and services (suitable for HGVs) along the A2, A299 and M2. A vehicle could wait in one of these areas until the LRN timing restriction has ended.”
  - **This is factually incorrect. There are no layby’s on the M2 (or on any motorway in the UK!) and stopping on a motorway unless it is an emergency is a criminal offence.**
  - **Additionally, there are minimal layby’s on the A2 approaching from Dover direction, but no layby’s on the A2 approaching from Sittingbourne.**
  - **There is just one layby on the A299 close to the junction which is often utilised by resting long distance HGV drivers.**
  - **In view of this, could the Applicant advise where, in reality, the construction traffic will wait?**
- Paragraph 6.9.1 states: “It is proposed that the speed of construction traffic along Head Hill Road and Seasalter Road is restricted to 20mph in places.”
- Paragraph 6.9.2 states: “The locations of the proposed construction traffic speed restrictions are shown in Drawing 007 in Appendix E at the rear of this report.”
  - **Could the Applicant please provide an explanation of this drawing as I have been unable to ascertain where the 20mph limits will apply?**
- Paragraph 6.12.3 states: “In the event that mud or debris is found on the public highway, a road cleaning contractor will be on call throughout the construction programme.”
  - **Could the Applicant advise how the road cleaning contractor will be contacted when mud or debris is found on the road by residents or road users?**

In addition, and following up on my open floor hearing comment about Headhill Road and Seasalter Road being used as diversions when there are problems on the A299 and M2, please see below two photographs which support this (figures 2 and 3).



Figure 2. Traffic queuing at the Headhill Road / Whitstable Road junction due to an incident on the A299 on 23 August 2019. This resulted in grid lock in all directions on the three roads.



Figure 3. Traffic queuing outside our house on Seasalter Road on 22 August 2019 following a problem on the M2 which resulted in traffic queues on the A299 with drivers diverting through Graveney. On this occasion, this situation went on for many hours.





Please let me know if you require any further information.

Kind regards,

*TA King*

Tom King

## APPENDIX 1

### Road Measurements 7 August 2019

Measurement 1 (Top of Headhill Road by fruit and veg stall) – 5.4m



Measurement 2 – 4.4m



Measurement 3 – 4.6m



Measurement 4 – 4.5m



Measurement 5 – 5.1m



Measurement 6 – 4.8m





Measurement 7 – 6.1m



Measurement 8 – 4.9m



Measurement 9 – 5.1m



Measurement 10 – 5.4m



Measurement 11 – 5.6m



Measurement 12 – 5.4m



Measurement 13 – 5.5m



Measurement 14 – 4.8m (excludes layby which is privately owned)



Measurement 15 – 5.2m





Measurement 16 - 4.8m



Measurement 17 – 5.1m



Measurement 18 – 4.7m



Measurement 19 – 5.0m



Measurement 20 – 5.0m



Measurement 21 – 5.0m



Measurement 22 – 4.2m



Measurement 23 – 4.9m



Measurement 24 – 4.7m





Measurement 25 (by London Array entrance) – 5.4m

