

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Cc: [REDACTED]
Subject: Heritage Harbour Submission for Deadline 6
Date: 03 October 2019 22:41:29
Attachments: [REDACTED]

Dear Sir/Madam

Attached is our submission for Deadline 6. Please would you confirm receipt in due course.

Regards

David Pollock

David Pollock
Vice Chairman, Faversham & Oare Heritage Harbour Group
15 Faversham Reach, Upper Brents, Faversham, Kent ME13 7LA

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Faversham & Oare Heritage Harbour Group

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

3 October 2019

SENT 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

Heritage Harbour submission for Deadline 6

We write further to our verbal submission at Specific Hearing 6 held on 11 September 2019 and to the Applicant's subsequent submissions for Deadline 5.

At Specific Hearing 6, we were asked if the additional material at that time submitted by the Applicant provided satisfactory answers to the specific issues we had raised. We stated that we would have to reserve our position until we had had a chance to review the data contained in the topographic survey, in particular, which the Applicant had stated, at the Hearing, was already included in the Environmental Assessment.

Following the Hearing, we re-examined the EA, but were unable to identify any specific topographic survey or data within that documentation. The only such information provided is in Figure 7.4, which represents an illustrative overview with no usable empirical data, as we had requested.

Subsequently, as part of their submission for Deadline 5, the Applicant has responded to the Heritage Harbour comments for Deadline 4; has also provided some additional cross sectional data and some further topographic analysis of the development site and its environs.

The documents now provided by the Applicant, apparently in response to our requests include:

Submission item 29, ref 13.3.1 pp 39 – 42. This contains the Applicant's comments on our Deadline 4 submission. The Applicant concludes that their existing submissions and supporting illustrations provide sufficient data and analyses to answer our concerns.

We disagree with this conclusion, as should be evident from our continuing requests for the Applicant to provide extended illustrations, or to replicate our analysis using empirical survey data, or at least to provide appropriate empirical data to allow a reliable analysis of the impact on the surrounds and setting of the proposed development to be made; all as set out in our previous submissions.

Submission item 23; additional cross sections. These contain minimal changes to the previous version: Section E – EE has been extended to include a view of the proposed substation, but not of any existing buildings, as we had requested.

Section B – BB has been revised to take into account a higher viewpoint AOD only.

Section C – CC has been extended to the southern boundary of the site, but does not include views of any existing buildings/ structures, as we had requested.

Sections A – AA and D – DD appear to be unchanged.

None of the sections identifies the actual existing ground levels in comparison to proposed finished ground levels, in terms of specific levels and contours AOD.

Submission item 52, reference 13.4.4. This contains some topographic data relating to a nearby road, together with some roofline levels of adjacent buildings, which are not identified. The relationship of this data to the basis of the proposed development is not explained.

Submission item 56. This appears to be a larger scale version of the topographical analysis set out in Figure 7.4 but, as above, this represents an illustrative overview with no usable empirical data, as we had requested.

Consequently, whilst we accept that the data and analyses we have requested in our previous submissions may not do other than to confirm the Applicant's statements, we cannot confirm our acceptance of the Applicant's assurances without access to this information. We wonder why the Applicant appears still to be reluctant to provide the information or analyses we have requested.

In conclusion, pending a positive response from the Applicant, our earlier submissions and assessments still stand.

Regards

David Pollock

David Pollock
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