

Response for deadline 7 to Applicants answer to AP10 from ISH3

Planning Inspectorate ref: EN020026

My ID: [REDACTED]

1) Introduction

For context, the Ex A asked the Applicant the following:

“There have been comments from people in Kent suggesting there would be a vast amount of aggregates and many thousands of HGVs brought to Minster Marshes to form the foundation base of the proposed converter station. How would you respond to that? Because it's still the point that's being raised with us”.

The reply from the Applicant was very dismissive and either deliberately or mistakenly misinterpreted what was being asked:

“From our perspective, in terms of what we've assessed, the single busiest day for the Kent Onshore scheme is 108 HGVs and not the thousands that were mentioned there”.

Nobody had ever suggested that there would be thousands of movements a day.

The Ex A replied:

“In terms of those, the numbers which have been mentioned, you don't recognise those as something that you would anticipate” to which the Applicant said:

“No, I wouldn't”.

When KCC was asked by the Ex A to comments on the point about HGVs through the Ramsgate area KCC highways said:

“Much like the applicant said, I don't see anything to that effect in any of the work that's been done to date. So, I'm not quite sure where those figures are coming from to be honest”.

I, David Stevens, subsequently said:

“There was a figure mentioned of 108 lorry movements a day. Does that figure of 108 a day include lorries delivering aggregate because obviously over a ten-day period that gets us into the thousands of movements”.

This led to the Ex A raising Action Point 10 requesting the Applicant to respond to my question.

2) Action Point 10

The Applicant is required to *“respond to Mr Stevens' concerns regarding numbers of HGVs which would have to access Minster Marshes during the construction phase”.*

a) The response by the Applicant

“The Applicant recognises that over the programme of the project thousands of vehicles will be required for the construction of the project. The Applicant has assessed the maximum number of HGV's accessing the Minster Converter Station site via the main proposed site access on the A256 (access K-BM02) as

previously noted in a number of responses to documents submitted by the members of the public and by questions from interested Parties and the ExA. The number of vehicles mentioned by Mr Stevens in the Hearings relates to vehicles importing material to the Minster Converter Site for the creation of the piling platform. The number of these vehicles has been assessed as part of the ES and this has concluded no significant effects.

The applicant has assessed a peak number of 236 vehicles per day (which includes 100 HGVs per day) for works associated with the Minster Converter Site (taken from Table 7.31 of **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** for access K-BM02) and it is this daily peak that has been used to assess impact. As previously mentioned during ISH3, the single busiest construction day would involve a daily maximum of 108 HGVs across all access points”.

b) Analysis of response

- i) On the day of the hearing the Applicant was very dismissive of the “thousands of HGV movements” as shown in the introduction when they said, “From our perspective, in terms of what we’ve assessed, the single busiest day for the Kent Onshore scheme is 108 HGVs and not the thousands that were mentioned there”. However, they now say that the “Applicant recognises that over the programme of the project thousands of vehicles will be required for the construction of the project” which is the point that has been made all along.
- ii) The Applicant does not actually address the question of whether the 108 movements (APP-067 Table 7.26) include lorries delivering aggregate using K-BM02. The Applicant must know this information because aggregate must be required at the beginning of construction to a) build the haul road from K-BM02 to the Minster Converter site and b) to start to stabilise the land.
- iii) My question at ISH3 related to the 2026 Peak value of 108 because that was the figure the Applicant used to answer the question put to them by the Ex A in ISH3. However, the Applicant switches in the second paragraph to referring to the 2028 peak daily HGV construction movements for K-BM02 as stated in APP-067 Table 7.31.
- iv) This generates a different question. Is it possible for the Applicant to be asked how many of the 100 HGVs entering K-BM02 involve the transportation of aggregate by HGVs?
- v) As explained in detail in my REP6-199, using the Applicant’s own figures and industry recognised standards, there will need to be a minimum of 47,500 HGV movements to deliver the aggregate using K-BM02. This aggregate must be delivered relatively early in the construction process as explained in ii) above.
- vi) As explained in detail in my REP6-199, referring to **APP-90 Table 1.1, “The construction noise assessment for construction and removal of haul roads, construction of compounds and working platforms for permanent works”** the only vehicles capable of bringing aggregate on site are four 8-wheeled tipper HGVs on site for 25% of the time. It is hard to rationalise this information with the requirement for 47,500 of these 8-wheeled tipper HGVs to deliver aggregate.
- vii) This would suggest that each of the four 8-wheeled tipper HGVs would only be on site for 15 minutes in every hour.
- viii) APP-067 Table 7.31 indicates that 100 HGVs will arrive at and 100 HGVs will depart from K-BM02 over a ten-hour period. If only a maximum of four 8-wheeled tipper HGVs have been assessed for construction noise that would give a maximum of 40 permissible 8-wheeled tipper HGVs on site over the ten-hour working day.
- ix) Looking at the itemised Plant Description in APP-090 Table 1.1 it is not clear how the figure of 100 HGVs in APP-067 Table 7.31 has been arrived at whilst still satisfying the requirements of the construction noise assessment.

3) Additional Information required to give clarity

a) Stabilising the land at the site of the Minster Converter Station

Unfortunately, the Applicant has still not given any detail of the method it intends to use for stabilising the land. This is important because it has a real effect on the type and number of HGVs using K-BM02 and the timing of such movements. This in turn will affect the junction modelling and possibly alter when the peak daily construction vehicle movements will occur.

b) Specific details of the type of type of HGV movement using K-BM02

- i) Is it possible for the Applicant to please confirm, or otherwise, that a maximum of forty 8-wheeled tipper HGVs will be permitted on site in a ten-hour working day under the requirements of the construction noise assessment?
- ii) It would be useful for the Applicant to give a specific breakdown of the 100 HGV movements by vehicle type. This information must be known to the Applicant because, without that information, it would not have been possible to do junction modelling in general, forecast peak daily construction HGV movements for K-BM03 specifically, noise assessments, noise contours etc.

David Stevens.