

From: [REDACTED]
To: [Jones, Hefin](#); [REDACTED]
Subject: Deadline 3 Submission
Date: 01 August 2019 12:02:28
Attachments: [REDACTED]

Dear Hefin

Attached is the third and final submission from the Faversham Society for Deadline 3.

Kind regards
Harold
Chair Faversham Society

[REDACTED]

CHSP Submission from The Faversham Society

For Deadline 3, August 1st

At the end of the first set of hearings, the Faversham Society still has some major concerns since many questions remain unanswered, and new questions have been raised. While the applicant may answer some of these in written submissions, the Society considers that these answers should be subject to challenge. It was clear from the first set of hearings that there are inadequacies and omissions in the documentation submitted by the applicant and that the applicant's submissions need to be challenged.

We also have serious concerns about the capacity of Swale Borough Council (SBC) to undertake the work necessary to adequately address the Discharge of Requirements if this becomes necessary. The fact that the applicant has a right of appeal against SBC decisions and their refusal to give up this right is worrying. The developer's extensive resources pitted against SBC's limited resources constrained by public spending limits do not augur well for SBC ability to adequately provide oversight. In order to level the playing field, we would urge that the DCO is as explicit as possible about those requirements that need to be satisfied.

If the development is built it is not clear to us how the various conditions might be enforced. This also means in particular that our cogent arguments on the limitations of the Rochdale envelope should be accepted, and that much more detail on the technology is provided now.

As already notified, we request additional Issue Specific Hearings as follows:

A. The Battery Energy Storage System(BESS)

As you will recall, the applicant suggested that after 40 years the PV panels would be removed, but that the battery compound and batteries might be retained. The applicants did not respond when we tried to pursue this. This statement is in stark contrast to other statements by the developer that the BESS is not an essential part of the development and may be replaced by additional PV panels. Given the huge cost and construction time of the bund around the BESS enclosure, the developers admitted that such a decision would have to be made at the start of the project. Not implementing the bund would require a major change to the proposal as it stands, not least to time scales and traffic plans. But as we have also pointed out, exchanging a BESS with more solar PV is a major change of technology and fundamentally changes the nature of the proposal. Why has such an important and fundamental decision not been made already?

The considerations above lead us to a requirement that the developers are explicit on their intentions for the BESS both during and after the 40 year lifetime of CHSP.

- Is its main purpose for smoothing intermittent supply from renewable energy sources or is it primarily a means of storing and trading energy?
- Does it have a role in relation to the existing wind power capacity or is the possible use after 40 years simply for energy trading?

These and other questions, on for example the energy specification of the BESS, are fundamental and the answers may possibly indicate an intention to create what is effectively a standalone BESS which is very different from a proposal for a solar PV plant.

A further ISH on batteries and associated technology is needed to explore the many outstanding questions relating to the BESS, which besides those raised above would include:

- Justification by the developers of their blanket use of the Rochdale envelope and reaching a defined position on the appropriate level of detail in the light of the well-documented hazards associated with large scale BESS
- Specification and type of batteries and criteria for their choice based on, for example, safety record. E.g containerised vs stand alone
- Worst case scenario on proposed total energy storage
- Previous UK and European experience of this scale of BESS
- Implications of current best practice advice on large scale BESS including that previously presented at Open Floor 2 from the insurance industry
- Spacing of batteries to avert thermal runaway and provide emergency services access, and the impact of spacing on total energy storage
- Access by emergency services by external roads and through the bund to all points in the BESS in order to ensure individual fires can be dealt with
- Liaison with Kent Fire and Rescue Service (KFRS) in the BESS design stage and sign off by them and the HSE
- Fire elimination and suppression measures to be built in, in the light of their previous well-documented failure in Hawaii, Arizona and Belgium
- An independent assessment of the local knowledge and capacity of KFRS to deal with a runaway fire, including proposed suppression methods, extinguishing, cooling, and reignition (which has been shown to occur well after an incident). This to include best practice for lithium-ion batteries as well as the possibility of free lithium being produced in the event of an explosion, making the use of water extremely dangerous. Ability to cope in a toxic emission situation
- Impact of hydrogen fluoride and other toxic gas emissions from a fire on neighbouring receptors including the whole of Faversham. See the submission by Bruno Erasin on HF emissions at Open Floor 2

B. Need and Alternative Sites

We have submitted further evidence on need for deadline 3 drawing on the recently published FES 2019 projections from the National Grid. This shows that there is no evidence of need for CHSP. The National Grid also points out that right through to its 2050 projections, future energy need will be met from distributed generation rather than centralised energy plants such as CHSP.

This authoritative and seminal view of need derived from the National Grid's FES 2018 and FES 2019 is an unexplained omission from the application which has not been raised in the Examiner's Questions nor has it been discussed in Hearings. Our view is that it is essential that the applicants provide a response and that they can be questioned on it.

Having carefully read the applicant's submission and listened to their evidence, we are now firmly of the view that the location is opportunistic. The site has been chosen because of the availability of the link to the national grid due to the spare capacity from the London Array, and we would like to point out that further wind power generation would almost certainly

have had less negative environmental impacts than the Cleve Hill proposal. We would like to see further evidence on need and a proper review of alternative sites.

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In addition to our proposals for two further Issue Specific Hearings above, we have outstanding questions relating to the following topics. We would like these questions to be put to the applicants in the next round of Examiners' questions.

1. Agricultural Land

The wide difference between the applicant's assertions about the quality of the site as agricultural land and that presented by Dr Bruno Erasin is cause for concern. His evidence provides a substantial critique of the timing, methodology, data and the applicant's evidence; sufficient to call into question the reliability of the applicant's evidence.

2. Managed Retreat

Marshland is now recognised as important for carbon sequestration and we have not found any acknowledgement of this in the application. We would like the applicant to be required to present data on the value of the ecosystem of the land as marsh compared to its use for power generation.

There was reference by the Environment Secretary in a speech on UK Climate Change Projections to coastal realignment and a new strategy by the Environment Agencyⁱ he said 'We are also pioneering 'natural flood defences', which support biodiversity and sequester carbon while lowering the risk of flooding.'

In the scientific literature, there is increasing evidence of the significance of the marsh for carbon sequestration:

"If coastal habitats are maintained at their current extent, their sequestration capacity over the period 2000–2060 is valued to be in the region of £1 billion UK sterling (3.5% discount rate). However, if current trends of habitat loss continue, the capacity of the coastal habitats both to sequester and store CO₂ will be significantly reduced, with a reduction in value of around £0.25 billion UK sterling (2000–2060; 3.5% discount rate). If loss-trends due to sea-level rise or land reclamation worsen, this loss in value will be greater."ⁱⁱ

The justification for the development of CHSP is its contribution to addressing greenhouse gas emissions, should the applicant not be asked to provide evidence that the net greenhouse gas benefit is positive taking into account the greenhouse gas emissions from establishing and operating the CHSP including the loss of carbon sequestration if the area reverted to salt marsh through managed retreat?

3. Biodiversity

We believe that there is good reason to question the quality of the applicant's work on biodiversity. We heard evidence at the hearings of the importance of the site for European eels, Dormice and the Great crested newt. We would also like to have the opportunity to question the outcome of the Habitat Management Steering Group, about which, to date, we know very little. There should be an opportunity to challenge the evidence presented by the

applicant on no net loss.

We heard Natural England inform us that monitoring of SSSIs is not taking place, what monitoring might we expect of the conditions attached to the DCO by either the Environment Agency or Natural England?

4. Cultural Heritage and the Views

We share Historic England's concern about the level of harm to the setting of the listed buildings at All Saints Church (Grade I) and Sparrow Court and Graveney Court (Grade II).

We are concerned about the applicant's lack of demonstrated concern and provision for the treatment of the WWII aircraft and any other archaeology which may be found on the site and have poles driven through it.

The cross-section drawings will assist with assessing the proposed planting and its impact on the intervisibility between the listed buildings and the Graveney Conservation Area.

We think that special regards should be paid to the relevance of the Barnwell case.

5. Transport

During construction of the London Array, there were specific measures to avoid movement by Graveney School at busy times. We have been surprised and dismayed by the lack of detail on safety, dirt, noise, visual intrusion and disruption to the education of young children

We have also not heard from KCC on the impact on traffic levels and the roads.

6. Finances

We realise that we have no access to the financial model behind the proposal, but we understand that the applicant has told residents that there is insufficient profitability to make any contribution to local causes. This contrasts markedly with the London Array development and raises questions in our mind about the viability of CHSP and leads us to suggest that there should be a bond to cover removal, disposal and habitat restoration.

Pole driving to support the panels will be both noisy and difficult to remove. It has been suggested to us that it would be more appropriate to use helical poles which would cause less disturbance to people and wildlife and would be easily removed and reused.

Professor Harold Goodwin

Chair, Faversham Society

For and on behalf of the Faversham Society

ⁱ <https://www.gov.uk/government/speeches/michael-gove-speech-on-uk-climate-change-projections>.

ⁱⁱ <https://www.sciencedirect.com/science/article/pii/S0272771413005143?via%3Dihub>