

The Faversham Society

Response to Examining Authority's Written Question 1.08 regarding conformity with National Planning Statements

1. Our understanding is that the critical test for a NSIP is conformity with National Planning Statements (NPSs) rather than with any Local Plans. However, there is no NPS for either solar power or battery storage technology. Given the unprecedented scale of this development (see 9. Below) the Faversham Society regards it as totally inappropriate and indeed reckless to proceed without such planning statements for guidance. We support the view of Swale Borough Council that this constitutes a fundamental objection to the proposal.
2. Presumably appropriate NPSs will be developed in future so it might additionally be argued that consideration of the current, clearly singular, proposal would likely preempt or prejudice such development.
3. In relation to our objections to Heritage Impact on listed buildings, the need to balance 'benefits' and 'harm' lacks any basis for judgement without relevant NPSs
4. Your question relates to the Applicant's suggestion that NPSs EN-1 and EN-5 are potentially 'relevant and important' in relation to the Examination. We firmly assert that they are neither, other than in a very general (and unsupportive) sense for EN-1. (see 7. & 8. below)
5. The Applicant refers to the National Policy Statement on Renewable Energy (EN-3) which provides no guidance on solar energy or battery storage installations and is therefore irrelevant.
6. Similarly the National Policy Statement for Electricity Networks (EN-5) relates primarily to new overhead electricity lines of 132kV and above, along with associated sub-stations etc. It refers consistently to the impact of power lines and its focus is clear. No such infrastructure is proposed in the application and there is no reference to PV arrays or energy storage systems. We believe that EN- 5 therefore can be discounted along with EN-3.
7. The Overarching National Policy Statement for Energy (EN-1) provides the background for the consideration of other NPSs on specific technologies, but equally makes no reference, nor provides guidance on solar or energy storage. Whilst EN-1 is supportive of low carbon energy production it is not in any sense supportive of development on the scale of the proposed CHSP. Rather it encourages decentralised and community installations with increased connectivity, as well as supporting reducing energy demand.
8. NPS EN-1 also stresses the importance of considering the impact on tourism and rights of way, wildlife habitats, European sites, and landscape issues, especially in coastal areas. Importantly it highlights the dangers of flood risk and advocates the siting of vulnerable parts of developments away from areas of highest risk.
9. We can only speculate as to the reasons why there are no NPSs for solar energy. Whilst large scale batteries have only become of interest recently, PV cells were developed in the 1950s and we used them extensively in space applications in the 1960s. Large scale (over 200MW) PV arrays have been developed worldwide since 2012 (India) but they are (unsurprisingly) predominantly in remote locations in China, India and the USA. The only other current solar power station in Europe over 200MW is in Cestas, France (300MW 2015) It is itself an outlier, being twice the size of the largest in Germany. The largest in the UK is currently 72 MW at Shotwick, Flintshire (2016, completed in 6 weeks).
10. Clearly the proposed CHSP at 300MW is well beyond anything envisaged and well beyond the scope of existing NPSs and planning experience in the UK. Any solar array development on this scale must surely require national policy guidance. Additionally, the proposal for such

a large scale energy storage system using emerging and potentially hazardous technology requires specific national policy guidance.

11. In conclusion, the Faversham Society is firmly of the view that not only is there a lack of NPS guidance to determine the CHSP proposal, it is inappropriate to consider at this time an application of this unprecedented scale and with still emerging technology.

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