

10th October 2018

Graveney Rural Environment Action Team
3 Nagden Cottages
Graveney
Faversham
Kent ME13 9DP

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

Re: Cleve Hill Solar Park Ref EN010085

Dear Ms Williams,

Thank you for your response and advice dated 13 July regarding the non-compliance, by Cleve Hill Solar Park developers, with the statutory requirement to consult with the community.

I represent GREAT (Graveney Rural Environment Action Team) and we consider that the process involved in applying for a National Infrastructure Planning Project is heavily weighted towards the developers and not the community impacted by this proposed development. This includes the location of the site, the use and abuse of the Rochdale envelope, and the by-passing of the local planning process.

We also question the reasons for the proposal to be regarded as nationally important as it is likely that the energy produced by this solar farm - should it go ahead – will be sold to the highest European bidder, so it is unlikely that there will be any nationally important benefits from this project.

In addition we object to planning notes being distributed on a national basis when there has been no verification of the reliability of the input from the developers. Their responses and assertions are taken as a true reflection of their actions when they do not reflect reality.

There are a number of concerns that we would like the National Planning Inspectorate to take into account in respect of the meetings that took place with Cleve Hill Solar Park developers and we have outlined most of these below. These points do need to be taken into account when considering the application, as it clearly demonstrates attempts by the developers to misrepresent evidence about the consultation and planning process.

- The Planning Inspectorate Meeting Note 3 May 2017, *Landscape and Visual Impact*:
 - *“The Applicant advised that many of the properties close to the site do not face towards the proposed application site. The Applicant was advised to engage with the*

residents of dwellings closest to the site at an early stage.” It is incorrect to state that the properties close to the site do not face towards the proposed application site. We make particular reference to properties in Nagden and Broom Street. In addition, not all residents of dwellings closest to the site were contacted at an early stage, and this is particularly the case for those living in the Broom Street area.

- The Planning Inspectorate Meeting Note 23 February 2018, Consultation:
 - *“The Applicant noted that interest in the Proposed Development had been very low on the Isle of Sheppey compared to the other locations used.”* This statement implies a lack of interest on behalf of the residents on the Isle of Sheppey. However, **this response was inevitable as the consultation event took place in a remote, inaccessible location with very limited parking with only one evening event offered.**

- The Planning Inspectorate Meeting Note 26 March 2018, *Non-Statutory Consultation Update:*
 - *“The meetings with the residents closest to the site (which presented specific mitigation proposals for the affected properties) were well received. The residents were appreciative that their concerns regarding the panels on the south-eastern section of the site (which have now been removed from the project design) had been taken on board.”* **It is incorrect to report that the meetings with the residents closest to the site were well received.** GREAT received four complaints from “near neighbours” about the behaviour of Mr Brennan at those meetings. They referred to his bullying and threatening behaviour and the fact that they were told that they should appreciate that the developer “was willing to take the time to engage with them.” **It is also incorrect to say that the residents were appreciative that their concerns regarding the proposal had been taken on board.** This is a circular argument as in fact the statement only relates to the opinions of one or two households, not the many residents who will be affected by the development.
 - *“GREAT was noted to be opposed to the Proposed Development and the Applicant is continuing dialogue with this group. Some issues raised at these meetings relate include community benefits and enhanced rights of way.”* **This is untrue, at the time of the meeting with The Planning Inspectorate no meetings had taken place with GREAT and the developers.** GREAT had raised with Swale Borough Council, Canterbury City Council and Kent County Council the unwillingness of the developers to formally engage. As a result of their intervention an inaugural meeting took place with GREAT and the developers on the 9th May 2018 in the Alexander Centre, minuted by the Parish Clerk. This is some 6 weeks after the Planning Inspectorate Meeting of the 26th March where **Cleve Hill Solar Park alleged that GREAT is only interested in community benefits and enhanced rights of way.** No requests for community benefits or enhanced rights of way have been made by GREAT and reporting information that is not factually correct is an attempt by the developers to portray GREAT in a negative light.

- The Planning Inspectorate Meeting Note 30 April 2018, *Non-Statutory Consultation*:
 - *“The Applicant has had several meetings with various stakeholders such as the National Fruit Collection with regard to the possibility of setting up a community orchard..”* **The National Fruit Collection is not a stakeholder as it is not situated in the affected area and, at this stage, there had been no consultation about the possibility of setting up a community orchard.** Furthermore, the view of the village is strongly opposed to having a community orchard. The latest update received from the developers (August '18) confirmed this feedback and advised that the idea of a community orchard has now been withdrawn.
 - *“... the owners of a local holiday park to discuss traffic impacts and how to best engage with the users of the holiday park (as some are seasonal visitors to the area).”* **The holiday park referred to will not be affected by traffic as it is sited several miles from the proposed development site and there are various entry and exit routes for that location. More importantly, no consultation has taken place with the residents of Graveney, who will be significantly affected on a daily basis for up to two years by this development.** During the second consultation phase, the traffic ‘expert’ employed by the developers was unable to meaningfully answer any questions about the potential impacts raised by the residents.

A feedback session about the phase 2 consultation was facilitated on the 19th September for statutory stakeholders to which GREAT were invited. There was in fact no real feedback on the phase 2 consultation, other than some copies of their leaflet. The traffic consultation itself was limited to a few points and merely served to confirm the destructive nature of the planned transport movement.

We would like the National Planning Inspectorate to take these points into account when considering this application, as it clearly demonstrates attempts by the developers to misrepresent evidence about the consultation process.

Yours sincerely,

Michael Wilcox

GREAT - Chair