

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Subject: Re: Deadline 4 submission - Faversham Creek Trust / Faversham & Oare Heritage Harbour Group
Date: 20 September 2019 16:49:08
Attachments: [FCT Cleve Hill Submission Deadline 4.pdf](#)
[12 new wind farms.mp3](#)

Dear Sir or Madam

I attach my submission for Deadline 4 of the Cleve Hill Solar Park Enquiry, and an mp3 file of an excerpt from BBC Radio 4 The World at One on 20/09/19 regarding contracts for 12 new wind farms, referred to in my submission (I apologise for the poor audio quality).

Yours faithfully

Sue Akhurst
Chairman
Faversham Creek Trust

Sue Akhurst [REDACTED]

FAVERSHAM CREEK TRUST

REGENERATING FAVERSHAM'S MARITIME HERITAGE

20th September 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 – Deadline 4 Submission

Thank you for giving me the opportunity to speak at the Issue Specific Hearing 6 on Environmental Matters on 11th September 2019.

It became increasingly evident as the day progressed that if this solar power station is given permission to be built, it will place an incredible workload and cost on many public sector bodies, charities, voluntary organisations and individuals to monitor the work during construction, the period of operation and the period of decommissioning.

For example, the local authority Swale Borough Council will be responsible for deciding planning conditions, which can be challenged by the developer in the courts, with potentially very large costs to Swale's residents. The Environment Agency will be responsible for monitoring environmental concerns and ensuring that restrictions and constraints are adhered to, and Kent County Council must monitor and control traffic movements and damage to road surfaces, verges etc. We already know from several building materials recycling sites, such as East Kent Recycling in Oare, that neither the Environment Agency nor KCC have the funds to monitor much less major industrial sites than the proposed Cleve Hill Solar Power Station.

Charities including the RSPB and Kent Wildlife Trust, plus additional volunteers, will need to manage the additional nature reserve area including fertilising it, plus they must keep a check on the drainage ditches and land around the solar panels to ensure that the existing wildlife, including European eels, are as little disturbed as possible. They will conduct counts of wildlife including the wintering birds and Marsh Harriers, to assess the impact of the construction period then they will continue to check populations during the period of operation and maintenance.

These are just a few of the many monitoring and evidence collecting tasks that many organisations will have to conduct over all the years of construction, operation and decommissioning of the site – a period that may be 45 or more years long.



Patrons: The Countess Soudes, Sir David Melville CBE, Professor Christopher Wright
Faversham Creek Trust: Registered Office,
The Purifier Building, Morrisons Wharf,
North Lane, Faversham, Kent ME13 7DY
Charity Number 1146660 • Company Number 7667130 • www.favershamcreektrust.com

The actual technology which will be used for this site, especially the battery technology, is not yet decided. The representatives for the applicant made it clear that they will not be ready to provide final specifications until much nearer the time when the solar power station is constructed, and that could be five years from now. This creates considerable uncertainty, especially if permission is granted before the full facts and risks are known.

While the decommissioning period may be more than 40 years into the future, there are likely to be significant upgrades in the intervening years, as batteries, transformers, solar panels etc need to be replaced, all causing disruption to both wildlife and local residents, and creating risks from the removal process. There may be a serious risk if sulphur hexafluoride is being used in the battery installation, as it has been reported that “the world’s most powerful greenhouse gas (is) on the rise ‘due to the green energy boom’” (see this article in the Daily Telegraph: <https://www.telegraph.co.uk/news/2019/09/13/worlds-powerful-greenhouse-gas-rise-due-green-energy-boom/>)

I am also concerned about how the costs of the decommissioning will be assured by the developer. Over the period of operation the solar power station may change hands several times. Is there an absolute confidence that, when the time comes, the owner at that time will pay the very considerable cost of decommissioning, and not declare bankruptcy or renege in any other way, leaving the cost and work to the local authority or national government? Through a project I am working on with KCC, I am aware that local authorities set aside money in advance of major construction projects, to cover their long term maintenance and future demolition. Should there be a requirement for a similar provision in this case?

Although the issue of Need was not a part of this stage of the Enquiry, I am sure you will be aware that today, Friday 20th September, there was a government announcement that permission has been given to 12 new renewable energy projects which have secured contracts to provide power for 7 million homes, a breakthrough which is bringing the cost of offshore wind down to a level that will require no subsidy. See BBC Radio 4 The World At One timed from minute 2.38 to 3.07.

On the basis of the evidence of potential irreversible damage to this valuable environment, significant costs to the local tax payers, charitable donors and individuals, doubts over the safety issues now and in the future including guarantees for the decommissioning phase, and the unproven need, I contend that permission should not be granted to build Cleve Hill Solar Power Station.

Yours faithfully



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

