

From: [REDACTED]
To: [Cleve Hill Solar Park](#); [REDACTED]
Subject: Reference Number 20021797
Date: 24 June 2019 13:13:26
Attachments: [REDACTED]

Dear Cleve Hill Case Team,

I attach the written representation, on behalf of the Ely Family.

Best wishes,

Janice Ely

Sent from [Outlook](#)

Submission to Cleve Hill Solar Park Examination

From Janice Ely on behalf of the Ely Family
Reference Number 20021797

We support the principle of renewable energy but believe it is essential that the right schemes are built in the right places. We have very serious concerns about the proposed solar power station for the following reasons:

1. Unacceptable Scale

This project will result in the industrialisation of an area as large as Faversham. To call it a “park” is a misnomer - these plans are for a power station.

We do not think sufficient evidence has been provided to justify the building of the UK’s biggest solar park/solar power station in this particular location. The concentrated east-west solar panel orientation, with panels as high as double-decker buses, will create the appearance of continuous roofing to massive industrial warehouses over a vast area that, at present, is a green open-space.

2. Location

Graveney marshes are not the place for the UK’s biggest power station. This area is popular for local residents, walkers, birdwatchers, artists as well as visitors to the neighbouring towns of Faversham, Whitstable and Canterbury. They are attracted by the visual beauty of these marshes, the open views and big skies, as well as the tranquility of the area. It is important to preserve this much-loved local landscape. As a society we need such green spaces for our physical and mental well-being.

Further, this site is inappropriate because it is surrounded by 3 designated protected areas - a national Special Protection Area, a European Site of Special Scientific Interest and a Ramsar Convention Site of international importance. The site also adjoins two Kent Wildlife Trust reserves – Oare Marshes and South Swale – while the Royal Society for the Protection of Birds manages large chunks of the nearby Seasalter Levels. In addition, the site itself lies within the Natural England-designated Greater Thames Estuary Natural Area and Character Area, while almost all of it is noted as an Area of Greatest Habitat Opportunity (enhancement) and as a Biodiversity Opportunity Area. All this highlights the fact that the Kent marshes provide an important habitat for a wide variety of wildlife and plants, which must be safeguarded.

3. Visual impact from the Saxon Shore Way

The Saxon Shore Way is a well publicised walk and, when it eventually becomes part of the English Coastal Path, will become even more popular.

The plans submitted for the solar power station would mean that anyone who walked along the Saxon Shore Way, from Faversham to Seasalter, would encounter monotonous lines of solar panels, as well as views of the battery compound and substation enclosed by a 5.3m high flood protection bund; and all of this edged by security fencing and CCTV cameras mounted on 3m poles. The proposal will introduce a hostile, industrial presence into the marshland and will ruin the character of the much-used Saxon Shore Way in this part of the Swale Estuary.

4. Visual impact on the wider landscape

The existing Cleve Hill substation (part of the London Array) can still be seen clearly from Harty Ferry, Oare seven years after its construction, even though, apparently, 10,000 trees and shrubs have been planted to reduce the visual impact. We are therefore very sceptical about statements that the Cleve Hill Solar Power Station will, after 10 years, not intrude on the landscape and that there would be “no significant effects” from a variety of viewpoints such as Wraik Hill on the A299 at Whitstable, from Boughton Hill on the A2 or from Oare Marshes. The solar power station will also be visible from the south side of Harty Church on the Isle of Sheppey.

Another location, where a beautiful panoramic view over the Swale can presently be seen, is from Public Rights of Way ZR518, just off Dawes Road near Boughton (National Grid Reference TR 075 600). This viewpoint is referred to in the walking guide, “The Peasant’s Last Revolt’ (Section D4). (This particular walking guide is part of a series of Faversham Food Trails produced by the Faversham Enterprise Partnership working in collaboration with Faversham Area Tourism Association. The guide can be accessed at the following websites:

www.visitkent.co.uk/attractions/food-trail-the-peasants-last-revolt-walk-2087

www.explorekent.org/activities/the-peasants-last-revolt-walk-boughton-street

5. Impact on Faversham’s long term economy

Faversham, with its long history and attractive old buildings, has, in recent years, become a destination town. Visitors come to explore not just the town but the surrounding area as well. The enormity of this present proposal will cause unacceptable damage and loss of amenity to the entire Graveney marsh area. It is likely to make Faversham a less desirable town to visit, which would impact on local businesses.

6. Impact on wildlife

This proposal is in an area surrounded by 3 designated protected areas - a national Special Protection Area, a European Site of Special Scientific Interest and a Ramsar Convention Site of international importance. Much of the targeted site itself lies within the Natural England-designated Greater Thames Estuary Natural Area and Character Area, while almost all of it is noted as an Area of Greatest Habitat Opportunity (enhancement) and as a Biodiversity Opportunity Area. Further, the Cleve Hill site adjoins two Kent Wildlife Trust reserves – Oare Marshes and South Swale – while the Royal Society for the Protection of Birds manages large chunks of the nearby Seasalter Levels.

This very special landscape is enhanced by an incredible array of birdlife, particularly wildfowl and waders, while numbers of marsh harriers – a bird of prey on the brink of extinction in this country not so very long ago – are high. This therefore is an important area where key bird species over-winter, feed and breed.

The east-west solar panels are installed closer together than conventional south facing panels. This arrangement will reduce the opportunities for wildlife (including flora) compared with ‘traditional’ designs.

We are also concerned about the impact of noise from the solar power station on the wildlife, particularly as details about the storage batteries and the transformers have yet to be finalised.

7. Flooding issues

The marshes are a protective floodplain for Faversham. We have concerns that any work done to protect the solar power station from flooding, such as the proposal to build a flood protection bund of 5.3m above sea level, around the critical infrastructure, will increase the flood risk in Faversham.

8. Battery technology

We are concerned about the size of the batteries proposed - they will occupy an area more than the size of Faversham Recreation Ground, which is about 8.1ha. Yet, because the battery technology is very new and still being developed, the published details are very limited. We are therefore concerned that the batteries have not been adequately tested regarding health and safety aspects.

We believe that battery installations on this scale have previously only been sited in Australian or Californian deserts, which are very different and more isolated locations than the Graveney marshes.

This proposal for a solar power station is promoting the idea that solar power is a green and environmentally friendly form of energy yet the production of the huge batteries (and also the solar panels) may not be so environmentally friendly.

Also, because the batteries would enable electricity to be imported/exported and stored, the energy company would be able to take advantage of fluctuating diurnal electrical prices and make huge profits. It seems wrong that beautiful and much-loved countryside could be lost to such an enterprise and that the local community receives no benefit at all, not even the electricity.

9. Alternative locations for solar panels and solar parks/power stations

We believe that all new houses should be built with solar panels on their rooftops.

There are alternative brownfield sites, in Kent, already attached to the National Grid, such as the decommissioned power stations of Kingsnorth and the Isle of Grain, where solar power stations could be located.

In conclusion, we consider that this application is on an unacceptable scale and in an entirely wrong location. It will impact negatively on the natural environment and on the people who live in Faversham and the surrounding villages. The renewable energy benefits of the scheme don't outweigh the damage that it will cause to the North Kent Marshes and the local communities.