

Cleve Hill Solar Park Project Development Consent Order application

Submission for Issue Specific Hearing on Landscape and Visual Impact Appraisal on Tuesday 23rd July 2019 at Hempstead House, Bapchild, Sittingbourne

Anne Salmon BA MCD MRTPI will present the following:

The site proposed for the solar power station with nearly 900000 solar panels and its associated roads, fencing, new culverts to some of the drainage ditches and battery storage in a bunded enclosure would occupy the greater part of the present open marshland between Graveney, Nagden and the sea wall.

The site is within the South Swale Marshes as defined in the Swale Local Landscape Designations (SLLD) 2018. This report was approved by Swale Borough Council in November 2018 and re-designates the area as a Kent Level Area of High Landscape Value. The description of the arable part of the Graveney Marshes, which is the area which will be occupied by the solar panels, is that this area remains an atmospheric and tranquil landscape and is functionally linked to adjacent marshland habitats. It is acknowledged in the SLLD 2018 by deleting Graveney Hill and Cleve Hill from the Local Landscape Designation that the existing substation compromises the character of this part of the area. The South Swale marshes is described as having a strong sense of place, a high level of remoteness, wildness and isolation, with much accessible only on foot; these are rare qualities in SE England. These marshes are important for recreation and are accessible via the Swale Heritage Trail and Saxon Shore Way promoted routes. The nature reserves at South Swale are valued for informal recreation opportunities and notably birdwatching. The area is extensively designated as SSSI, Ramsar and SPA, with National Nature Reserves as well as a number of Local Wildlife Sites. These include areas of saltmarsh, mudflats, coastal grazing marsh, freshwater dykes and reedbeds. It is of international importance for migratory, overwintering and breeding wetland birds. This re-assessment of the landscape designations will make an important contribution to the content of the next Swale Local Plan which is expected in 2022.

The site also comprises most of the area defined in the Swale Landscape Character and Biodiversity Appraisal (SLCBA) 2011 as Graveney Arable Lands. This is described as a largely inaccessible landscape where agricultural vehicles are limited to a single track. Pedestrians are limited to the coastal path of the sea wall and a footpath between Faversham Creek and the nature reserve. This provides the marsh with a sense of remoteness. Areas of scrub are found scattered along marshland tracks. Otherwise the area contains no mature native vegetation and is consequently extremely exposed. It has views of the Cleve Hill substation and a line of pylons but there are very few buildings around the margins of the area. There are panoramic views inland and to the Swale, the Isle of Sheppey and Whitstable. The area is defined as of moderate sensitivity and is in moderate condition. The area immediately abutting this which is intended to be used as part of the area reserved for Brent geese and waders forms part of the Graveney Grazing Lands. This area is identified as being in very good condition and is highly sensitive in visual and ecological terms and thus is highly sensitive.

Together, the descriptions in these documents show that this area is of considerable importance for its rarity as an open, farmed landscape adjacent to internationally designated sites for wildlife. They also demonstrate that the area is highly valued for these qualities.

The reference in the developers Landscape and Visual Impact Appraisal Chapter to other sites and designations in the SLCBA 2011 which are beyond and do not even abut the Graveney Marshes and into which the development does not extend distracts from the importance of the site itself. The reference to the SLCBA 2011 not mentioning the possible impact of solar panels in any of the defined landscape areas is repetitive and also distracts from the message that the areas are being assessed in the document on their existing merits.

Specifically, the definition in the SLCBA 2011 and SLLD 2018 is that the land is open and has wide views across it. This includes from the houses around the edges at Nagden, Warmhouse and Coney Banks. Therefore, the introduction of shelter belts which would screen the views of the solar panels and battery storage would be uncharacteristic of the area and would stop views across the area by the existing residents and walkers who use the footpaths around the edges of the site. These shelter belts are only shown as increasing in height and growth over a period of ten years when the development is expected to be in situ for up to forty years. By this time, any trees in the planting belts such as poplar or alder are likely to be mature and tall and may affect views of the skyline beyond the extent of the site from the footpath on the sea wall. Hence, photomontages of the trees on the site for beyond ten years may be necessary to show the impact of these alterations to the landscape over a much longer period. Even when the solar panels are removed and the site decommissioned, it is unlikely that the trees that have been planted will also be removed to reinstate the existing character of the landscape.

There are twenty two viewpoints identified in the Landscape and Visual Impact Assessment Chapter, and for most of these, views are presented as existing, at one year, at five years and at ten years after the development has been installed. It is not clear at what stage during construction any shelter belts will be installed and how long this will take so that what is year one at the locations around the edges is not defined. This implies that residents at Warmhouse and Nagden and also at Broom Street are likely to have views of much of the construction work but a gradually less open view of the installed panels. This is rightly described as having a major impact.

Other viewpoints are identified along the sea wall at the mouth of Faversham Creek, at the point where the footpath ZR 485 meets the sea wall (the Saxon Shore Way) and west of The Sportsman. The latter site is east of the area to be covered by solar panels and when walking westwards, users will first come across the areas set aside for wintering birds as the arable reversion habitat management area. However, they will still have a clear view across the marshes of the large, bunded area enclosing the battery storage and the batteries and other equipment within it. This is not set against the higher ground as was achieved at the existing substation and thus would be more prominent than it could have been. At the footpath junction near Castle Coote and on the sea wall at the mouth of Faversham Creek, what is at present an

open view across arable land with some taller vegetation on the inland side and views to a horizon of distant higher ground would be replaced in the foreground with an industrial-looking expanse of solar panels with narrow gaps for the ditches. At the footpath junction, there will also be a narrow gap for footpath ZR 485 heading inland and across the site towards Nagden. These again are rightly identified as major impacts. However, the impact is not just at these isolated locations. For the whole length of the Saxon Shore Way from Sandbanks Road at Nagden until the walker is well past Castle Coote and fairly close to The Sportsman, they will have views inland over an expanse of solar panels with only narrow gaps for ditches between. This walk would take them around one hour. That the foreground includes a slightly enriched ditch is not likely to encourage them to walk along with their eyes looking down into it, and neither are walkers likely only to look over the sea wall towards the sea or mudflats depending on the state of the tide.

The impact on views from footpaths is included in the Socio-Economic and Tourism chapter but is also an important landscape and visual impact and would change the character of the land entirely. At present, the only routes through the site are footpath ZR 485 from Nagden to the sea wall at Castle Coote and part of ZR 488 across part of the eastern end of the site. Walking across both of these, users at present experience open views across farmed land where in winter they might see flocks of birds flying over the fields or in over the sea wall, views of the sea wall itself and behind them views towards the shelter belts of the fruit growing areas. With the solar panels in place, on footpath ZR 485, walkers will be confined in a fenced enclosure with security cameras, with solar panels almost twice as tall as themselves. They would then have to cross a stone roadway with gates to either side and for most of the distance from Nagden to the sea wall would only have views under the panels of their supporting structures. This impact is also defined as major.

In all of these cases, the alteration is stated to be temporary and therefore its impact is defined as less severe. Since the development is expected to be in place for forty years, this would take up a significant part of most people's active life from when they can first visit the site and appreciate it to when they are getting elderly, or for existing older persons, until they pass on. It is not considered that temporary is a realistic description for a forty-year period.

The solar farm would also be visible from the village of Graveney, specifically from Graveney Church which is listed Grade I and from Sparrow Hall and Graveney Court Farm which are listed Grade II. It will become part of the setting of these buildings which were constructed as part of a village which was set at the edge of an open marsh. The development, including the solar panels and bunded battery compound would have a substantial impact on the landscape and setting of the village including the listed buildings. This group of buildings is a highly sensitive receptor and the impact of this development on its landscape and setting would be major.

Other viewpoints show the site from more distant locations such as Victory Wood near Dargate and Wraik Hill on the west edge of Whitstable. The landscape viewed from these sites and other places along the Blean Ridge includes orchards, fruit growing areas including polytunnels and villages in a typical Kent landscape. Some

of these areas are defined as areas of high landscape value in their own right in the SLLD 2018. The marshes at Graveney and across the Swale appear in the distance as unspoilt open areas with no roads or any built development. Although only forming a small part of the total view, the inclusion of a large block of land covered with solar panels would add an industrial-looking element to the views which would harm the overall character.

Overall, it is considered that the method by which the developer assesses the impacts of the development on the range of receptors and the inclusion of irrelevant or marginal designated areas, some which are not close by, appears to trivialise the impact of the scheme on the specific area. This is because the 'major' impacts which are really major and close to the site are subsumed in a description of a much wider area in which it would only be a small part such as the North Kent marshes as part of the whole of Kent or as a tiny part of a distant view from the Area of Outstanding Natural Beauty.

The Graveney marshes are a rare and important landscape in the south east of England and attached and functionally linked to internationally important wildlife designated areas and as such the introduction of an extensive energy installation is not appropriate.

Anne Salmon BA MCD MRTPI

On behalf of Faversham and Swale East Branch Labour Party