



CLEVE HILL SOLAR PARK

ENVIRONMENTAL STATEMENT
VOLUME 4 - TECHNICAL APPENDIX A3.3
OTHER COMMENTS ON ENVIRONMENTAL IMPACT ASSESSMENT
SCOPING REPORT

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www.clevehillsolar.com



**CLEVE HILL SOLAR PARK
REVIEW OF CLEVE HILL SOLAR PARK LTD SCOPING
REPORT**

JANUARY 2018

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1 Introduction

1.1 Purpose of this Report

1.1.1 The Planning Inspectorate is consulting stakeholders, including Canterbury City Council, on the Scoping Report in order to inform and influence the process of Environmental Impact Assessment in relation to the Cleve Hill Solar Park project.

1.1.2 Canterbury City Council has reviewed Cleve Hill Solar Park Ltd's Scoping Report. The purpose of this report is to:

- Summarise key points from the Scoping Report, to give an overview of its contents;
- Identify issues which may be of potential concern to the City Council, or where a response may otherwise be appropriate; and
- Provide the City Council's response.

1.1.3 Whilst the City Council has a good general understanding of the various issues, we do not purport to have detailed expertise on specialist topics (e.g. ecology, air quality, etc.) and where necessary additional advice may need to be sought from Council staff or other consultees with such expertise.

1.2 Overview

1.2.1 Cleve Hill Solar Park Ltd intend to create a proposed solar photovoltaic (PV) electricity generating and storage facility with an export capacity of greater than 50 megawatts (MW) on land approximately 2 km north-east of Faversham and 5 km west of Whitstable on the north Kent coast.

1.3 Planning process

1.3.1 The project falls within the Planning Act 2008 definition of a Nationally Significant Infrastructure Project, as the construction of a generating station with a capacity of more than 50 MW. Cleve Hill Solar Park Ltd is therefore preparing an application for a Development Consent Order (DCO) to the Secretary of State (SoS) for determination in accordance with the Act.

1.3.2 Cleve Hill Solar Park Ltd carried out Phase One community consultation in December 2017 with a second phase of consultation planned for Spring 2018.

Policy context

1.3.3 There is no national policy statement which provides specific policy in relation to solar PV and energy storage development, however the Act states that where a national policy statement does not exist for the development, the Secretary of State must have

regard to any Local Impact Report and to any other matters which relate to and are important to the decision. This can include national planning and local planning documents, including national policy statements if they have relevant provisions relating to solar PV and energy storage development. In this case, this includes:

- (1) the overarching National Policy Statement for Energy (EN-1)³, which sets out the overall national energy policy for delivering major energy infrastructure
- (2) the National Policy Statement on Renewable Energy Infrastructure (EN-3)⁴, which sets out national planning policy in respect of renewable energy infrastructure
- (3) the National Policy Statement on Electricity Networks Infrastructure (EN-5)⁵ in relation to the proposed grid connection

1.3.4 The National Planning Policy Framework (NPPF) and the adopted Canterbury District Local Plan 2017 is also relevant.

1.4 Environmental Impact Assessment process

1.4.1 The project falls within The Development is a 'Schedule 2' development under Part 3(a) of the EIA Regulations as it constitutes 'Industrial installations for the production of electricity, steam and hot water'. Cleve Hill Solar Park Ltd have confirmed that an Environmental Statement (ES) summarising the EIA process and its findings will be submitted with the DCO application.

1.4.2 Cleve Hill Solar Park Ltd is currently seeking a Scoping Opinion from the Planning Inspectorate (PINS) on the information that should be supplied in the forthcoming ES. It has provided PINS with a Scoping Report which identifies the likely significant environmental effects of the development. It then summarises the approach proposed to be taken to the EIA process.

1.4.3 Stakeholders, including the City Council, are now being invited to respond to PINS on the contents of the Scoping Report.

1.5 Structure of this Report

1.5.1 Section 2 provides a brief overview of the proposed development. This aims to provide a summary of the key points rather than drawing attention to every aspect of the proposed development.

1.5.2 Section 3 provides a commentary summarising the proposed scope as set out in the Scoping Report, highlighting any areas of potential concern, or where further information is required.

2 Summary of Proposed Development

2.1 Introduction

2.1.1 This section of the report summarises the main features of the proposed development.

2.2 Key features of the proposed development

Summary

2.2.1 The Development is likely to include the following infrastructure:

- (1) Solar PV modules - The number of modules depends upon the layout design process, with the initial indicative layout including over 1 million modules. (Individual modules are typically 2 m long and 1 m wide);
 - (2) PV module mounting structures - Modules are likely to be mounted on structures with an upper height of approximately 2.5 to 4.5 m;
 - (3) Inverters - Located on the underside of modules, or centralised, stand alone units amongst the modules;
 - (4) Transformers - Cabins are likely to be located across the site at regular intervals with approximate dimensions of 3 m x 7 m x 4 m;
 - (5) Onsite cabling;
 - (6) Fencing and security measures - Boundary treatment of approximately 1.8 to 2.5 m in height, enclosing operational areas;
 - (7) Access tracks - The existing access road from Seasalter Road to the Cleve Hill Substation is expected to be the main site access point for construction and operation of the development, with a spur off this road before the existing substation to access to the wider site together with a stone access track; and
 - (8) An electrical compound comprising:
 - (a) An energy storage facility (expected to be formed of batteries storing electrical energy);
 - (b) A substation and control building - Approximate site area of up to 215 m x 155 m for substation compound and approximately 20 x 20 x 6 m for the control building; and
 - (c) Equipment facilitating electrical connection to the National Grid infrastructure.
- During the construction phase, temporary construction compounds could be proposed together with temporary roadways to the site.

2.3 Programme

2.3.1 Construction works are currently anticipated to last approximately 6 to 18 months.

3 Commentary on Proposed ES Scope

3.1 Overall Comments

3.1.1 Cleve Hill Solar Park Ltd has set out its approach to the scope of the ES in Chapter 4 of their scoping report. The City Council has reviewed the scoping report and has the following comments to make:

- (1) *Chapter 3: The Legislative and Planning Framework* - the City Council considers that regard must be had to the Canterbury District Local Plan 2017 within any DCO submissions.
- (2) *Chapter 5: Landscape and Visual Impact Assessment* - the City Council expect the LVIA to be undertaken in accordance with best practice and recognised methodology, and will expect to agree viewpoints as part of the LVIA process, particularly in longer views from higher land to the east of the site. The ES should fully assess the impact on heritage assets, particularly in longer views from the Canterbury district, including the historic setting of Whitstable.
- (3) *Chapters 6 & 7 - Ecology and Ornithology* - The results of the surveys and detailed mitigation strategies must be submitted as part of the DCO application, including a Habitat Regulations Assessment (in accordance with The Conservation of Habitats and Species Regulations 2017), and full assessment of any surface water run off to tidal waters within a comprehensive Flood Risk Assessment, to enable the the City Council to fully comment upon the impact of the proposed development on ecology and biodiversity on the Canterbury district.
- (4) *Chapter 11 - Access and Traffic* - any Transport Assessment should include construction and operational phases, together with a draft Construction and Environmental Management Plan, including a full air quality assessment, to allow the City Council to assess the impact upon the Canterbury district in terms of amenity of local residents.

3.2 Cumulative Impacts

3.2.1 The EIA should consider the potential for cumulative effects associated with other major development in the area, including development that is under construction; applications which have been permitted or submitted but not yet determined; projects on the PINS Programme of Projects; schemes identified in development plans; or other developments which are reasonably likely to come forward. A full assessment of alternatives must be included within the ES.

Andrew Mott

Subject: FW: EN010085 - Cleve Hill Solar Park - EIA Scoping Notification and Consultation

From: Graham Thomas <GrahamThomas@swale.gov.uk>

Date: 25 January 2018 at 08:23:46 GMT

To: 'Cleve Hill Solar Park' <CleveHillSolarPark@pins.gsi.gov.uk>, "James Freeman" <JamesFreeman@swale.gov.uk>

Cc: "ClareW@arcusconsulting.co.uk" <ClareW@arcusconsulting.co.uk>

Subject: RE: EN010085 - Cleve Hill Solar Park - EIA Scoping Notification and Consultation

Dear Ms Cottam,

Thank you for your email yesterday. I can confirm that the Borough Council has no comments to make on the Scoping Report for this project.

Graham Thomas
Area Planning Officer
Swale Borough Council
Tel; 01795 417314
grahamthomas@swale.gov.uk



From: Cleve Hill Solar Park [<mailto:CleveHillSolarPark@pins.gsi.gov.uk>]

Sent: 24 January 2018 17:23

To: Graham Thomas; James Freeman

Subject: FW: EN010085 - Cleve Hill Solar Park - EIA Scoping Notification and Consultation

Dear Mr Freeman and Mr Thomas

I note we have not received a scoping consultation response from Swale Borough Council regarding the proposed Cleve Hill Solar Park (see email below and attached letter). Although the consultation has now closed (and the Scoping Opinion adopted), I just wanted to check whether you are intending to submit a late response?

Any such response from yourselves would still be published on the Planning Inspectorate's website and forwarded to the developer.

Kind regards
Emma

Emma Cottam

EIA and Land Rights Advisor – Environmental Services Team
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, 2 The Square,
Bristol, BS1 6PN

Direct Line: 0303 444 5721

Helpline: 0303 444 5000

Email: emma.cottam@pins.gsi.gov.uk

Web: infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

This communication does not constitute legal advice.

Please view our [Information Charter](#) before sending information to the Planning Inspectorate.

From: Cleve Hill Solar Park

Sent: 12 December 2017 10:53

To: 'jamesfreeman@swale.gov.uk'; 'GrahamThomas@swale.gov.uk'

Cc: 'PlanningAppeals@midkent.gov.uk'

Subject: EN010085 - Cleve Hill Solar Park - EIA Scoping Notification and Consultation

FAO James Freeman/Graham Thomas

Please see attached correspondence on the proposed Cleve Hill Solar Park.

Please note the deadline for consultation responses is **9 January 2018**. This is a statutory requirement triggered by submission of the Applicant's Scoping Report and cannot be extended.

Kind regards,
Emma

Emma Cottam MRTPI

EIA and Land Rights Advisor – Environmental Services Team

Major Casework Directorate

The Planning Inspectorate, Temple Quay House, 2 The Square,
Bristol, BS1 6PN

Direct Line: 0303 444 5721

Helpline: 0303 444 5000

Email: emma.cottam@pins.gsi.gov.uk

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Cleve Hill Solar Park Ltd
Woodington House
East Wellow
Hants
SO51 6DQ

By Email only: info@clevehillsolar.com

19th January 2018

Dear Mr Bird,

Re: Pre application Environmental Impact Assessment scoping report, Cleve Hill Solar Park.

The RSPB welcomes the opportunity to comment on the Environmental Impact Assessment scoping report for the Cleve Hill Solar Park in Kent. Our primary area of concern in responding to this consultation is to ensure appropriate recognition is afforded to the internationally important coastal habitats, and the waders, wildfowl and seabirds these support within and adjacent to the development area.

We are grateful for being involved in this project this early in the process while looking forward to continuing further discussions to ensure our concerns are addressed.

The RSPB, Climate Change and Renewable Energy Generation

The RSPB supports deployment of renewable energy projects, provided that harmful impacts on wildlife are avoided through appropriate siting and design. Renewable energy infrastructure can have a detrimental impact on wildlife if it is poorly located and/or designed, whether at sea or on land. The main potential impacts on birds include the risk of collision with structures, disturbance/displacement, barriers to movement of e.g. migrating birds or disruption to functional links, for example between feeding and breeding areas, habitat change with associated changes in food availability, and the cumulative and in combination effects of these impacts with those of other projects.

We believe that Government has a duty to ensure renewable energy targets are met with minimal environmental impact. Our aim therefore is to ensure the delivery of the maximum capacity of renewable energy for the minimum impact on the natural environment.

Comments on the Environmental Impact Assessment scoping

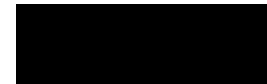
Overall, we consider the Scoping report to be very comprehensive and we applaud the effort that has been put into data collection. We are content with the methodologies and surveys undertaken to study the development area. We think these will ensure that robust evidence is presented so that the potential environmental impacts can be properly understood and evaluated.

We noticed that in topic 7.4.1 Relevant Legislation and Guidelines the developer mentioned the RSPB guidance on solar panels and we would suggest that the BRE Biodiversity Guidance for Solar Guidance¹ will also be a relevant and helpful source of guidance for this project.

We trust our comments are of use, and look forward to continuing to engage constructively with Cleve Hill Solar Park. Please note that the RSPB reserves the right to add to and/or amend its position in light of any new information and/or analysis submitted by the Applicant.

Please do not hesitate to contact me should you require any clarification or further information.

Yours sincerely,



Dora Querido

Conservation Officer

Email: dora.querido@rspb.org.uk

Direct dial: 01273 775333

¹ BRE (2014) Biodiversity Guidance for solar developments. Eds G E Parker and L Greene.

**South East England
Regional Office**
1st Floor, Pavilion View
19 New Road
Brighton
BN1 1UF

Tel 01273 775333
Fax 01767 685535

rspb.org.uk

Patron: Her Majesty the Queen **Chairman of Council:** Professor Steve Ormerod, FIEEM **President:** Miranda Krestovnikoff

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The RSPB is part of BirdLife International,
a partnership of conservation organisations
working to give nature a home around the world.