

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Subject: Deadline 3 submission - Faversham Creek Trust / Faversham & Oare Heritage Harbour Group
Date: 01 August 2019 21:13:30
Attachments: [REDACTED]

Dear Sir or Madam

I attach my submission for Deadline 3 of the Cleve Hill Solar Park Enquiry.

Yours faithfully

Sue Akhurst
Chairman
Faversham Creek Trust

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FAVERSHAM CREEK TRUST

REGENERATING FAVERSHAM'S MARITIME HERITAGE

The Purifier Building • Morrisons Wharf • North Lane • Faversham • Kent • ME13 7DY

1st August 2019

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol BS1 6PN

BY EMAIL TO: CleveHillSolarPark@planninginspectorate.gov.uk

Dear Sir or Madam

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

Further to my representation to the Rule 8 stage of this Enquiry, I spoke at ISH3 and ISH4 and was invited by the Inspectors to make a further written submission.

I am particularly concerned that the document submitted to the Enquiry on the possible effect of solar energy installations on wildlife, *Solar Panels and Wildlife Review 2019*, contains no research of relevance to this size and design of installation in this kind of location, because no such research exists. Research cannot have taken place because there is no installation comparable to this one, anywhere in the world. For example, research on bird collisions with solar panels references a solar array of a different type in a desert in the USA.

The report refers to “grey literature” indicating that birds, bats and insects in general, and water birds in particular, may confuse large solar arrays with water. Anecdotal evidence that I have heard includes the example of a swan which crashed into a wet road at night, assuming it was water, with disastrous results. The report cites examples of bats colliding with solar panels, thinking they are water. I have been told that 50% of the bat species found in the UK are present in this marshland. Sky Larks, Marsh Harriers and others will attempt to drink from the panels. It is probable that such a vast array of reflective solar panels would present an unacceptable risk to the valuable populations of birds, bats and invertebrates in this area.

Regarding the effects on biodiversity in general, the report cites research from solar arrays of a very different design from this one, where 70-95% of the ground remains available. In the proposed design for Cleve Hill a very small proportion of the ground will remain available, because you cannot include the ground below the panels. This ground will receive little or no sunlight or rainfall, and over time it could become biologically dead, without even bacteria in the soil. It will not provide a habitat for wildlife. The strips of land between panels will not compensate for the lost extent of open arable fields.

There are many examples of professionals in ecology, biodiversity, wildlife and heritage speaking out against pursuing renewable energy at the cost of the environment we are striving to protect



Patrons: The Countess Soudes, Sir David Melville CBE, Professor Christopher Wright

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from climate change. BBC Radio 4 has been running a series about puffins, some of which has formed part of the PM Programme. On Monday, 22nd July the broadcast (minutes 24.55 to 30.27) was a report on anticipated effects on the puffin population of the development of a wind farm off the coast of the Isle of May (one of four in the Forth/Tay area – which will make a massive contribution to the National Grid's commitment for green energy). Ally McClusky, the representative for the RSPB – which contested the development in the Scottish Courts – remarked on the tension between the need to reduce carbon emissions and conserving wildlife, and said that wildlife needs to be better taken into account. *"No question we need renewable energy to tackle climate change. We do think however that you need to take into account environmental concerns when deciding on the location of renewable energy development. We should not be siting them in areas of internationally important seabird populations."*

In a separate programme in the series, David Steel, Reserve Manager on the Isle of May, said that the birds in the area may not like the wind farm and may become displaced, having to move to other areas, and that *"seabird research is a long game."* The representative for EDF Renewable UK, the industry body working on the wind farm, has been working on the impact on seabirds for over eight years. There have been no such long term, in depth studies of the potential effects on wildlife of the proposed solar installation at Graveney.

On the Today Programme (BBC Radio 4, Thursday, 1st August 2019, starting at hour/minute 2:44) Hilary McGrady, Director General of the National Trust, was interviewed in advance of meeting Theresa Villiers, Environment Secretary. Ms McGrady said: *"The health of our environment underpins everything. It underpins our wellbeing, it underpins our health, it is why people get out of bed in the morning, so there can't be anything more important."* Among other things, Ms McGrady intended to raise with Ms Villiers the proposal to include built heritage in the forthcoming Environment Bill. Both these points are highly relevant to the Cleve Hill site.

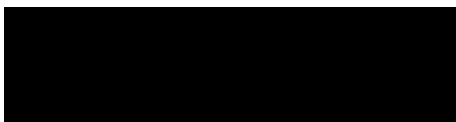
The *Solar Panels and Wildlife Review 2019* report concludes that *"In March 2019, DEFRA confirmed that the delivery of biodiversity net gain would be a mandatory requirement for all new developments in England."*

I cannot see how this mandatory requirement can be met by creating a hundred acre wildlife area to replace 900 acres of farmed marshland, even allowing for 'corridors' of grass, hedge or tree planting. A very wide variety of species – mammals, birds and invertebrates – live in this thousand acre site, including ones of national and international significance. The area is surrounded on two sides by an internationally important estuarine habitat, which is a Marine Protected Area and an SPA with marine components. It includes and is adjacent to land designated SSSI, SPA and Ramsar. As far as I can tell, no thorough survey over several years has been conducted to record and analyse the plant and animal life that is present on the site, so there is no benchmark against which any changes in biodiversity can be measured.

The report states *"The primary suggestion was to locate solar energy facilities in areas supporting little biodiversity.", and "Natural England recommend the avoidance of solar developments in or near to areas of high ecological value or designated sites."*

On the basis of all the evidence and lack of research evidence, I contend that this is the wrong site for a solar panel and battery installation of this extent and magnitude. It would cause irreparable damage to the environment that we value so highly and are trying to protect.

Yours faithfully



Sue Akhurst
Chairman – Faversham Creek Trust
Convenor – Faversham & Oare Heritage Harbour Group

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Welcome Map Layers **Key**

Marine Protected Areas

SACs with Marine Components
SACs with marine components
✓ SACs with Marine Components

SPAs with Marine Components
SPAs with Marine Components
✓ SPAs with Marine Components

Marine Conservation Zones
Marine Conservation Zones
✓ Marine Conservation Zones

Nature Conservation MPAs & Other Area Based Measures
Nature Conservation Marine Protected Areas
✓ Nature Conservation Marine Protected Areas
Other Area Based Measures (Scotland)
✓ Other Area Based Measures (Scotland)

Marine Nature Reserves
Marine Nature Reserves
✓ Marine Nature Reserves

Administrative Boundaries

12nm territorial seas limit
✓ 12nm Territorial Sea limit
UK Continental Shelf designated area
✓ UK Continental Shelf Designated Area

Marine Protected Areas in the UK

