

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Cc: [REDACTED]
Subject: Re: Open Floor Hearings: application to speak
Date: 16 July 2019 14:30:28
Attachments: [REDACTED]

Dear Hefin

Thank you for your efforts in accommodating me to speak at the end of the session this morning, since we hadn't seen your email below yesterday afternoon.

As advised by the Inspector, please find attached a written copy of our oral submission today, for the files.

With kind regards
Anna

On Monday, 15 July 2019, 15:29:38 BST, Cleve Hill Solar Park
<CleveHillSolarPark@planninginspectorate.gov.uk> wrote:

Dear Anna,

Further to my colleague's e-mail below I can confirm that we had pencilled you in to speak at Open Floor Hearing 2 on the evening of Monday 22 July 2019. A copy of the agenda for that Hearing can be found [here](#).

If you are unable to speak on Monday 22 July please advise us tomorrow morning and we will endeavour to accommodate you towards the end of the Hearing if sufficient time is available.

Kind regards,

Hefin

Hefin Jones
Rheolwr Achos / Case Manager
Cynllunio Seilwaith Cenedlaethol / National Infrastructure Planning
Yr Arolygiaeth Gynllunio / The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN
Llinell Uniongyrchol / Direct Line: 0303 444 5944
Llinell Gymorth / Helpline: 0303 444 5000
E-Bost / Email: hefin.jones@planninginspectorate.gov.uk

Wê / Web: <https://infrastructure.planninginspectorate.gov.uk> (Cynllunio Seilwaith Cenedlaethol/National Infrastructure Planning)

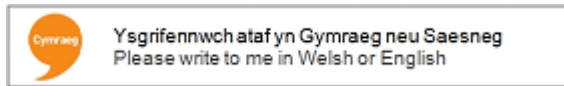
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apeliadau/Casework and appeals)

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From: Cleve Hill Solar Park <CleveHillSolarPark@planninginspectorate.gov.uk>

Sent: 15 July 2019 09:19

To: Swale FoE [REDACTED]; Cleve Hill Solar Park
<CleveHillSolarPark@planninginspectorate.gov.uk>

Subject: RE: Open Floor Hearings: application to speak

Dear Anne,

Thank you for taking time to contact the Planning Inspectorate.

For Open Floor Hearing 1, seating will be available from 9:30am with the hearing starting at 10:00am on Tuesday 16 July 2019.

The order in which Interested Parties are to speak will be confirmed on the morning of the hearing by the Examining Authority (ExA), therefore I would advise being present at the hearing by 10:00am and be prepared to attend the whole hearing.

The 5 minute time slot will be dependent on how many Interested Parties are registered to speak, it is down to the discretion of the ExA on how much time is allotted but each party will have the same amount of time. This will also be confirmed on the morning of the hearing.

I hope this has been some assistance,

Kind Regards,

Paige Hall

Swyddog Achos / Case Officer

Cynllunio Seilwaith Cenedlaethol / National Infrastructure Planning

Yr Arolygiaeth Gynllunio/The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN

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and appeals)

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From: Swale FoE [REDACTED] >
Sent: 14 July 2019 20:42
To: Cleve Hill Solar Park <CleveHillSolarPark@planninginspectorate.gov.uk>
Subject: Re: Open Floor Hearings: application to speak

Dear Paige

Could you confirm arrangements for the open floor hearing on Tuesday please? What time should I arrive at the Alexander Centre and is there a specific slot we have been allocated or should we plan to attend for the whole morning? I understand that the maximum length of my speech should be 5 minutes - is this correct?

I am not aware of any other members of our group planning to attend the session on Tuesday - just me on behalf of Swale FoE.

Many thanks

Anna

Anna Stanford

Coordinator

Swale FoE
[REDACTED]

On Wednesday, 12 June 2019, 15:21:03 BST, Cleve Hill Solar Park

<CleveHillSolarPark@planninginspectorate.gov.uk> wrote:

Dear Anna,

Thank you for providing this information to the Planning Inspectorate.

I can confirm that I have added your desire to speak at the Open Floor Hearing 1 on 16 July 2019. I have also updated the attendance log that some representatives of Swale Friends of the Earth will be observing.

Would it be possible to confirm how many people intend to attend these meetings for our administrative purposes.

Kind Regards,

Paige Hall

Swyddog Achos / Case Officer

Cynllunio Seilwaith Cenedlaethol / National Infrastructure Planning

Yr Arolygiaeth Gynllunio/The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Llinell Uniongyrchol/Direct Line: 0303 444 5200

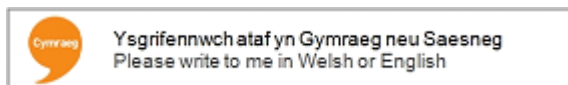
Llinell Gymorth/Helpline: 0303 444 5000

E-Bost/Email: Paige.Hall@planninginspectorate.gov.uk

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From: Swale FoE [REDACTED]

Sent: 12 June 2019 14:34

To: Cleve Hill Solar Park <CleveHillSolarPark@planninginspectorate.gov.uk>

Subject: Open Floor Hearings: application to speak

Dear Sir/Madam

Further to your letter of 7th June regarding the Examination timetable and process, Swale Friends of the Earth would like to apply to speak at Open Floor Hearing 1 on the morning of 16th July at the Alexander Centre, Faversham. We are also available to speak at the 2nd Open Floor Hearing on the evening of 22nd July at Hempstead House, Sittingbourne, if that is more convenient for the examination timetable and your agenda.

We would like to make an oral representation based on our submission in January this year:

- our support in principle for this proposal based on: the need to reduce greenhouse gas emissions to address climate change; the need for a significant scaling up of renewable energy capacity in order to do this most cost-effectively; the important role therefore that large utility-scale solar projects like this play; the need for co-sited battery storage for maximum efficiency and the move to a smart, modern and reliable grid; knock-on benefits for green jobs.
- no objections on visual, landscape, noise, safety or heritage grounds
- support for taking the proposed site out of agricultural use because of the wildlife and biodiversity benefits this will have and the potential for large solar farms to have a net benefit for wildlife
- concern that the proposed design, with its unusual 8 degree orientation, will create a roof-like structure that may not achieve the potential benefits for flora and fauna - lack of information on this, what guarantees and safeguards can be put in place and need of more data on the benefits of reduced chemical inputs

We have no special needs at the hearing.

Representatives from our group would also like to attend, just as observers, the other Open Floor Hearing and the Issue Specific Hearings on Need, Landscape and Biodiversity. I would be grateful if you could confirm if this is possible.

I look forward to hearing from you.

Yours sincerely

Anna Stanford

Coordinator

Swale Friends of the Earth

**Swale Friends of the Earth representation
on Cleve Hill Solar Park
Open Floor Hearing 16th July 2019**

Good morning. My name is Anna Stanford and I am the Coordinator of Swale Friends of the Earth.

We are one of around 150 voluntary local groups across the UK affiliated with national and international Friends of the Earth and our goal is that: *'by 2030 the next generation will enjoy an environment that is getting better: a safer climate, flourishing nature and healthy air, water and food.'*

We are optimistic, ambitious and solutions-based – we know we have significant environmental challenges on our hands but we also believe that, having created the problems, we know how to solve them, with modern sustainable technologies and the right will at national and local level, amongst business, politicians and communities.

I am speaking today on behalf of our group and representing our agreed position. One of our supporters has asked us to note that she does not agree with our position, but she has taken the opportunity to represent her views through other channels.

Summary:

In summary, our position is that we support the development of the project because of the urgent need to install - at significant scale and great speed - a large amount of renewable energy generating capacity across the UK to meet critical climate change targets. However, we would like to be reassured that the design of the project – particularly the east-west orientation – will bring about the net ecological benefits set out in the EIA.

Why do we support the project?

One of our campaign priorities is action against climate change. On this basis we support solar farms in Swale, including large utility-scale projects because of the urgent need identified by scientists to quickly, cheaply and significantly reduce carbon emissions.

The climate crisis is real. The choices my generation and previous generations made in sourcing the energy needed to grow our economies will have serious consequences for future generations and – disproportionately – on the most disadvantaged and vulnerable in society both here and in developing countries.

We are lucky here – we are relatively wealthy and so we will have more resilience to climate change than most. But in other parts of the world people are already being badly affected – from extreme heat, flooding, forest fires, drought and conflict.

We have already hit 1 degree C of warming and we are on a path for 4 – 5 degrees. Scientists say we must keep within 1.5 degrees and the task is therefore urgent – what happens between now and 2030 will determine if we can keep to that. In other words, we have 12 years to make enormous strides in decarbonising our energy system.

We welcome the commitment by government to get to net zero carbon emissions by 2050 – it's something we have campaigned for. But the government's own experts – the Committee on Climate Change – said just last week that policies are failing and that swifter action is needed within the next 18 months. And National Grid also said last week that we cannot pick and choose the technologies – we have to throw everything at the challenge.

Swale Friends of the Earth believes in positive action.

- We supported the onshore wind farm applications on Sheppey when they were opposed by local residents and by Swale Borough Council. Those turbines are now generating without problems, contributing funds to the local community and, as a result, Sheppey recently became self-sufficient in green energy for all its domestic use.
- We also supported the original substation planning application at Cleve Hill a few years ago. Without it we wouldn't now have the London Array offshore wind farm generating huge amounts of clean energy every year. It is something that we as a community should be proud of.

I and many members of our group love the marshes around Cleve Hill but this landscape and the wildlife it supports will be affected by climate change, much more than by a relatively benign renewable energy generating project. The solar park may be a change in the landscape, but we all have to do our bit to contribute to climate solutions. We can't keep saying no and hope that someone else, somewhere else will act.

We also face a biodiversity crisis. In the UK, 60% of species have declined in the last 50 years. We believe that this project could help to address the catastrophic decline in insect numbers, if the design is right.

In principle, therefore, we support the development of Cleve Hill Solar Farm.

- The project will provide enough clean electricity for over 91,000 homes annually and contribute to the fourfold increase in renewable electricity capacity that we need.
- It will save an estimated 2.2 million tonnes of CO₂ in its lifetime.
- The project is a time-limited and reversible use of low grade intensively-farmed agricultural land.
- Traffic impacts during construction will be temporary.

It is also important that renewable energy is affordable and we welcome that this project will be developed subsidy-free, without any burden on electricity consumers. The battery storage system is an important factor in achieving this.

We have no objection to the scale or location on visual impact grounds. In our opinion, the need to increase UK renewable energy capacity overrides this.

We also have no objection to the battery storage system on visual, safety or sustainability grounds - storing energy is critical for a smart, decarbonised energy system fit for the 21st

century.

It is important, however, that any renewable energy project is designed to avoid local environmental impacts and our primary concern when the project was proposed was around the potential for negative impact on wildlife and biodiversity, because this is a sensitive area. **We are therefore supporting this project only on the basis that there will be a positive impact on local biodiversity and wildlife.**

We note the conclusion of the EIA that it predicts *“a net gain in ecologically important habitats and biodiversity generally”*. We believe strongly that taking the fields out of agricultural production will have a benefit, by reducing chemical inputs. The EIA surveys have shown that invertebrate numbers on the site are low as a result of current and previous agricultural use. As has been demonstrated elsewhere, change of use to a solar farm could have important benefits for insects and therefore birds on the site and also for wildlife on surrounding waterways (amphibians, fish and birds). **We note and welcome in particular that the EIA predicts a “significant beneficial effect” for invertebrates.**

Therefore, we welcome the following aspects of the proposal:

- siting of the panels on arable fields of negligible ecological value and protection of margins and waterways;
- change of use from intensive agriculture and chemical inputs to sheep grazing;
- inclusion of the dedicated Habitat Management Area where arable is converted to grassland and grazing marsh, plans for conversion to lowland meadow and for hedgerow and native species planting;
- the appointment of an Ecological Clerk of Works during construction;

However, we still have some questions and concerns about the particular design of this project and whether the flatter east west orientation design of the panels will achieve the benefits from change of land use that have been seen at other projects or are predicted in the EIA. We understand this design gives a more even generation profile, benefiting the economics. However, we are concerned that this will create too much shade under a 'roof' of panels, possibly sterilising the ground below, preventing the growth of flora that could benefit insect life and other fauna.

We would therefore like more examination at the issue specific hearings of this, including information on examples of where this design has been used in similar habitats elsewhere and what the resulting biodiversity benefits have been from change of use. While remaining in favour of the project over all, we would like to register concerns on the design currently proposed on wildlife grounds. We would prefer a traditional 30 degrees south facing layout.

In addition, if the project goes ahead:

- we would encourage the solar farm to be used as an educational opportunity once operational;
- we note the significant business rates benefits that will accrue to local authorities but we would also like to see an annual community fund set up. This is standard at utility-scale renewable energy projects in the UK and can be managed and spent by

the local community, potentially on local environmental and sustainable projects, such as solar panels on schools or community buildings, cycle and walking paths, tree-planting and nature conservation projects in the wider area.

Anna Stanford
Coordinator, Swale Friends of the Earth

