

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Cc: [REDACTED]
Subject: Deadline 6 - Marsh Harriers
Date: 04 October 2019 12:41:09
Attachments: [REDACTED]

Dear Hefin,

Please find attached a submission on behalf of GREAT regarding the unknown impacts to marsh harriers.

Kind regards,

Marie

3 October 2019

National Infrastructure Planning
Cleve Hill Solar Park

BY EMAIL

Deadline 6 – Marsh Harriers

Dear Hefin,

I am writing on behalf of GREAT to challenge the Applicant's response to EXA written question 2.1.15 (The Applicant's Comments on Responses to the EXA's Second Written Questions – EXQ2, September 2019, Revision A, Document Reference: 13.3.1). Specifically that *"The Applicant concludes that marsh harriers will continue to forage at the site."*

None of the experts, including Kent Wildlife Trust and Natural England, are able to provide this certainty and we believe they are far better qualified than the Applicant. In fact, during the Examination Matters Hearing on 11 September, Natural England stated that there was *"still uncertainty that marsh harriers may consider the change so great that they won't use the area."*

Additionally, in the same response the Applicant stated *"In ISH 6 on Environmental Matters, the Applicant emphasised the importance of doing what the law requires with respect to the Habitats Regulations, given that no - one can state with certainty what the marsh harriers will do if the project is built. The Applicant advised that as stated in section 3 of the Applicant's submission on recent case law relating to appropriate assessment under Habitat Regulations Assessment [REP2-027] there is no requirement for absolute certainty, rather the requirement is to demonstrate beyond reasonable scientific doubt there will not be a significant adverse effect on a SPA, with the Secretary of State."*

We fundamentally disagree with this statement and this appears to also have been the view of the Secretary of State who recently delayed their decision on the Hornsea Three Wind Farm for 6 months from its original decision date of 2 October. This was as a result of Natural England raising fears that the huge wind farm would harm the populations of kittiwakes, gannets and the lesser black-backed gull which breed on the east coast.

(<https://www.edp24.co.uk/news/environment/hornsea-three-wind-farm-decision-delayed-norfolk-1-6294285>)

Additionally, former Secretary of State for Energy and Climate Amber Rudd argued that solar expansion should not come 'at the expense of our natural environment'.

In view of the huge uncertainties around the impacts the Cleve Hill development may have on the marsh harrier and a number of other key bird species, as well as the local natural environment in its entirety, we ask that this application is accorded the same caution and refused.

Regards,

Marie King
On behalf of GREAT
Graveney Rural Environment Action Team