

South Brooks Solar Farm

Preliminary Environmental Information

Volume 2: Outline Construction Traffic Management Plan

Document Reference: EN0110027
May 2026
Blue Planet Solar Limited



Table of Contents

1	Introduction	1
2	Access Strategy	2
3	Access Arrangements and Permits	4
4	Proposed Traffic Management Measures	6
5	Staff Travel Plan	14
6	ALL Traffic Management Measures	19
7	Onsite Access Management Proposals	22
8	CTMP Management	25
9	Summary & Next Steps	27

Figures

Figure 4-1: Example Information Sign Plate	10
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1 Introduction

1.1 Report Purpose

- 1.1.1 The Outline Construction Traffic Management Plan (oCTMP) supports the Development Consent Order (DCO) for a solar and Battery Energy Storage System (BESS) development (the 'Project') located to the east and north of Lydd, Kent.
- 1.1.2 The Project comprises the construction, operation and maintenance, and decommissioning of a solar photo-voltaic (PV) array electricity generating facility. The Project includes solar PV arrays, BESS, onsite substations and associated grid connection infrastructure which would allow for the generation of electricity to Dungeness Substation.
- 1.1.3 The purpose of the oCTMP is to provide the framework through which the CTMP would be prepared, which in turn details how traffic measures for the management of construction traffic would be implemented as part of the Project. This document does not specifically address operational or decommissioning traffic activities.
- 1.1.4 The CTMP would be prepared in accordance with this oCTMP, in accordance with a Requirement of the DCO and would be approved by the relevant local planning and highway authorities in advance of starting the construction works.

2 Access Strategy

2.1 General

2.1.1 The Project is predominantly located within the administrative boundary of Kent County Council, with part of the Site within the neighbouring East Sussex County Council. Access routes are shown going through both administrative boundaries.

2.1.2 For ease of reference and for the purposes of this oCTMP, the land within the Site can be subdivided into five sections; namely:

- South Brooks A: The area located to the northwest of Lydd and located on farmland between Lydd and Little Cheyne Court Wind Farm. This area would be accessed from the A259 corridor;
- South Brooks B: The area located to the south of the A259 / B2075 Romney Road Junction. This area straddles the B2075 and would be accessed through two new priority junctions;
- South Brooks C: The area located between Lydd and Greatstone. This area would be accessed from an existing junction on the B2075 Romney Road;
- South Brooks D: The area located to the west of Lydd Airport and accessed from the airport access road; and
- South Brooks E: The area located to the south of Lydd for environmental enhancements.

2.1.3 These areas and access locations are described in further detail in the Transport Assessment. Further access would be required for the grid connection access route and this would be detailed in the submission outline CTMP, once the exact alignment has been determined.

2.1.4 To construct the Project, a variety of vehicles would be required. These would include, but not be limited to:

- Cars and Light Goods Vehicles (LGV);
- Articulated and rigid Heavy Goods Vehicles (HGV) delivering plant, materials and electrical components;
- Rigid HGV delivering bulk materials such as aggregate, ready mix concrete, etc for use on the Site;
- Specialist machinery, usually delivered using a low loader style articulated HGV, that may include loads such as directional drilling equipment, mobile cranes and excavation plant (for the cable crossing public roads and watercourses); and
- Abnormal Indivisible Loads (AIL) carrying special oversized loads such as electrical grid transformers.

2.2 Construction Traffic

2.2.1 Construction traffic would enter the Project via specifically designed access junctions or via upgraded existing junctions. The principal access points are located on the A259 and B2075 Romney Road and serve the main development areas of the Project.

2.3 Abnormal Loads

- 2.3.1 A detailed AIL Route Survey of the access route will be undertaken and will be provided in the DCO submission oCTMP report. Mitigation measures to allow access for these loads between the trunk road network and the AIL access junction(s) will be identified. The detailed design of these works would be secured by the DCO and would be subject to a technical approval process, reviewed and approved by the relevant highway authorities.

2.4 Proposed Operational and Maintenance Access Strategy

- 2.4.1 During the operational phase of the Project, it is anticipated that the trip generation associated with the maintenance of the Project would be minimal and that occasional access by LGV or 4x4 vehicles would be required.
- 2.4.2 HGV access during panel and BESS replacement will be required and will use the retained construction access junctions to access the Site. The number of these trips will be below that associated with the peak construction traffic flows, as repainting areas will be limited and will involve fewer staff members than construction.
- 2.4.3 To protect future stakeholders, it is proposed that an outline Decommissioning Traffic Management Plan (oDTMP) would be included within an outline Decommissioning Environmental Management Plan (oDEMP) that is prepared prior to decommissioning works commencing and that this requirement is secured via a DCO requirement. Transport and access matters would be properly addressed at decommissioning, with the DTMP being based upon the measures contained in the oCTMP.

3 Access Arrangements and Permits

3.1 Access Junctions

- 3.1.1 Construction access to the Project would be taken from the public road at various locations as illustrated in Figure 1-3 of the Transport Assessment (see Appendix 10.1). Potential operational phase access points are also proposed and would only be used during the operational phases. Construction traffic would not use these operational phase access junctions.
- 3.1.2 The access junctions would be permanent and would be used throughout the lifetime of the Project.
- 3.1.3 The junction bellmouths and initial track sections from the public road would feature a metalled road surface to reduce the opportunity for debris and mud to be deposited on the public road. Vegetation within the visibility splays would be trimmed to ensure sufficient sight lines for vehicles using the access junctions.
- 3.1.4 The access junctions would be signed to clearly indicate the point of access to the Project. The Site Manager would implement appropriate measures, to ensure that there would be no verge parking by staff working at the Project. These would include, but not be limited to, the provision of a Staff Travel Plan to reduce the need for private car access, the provision of designated parking areas within the construction compounds, a contractual agreement to only park in designated areas, staff training, signage and regular tool-box talks on working at the Site. Access junctions would be designed in accordance with Kent County Council or East Sussex County Council standards where appropriate.
- 3.1.5 The public road within 500m of the Site access junction would be subject to regular cleaning activities during initial works periods to ensure that construction debris is not deposited on the public highway.

3.2 Timing and Permitting

- 3.2.1 Construction working hours would be 0700 - 1900 hours Monday to Friday and 0700 – 1200 on Saturdays. The need to undertake some limited works outside normal working hours or overnight cannot be discounted. Such works may include, for example, some trenchless crossings if the technique in use and/or ground conditions dictate that continuous working is required, highways works (to minimise traffic disruption), abnormal load deliveries under Police escort or commissioning activities.
- 3.2.2 Wherever possible, HGV deliveries would avoid school opening and closing times during term time so as not to disrupt journeys to and from school. Term times and hours for local schools would be obtained and advised to the Principal Contractor, noting that construction traffic is not routed along any routes that front the three schools located near the Project.
- 3.2.3 The timing of ALL convoy movements would be confirmed with the Police prior to deliveries commencing. The Police have previously advised for other projects that their preference is for loads to depart ports in the early evening to avoid peak traffic flows.
- 3.2.4 The Principal Contractor would liaise with both KCC and ESCC to prepare a diary for local community events such as village fetes, farmer's markets, etc. Where possible, HGV traffic flows would avoid moving on these days.
- 3.2.5 Consultation on the timings of movements would also be undertaken with other neighbouring developers to coordinate haulage operations that may use the access route during the construction period in order to minimise the cumulative impact on communities and road users.

- 3.2.6 The implementation of the access junction works and any associated mitigation works on the public road network required to allow access for the AIL and HGV deliveries would be subject to a technical approval process.
- 3.2.7 Prior to any construction works being undertaken within the limits of road adoption, the detailed design of these works must be submitted to the appropriate highway authority for approval. These submissions would include:
- A programme for the works, details of the construction method and traffic management requirements;
 - A detailed design pack of drawings and specifications detailing the works and any service / utility works that may need to be accommodated, informed by additional surveys including topographical surveys and additional speed survey data;
 - The necessary health and safety information required under the Construction, (Design & Management) Regulations, or their equivalent at the point of submission;
 - Details of the proposed contractor, including their insurance provisions;
 - If required by the local road authorities, a Road Safety Audit (RSA) to a combined Stage 1 and Stage 2 standard;
 - Details of any necessary road signage and road markings; and
 - Details of any proposed remediation proposals should the works not be permanent.
- 3.2.8 The Applicant would reimburse the highway authorities for the technical approval process at the time the applications are made, in line with costs for similar Section 278 or Section 184 applications made under the Highways Act 1980. The finalised CTMP would detail the exact process for these technical approvals.
- 3.2.9 Any application for the written consent from the highway authorities in relation to a Temporary Traffic Regulation Order (TTRO) would follow the procedure required by the highway authorities at the time of application and would include full details of the proposed TTRO for inclusion in a 'roadworks bulletin' to be issued by the highway authorities to relevant stakeholders which shall include the dates and times, locations and diversions, and contact numbers for the TTRO. Should any changes to these details be required post consent, the highway authorities would be informed.
- 3.2.10 The BE16 abnormal load permits and movement orders would be submitted using National Highways ESDAL (Electronic Service Delivery for Abnormal Loads) system. Permits and orders relating to these would be obtained by the haulier undertaking the transport of AIL components.

3.3 Road Closures

- 3.3.1 No public or private roads would require to be closed solely as a result of the activities associated with the construction of the Project.
- 3.3.2 Lane closures would be required to construct the access junctions in a safe and efficient manner. One lane would be coned off and controlled by traffic signals when the junction is being constructed.
- 3.3.3 These works would be temporary in nature and short-lived. They would not exceed 50 metres (m) in length and would not result in full road closures, diversion or significant delays.
- 3.3.4 As soon as the junctions are complete, the traffic signals and lane restrictions would be removed.

4 Proposed Traffic Management Measures

4.1 General Measures

4.1.1 Wherever reasonably possible, local suppliers such as quarries and concrete works are proposed to help minimise traffic levels of the network. Upon selection of the Principal Contractor, wider area routing information would be made available and final numbers of traffic movements confirmed.

4.1.2 The following measures would be implemented through the CTMP during the construction phase:

- Contractual requirement in the contract so that contractors would only use the agreed access route;
- Direction signage signposting traffic on the agreed access route;
- Identification numbers on HGV and vans to allow easy recognition. These to be of a unique design and to be installed on the sides and rear of all HGV accessing the Site, for journeys to and from the Site;
- Providing the public with details of how to report use of unapproved routes or driving issues of concern;
- Using GPS trackers to allow the monitoring of all frequent bulk material delivery HGV movements;
- Setting out Site staff disciplinary measures for those who ignore the agreed access route and enforcing these throughout the construction period;
- All HGV Site vehicles would feature "white noise" reversing warning devices to reduce noise disruption when on Site;
- All materials delivery lorries (dry materials) would be sheeted to reduce dust and stop spillage on public roads;
- Specific training and disciplinary measures would be established to ensure the highest standards are maintained to prevent construction vehicles from carrying mud and debris onto the carriageway;
- Use of spill kits in the event of an incident;
- Wheel cleaning facilities would be established at the Site entrances. A road sweeper would also be provided at Site to ensure that the public road within 500m of the proposed site access junctions is kept clean; and
- Site induction for all staff instructing them on what route to the Project they can use to enter and exit the Site and obtaining their acknowledgement on the approved access routes. The induction would include:
 - A toolbox talk safety briefing;
 - The need for appropriate care and speed control;
 - A briefing on driver speed reduction agreements (to slow Site traffic at sensitive locations through towns and villages on the route); and

- Identification of the required access routes and access junction operation and the controls to ensure no departure from these routes.

4.2 Agreed Transport Routes

4.2.1 All construction access for the South Brooks A development area would be taken from the A259. Traffic would access the land parcels from private access tracks connecting to the A259. Access to the Site would be from the northeast, with no bulk HGV deliveries being made from the southwest via Rye.

4.2.2 Access to South Brooks B, C and D would be made from the B2075. Access to these junctions would be from the north, with no bulk material HGV deliveries being permitted through Lydd.

4.2.3 Barred routes to HGV and LGV traffic identified at this stage would include:

- The minor public road network leading from the A259 between Brenzett and East Guldeford;
- The minor public road network leading from the A259 between Brenzett and New Romney;
- The A259 to the east of its junction with the B2075;
- The minor public road network leading from the B2075 between its junction with the A259 and Lydd;
- All residential streets within Lydd to the west of Harden Road / Robin Hood Lane and north of Tourney Road; and
- The minor road network leading from Jury's Gap Road.

4.3 Traffic Management Group

4.3.1 The traffic management proposals in this report would be provided to the Principal Contractor and they would be required to abide by these regulations as part of their commercial contracts with the Applicant. Failure to follow the traffic management measures proposed would be a contractual matter and could result in contractors being dismissed from the Site.

4.3.2 To assist with general traffic management proposals and measures during the construction period, a Traffic Management Group would be formed to help advise of progress, issues and to feedback public comments. The membership of the group would include the following as a minimum:

- Local Road Manager(s) from Kent County Council;
- Local Road Manager(s) from East Sussex County Council;
- Network Manager from National Highways;
- Local ward elected members;
- A representative from each of the neighbouring Parish Councils;
- A representative from the Police;
- The Site Manager;
- The CTMP Co-ordinator; and

- A senior member from the Applicant's team.

- 4.3.3 The Traffic Management Group would help co-ordinate works and provide a robust conduit for information and issues that may arise. This group would meet as a minimum, every two months during the construction period, although specific construction activities may warrant changes in frequency over that time.
- 4.3.4 Pages with information about the construction of the Project would be available on the project website. These would be updated throughout the construction period. If visitors to the Site are unable to find the answer to their question on the webpages, an email address would be provided on the project website to contact the Applicant. In addition, details would also be circulated via a newsletter advising about ongoing activities. A telephone number for the CTMP Co-ordinator would be published during operational hours to resolve any traffic management problems that occur, and these calls would be logged and reported to the Applicant on a weekly basis to monitor the situation.
- 4.3.5 All contractors would be monitored through regular spot-checks to ensure they follow the approved access route. Access routes identified would be clearly defined in all sub-contracts and signposted.
- 4.3.6 The Site access junctions would be kept clear at all times during construction and would be monitored by on-site staff to ensure vehicles do not attempt to use the area for parking.
- 4.3.7 Use of a visible vehicle identification system would be employed to ensure compliance with the agreed route and driver behaviour standards. This would allow the public to identify any rogue vehicles to the Site office for easy recognition and review. The visible identifier would be mandatory and required for trips to and from the construction Site.
- 4.3.8 The Applicant would also create a protocol for working with local businesses to ensure the construction traffic does not interfere with deliveries or normal business traffic wherever practicable.

4.4 Contractor Selection and CLOCS

- 4.4.1 The Principal Contractor working on the Site would be required to adhere to the Construction Logistics and Community Safety (CLOCS) best practice guidance. This would be a mandatory requirement and failure to adhere would be a contractual matter.
- 4.4.2 The Principal Contractor would be required to ensure that all subcontractors are compliant to CLOCS principles. Regular audits by the Applicant would be undertaken to monitor compliance and require changes, if necessary.
- 4.4.3 CLOCS is a national standard that requires all stakeholders in construction to take responsibility for health and safety beyond construction Site boundaries. It demands collaborative action to prevent collisions between vehicles servicing construction projects and vulnerable road users.
- 4.4.4 The CLOCS standards require the following from all key partners working on the Project:
- 4.4.5 The Applicant must:
- Specify in tender and contract documents for all stakeholders to comply to the CLOCS Standard;
 - Ensure the project team develops and implements a suitable and sufficient CLP (Construction Logistics Plan);
 - Ensure effective monitoring of compliance to the CLOCS Standard;

- Obtain and monitor the contractor's action plan to address all identified issues and non-compliances; and
- Ensure that all collisions that result in harm (and near-miss incidents) that occur on journeys associated with the Project are quickly investigated and actions taken to prevent recurrence.

4.4.6 The Principal Contractor must:

- Ensure the Project's potential impact on the community has been properly risk-assessed;
- Develop and / or implement the agreed CLP and ensure it remains suitable and sufficient;
- Procure Site and fleet operations that comply to the requirements of the CLOCS Standard;
- Ensure Site arrangements enable the safest fleet operations including but not limited to, 'last mile' routing, level access / egress, stable loading / unloading areas, effective delivery management systems and competent Site access traffic marshals;
- Ensure effective and efficient Site access gate checks of HGVs and their drivers to ensure they always comply to the CLOCS Standard. Non-compliances must be immediately risk-assessed, appropriately mitigated and addressed through procurement processes;
- Ensure effective independent monitoring of the project's compliance with the CLOCS Standard is undertaken approximately every 6 months and appropriate action taken to address non-compliance; and
- Review information on all collisions that result in harm (and near-miss incidents) that occur on journeys associated with the project and ensure they are quickly investigated and actions taken to prevent recurrence.

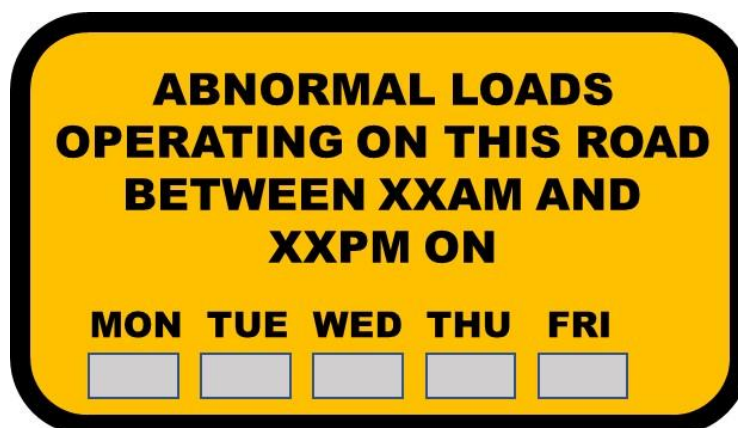
4.4.7 Vehicle operators (above 3.5 tonnes) working at the Site must:

- Ensure all journeys meet the requirements described as Silver in the Fleet Operator Recognition Scheme (FORS) Standard (by addressing key management, driver, vehicle and operations issues);
- Provide acceptable evidence of compliance as defined / specified by each procurer through formal accreditation through FORS or equivalent; and
- Amongst other issues it:
 - Provides evidence of a quality fleet operation;
 - Helps with selection of the most effective safety equipment;
 - Ensures drivers receive appropriate supplementary training;
 - Requires the collection and reporting of collision data to inform 'lessons to be learned' – reporting to clients / principal contractors were procured to do so; and
 - Reduces risk to protect drivers and commercial reputation provides competitive advantage when bidding for work and opportunity to influence client procurement.
- The use of CLOCS would help protect all road users from harm, both within and out with the Project.

4.5 Road Signage

- 4.5.1 A junction signage strategy would be prepared and agreed with both County Councils prior to works commencing. The strategy would include the following:
- Direction signage to ensure vehicles keep to the approved routes from the A2070;
 - Site access signage to advise other road users of increased movements at the junctions;
 - Chapter 8 (Traffic Signs Manual) "Slow Down" signage at locations near to the proposed access points; and
 - All specific signage.
- 4.5.2 Regular maintenance would be undertaken at the sign locations to keep the plates clean and to ensure that verge vegetation does not obscure them.
- 4.5.3 In addition to the statutory road signage noted around the Site access junctions, further information signage would be provided to assist road users especially during ALL deliveries. Advance warning signs would be installed at the following locations on the road network:
- On the A259 to the north, south and east of Brenzett, on the A259 to the west of New Romney at locations agreed with both National Highways and Kent County Council; and
 - On the B2075 to the north of Lydd.
- 4.5.4 Information signage would be installed to help assist drivers and an example is illustrated in Figure 4-1. Flip up panels (shown in grey) would be used to mask over days where convoys would not be operating. When no convoys are moving, the sign would be bagged over by the Traffic Management contractor.
- 4.5.5 This signage would assist in helping improve driver information and allow other road users to consider alternative routes or times for their journey (where such options exist).

Figure 4-1: Example Information Sign Plate



4.6 HGV Vehicle Requirements

4.6.1 To ensure the highest standards of safety for all road users and contractors, all HGVs frequently arriving at Site shall be required to comply with the following standards:

- Prominent hazard warning signage, advising other road users not to get too close to the vehicle;
- A camera system for blind spots;
- Audible or visual front nearside driver alerts;
- Audible nearside left turn warning;
- Reversing external warning; and
- A Mobile Digital Recorder capable of storing two weeks' worth of data, which would be viewed by the Principal Contractor on a 'just cause' basis.

4.7 Information to Local Business Interests

4.7.1 Regular updates on traffic management issues would be issued to local businesses / attractions with an interest in the proposed construction access route for their information.

4.7.2 Events organised by these parties would be noted, and if possible, specific traffic management measures could be introduced to avoid potential issue.

4.7.3 All of these parties would have the opportunity to raise specific concerns, if and when they arise, with the CTMP Co-ordinator.

4.8 Wear and Tear Agreement

4.8.1 A legal agreement with the relevant road authorities to cover the cost of abnormal wear and tear on the road network would be entered into. This would be agreed with each Council and National Highways following the granting of the Development Consent Order for the Project. The extents of the agreement would be agreed with both road authorities prior to works commencing.

4.8.2 The Wear and Tear Agreement would address concerns about possible damage to the public road, verges and structures. It would be based upon condition surveys of the road to ensure that the condition of the road does not deteriorate solely as a result of the construction works.

4.8.3 Video footage of the pre-construction phase condition of the proposed access routes would be recorded to provide a baseline of the state of the road prior to any construction work commencing. This High Definition (HD) baseline review would inform any change in the road condition during the construction stage of the Project as it notes the existing condition of the road surface and features and details current condition.

4.8.4 The condition survey would feature still images for the survey and would measure specific defects to monitor their progression. Locations of points would be accurately logged using a GPS tracker.

4.8.5 To agree the current condition of the road, the report would be agreed with the highway authorities prior to construction works commencing.

4.8.6 A review of drainage gullies within 500m of each access junction would also be undertaken to allow the condition of the drainage infrastructure to be included in the Wear & Tear agreement.

- 4.8.7 Any immediate necessary repairs would be coordinated with the highway authorities. Any damage caused by traffic associated with the Project, during the construction period that would be hazardous to public traffic, would be repaired immediately.
- 4.8.8 During construction activities, a general road wear and tear review would be undertaken with KCC and ESCC every three months during construction. Interim reviews would be undertaken by the Principal Contractor on a weekly basis and the update progress reports issued to the Applicant.
- 4.8.9 Any damage to road infrastructure caused directly by construction traffic would be made good, and street furniture that is removed on a temporary basis would be fully reinstated.
- 4.8.10 There would be a regular road edge review and any debris and mud would be removed from the public carriageway to keep the road clean and safe during the initial months of construction activity, until the construction junction and immediate access track works are complete.
- 4.8.11 Where defects occur on the road network, the Principal Contractor would ensure that they maintain a stockpile of road repair material to undertake repair works quickly and efficiently, when authorised by the relevant Council to undertake interventions.
- 4.8.12 Upon completion of construction activities, a follow-on condition review would be undertaken and a defects list prepared. Works required to reinstate the road back to its original condition would be undertaken at the Applicant's expense following a review by the County Councils.
- 4.8.13 There may be cases where defects would need to be undertaken quickly and the contractor would have arrangements in place to be able to respond to serious and significant defects within two hours during normal working hours and within four hours outside normal working hours.

4.9 Turning Facilities and Banksman

- 4.9.1 For safety reasons, both onsite and for other road users, the Site will be designed so all vehicles can enter and exit the Site in a forward gear. No vehicle will reverse onto unmanaged public roads and shall enter / exit the Site using forward gear only.
- 4.9.2 A banksman would be provided at the Site accesses to help guide traffic within the Site and to ensure health and safety access for the Site. The banksman would be in radio contact with the wider Site compound to advise of movements to and from the Site.
- 4.9.3 Upon completion of construction works, a gate would be provided on the access junctions. The gate would be set back from the public road to ensure that future maintenance HGV vehicles can stop at the gate without blocking the public road.

4.10 Onsite Parking

- 4.10.1 Once operational, parking at the Project would only be permitted in designated areas and all operatives would be required to reverse park at all times. An appropriate number of standard parking spaces and one disabled parking space would be provided adjacent to the control building. The Substation(s) would have a small number of parking spaces adjacent to the control building(s). The parking provisions for the substations has been developed from operational experience of similar sized projects.
- 4.10.2 During the construction works, parking would be provided in designated areas and all operatives and visitors would be subject to Site rules. No parking would be permitted on the public road verges.

4.11 Non-Motorised Road Users

Pedestrians and Cyclists

- 4.11.1 The Principal Contractor would ensure that speed limits are always adhered to by their drivers and associated subcontractors. Advisory speed limits would be installed in advance of the Site access junctions to help reduce speeds and make drivers aware of cyclists, hikers and other vulnerable road users.
- 4.11.2 Signage would be installed on the Site exits that makes drivers aware of local speed limits and reminding drivers of the potential presence of pedestrians and cyclists in the area. This would also be emphasised in the weekly tool box talks.

Equestrians

- 4.11.3 The British Horse Society has made general recommendations on the interactions between HGV traffic and horses. Horses are normally nervous of large vehicles and are flight animals, meaning that they would run away in a panic if frightened. Riders would do all they can to prevent this but, should it happen, it could cause a serious accident for other road users, as well as for the horse and rider.
- 4.11.4 The main factors causing fear in horses in this situation are:
- Something approaching them, which is unfamiliar and intimidating;
 - A large moving object, especially if it is noisy;
 - Lack of space between the horse and the vehicle;
 - The sound of air brakes; and
 - Anxiety on the part of the rider.
- 4.11.5 As a minimum the following actions would be included in the Site training for all HGV staff:
- On seeing riders approaching, drivers must slow down and stop, minimising the sound of air brakes, wherever possible;
 - If the horse still shows signs of nervousness while approaching the vehicle, the engine should be shut down (if it is safe to do so);
 - The vehicle should not move off until the riders are well clear of the back of the HGV;
 - If drivers are wishing to overtake riders, please approach slowly or even stop in order to give riders time to find a gateway or lay by where they can take refuge and create sufficient space between the horse and the vehicle. Because of the position of their eyes, horses are very aware of things coming up behind them; and
 - All drivers delivering to the Site must be patient. Riders would be doing their best to reassure their horses while often feeling a high degree of anxiety themselves.
- 4.11.6 Training for staff working at the Site would advise staff on how to react properly if encountering equestrians on the access route.

5 Staff Travel Plan

5.1 Introduction

- 5.1.1 The Staff Travel Plan (STP) sets out the strategy and implementation measures for the sustainable management of construction staff travel to the Site. It is intended to minimise the adverse impacts of construction staff traffic, particularly on the sensitive local road network.
- 5.1.2 The STP does not address operational or decommissioning traffic activities.
- 5.1.3 The STP would be a formal part of the CTMP and it would be a requirement of the DCO for it to be approved by the relevant local planning and highway authorities in advance of starting the construction works.
- 5.1.4 All vehicles accessing the Site need to be pre-booked for access to the Site. Vehicles that are not pre-booked would be denied access.

5.2 Staff Travel Plan Objectives

- 5.2.1 The primary objectives of this Staff Travel Plan (STP) are to:
- Reduce Single-Occupancy Vehicle Trips: Achieve the agreed modal split for staff travelling to the Site by private car alone.
 - Maximise Sustainable Travel: Promote and facilitate the use of shared transport (minibuses and car-sharing) where practicable and safe.
 - Mitigate Local Traffic Impact: Reduce traffic volumes and associated impacts on sensitive road links, particularly during local peak hours.
 - Ensure Compliance: Establish a robust framework for monitoring, review, and enforcement to ensure compliance by all construction personnel and contractors.

5.3 Staff Numbers and Working Hours

- 5.3.1 The construction phase would involve an estimated peak workforce of up to 600 staff. The general working hours are anticipated to be 07:00 to 19:00, Monday to Friday, and 07:00 to 12:00 on Saturdays. No general construction traffic or staff movements are permitted on Sundays or Bank Holidays, unless for emergency works or abnormal load deliveries pre-agreed with the relevant highway authorities.

5.4 Staff Modal Split

- 5.4.1 The solar farm site itself is farmland and not suitable for large scale car park provision, that is wasteful in materials, has environmental impacts and is not compatible with the sustainable aims of the Project. Minimising single car occupancy to and from the Site for staff is therefore considered essential.
- 5.4.2 The STP would ensure that the vast majority of staff movements are managed off these local roads where a suitable alternative exists, and that all remaining journeys are consolidated as far as is practical.
- 5.4.3 Provision of cycle parking facilities at the Site compounds on Site would be considered if demand is shown by staff.

5.5 Existing Public Transport Services

- 5.5.1 The distance of the Project areas to existing public transport bus services is such, that existing bus routes as a sole means of site access are not considered practical.
- 5.5.2 Access from residential areas to staff minibus pick up areas by bus and train are possible and the selection of pick up points would include Appledore and Rye railway stations.

5.6 Dedicated Construction Staff Minibus Service

- 5.6.1 The specialist nature of solar farm construction means that contractors may be sourced regionally and as such are more likely used to car / van sharing and shuttle buses as they would often travel in teams.
- 5.6.2 Through the Principal Contractor, the Applicant would require the contractors to provide for a minibus service for at least 70% of the total site workforce. This would provide connections from Appledore and Rye railway stations and any larger residential areas in the surrounding area and would be free at the point of use for staff travelling to and from the development site.
- 5.6.3 To promote the use of minibus access, the cost benefits for staff would be promoted by an appointed Staff travel Plan Co-ordinator.

5.7 Car / Van Sharing Scheme

- 5.7.1 A formal car / van sharing scheme would be actively promoted to staff who cannot reasonably access the minibus service or who live locally.
- 5.7.2 A target of up to 20% of staff accessing the Site by shared vehicle access would be expected and set out in the STP and would be a term of and so enforceable under the contractual arrangements with the Applicant.

5.8 Private Car Access

- 5.8.1 The use of single occupancy car trips would still be a requirement for some staff due to their responsibilities on Site or the location of their residence. Up to 10% of staff are predicted to require single car access to site and the Site compound parking areas would be sized to accommodate this, although these would be located out with the Site office frontage which would be reserved for car / van sharers.
- 5.8.2 Construction staff vehicles found parking on the public highway, including lay-bys or verges, would be subject to immediate disciplinary action, up to and including removal from the Project. Clear signage would be erected at the Site perimeter and along the access routes to inform drivers of this policy.

5.9 Staff Travel Plan Management

- 5.9.1 The following measures would be implemented in the Staff Travel Plan.

Staff Travel Plan Co-ordinator

- 5.9.2 The role of the Staff Travel Plan Coordinator, appointed by the Principal Contractor, is a key role, with responsibilities including:

- Implementation of the agreed Staff Travel Plan measures;
- Liaising with the local highway authorities;
- Raising awareness of the Travel Plan and travel options available to construction staff, including the provision of useful information including public transport information at the minibus pick up railway stations and the car share software;
- Assisting the Site manager to operate the Site compound car park;
- Arranging the staff minibuses; and
- Reviewing and operating the Staff Travel Plan, measuring its effectiveness and making alterations to suit changes, alterations in targets and reporting its effectiveness to the Applicant.

Staff Minibus

- 5.9.3 The minibus operation would provide connections from Appledore and Rye railway stations and any mass residential areas in the surrounding area and would be free at the point of use for staff travelling to and from the development site.
- 5.9.4 The buses used would have a capacity of up to 14 staff per vehicle.

Car / Van Sharing

- 5.9.5 Measures to encourage car / van sharing would include:
- Access to a car sharing website to assist in identifying lift share options;
 - Guaranteed parking space onsite; and
 - Use of fuel card for van sharing teams.

Parking Management

- 5.9.6 All staff parking would be managed through a strict permit system. Parking would be restricted to:
- Minibuses and shuttle services;
 - Approved operational /essential vehicles; and
 - Designated car-share vehicles.
- 5.9.7 The use of single occupancy vehicles using the Site access junction would be monitored by the Principal Contractor via the Travel Plan Co-ordinator.
- 5.9.8 Any construction staff vehicle found parking on the public highway, including lay-bys or verges on the access routes to site, would be subject to immediate disciplinary action, up to and including removal from the Project. Clear signage would be erected at the Site perimeter and along the access routes to inform drivers of this policy.

Information Pack

- 5.9.9 Travel information would be distributed to all construction staff at the induction process. This information would include the following:
- A copy of the Staff Travel Plan;

- Contact details for the Travel Plan Co-ordinator;
- A parking plan of the Site compound area, showing car / van share parking areas;
- Details of the approved access routes and the barred routes described in the CTMP;
- Details of public transport services that operate to the proposed minibuses pick up / drop off points;
- Public transport fare and timetable information;
- Details of any measures to encourage car sharing such as fuel cards, train season ticket discounts etc; and
- Details of an emergency link from the Site that can be used to depart the Site for personal emergencies.

5.9.10 Staff mess room message boards would also be provided with travel plan information and details.

5.10 Travel Plan Monitoring

5.10.1 The Staff Travel Plan Coordinator (TPC) would be appointed by the Principal Contractor prior to the commencement of construction. The TPC would be responsible for the management and monitoring of the Travel Plan.

5.10.2 The Staff Travel Plan would be an active document and would be monitored to ensure compliance on a monthly basis. The monitoring would be undertaken using the following:

- Banksman access records;
- Review of the car parking areas;
- Occupancy of the minibuses;
- Staff surveys; and
- Spot checks.

5.10.3 The TPC would also liaise with the Transport Liaison Group, highway officers and the police to review the operation of the plan in the wider area and deal with any reported issues from members of the public.

5.10.4 A Monitoring Report detailing performance against the targets would be submitted by the TPC to the Applicant every three months. Where corrective actions are required, these would be undertaken by TPC.

5.10.5 Monitoring of the Staff Travel Plan would be required under the final CTMP, which would be secured by a requirement of the DCO. Should additional measures be necessary to accommodate the travel needs of staff, these would be reviewed as appropriate by the Applicant and TPC.

5.10.6 Where modifications are required, these would be discussed with the relevant highway authorities.

5.11 Enforcement

5.11.1 The Staff Travel Plan is secured under the CTMP and is a requirement of the DCO. As such, it is legally binding on the Applicant.

- 5.11.2 The Applicant will require the Principal Contractor and other contractors to work in accordance with the DCO. As such, there is both a legal and contractual requirement for staff to follow the CTMP and Staff Travel Plan.
- 5.11.3 Failure to observe the requirements of the Staff Travel Plan would be a disciplinary issue, that ultimately can result in staff or contractors being sanctioned or removed from the Project.

6 All Traffic Management Measures

6.1 All Movement Protocols

- 6.1.1 All ALL movements would be undertaken in line with the UK Government's "Water Preferred" Policy at the time of delivery. All relevant ALL applications for permits and movement orders would be made by the selected haulier, prior to deliveries commencing in line with the relevant legislation.
- 6.1.2 ALL movements must be escorted by the Police. Given the size of the proposed loads, it is expected that at least three private escort vehicles and a minimum of two police escort vehicles, are likely to be required (exact requirement would be confirmed with the police). The likely deployment of escorts would be as follows:
- The first police escort vehicle would be the advance escort and would be located sufficiently ahead of the convoy, to advise the convoy in good time of traffic stoppages, constraints and oncoming hazards;
 - The second police escort and first civilian escort would provide support to the first escort at junction closures and would be located at the front of the lead vehicle; and
 - The second civilian escort would be located behind the last vehicle to protect the rear of the convoy and ensure that following vehicles do not attempt dangerous overtaking manoeuvres. A third escort would be located at this location to provide support at the rear of the convoy and to prevent dangerous overtaking.
- 6.1.3 Before the convoys depart the Port of Entry (PoE) (which would be determined following the granting of the DCO) the Lead Driver should check weather and traffic conditions and ensure this information is included within the daily toolbox talks.
- 6.1.4 Within the route, there are locations where general traffic flows would need to be stopped to allow the safe manoeuvre of the loads. In these circumstances the advance escorts would ensure that the traffic is stopped before the convoys enter the affected section. The advance escorts would confirm through radio contact that the area is clear and safe for transit. Should general traffic fail to observe the request to stop, the advance escort would advise the convoy to immediately halt and would then proceed to remove the rogue traffic. The convoy must not start without approval from the advance escort.
- 6.1.5 In areas where the load is likely to, or is close to straddling the centre line, the advance escort would be positioned to give advance warning to the convoy such that evasive action can be taken. In constrained areas and other locations where verges are potentially soft the drivers must exercise care to ensure the trailer wheels do not leave the road surface as this may result in adverse load stability conditions.
- 6.1.6 Urban areas along the route pose different challenges for the abnormal loads. Whilst the vehicle speeds would be less than those in the rural sections of the route, there are more potential conflicts with other road users to be aware of. These include:
- Pedestrians and cyclists;
 - Local vehicular traffic;
 - Parked vehicles;
 - Side junctions; and

- Street furniture.

6.1.7 Within urban areas, the convoy escorts would need to be aware of all road and footway users at turn sections within the route. At these locations there is potential for load over-sail and reference to the swept path assessment drawings is considered essential to identify these areas. It is important to note that only the Police have the power to request that vehicles and pedestrians move.

6.1.8 Within urban areas there is a higher chance of parked vehicles along the route and a possibility that parked cars would restrict available road width. Whilst these areas would not impede the loads they do create a further zone where the load drivers and escorts would need to take care of conflicts that include restricted road widths, car doors opening and pedestrians crossing the road between parked vehicles.

6.1.9 Information relating to AIL movements would be provided directly to residents living in the immediate vicinity of the access route. Information on the movement of the abnormal load convoys would also be provided to local media outlets by the Principal Contractor (or their appointed AIL delivery contractors) to help assist the public. Information would be provided to local newspapers and radio stations, which would include:

- Kentish Express;
- Kent Messenger;
- Folkestone and Hythe Express;
- Rye Record;
- KMFM Shepway and White Cliffs Country; and
- BBC Radio Kent.

6.1.10 The project website would also be used to help advise of movements. Information would relate to expected vehicle movements on the route. It is hoped that this level of information would make residents aware of convoy movements and help reduce any conflicts.

6.2 AIL Convoy Health and Safety Measures

6.2.1 All staff working on the project would be inducted before entering the Site. This would be undertaken prior to the commencement of AIL movements.

6.2.2 A daily Tool Box Talk for all convoy staff to be held at the start of each working day and carried out by the appointed Transport Co-ordinator or Appointed Lead Driver. A detailed record of the talk should be kept and filed once the convoy has arrived at the Site.

6.2.3 The Tool Box Talks would cover a minimum of the following matters:

- The current version of the CTMP to be carried by all convoy vehicles;
- Identification of any updates since the previous version of the CTMP;
- Requirement to have a CB radio (fixed or portable), with fully charged batteries;
- Anticipated transport restrictions in each section of the route;
- Driver instructions on incident reporting;

- Driver instructions on trailer steering methodology, and availability of assistance;
- Instructions on areas requiring traffic stoppage, and methodology for convoy passing through these areas;
- The welfare arrangements for drivers;
- A summary of the predicted weather, traffic and road conditions; and
- Any questions on the contingency plans.

6.2.4 Each of the convoy vehicles must be suitably equipped with hazard warning devices to warn all other road users. All the tractor, trailer and escort vehicles operating on the project must have the following:

- Tractor units to have beacon bars on the roof and 3M reflective markings on both sides;
- All vehicle warning signage to be in English;
- Trailer units to have amber beacons on the rear with 3M reflective markings on both sides;
- All escort vehicles would have beacon bars on the roof, with 360 degree motion for all round visibility, and 3M reflective markings;
- Fire extinguisher and first aid kit; and
- Certified cargo lashing straps are to be used at all times. Certification must be carried and made available for inspection, kept within the cab.

6.2.5 All hazard warning equipment must be checked and cleaned at the start of each day. Additional cleaning of the warning equipment may be required throughout the day and must be undertaken when required.

6.2.6 All relevant personnel must have the appropriate Personal Protective Equipment (PPE). All PPE clothing must be 'CE' marked to show it meets current standards and should be appropriate for use in trunk road situations (i.e. must be full coats with reflective bands on the arms).

6.3 Emergency and Contingency Plan

6.3.1 To ensure access for emergency service vehicles, a coordination protocol would be established with the blue light emergency services. As the AIL convoys are escorted by the Police, the Police would be aware of potential access issues for ambulances and fire service vehicles and can take appropriate action on the route to pull to the side of the road or mount a verge to allow emergency vehicles past.

6.3.2 Convoys would not enter constrained areas if a blue light emergency had been raised and would wait until the emergency situation along the road had been attended to.

6.3.3 The civilian escort vehicles carry equipment to make running repairs to vehicles in the unlikely event of a breakdown. Further spares and equipment can also be based at the Site for faster responses in case of mechanical issues.

6.3.4 The haulier would establish contracts with local suppliers to attend to any punctures and tyre issues, to minimise any stoppage time on the route.

7 Onsite Access Management Proposals

7.1 General Measures

- 7.1.1 During the construction phase, construction traffic has the potential to interact with walkers, cyclists and equestrians using the existing footpath network. Various measures are proposed to assist with the safety of all path users. Discussions with local equestrian groups would be held during the construction period to keep riders informed of works and activities, via a Community Liaison Officer. These discussions would also allow the contractors to tailor their toolbox talks to specific equestrian issues.
- 7.1.2 During construction, the Project would be subject to a Rights of Way and Access Strategy (RoWAS). This would set out measures that would be implemented, so far as is practical, to ensure the works do not adversely impact public rights of ways. An Outline RoWAS is to be prepared as part of the formal DCO submission.
- 7.1.3 The Applicant would ensure that the Principal Contractor undertakes to do the following during the construction phase:
- That any footpath which has had its surface disturbed would be remediated upon completion of the relevant construction activity (i.e. at a crossing point);
 - People would not be asked to avoid using a route or area when there is no safety related reason to do so;
 - Warning signs would be removed promptly when the relevant hazard has ceased;
 - Vehicular access gates may be locked for management reasons including the control of unauthorised vehicles for example but would only be locked where a pedestrian side gate is provided. Where construction activities present a potential danger to pedestrians / other users a temporary diversion or re-routing would be advised in the interests of health and safety;
 - All pedestrian gates to be provided on Site would meet BS 5709 and shall have a minimum width of 1.525 m to ensure equine access; and
 - Electric wires or barbed wire would not be used on the Site.
- 7.1.4 During construction activities, the construction contractor operatives would act and behave in a responsible manner when asking people to avoid construction activity risks. They would:
- Display signs notifying path users of any upcoming diversion option, prior to any diversion taking place;
 - Notify path users that a diversion option is in place by displaying signage at the Site of the diversion itself;
 - Take precautions, such as asking people to avoid using a particular route or area, or to avoid doing a particular activity where there are more serious or less obvious hazards to their safety;
 - Keep any precautions to the minimum area and duration required to safeguard people's safety;
 - Notify the public about any precautions at all access points;
 - Not deliberately obstruct a footpath; and

- Not obstruct or hinder people from exercising access rights, either by physically obstructing access or by otherwise discouraging or intimidating them.

7.1.5 In addition, all construction operatives would be required to understand the requirements of onsite access rights at their induction. Failure to observe these may result in their removal from Site.

7.2 Areas of Proposed Exclusion

7.2.1 Construction operations such as track construction, cabling and fencing works would require exclusion areas being set out in the areas surrounding these works.

7.2.2 Should there be a need to provide a short-term closure of a footway, the Applicant would advise the relevant County Council Access Officers and would request the closure. Such closures would be signposted at entrances to the affected footpath(s).

7.3 Proposed Temporary Diversions

7.3.1 Diversions to footpaths would only be required during track construction and cabling activities.

7.3.2 During construction, it would be necessary to form the access track across existing footpath alignments. During these operations, the footpath would be subject to a minor diversion around the advancing head of the access track works. This would ensure access for footpath users in safety and diversion signs would be provided.

7.3.3 The diversion works would be 2m in width and would provide a 10m approximate diversion to allow the access track works to slightly pass the crossing point. Ducting would be provided to allow cabling works at a later stage that would not disrupt footpath access.

7.3.4 Upon completion of the track works, a footpath crossing point would be installed.

7.4 Path Signage

7.4.1 Signage to inform footpath users would be provided on stakes at strategic locations on the footpath network. This would include at the entry points to the Site, at any crossing points and at strategic points as a reminder.

7.4.2 All direction signs would be green and would have text height of at least 75mm to allow easy viewing.

7.4.3 In addition, the Principal Contractor would post a plan of the Site at the entrance points to the Site each week highlighting areas where works are ongoing to help advise path users.

7.5 Crossing Point Details

7.5.1 Where a footpath crosses the access tracks, a crossing point would be formed. This would include the following:

- "Access Track Crossing Ahead" signage for the footpath, on either side of the crossing, located at least 20m in advance of the crossing;
- "Crossing Point" and "Please look in both directions" signage for the footpath on either side of the crossing, potentially including banksmen for certain busy crossing points;
- A 2m wide chicane to ensure that cyclists slow down for the crossing to ensure the safety of all users;

- “Crossing Ahead” and “Slow Down, 10mph” signs on access tracks, located 100m and 50m in advance of the crossing on both directions; and
- “Give Priority to Footpath Users” signage on the Site access track.

7.5.2 Reflective pole markers would be provided in advance of the crossing point to aid identification for access track users.

7.5.3 A visibility splay in the access track verge would be created so that footpath users have good visibility in either direction at each crossing point. This would be maintained throughout the construction phase.

7.5.4 All signage would be kept and maintained during the operational phase of the Project.

7.6 Livestock Crossings

7.6.1 Livestock crossing points would be provided on the access track network at locations discussed and agreed with the relevant farmers. The livestock crossings would be controlled by the use of gates on the private access tracks to separate construction traffic and staff from livestock movements. All parties would work together to ensure the safe and efficient operation of livestock movements, so that agricultural business interests are respected during the construction process.

7.6.2 The crossing points would be designed through discussion with the relevant farmers to ensure the crossings are of a sufficient width to enable the safe transit of livestock.

8 CTMP Management

8.1 CTMP Management Measures

- 8.1.1 The key to the successful delivery of the CTMP would be the implementation, monitoring, review and enforcement of the plan. Without the implementation at the start of the project, the CTMP would not be effective and it would need to be carefully monitored and reviewed as the Project progresses.
- 8.1.2 Key to this would be the requirement in the Principal Contractor contract for the CTMP to be included as a deliverable measure within the contract, given the same status as the physical elements of the solar farm Site itself.
- 8.1.3 The contractor would be obliged to follow the CTMP and would face penalties if this was not undertaken, which could result in disciplinary actions and ultimately being removed from the contract. This requirement would be placed upon all subcontractors working on Site and would be communicated via the various contracts and through induction processes and tool box talks.
- 8.1.4 A CTMP Co-ordinator would be appointed on Site and would be responsible for the implementation of the Project and the monitoring of its effectiveness. The Co-ordinator would also be the communication point for all external queries raised by members of the public, whilst also being the on-site lead for the plan.
- 8.1.5 The Co-ordinator would be Appointed by the Applicant and would be their transport representative.
- 8.1.6 Prior to works commencing the Co-ordinator would hold an initial meeting of the Traffic Management Group to advise all relevant groups of the start of works on Site, expected traffic levels and what measures are to be deployed.
- 8.1.7 During the construction phase a log of public and staff comments relating to the operation of the CTMP would be kept and the Co-ordinator would be required to brief the Applicant on the issues raised and what measures are to be undertaken to address comments.
- 8.1.8 The Co-ordinator would chair the Traffic Management Group and would provide updates and information for onward dissemination to the local community including local media queries and press releases for items such as AIL movements.
- 8.1.9 Quarterly reviews of the CTMP would be undertaken and where modifications are required, these would be discussed with the Council(s) and Police and agreed before changes occur on the ground. Updates would then be advised to the Traffic Management Group.
- 8.1.10 Regular road condition reviews and sign maintenance would also be undertaken to ensure that the physical measures are safe and working efficiently.
- 8.1.11 The engagement of stakeholders and local representatives is considered key in ensuring that the increase in traffic levels associated with the construction phase can be carefully, efficiently and sensitively managed to the benefit all parties concerned.

8.2 Complaint Management

- 8.2.1 When complaints are received, the CTMP Co-ordinator would record the incident using a database logging system. A receipt of the complaint will be emailed to the person making the complaint. The receipt would include details of the formal response and how the complaint can be escalated, if required.

- 8.2.2 The Co-ordinator would then investigate the incident and would discuss what actions need to occur with the Applicant and Site Manager.
- 8.2.3 To ensure public faith in the reporting system, the Co-ordinator would agree a response timetable as part of the agreed CTMP. The following suggested response times are suggested:
- Receipt of original complaint: Within 2 working days of the complaint being received;
 - Investigation time: Within 3 working days of receipt of the complaint (assuming no requirement to involve / consult with third parties);
 - Corrective Action Decision: Within 1 working day of the completion of the investigation (assuming no requirement to involve third parties); and
 - Response: To be issued to the complainant within 2 working days of the Corrective Action Decision.
- 8.2.4 It is of the utmost importance that the public know that their complaint would be investigated, actioned and that they are informed of what actions are being taken.
- 8.2.5 The time taken to respond, the number of complaints raised and a review of the corrective actions would be a standing agenda item of the Traffic Management Group to ensure that the public can be assured that their issues are being considered and dealt with.

8.3 Co-ordination with other Projects

- 8.3.1 The CTMP Co-ordinator would liaise with other significant developments in the area with a view to coordinating works and deliveries between other Projects in the area.
- 8.3.2 Where common issues can be agreed, these would be implemented once to avoid the need for repetition and delay to existing road users, where it is possible to do so.

9 Summary & Next Steps

- 9.1.1 To assist with the management of construction traffic on the access routes, an Outline Construction Traffic Management Plan (oCTMP) is proposed and will be submitted as part of the DCO application. This outline document forms the early basis of the final CTMP that would be used during construction of the Project.
- 9.1.2 The oCTMP sets out the approved access route to the Site, how this would be managed and the steps that would be undertaken to ensure that the roads leading to Site are well managed to the benefit of all road users.
- 9.1.3 The CTMP would be secured by a DCO requirement and would seek to be partly self-enforcing through spot checks, contractual controls and information provision.
- 9.1.4 The Applicant would work with both County Councils to further develop this early oCTMP into the measures submitted as part of the oCTMP, which then feeds into the final CTMP, ensuring that the road network can function in a safe and efficient manner for all road users.



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