

From: [REDACTED]
To: [REDACTED]
Subject: Faversham Town Council Written Submission
Date: 26 June 2019 12:59:49
Attachments: [REDACTED]

Dear Herfin Jones

Please find attached Faversham Town Council's written response regarding the Cleve Hill proposal.

Kind regards

Adrienne

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DEPUTY TOWN CLERK –MISS ADRIENNE BEGENT
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Dear Sir

Planning Act 2008–Section 88 and The Infrastructure Planning (Examination Procedure) Rules 2010–Rule 6

Application by Cleve Hill Solar Park Limited for an Order Granting Development Consent for the Cleve Hill Solar Park Project

This letter comprises the express views of Faversham Town Council (FTC) with regard to the above application. FTC recognise that climate change as a consequence of the burning of fossil fuels poses a clear and present threat to the future health and wellbeing of our planet. We agree that the UK should be investing in, and supporting renewable energy, however we do not support this particular application as we consider that, on balance, the identifiable concerns outweigh the potential ‘clean energy’ benefit of this project. Consequently, FTC, as the local representative body of Faversham residents, object to the proposal to construct and operate a solar power station on Graveney marshes. The remainder of this letter outlines our key concerns.

Background on Faversham

Faversham is an ancient market town, mentioned in the doomsday book, which won its first recorded charter in 1252. Faversham grew up as a consequence of its location on Faversham Creek with its link to the Swale and the North Sea beyond. It was once a thriving port and gained regional significance as an associate member of the Confederation of Cinque Ports. The barges once carried agricultural produce, gunpowder and bricks mainly to London but also further down the coast towards the open sea. The town itself retains a wealth of historic buildings, over 500 listed by English Heritage at last count, some of which date back to medieval times. Although the creek is now a much quieter place, there are plans to develop a ‘heritage harbour’ for the many over-wintering historic Thames barges. Faversham has a distinctive sense of place enhanced by its surrounding countryside. To the south there is the dramatic landscape of the North Downs AONB, fruit orchards including the DEFRA National Fruit at Brogdale, open pasture and parkland estates. To the north, east and west are the North Kent Marshes. This flat coastal landscape is just as important with its arable and grazing, dykes, flora and fauna. The marshland areas of Oare, Seasalter, Graveney and Cleve Hill are a mecca for Ornithologists. Many visit from other regions of the UK and beyond, staying and eating locally; supporting the economy of Faversham and its surrounding villages.

The Size and Adverse Visual Impact

The planned project site is located near the village of Graveney, about 2 km North-East of Faversham and 5 km West of Whitstable on the North Kent coast. We understand the site is planned to cover an area of approximately 890 acres (365 hectares). This is an area of land larger than the village of Graveney and the town of Faversham combined. The size of the proposed facility and its close proximity to towns and villages are to our knowledge, unprecedented in the UK. The facility will, if constructed, dwarf the communities which border it.

The area under consideration is crossed and bounded by footpaths which allow both resident and visitors ready access to an area of countryside with uniquely expansive views and ready access to wildlife. The area is within the Eastern Swale Marshes Character Area, partially within the Eastern Fruit Belt Character Area, and predominantly within Graveney Marshes Landscape Character Area. It is bordered by the Saxon Shore Way, has a public right of way (PRoW ZR485) running through it and it is also close to and visible from the National Cycle Network Route 1. We consider the probable effect on the landscape character and visual amenity of the site and its surroundings for some distance to be severely negative and we do not agree that the landscaping mitigation which has been described would materially minimise the negative effect. Given the low level of the land within the site plan and the proposed height of the solar panels (up to 3.9m high) plus transformers throughout the site of 3m, screening with vegetation and positioning of the panels (East – West orientation) will make little or no difference when travelling through it or around it. It is our view that this facility would fundamentally and detrimentally change the appearance of this locality from the moment its construction begins. Footpaths will be bounded by fencing, CCTV cameras and lighting on poles. Inevitably this will adversely impact upon the public's perception and enjoyment of the unique character of this place.

The increased flood risk

Faversham is low lying and consequently at risk from flooding and rising sea levels. This is always apparent when there is a spring tide. The applicants of the Solar Park will have the responsibility for maintaining of the sea wall that forms a large proportion of its northern boundary. The presence of this sea wall acts to increase the flood at Faversham. The town council wants to see the area used as it once was, a flood plain.

The detrimental impact of construction and site access.

Construction is planned to take place over a 2-year period. All of the equipment, materials and plant will have to be brought in by large vehicles. This will have a major impact not only on the village itself but on the M2 and junction 7. Brenley Corner, as it's known locally, is already over capacity at peak times of the day. This junction is notorious for accidents and the subsidiary roads leading to the site will struggle to accommodate large vehicles. The road to the site is a windy rural lane with lots of tight bends. Graveney village school fronts this road with classroom windows 4-5metres from the road edge, its playing field is on the other side. We understand there will be 80 movements a day, that is one every 6 minutes. The village school is very popular with Faversham families who generally take their children

to school by car. The amount of lorry movements and everything that goes with that from noise, vibration and poor air quality will have a detrimental effect on this rural village and school. The route to the site is also Sustrans National Route 1. This an extremely popular route for cyclists and no consideration has been made for this. Let's not shy away from the fact that HGV's have a poor safety record regarding cyclists.

Concern over battery safety.

Faversham Town Council is very concerned with the scale of the storage area for the Batteries and the known fire risk.

Lithium-ion (Li-ion) battery fires are acknowledged as among the most difficult to control and suppress. There is some advice which suggests that you let the fire burn itself out but what about the toxic fumes that would be given off? Given the size of the Li-ion batteries suggested in the application, it would be a major catastrophe. What arrangements or consultations have taken place with the Kent Fire and Rescue Services?

There is no technical detail on the storage system and considering the potential hazards involved it is paramount that it is provided and can be scrutinised by independent professionals who have the expertise to do so.

Detrimental Impact on Wildlife.

The proposed site is immediately adjacent to The Swale which is a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar site. The Swale Estuary is also a National Nature Reserve (and Marine Conservation Zone) and the site is bordered on the North and West, by both the South Swale Local Nature Reserve and the Oare Marshes Local Nature Reserve. The site is almost wholly enclosed by land which is designated as Wetland of International Importance (Ramsar sites). Although the land which would be used to accommodate the facility is not itself protected or designated as a Ramsar site, it is of a markedly similar character and quality to the surrounding Ramsar areas. It is also clear from the PEIR and NTS that the rare birds and other species which use the surrounding protected areas also use the nearby land including the site itself as habitat. It is clear there is a high likelihood of long-term negative effects on Dark-bellied Brent Geese and Breeding Marsh Harriers. The nearby SPA boasts a population of 24 pairs of the latter, representing at least 15% of the breeding population in Great Britain.

We also believe that over reliance is placed on the suggested 40-hectare habitat management area north of the Cleve Hill substation. The plan assumes that the potential negative effects on these species will be simply offset by establishing a small grassland area nearby and / or that such species will simply relocate to similar habitats elsewhere. The success of this area will depend upon achieving a high carrying capacity for the SPA species. Whether or not this capacity can be achieved is unknown and is therefore, an environmental and ecological gamble.

With both the Kent Wildlife Trust and Nature England opposing the scheme we cannot afford to risk the wild heritage and existing ecological environment of such an important site.

The negative impact on local heritage and archaeology

The Graveney Marshes are a man made environment dating from the mid- medieval period onwards. Used predominantly for sheep rearing, fishing and wild fowl trapping, it consists of sea walls , artificial canals and decoy ponds. As a trading route from Europe there is likely to be evidence of Bronze Age, Roman, Saxon, Viking movement, trade and settlement that is deserving of further investigation and recognition. There has thus far been archaeological surveys conducted on the site of the existing substation with little investigation of the wider environment. These investigations, carried out by Wessex Archaeology in 2007 and 2008 uncovered minimal evidence of settlement but did unearth evidence of transient prehistoric and Roman use that is worth consideration given the small scale of the survey. There is much potential for the area to house finds of important archaeological significance and due to the limited scope of work carried out on the site, development could permanently damage any underlying archaeology and despite proposed mitigation by the developer, eradicate the possibility of ever knowing the true history of an area that is significant to the community and to the national heritage of trade with the UK.

The lack of any substantial benefit to local communities.

Faversham has a vibrant community who have worked hard over the last few decades to attract both visitors and new residents. A key part of the attraction is the built environment of the town itself but of course this is only enhanced by the semi-rural setting of the town. Faversham is bounded by an area of outstanding natural beauty to the south, the Swale Estuary to the north and characterful fruit farms and marshland both east and west. The placing of such a vast Solar Power Station so close to Faversham will inevitably, change perceptions of the area and affect its attractiveness as a place to live, work and spend time. FTC works alongside local civic groups seek to promote our town based on its rich natural and built heritage. We fear this development will thwart of efforts to the eventual detriment of the almost 20,000 people who live and work here.

This proposal is projected to have no direct positive economic impact on the local economy. There are no projections for increases in local employment, spend with local business, development of a supporting business ecosystem etc. The only benefit (of any kind) that Cleve Hill Solar Park can identify for the local area is their obligatory business rates payments to Swale Borough Council. We consider to be a poor value exchange in light of the concerns we have described in this response.

In conclusion, Faversham Town Council, acting in the best interests of the residents of Faversham, are opposed to the granting of permission for the development of the Cleve Hill Power Station.