Hi Hefin, hope you are well. Please find attached GREAT's submission of traffic for Deadline 5.

Kind regards,

Marie
GREAT Comments about Traffic at Issue Specific Hearing 6 on 11 September 2019 on Environmental Matters

- There is constant comparison made to the London Array development - but there is NO comparison. Looking back at the Swale Borough Council Planning Committee minutes in June 2006, it is stated clearly that the average HGV level would be about 5 per day. The very worst scenario would be 30 lorries per day (60 movements) and this would be experienced if different elements of the projects occurred simultaneously.

- Looking at the figures stated in the Outline Construction Traffic Plan (Revision C, August 2019) for the Cleve Hill development (challenged and not yet validated):
  - The average HGV level will be 31 lorries per day (62 movements) throughout the 24 month construction period.
  - Peak daily total construction traffic is expected to occur in week 100 (challenged and not yet validated as the documentation shows this continues for the rest of the construction period) of the construction programme. This comprises of 81 HGV’s (162 movements).

- Added to this there would then also be the additional period of time to build the battery storage of 6 months. This means that the total duration of the project is longer than London Array substation, both for daily working hours (11.5 hours per day for London Array, 14 hours per day for Cleve Hill), and duration for construction (24 months for London Array, up to 30 months for Cleve Hill).

- In response to the statement by Mr Gareth Philips that, during the London Array development, residents had most issues with the condition of the road, Lut Stewart advised that most residents actually had most issues with the number of lorries travelling through the village. She also added that the developers had only committed themselves to repairing, putting the road back in the condition they found it – they would not be improving it.

- GREAT also commented on the statement in Paragraph 2.7.1 of the Construction Traffic Management Plan:
  - The estimated volume and type of vehicles that would be generated throughout the construction phase of development has been informed by the Applicant’s anticipated construction programme, *which is based on their extensive experience of delivering similar developments throughout the country.*
This is a further disingenuous statement as the applicants have no experience of delivering similar developments throughout the country.

- Road sign displayed for the last few weeks at the junction of Graveney Road and A299 attached below. Kent Highways clearly believe the road is unsuitable for HGV’s yet their traffic plan states otherwise.

- Looking at the definitions of LGV and HGV’s, there is only 1 lb difference in the amount of goods that can be carried. As it is difficult to assess from the figures provided in the documentation, it would appear that there will be very little difference in the impacts experienced from this traffic.
  - Definition of light goods vehicle. light goods vehicle means a motor vehicle constructed or adapted to carry or to haul goods of not more than 3.5 tonnes in weight
  - A heavy goods vehicle, also large goods vehicle or medium goods vehicle, is the European Union term for any truck with a gross combination mass of over 3.5 tonnes in weight