

From: [REDACTED]
To: [Cleve Hill Solar Park; Janice Ely](#)
Subject: Question 1.0.8 Response from the Ely Family Reference No: 20021797
Date: 25 June 2019 11:49:55
Attachments: [REDACTED]

Dear Cleve Hill Case Team,

I attach our response to Question 1.0.8.

Best wishes,

Janice Ely

Sent from [Outlook](#)

Cleve Hill Solar Park Examination
Question 1.0.8

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

I am writing on behalf of the Ely Family in support of the views expressed in the Local Impact Report produced by Swale Borough Council.

In particular, regarding National Planning Policy, we note that paragraph 5.1.1 of the SBC Report states that:

EN-3 does not provide any guidance on solar energy or battery storage installations and can effectively be discounted; whilst EN-5 principally relates to new overhead electricity lines and associated infrastructure, which are not proposed here.

Also, with regard to EN-1, that Paragraph 5.1.3 highlights the need for Infrastructure Planning Commission to have regard to habitats and whether a project may have a significant effect on a European site, consider alternatives, minimise flood risk, as well as also considering visual intrusion on coastal areas, the impact on tourism and on rights of way.

We further consider the last paragraph of 5.1.3 of the SBC Report to be an extremely important one. This states that:

In the absence of a specific NPS relating to solar power or battery storage, and given the inevitable tensions between the efficiency of the technology, use of greenfield sites, areas of wildlife conservation and heritage significance and use of agricultural land versus deployment of solar technology on rooftops or use of previously developed sites, there is clearly a big question about whether any NSIP project for solar power, let alone one of this scale in such a sensitive location, should be approved on an ad hoc basis without regard being had to comprehensive and strategic policy in the form of an NPS. The battery storage technology proposed is also new and largely untested, meaning that its possible impacts are not yet fully understood.

Paragraph 5.1.4 of the SBC Report then concludes the section on Planning Policy:

The National Planning Policy Framework (NPPF) contains no specific policies for NSIP development, meaning that the NPSs, which do not refer to solar energy or battery storage projects, are the main source of national policy in relation to this application. Accordingly, as required by Section 105 of The Planning Act 2008, in the absence of a specific NPS for solar power, the Secretary of State must have regard to this LIR and is not bound to decide the application in accordance with any particular NPS.

We therefore fully support Swale Borough Council in its view that, in the absence of National Policy for this type of development, Local Policy should be referred to.