

The Faversham Society

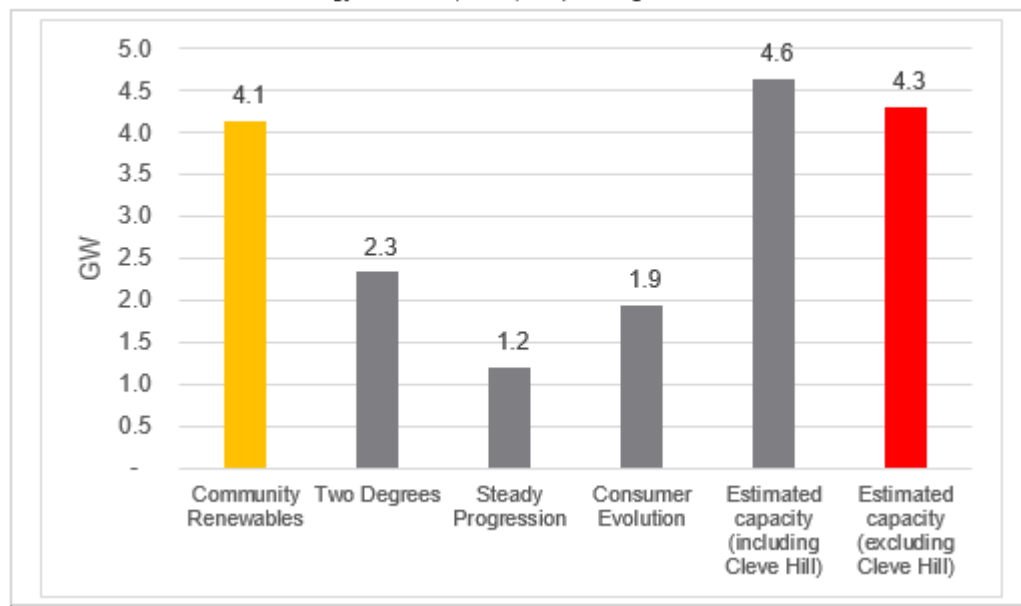
CHSP Examination

Submission to Issue Specific Hearing on Need, 17 July 2019

1. Our submission relates to the need in terms of electricity generating capacity for a solar power station of this magnitude when it is balanced against the harm resulting from: Damage to Heritage Assets and Archaeology; Habitat Loss; Flood Risk; Landscape and Footpath Impact; Damage to Local Communities; Traffic and Transport Impact; and is considered in terms of the nature of future energy distribution in the UK.
2. The proposal is not only massively out of scale with the local environment; its dimensions do not relate to any significant argument on national need. Rather the location, dimensions and proposed generating capacity appear to be based entirely on opportunism as a result of the spare capacity resulting from the previous development at Cleve Hill.
3. The chart below shows the total estimated new generating capacity outlined by National Grid in each of the National Grid deployment scenarios described above over the four years 2019 to 2022.

Figure 1: Forecast Solar Deployment 2019 to 2022

Source: National Grid Future Energy Scenarios, 2018, UK planning databases



As the National chart above shows, the highest deployment projection for solar currently envisaged by National Grid is 4.1 GW from 2019 to 2022. Even without new additional solar PV, which will inevitably come online in the coming years, the estimated capacity currently in planning, excluding Cleve Hill, is 4.3 GW, which exceeds this projection. We submit that there is sufficient solar PV capacity in the UK to meet our current energy and decarbonisation needs.

4. This 350 MW solar power station (the generally accepted title) is almost five times larger than the UK's current largest solar power station in Shotwick, Flintshire (72MW). The latter was built in 2016 and completed in six weeks. Contrast this scale with the two year construction period, plus a possible further six months for the Applicant's proposal.
5. This 350MW solar power station, if agreed, will be the largest in Europe, with the next being 300MW in Cestas, France. Apart from a 166MW installation in Meuro, Germany all others in Europe are less than 85MW, making Shotwick currently Europe's 4th largest solar power station. Such an outlier as CHSP in terms of current European practice needs much stronger justification than that provided in the application.
6. In Global terms the five countries with most of the solar installations larger than the proposed CHSP (China, India, USA, Brazil and Mexico) all have much larger populations and sunnier climates than the UK, as well as large land areas on which to build them. In short, for these countries, large solar installations are more appropriate and more efficient.
7. In terms of need such a large scale proposal is not congruent with national policy guidelines (NPS EN-1) which encourages decentralised, and community installations with increased connectivity, as well as supporting reducing energy demand.
8. A 2015 article by Steve Holliday, CEO of the National Grid in [energypost.eu](https://energypost.eu/interview-steve-holliday-ceo-national-grid-idea-large-power-stations-baseload-power-outdated/) <https://energypost.eu/interview-steve-holliday-ceo-national-grid-idea-large-power-stations-baseload-power-outdated/> argues that large scale localised power stations are already outdated and that the future 'base load' ie the core of world power generation is already 'moving towards much more distributed electricity production and towards microgrids'. He notes that these means were, in 2015, resulting in over 1,500 MW (4 CHSPs) of solar power being added in 3 months, and that small-scale distributed generation would represent a third of total capacity in the UK by 2020.
9. Such considerations from an authoritative source, who is the manager of our national energy system, indicate the irrelevance of a 350MW centralised solar power station, such as CHSP, to the total solar capacity which is growing much more rapidly and is more in tune with future distributed needs.
10. This suggests strongly that the adverse effects and 'harm', summarised in 1. above, far outweigh the potential benefits of an out of scale, massively disruptive proposal which may be unnecessary and is already being outflanked by more appropriate and more effective small-scale developments.

Professor Sir David Melville CBE, CPhys, FInstP
Vice Chair
The Faversham Society