



THE FAVERSHAM SOCIETY

FOUNDED 1962

FLEUR DE LIS HERITAGE CENTRE

ESTABLISHED 1977

Harold Goodwin, Chair, 10-13 Preston Street, Faversham, ME13 8NS

6th August 2018

FAO Planning Inspectorate

**The Cleve Hill Solar Park:
The Society's Critique of the Consultation Process**

The Faversham Society considers the public consultation process conducted by Cleve Hill Solar Park Ltd to be so fundamentally flawed that they cannot be considered to have undertaken their duty to fully engage with and consult the public. The results of this process cannot be taken as a true reflection of public sentiment about the development of the proposed solar power station.

Members of the Society strongly believe that the consultation process has been deliberately designed to obscure the full effect of the Cleve Hill development and to misrepresent the evidence about the damage to the environment, the negative effects on the local economy and the significant reduction in amenity value for both those who live in Faversham and the surrounding villages and for those who visit the area recreationally.

The Faversham Society considers that the consultation process adopted by the developers does not meet the Planning Inspectorate's standards because of deliberate exclusion, bias and misrepresentation. Examples of evidence to support this view are legion but include:

- The widely circulated consultation document published in May 2018 did not fairly represent the scale of the development nor its impacts. The visual representations are misleading.
- Perhaps the most glaring example is the name the developers have chosen for the project. Cleve Hill is but a small part of the area that will be devastated which is in fact the three large salt marshes of Nagden, Graveney and Cleve. To use 'Cleve Hill' is a deliberate misrepresentation – especially as the small area known as Cleve Hill is on the very periphery of the development. Equally misleading for a development of this unprecedented scale is the use of the anodyne term 'park'. This is a solar power station. Before any meaningful consultation can occur the name must be changed to more truthfully reflect what is being proposed.

- Several important aspects of the proposals – most notably the specification of the battery and the area of the power station - have changed during the consultation process.
- If developers were serious about conducting an open and fair consultation with the public they would have used social media as do most other public and private organisations. Such communication channels are now the norm in public consultation and we can only assume that the developer's reluctance to use them signifies deliberate avoidance of meaningful public consultation.
- The public have been effectively excluded from understanding the real implications of the proposals by developers hiding their negative impacts in technical documents of over two thousand pages – impenetrable to anyone without expert competence in a number of scientific fields. This appears to have been a deliberate ploy.
- This exclusion was compounded during the consultation events by the developers avoiding answering direct questions by referring members of the public to this data base. This occurred in meetings hosted by the Faversham Society when they were asked specific questions about environmental impact, noise during and after construction and the modelling of disruption to local traffic.
- Most particularly the vantage points chosen to provide an impression of what the developed site would look like suggested far less visual impact than would in fact be the case. There were no high level or distant views of the whole site. It was said during a consultation meeting that these vantage points were suggested to the developers but that does not excuse them from allowing a misleading picture to be presented to the public.
- A further example of deliberate misrepresentation is the picture of a 'solar pv module mounting structure' on page 6 of the document. The panels here - when scaled against the fence in the photograph – cannot be more than 2 metres high. The Graveney panels could well be 4 metres high. The 'indicative fencing and CCTV' photo on page 8 shows no panels in evidence at all!
- Moreover the contents of the 'non-technical summary' published in May 2018 on closer examination does not match the data in the main PIER. Assertions that there are 'no significant noise and vibration effects' (Page 23 para 12) does not tally with the evidence in the technical document that there would be noises of 100db generated by the plant.
- Moreover assertion that the 'socio-economic' impact of the development will have 'negligible adverse effect' (see Para 13 Page 23) is unsupported. The data used was 'Swale and the wider Kent area' and not the more immediate environs of Faversham and the surrounding villages. The public need to see the output of economic modelling for this more relevant for this

more local area particularly on tourism and visitors and the many small local businesses that service their needs.

- The assertion that ‘the effect of the development on land use will be negligible’ – even at a common sense level is laughable. If that were the case then why the consultation?
- Descriptions of the effect of the development on wild life end with phrases like ‘negligible’, ‘low magnitude’, ‘not significant’, ‘no material effects’, ‘no direct disturbance’, ‘disturbance to birds is not predicted to occur’. Experts within the Society assure us that considerable damage to rare and protected species will occur. However we await the judgement of the RSPB and the Kent Wildlife Trust to make the inaccuracy of the developer’s assertions evident.

Submitted on behalf of the Board by

Harold Goodwin

Chair of the Faversham Society

