Dear Hefin,

Please find attached my response to the Applicant's comments on my previous submission.

Kind regards,

Tom
3 October 2019

National Infrastructure Planning
Cleve Hill Solar Park

BY EMAIL

Deadline 6 – Response to Applicant’s Comments on Tom King’s Written Representation in relation to the Outline Construction Traffic Management Plan

Dear Hefin,


- Network Rail:
  - I am not entirely sure how or why delivery of the abnormal loads is commercially sensitive and wonder if this is another example of the Applicant not being honest and transparent.
  - The Applicant added an email from Network Rail at Deadline 5 which includes a number of conditions and requirements on taking abnormal loads over Graveney Bridge. I request that these conditions are included for this application.

- Abnormal load movements:
  - The Applicant’s response states that:
    - abnormal loads will be undertaken in line with statutory obligations, and
    - prior consultation and advanced notice of abnormal load movements will be undertaken before any deliveries are made.
  - I would like to see these included as conditions.

- HGV volumes:
  - The Applicant states that “increases of over 100% in HGV’s using Sealsalter Road were identified” and “This represents the relatively low number of HGV’s that currently use this section of road.”
  - In view of this, I ask again how this application can be considered when such a huge impact on the roads will be experienced which cannot be fully mitigated.

- Width of road:
  - I provided 25 random measurements of the road which contradict the data provided by the Applicant. This issue has not been addressed.
  - The Applicant has stated that “At the locations where vehicles are not able to pass each other there is available carriageway ahead to allow a vehicle to wait for another to pass”. This is not true. Currently if there are two vehicles that cannot
pass, one pulls over where possible but quite often this is on to private land (driveways, private layby) or the verges resulting in damage. This is an unacceptable solution for the vast number of additional vehicles that will be present during construction.

- The Applicant has stated that “at these locations good forward visibility was identified”. Again, this is not true. There are a number of areas where it is impossible to see if the road is clear due to the bends and high vegetation. As an example, it is often necessary to follow cyclists for most of Headhill Road because it is impossible to get a clear view of the road ahead.

- In my original submission I asked for the road to be physically assessed as this is the only true way of understanding what it is like and how difficult it is for vehicles to pass. This has still not been done and I have grave concerns about any decisions being made on this being a suitable route for this development based on desk top studies alone.

- **Road Condition:**
  - The Applicant states that “remedial works would be undertaken prior to construction of the Development, to ensure an appropriately smooth carriageway surface is provided”.
  - What is the Applicant’s definition of ‘an appropriately smooth surface’?
  - Will this be monitored and repaired to maintain this surface throughout the construction period?
  - Who bears the cost of these repairs?

- **Laybys and Services:**
  - The Applicant has stated that the M2 services will be used to control movement of HGV’s. My understanding was that the majority of construction materials will be brought in by sea to Sheerness. The M2 services are London bound from Sheerness, so that would require lorries to:
    - drive the wrong way on the M2 to get to the services, park and wait there until instructed
    - continue to drive the wrong way on the M2 to junction 4 to turn round and rejoin the M2 coastbound
  - I would like the Applicant’s assurances that this scenario will be implemented.
  - The HGV parking area at the M2 services are usually very busy and lorries are not always able to park there. What is the Applicant’s proposal for dealing with this scenario?
  - Likewise, the laybys on the A2 and A299 are usually very busy and often have HGV’s parked up there. Again, what is the Applicant’s proposal for dealing with this situation?

Kind regards,

Tom King