

18th Nov 2019



For attention of the Examination Authority
Planning Inspectorate

Re Proposed Solar Farm Cleeve Hill Faversham.

Dear Sir

I wish to comment on various aspects of this application before the closure of the The Examination for this project the date of which is the the 29th November 2019.

I trust that my views will be of sufficient importance to be forwarded to the Secretary Of State.

My background is of a Corporate Banker in the City and in my opinion with a proposed scheme of this magnitude and importance nationally that at a much earlier date due diligence would have been carried out by a leading firm of city accountants on all parties involved with the Cleeve Hill proposal.

Whilst I fully appreciate this is a Planning Decision, personally, I see this as an integral part of the planning process bearing in mind there are huge risks financially and in other sectors of the application which I will come to later in this letter.

FUNDING STATEMENT

I have studied this document from the Examination Library sect APP-020 and would like to make some observations.

The applicant is CHSPL and there should be complete transparency on all 3 companies and its directors involved with the proposal.

2-16 Project Funding ----states that the company has assessed and taken expert advice on the commercial viability of the project and are confident that the project will be commercially viable.

It should be disclosed who gave the expert advice and financials submitted to support that statement.

2-17 Project Funding----- the company has already committed significant resources to date.

In financial terms what were those resources and from what source.

Appendix 1 Wirsol Energy Ltd. It is noted the audited accounts are for year ending 31st Dec 2017.

2.

Therefore they are out of date.

Companies House records show, that at the date of this letter, the accounts to 31st Dec 2018 were due at Companies House by the 30th Sept 2019. It is now 2 months after that date and the records are marked as **overdue**. This is unsatisfactory and the directors should be asked for an explanation.

To fully understand the funding of this application it is considered that up to date, year end, accounts should be produced for Cleve Hill Solar Farm Ltd, and Hive Energy Ltd in addition to Wirsol Energy Ltd.

For Cleve Hill Solar Farm Ltd accounts to 31st March 2019 are due at Companies House by 31st Dec 2019.

For Hive Energy Ltd accounts to 31st March 2019 are due at Companies House by 31st Dec 2019.

Therefore including the over due accounts for Wirsol Energy Ltd at 31st Dec 2019 up to date accounts for all 3 companies should be available at Companies House for scrutiny.

Until such time as those figures can be produced to the Planning Inspectorate planning permission should not be granted.

In looking at Company House records on the directors of those 3 companies it is apparent that in a short space of time each has been involved in numerous appointments as directors of Solar Energy Companies many of which are designated as resigned as director, company dissolved or company active.

The directors should be requested to provide full details of their involvement as company directors in every Solar Company and confirm if the companies were trading in energy or being developed to sell on at a profit.

This is very important as to the application before the planning inspectorate and to the future of the Solar Farm proposed at Cleeve Hill.

There must be assurances that the overall management of the project is protected in the event of any sale and that funds are always in place for decommissioning.

In its current form my view is that the funding statement is inadequate in terms of fact to support the generalisations and makes it difficult for a decision to be made on the project as a whole.

Cont sheet No 3.

3.

B.E.S.S. (BATTERY ENERGY STORAGE SYSTEMS).

The following information I have summarised from www.favershameye.co.uk (Cleeve Hill-batteries included.).

This provides scientific evidence of the risks associated with lithium battery storage. It warns of the risks with fire and leaking toxic chemicals and the risk to human health.

What is known is that li-ion batteries spontaneously burst into flames and when they do, they produce copious volumes of one of the worlds most toxic gases, hydrogen fluoride as well as tiny amounts of an even more lethal gas, phosphoryl fluoride.

To build li-ion batteries on a large scale, as planned for Cleeve Hill, Sunnica Ltd in West Suffolk and East Cambridge plus any further large scale Solar installations, they must be in a very dry area, ideally desert, and far away from human populations. It is recommended they are placed 10/15 miles from the nearest property.

Therefore this creates a risk to the developer which must be insured. The question of insurance is now becoming a problem to obtain even with the worlds largest insurance companies and it is doubtful from the article if in fact it would be available for the Cleeve Hill project.

It is suggested insurance should be available up front before planning permission is granted.

In addition to the financial risks to the developer there are of course the risks to human health.

It is inconceivable that any government in the UK would ever allow such risks to exist.

For this reason alone there is sufficient evidence to ensure these large scale solar farms are not allowed to proceed when including untested B.E.S.S. in their plans. The risks are there for all to see.

If however this is not the case and there is a catastrophe in the future one could only liken it to the Grenfell Tower tragedy in June 2017 when there were 72 deaths and 70 people injured. However at Cleeve Hill the numbers would be far greater.

At Grenfell Tower it was untested cladding thought to be responsible for the fire spreading so rapidly up the tower block. At Cleeve Hill it would be untested li-ion batteries.

As a nation we must learn of the consequences of such risks.

Cont on sheet No 4.

4.

SITES FOR SOLAR

The 2 present proposed Solar Farm Applications with the Planning Inspectorate namely Cleve Hill and Sunnica Ltd have caused unnecessary alarm, concerns and anxiety for the inhabitants of the villages and towns affected and the length of time before a decision is made gives rise to uncertainty. . Both these proposals are the largest in the UK so far and lessons have to be learnt as to the siting of large areas of land for renewable energy and the risks involved.

Developers of solar farms have no legal right to land on ones doorstep and dictate their intentions and if need be compulsory purchase land.

There should be a planned strategy by the Government through out the UK to identify suitable sites, away from inhabited areas in each County. The Solar Trade Association in its notes to support its 10 commitments, comments that ground-mounted solar should ideally utilise previously developed land, brownfield, contaminated and industrial land.

There are many redundant M.O.D sites and airfields that fall into these categories.

Once those sites are identified developers could then bid for them which diverts the problems of the current schemes away from local communities.

I would now like to refer to the Solar Energy UK-roadmap launch speech by the then Minister of State, Gregory Barker published on the 8th October 2013.

The full speech can be viewed at Google [solar energy UK- roadmap launch-gov.uk](http://solar-energy-uk-roadmap-launch-gov.uk)

I quote from page 4:

*However, as solar PV grows in scale and maturity, it is also starting to attract new critics.

*A number of groups across the country have started campaigning against runaway solar PV developments on prime agricultural land, against solar farms deployed on our beautiful countryside.

*It would be a grave mistake of monumental proportions for the industry not to heed these concerns.

***The sector must not allow a few large scale, inappropriately sighted developments to ruin it for everyone else.**

*I have a huge amount of sympathy with those views.

*We have already strengthened the planning guidance to provide a stronger voice to communities affected by projects.

*And made it clear to planners that landscape, rural beauty and local feelings really matter.

Cont on page 5.

5.

In view of the above statements by the Rt Hon Gregory Barker in his speech and the fact 6 years have passed since that Launch it has to be recognised that there have been huge advances in solar technology.

With this has come the huge risks with large battery installations.

Therefore there seems no justification whatsoever in the Developer for Cleeve Hill Faversham obtaining planning permission for their proposal.

