

# **GRAVENEY with GOODNESTONE PARISH COUNCIL**

[www.graveneywithgoodnestonepc.kentparishes.gov.uk](http://www.graveneywithgoodnestonepc.kentparishes.gov.uk)

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

By email to: [CleveHillSolarPark@planninginspectorate.gov.uk](mailto:CleveHillSolarPark@planninginspectorate.gov.uk)

Your ref: EN010085

20<sup>th</sup> September 2019

Dear Sir/Madam,

Application by Cleve Hill Solar Park Limited for an Order Granting Development Consent for the Cleve Hill Solar Park Project

Graveney with Goodnestone Parish Council is presenting this written submission to reinforce and expand on the points raised in the oral submission which was made at the hearing on 11<sup>th</sup> September, specifically in relation to Traffic and Transport.

Our starting point is to emphasise that traffic was the principal issue which most affected the villagers during the London Array project; it had a significant and long lasting effect on our community and the wellbeing of residents during the construction phase. We are therefore struggling to comprehend how we could possibly cope with the consequential impact associated with the Cleve Hill project given the enormous scale of the development and the unrealistic assumptions and omissions currently set out in the Outline Construction Traffic Management Plan (OCTMP) of August 2019 – Revision C.

We are disappointed that having reached an advanced stage in the enquiry process the applicants have not been able to submit a more complete and comprehensive plan which can be given greater scrutiny in view of the fundamental importance of Traffic and Transport to the overall project. This is despite two preliminary meetings having been arranged by the applicants in Faversham with statutory and other consultees in September 2018 and March 2019 to provide an update on Traffic and Transport matters. We expressed our concerns at those meetings but received very little constructive feedback as to potential mitigation measures and the OCTMP does nothing to materially address these issues.

We consider that issues such as noise, dust and air pollution and their impact on our community have not been properly assessed and quantified, and these are specific matters which will be addressed in more detail by other objectors.

In 1.2.2 of the OCTMP a somewhat bold statement is made that the final CTMP will provide mitigation for the traffic generated and in doing so ‘will ensure that impact on existing users of the public highway network, or those close to it, is limited’. Unfortunately, from the information we have so far, we do not share the applicant’s optimism.

We would therefore wish to put forward the following observations regarding the OCTMP:

1. In 1.1.3 and 1.1.6 there is no indication as to the estimated decommissioning phase period.
2. In 1.1.6 the construction period is stated as being up to 24 months but in 2.2.5 we are advised that Phase 2 construction could run for an additional 3 to 6 months and at the hearing the longer period seemed to be the revised timescale. In 2.2.2 we are advised that Phase 2 itself could be undertaken in multiple phases, potentially adding to the overall time frame and disruption.
3. In 2.7.1 we would call into doubt the applicant’s ‘extensive experience of delivering similar developments throughout the country’. They have clearly not been involved in any solar park development exceeding 50 MW, let alone 350 MW.
4. In 2.7.4 we are confused with reference to the peak starting around Week 27 (October 2021) as this appears to be at variance with Figure 2.2.
5. In 2.7.8 the absolute daily peak of 222 two-way vehicle movements may be in Week 100 but total traffic is at or above 180 for an extended nine month period from June 2022 until March 2023 according to Figure 2.2. Furthermore, the draft Development Control Order does not seek to limit two-way daily vehicle movements to 222.
6. In 4.2 based on our long standing experience of existing vehicle movements along the designated route of Seasalter Road and Head Hill Road we would submit that there are other locations where a large HGV or even an LGV and a large car may experience difficulties in (a) passing or (b) experience restrictions on forward visibility, contrary to 4.2.3. Those additional locations falling into category (a) would be along the line of the conifer hedge by Barons and Hobbits Oasts and the section of the road between Goodnestone Lane and the approach to Langdon Manor Farm. We also consider that the entire length of Head Hill Road from The Lodge to the top of the road should be included, contrary to 4.2.6. Those locations falling into category (b) would be Graveney Railway Bridge, Goodnestone Lane bend and Poplar Hall bend. In particular, we would mention the Sandbanks Lane junction at Graveney Railway Bridge where visibility for cars turning left or right from Sandbanks Lane is very restricted and with the significant increase in construction vehicle movements, special measures for this location would need to be put in place.
7. In view of the number of width and visibility limitations associated with the designated route we note that the applicants do not see the need to propose any passing places; we would submit that this would be a vital and effective mitigation measure against the inevitable grid lock on the roads serving the villages. One cannot rely upon the long term use of private land, such as driveways and forecourts, to assist, as these cannot be guaranteed as is evident along Waterham Lane where owners have taken measures to close passing places on their land.

8. No account has been taken in the methodology or analysis as to the effect of seasonal growth of the roadside hedgerows along the designated route as this can serve to further restrict the clearance for passing vehicles.
9. No account has been taken of cautious or hesitant drivers using the designated route; one cannot assume that plan measurements correspond with the reality of a large HGV or LGV being able to pass another vehicle and tolerances need to be reflected in the calculations to take account of realistic clearances from roadside hedgerows and banks , and between passing vehicles.
10. No account has been taken of multiple vehicles using the designated route at the same time which would potentially be contrary to 4.2.3 as other vehicles could easily create a queue in the event of a hold up thus exacerbating any congestion.
11. Hold ups could easily develop on account of parked cars, farm traffic, pedestrians or cyclists and we would stress that as the designated route is part of a National Cycle Route (NCR) we often have lines of cyclists travelling through the villages which slows the traffic flow even more. The applicants identified the NCR as a sensitive receptor in their Preliminary Environmental Information Report and we consider that the safety of cyclists should be of paramount importance and their presence is in direct conflict with the expected construction traffic movements through the villages.
12. In 4.2.9 we would question the practicality of the measure identified and will comment further in relation to 6.7.
13. In 6.7.2 we would query whether the efficiencies mentioned assume a 12 hour shift pattern as otherwise you would need to factor in additional vehicle movements associated with shift changes.
14. The Delivery Management System (DMS) seems rather simplistic with no mention of any holding areas or radio control communications; these measures greatly helped with controlling vehicle movements in connection with the London Array project. It has been stated during the course of the hearing by the applicants that HGVs will often be travelling long distances and they would be able to track them with GPS devices. We cannot see how the proposed DMS can effectively control vehicle movements to take account of rush hour traffic, the inevitable congestion at the Brenley Corner junction, the unpredictability of being able to use laybys, and the futility of trying to achieve a booking system and timed deliveries. Such a coordinated approach may appear achievable as part of a desk top exercise but in reality a very different and totally unacceptable scenario would result.
15. In 7.2 we note that a Traffic Management Group would be established which would include the Parish Council but this would need to have robust and effective terms of reference and enforcement powers ; we would also submit that a working group would need to meet on a weekly basis , as happened with the London Array project, to oversee the implementation , compliance and mitigation measures.

In our opinion the present OCTMP is wholly inadequate in terms of offering a cohesive and effective document to deal with the question of construction traffic and the unrealistic proposals and assumptions would only result in unacceptable disturbance and congestion for the residents and businesses in Graveney and Goodnestone for at least 30 months. Safety for pedestrians,

cyclists and other motorists would be at risk and prompt access for emergency vehicles would undoubtedly be compromised.

Yours faithfully,



Bex Ratchford  
Parish Clerk



clerkggpc@gmail.com