

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Subject: Additional submissions from CPRE Kent (ref 20022146)
Date: 01 August 2019 16:45:22
Attachments: [REDACTED]

Dear Paige,

Thank you very much for confirmation of my earlier email.

I now attach our additional submissions for Deadline 3.

These comprise:

- A written statement from Richard Knox-Johnston concerning the Open Floor Hearing of 22nd July
- A further statement on biodiversity
- A written statement on aviation glare
- A statement on a recent SoS decision on an energy recovery facility, supported by a copy of the SoS's letter
- A statement on Climate Change and Carbon Sequestration, supported by a partial transcript of evidence given by the Chairman of Natural England to the Environmental Audit Committee on 23rd July. In view of the importance of this evidence, we repeat here our request to the Inspectors (included at the end of our attached statement) that Environment Agency and Natural England be invited to provide evidence on this subject.

Kind regards

Hilary

Dr Hilary Newport

Director
The Kent Branch of CPRE



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CPRE Kent, Queen's Head House, Ashford Road, Charing TN27 0AD tel 01233 714541

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From: Cleve Hill Solar Park <CleveHillSolarPark@planninginspectorate.gov.uk>
Sent: 01 August 2019 14:59
To: Hilary Newport <hilary.newport@cprekent.org.uk>; Cleve Hill Solar Park <CleveHillSolarPark@planninginspectorate.gov.uk>
Subject: RE: Written representations from CPRE Kent

Dear Hilary,

Thank you for submitting this to the Planning Inspectorate.

I can confirm safe receipt of the request. This will be published as soon as practicable once the deadline has passed.

Kind Regards,

Paige

From: Hilary Newport [REDACTED]
Sent: 01 August 2019 14:55
To: Cleve Hill Solar Park <CleveHillSolarPark@planninginspectorate.gov.uk>
Subject: RE: Written representations from CPRE Kent

Dear Hefin

We will be making further submissions for Deadline 3 later today, but meanwhile we write to formally request that additional ISHs are scheduled covering (1) climate change and (2) the availability of alternative brownfield sites.

We also wish to record our support for GREAT's request for an ISH on the Setting of Heritage assets. We also endorse the Faversham Society's request for ISHs on the concerns over the Battery Energy Storage System and an additional hearing on Need, in the light of the recent publication of the National Grid Future Energy Scenarios report for 2019 (FES 2019).

Kind regards,

Hilary

Dr Hilary Newport
Director
The Kent Branch of CPRE



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

Sent: 25 June 2019 16:31

To: Hilary Newport <[REDACTED]>

Subject: RE: Written representations from CPRE Kent

Dear Hilary,

Thank you for your deadline 2 submissions. These will be published once the deadline has passed.

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

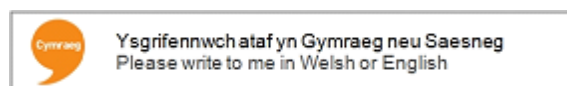
Wê / Web: <https://infrastructure.planninginspectorate.gov.uk> (Cynllunio
Seilwaith Cenedlaethol/National Infrastructure Planning)

Wê / Web: www.gov.uk/government/organisations/planning-inspectorate
(Gwaith achos ac apeliadau/Casework and appeals)

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From: Hilary Newport <[REDACTED]>

Sent: 25 June 2019 16:20

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

Subject: Written representations from CPRE Kent

Dear Cleve Hill Solar team,

Please find attached three Written Representations from CPRE Kent (ref 20022146) covering:

- Ecology and Biodiversity
- Flooding
- Hydrology.

The latter paper refers to two supporting documents from external organisations, both attached separately for ease of reference. I would be most grateful for acknowledgement of receipt.

Kind regards

Dr Hilary Newport

Director

The Kent Branch of CPRE



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**National Infrastructure Planning
Cleve Hill Solar Park
CPRE Kent (Reference 20022146)**

Climate change and carbon sequestration

This topic has been submitted by CPRE Kent on the basis of loss of sequestration of carbon on land affected by the solar panels.

In a recent submission to the Audit Select Committee on Tuesday 23rd July 2019 (transcript attached), Tony Juniper CBE, Chair of Natural England, stated:

“So, salt marshes are a very important habitat from the point of view of various plants, birds and invertebrates and they are also very significant carbon stores.

I was surprised to learn a couple of years ago that in a hectare of healthy salt marsh around the British coast you may find more carbon than a hectare of tropical rainforest”.

He then goes on to say “Rather than the rainforest with carbon being mostly in vegetation above (apart from peatland rainforest of course), you find that the carbon is trapped in the sediments, organic material in layers being accumulated as the salt marsh grows. So what we have done with a lot of our salt marshes is we’ve “reclaimed” them and turned them into grazing marshes or into agriculture”

He then goes on to discuss the work that Natural England has done together with the Environment Agency on restoring salt marshes and encouraging managed retreat.

During this inquiry CPRE has provided evidence on the research into the loss of carbon sequestration due to the erection of solar panels. We have also pointed out the importance of managed retreat to flood protection. From the comments made by the Chair of Natural England, it appears that there could be considerable loss of carbon sequestration due to the loss of increasing salt marsh, due to the retention of the sea wall, for approximately 40 years. A time which is critical to climate change targets.

However, there is no evidence either from Natural England, the Environment Agency or the applicant on the effect of loss of sequestration due to this development. In view of the Government’s target on the reduction of carbon dioxide, the Graveney Marsh could have an important role to play and should be protected.

CPRE Kent believes that the Environment Agency and Natural England should provide important evidence to the Inquiry to inform the balance of climate change benefit.

The full hearing can be viewed here: <https://www.parliamentlive.tv/Event/Index/cf73f980-93e8-49d0-9183-f3cd18955465>

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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www.cprekent.org.uk Phone 01233 714540 Email info@cprekent.org.uk**

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Chairs of the Committee on Climate Change and Natural England questioned



19 July 2019

The Environmental Audit Committee holds a one-off session on climate change and biodiversity.

- [Watch Parliament TV: Climate change and biodiversity](#)
- [Environmental Audit Committee](#)

The Committee asks questions on two of the greatest threats facing humanity: climate change and biodiversity loss. This will include reducing the UK's emissions, preparing for climate change, Net Zero Government, Natural England's Action Plan, land management, carbon storage and funding.

Witnesses

Tuesday 23 July 2019, Grimond Room, Portcullis House

At 10.15am

- Rt Hon. Lord Deben, Chair of the Committee on Climate Change
- Tony Juniper CBE, Chair of Natural England

Further information

- [About Parliament: Select committees](#)
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Image: mr sweetis/Pixabay

Questions from Kerry McCarthy, member of the EAC

Responses from Tony Juniper, Chair of Natural England

Starts at recording time 11:17:17

Can I briefly ask about salt marshes as well?

We are very keen on salt marshes (laughs)

What are you doing to demonstrate your love for salt marshes?

So, salt marshes are a very important habitat from the point of view of various plants, birds and invertebrates and they are also very significant carbon stores.

I was very surprised to learn a couple of years ago that in a hectare of healthy salt marsh around the British coast you may find more carbon than in a hectare of tropical rainforest. Rather than the rainforest with the carbon being mostly in vegetation above (apart from peatland rainforest of course), you find that the carbon is trapped in the sediments, organic material in layers being accumulated as the salt marsh grows. So what we have done with a lot of our salt marshes is we've "reclaimed" them, and turned them into grazing marshes or into agriculture; quite a few of them have been drained or bisected by infrastructure. Some of them have had ports put on top of them.

There's some quite troubling statistics about the level of salt marsh losses particularly around the south eastern coast of England, and that obviously brings various environmental impacts in its wake.

Now one of the very exciting things - and this is work that we've been involved with on the ground in different parts of the country, including with the Environment Agency - is to look at the extent to which it is possible to restore salt marshes not only as a wildlife habitat but also potentially as a carbon store, and also as a way of having more resilient coastal defences into the future as we face the effects of sea level rise and more extreme weather conditions. I know that actually in Therese's (*Therese Coffey, MP Suffolk Coastal*) constituency one place I visited with the Suffolk Wildlife Trust recently (where I saw an area where in - I think it was in 2014 - in a very high tide the coastal defences were overwhelmed and the decision afterwards was to leave it as it was, for this area of grazing marsh that had been inundated by the sea to leave it to return to salt marsh, which did happen, and this was then proven subsequently to be a good way of keeping the sea at bay. It is a very good new habitat bringing in many birds. One of the most interesting thing I heard was how that piece of new salt marsh, only a few years old, has already turned into a very significant nursery area for dover sole and bass that are coming in to spawn there because these shallow water habitats are very important for oceanic fish. So you can foresee even an impact positively out into the near ocean where people in years to come will be catching fish that have been bred in this new area of salt marsh - another kind of example of co-benefit just to emphasise the importance of these coastal ecosystems. On the carbon side there are three marine habitats that hold 50% of the marine carbon: salt marsh, sea grass beds and mangroves; those three habitats between them, holding 50% of (marine) carbon, are just 2% of the coastal and marine area. So (there is) a very high concentration of carbon into these very particular habitats of which we happen to have some in the UK - the sea grasses and salt marshes.

How far does your remit go?

Our remit goes 12 miles out - then the JNCC takes over

We are still waiting for the third tranche of marine protected areas and I don't think we've really looked at that from the point of view of carbon sequestration.

There is also some really interesting stuff being done with seaweed farming, which is also a really good substitute for plastic packaging but is also a massive carbon sink.

Right – there's some really interesting stuff there – huge opportunities for innovation for UK companies to be looking at these opportunities, I would say, and sustainable management of the marine environment in that way, as well.

Ends at recording time 11:21:23