CLEVE HILL SOLAR PARK

Consultation Report: Appendices 1-13

November 2018

Document Reference: 5.1.1
Section 37(7) of the Planning Act 2008

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Consultation Report

List of Appendices

Appendix No.	Title
1	Consultation Compliance Table
2	Applicant Regard to Section 47 Consultation Responses
3	Applicant Regard to Section 42 Consultation Responses
4	Section 46 Notification to Planning Inspectorate
5	Section 42 Consultees Consulted Under Section 42 of the 2008 Planning Act
6	Notification to Section 42 Consultees of Section 42 Consultation (31 May – 13 July 2018)
7	Section 47, Duty to Consult Local Community – Statement of Community Consultation Cover Letter to Planning Authorities.
8	Section 47, Duty to Consult Local Community – Draft Statement of Community Consultation
9	Section 47, Duty to Consult Local Community – Final Statement of Community Consultation (09 November 2017)
10	Section 47 Statement of Community Consultation Advertisements
11	Stakeholder Briefing Pack (Autumn 2017)
12	Publicity of Phase One Section 47 Community Consultation Events
13	Phase One Section 47 Community Consultation Leaflet (November 2017)
14	Phase One Section 47 Community Consultation Materials
15	Phase One Section 47 Consultation Analysis
16	Phase One Section 47 Community Project Update
17	Section 48 Notice
18	Section 48 Notice Advertisements
19	Publicity of Phase Two Section 47 Community Consultation Events
20	Phase Two Section 47 Community Consultation Leaflet (May 2018)
21	Phase Two Section 47 Community Consultation Materials
22	Phase Two Section 47 Consultation Analysis
23	Phase Two Section 47 Community Project Update
24	Community Newsletter (May 2018)
25	Project Website
26	Ongoing Areas of Agreement
27	Section 47 Consultee Full Response (as requested by consultees)
28	Section 47 Consultation Coverage Area
29	Late Section 42 Notice to Medway Internal Drainage Board
30	Section 42 Landowner (Section 44 consultee) notification
31	Elected Members Distribution List
32	Section 48 Site Notices and Distribution Area
33	Habitat Management Steering Group Meeting Notes

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Consultation Report

Appendix 1: Consultation Compliance Table

Ref	Legislation/ Guidance/ Advice	Compliance Y/N	Response
Planning Act 2008			
Section 42	**Duty to consult** (1) The applicant must consult the following about the proposed application (a) Such persons as may be prescribed	**y**	The Applicant consulted all persons listed as a prescribed consultee notified by the Planning Inspectorate under Regulation 11(1)(a)o of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') and hereafter referred to as the 's42 consultees'. See Appendix 5 of the Consultation Report.
	(aa) the Marine Management Organisation, in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection (2)	**y**	Preliminary Environmental Information (PEIR) submitted in May 2018 showed a change in the red line boundary in response to dialogue with the Environment Agency about maintenance of the flood defences along the northern edge of the Development boundary. In response the Applicant changed the red line boundary to include the flood defences and an area of the intertidal area to the north of the site. Owing to this change the Applicant consulted the Marine Management Organisation (MMO) on the PEIR. The Applicant also informed the MMO of the consultation on the Statement of Community Consultation (SoCC), of which the MMO were satisfied of the approach.
	(b) Each local authority that is within Section 43	**y**	The Applicant consulted each local authority that is within s43. For the sake of clarity, these are listed below.

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			‘B’ Host Authorities: • Swale Borough Council • Kent County Council • Canterbury City Council ‘A’ Neighbouring Authorities: • Ashford Borough Council • Maidstone Borough Council • Medway Council • Thurrock Council • London Borough of Bexley • London Borough of Bromley • East Sussex County Council • Surrey County Council Owing to a change of the red line boundary, the following neighbouring local authorities were scoped in by the Planning Inspectorate as prescribed consultees as listed in the revised Schedule 1 of the APFP Regulations as received by the Planning Inspectorate on 25 May 2018: • Folkestone and Hythe District Council • Thanet District Council • Dover District Council

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			All A and B authorities were consulted as part of the s42 consultation which commenced on 31 May 2018 and concluded on 13 July 2018.
	(c) the Greater London Authority if the land is in Greater London; and		Not applicable.
	(d) each person who is within one or more of the categories set out in Section 44.	**y**	The Applicant consulted each person who is within one or more of the categories set out in s44. See Book of Reference (document reference number 4.3).
	(2) The areas are— (a) waters in or adjacent to England up to the seaward limits of the territorial sea; (b) an exclusive economic zone, except any part of an exclusive economic zone in relation to which the Scottish Ministers have functions; (c) a Renewable Energy Zone, except any part of a Renewable Energy Zone in relation to which the Scottish Ministers have functions;	**y**	Please see response to 42(1)(aa) above.

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	(d) an area designated under section 1(7) of the Continental Shelf Act 1964, except any part of that area which is within a part of an exclusive economic zone or Renewable Energy Zone in relation to which the Scottish Ministers have functions.		
Section 45	**Timetable for consultation under Section 42** (1) The applicant must, when consulting a person under section 42, notify the person of the deadline for the receipt by the applicant of the person's response to the consultation.	**y**	All s42 consultees were informed of the deadline in the cover letter dated 31 May 2018 notifying them of the commencement of the Section 42 consultation. The deadline given was 13 July 2018. The consultation process therefore ran for a period of 6 weeks (which is longer than the statutory 28-day minimum as per s45(2)).
	(2) A deadline notified under subsection (1) must not be earlier than the end of the period of 28 days that begins with the day after the day on which	**y**	The Applicant undertook consultation on the PEIR in July 2017. All s42 consultees were formally notified in writing of the commencement of statutory consultation on 30 May 2018. The s42 consultees were also notified by email on 31 May 2018. The deadline for responding to the

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	the person receives the consultation documents.		s42 consultation was 13 July 2018 (therefore giving consultees 42 days in total to respond). The consultation ran in parallel to consultation under sections 47 and 48 of the 2008 Act. Following the s42 consultation, it was recognised that the Medway Internal Drainage Board (MIDB) had not been consulted. Therefore, under s42, the MIDB were formally notified of the consultation and PEIR on 18 July 2018 and a consultation deadline of 30th August 2018 was provided (allowing the statutory 28 days consultation period). A statutory consultation deadline was provided as the Applicant was already in dialogue with MIDB regarding their response.
	(3) In subsection (2) "the consultation documents" means the documents supplied to the person by the applicant for the purpose of consulting the person.	**y**	The consultation documents provided to all s42 consultees as listed in Appendix 5 comprised of: • A covering letter (see Appendix 6) • A copy of the Development site plans including the proposed site boundary (See Appendix 6) • A USB device containing the full Preliminary Environmental Information Report (PEIR) including a Non-Technical Summary ('PEIR NTS') • A hard copy of the notice publicised in accordance with s48 of the 2008 Act

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			(including details of the public consultation events and the locations where the consultation documents could be inspected free of charge) (see Appendix 18)
Section 46	**Duty to notify Secretary of State of proposed application** (1) The applicant must supply the Secretary of State with such information in relation to the proposed application as the applicant would supply to the Secretary of State for the purpose of complying with section 42 if the applicant were required by that section to consult the Secretary of State about the proposed application.	**y**	The Applicant notified the Planning Inspectorate in writing under s46 of the 2008 Act on 31 May 2018 that it was intending to commence consultation under s42 of the 2008 Act on the PEIR commencing on 31 May and closing on 13 July 2018. Consultation documents included in this package: • A covering letter (see Appendix 4) • Example copies of the s42 letters (one letter type being for prescribed consultees and the other letter being for landowners) (See Appendix 6) • A copy of the Development site plans including the proposed site boundary (See Appendix 6) • A USB device containing the full Preliminary PEIR including a 'PEIR NTS' • A hard copy of the notice publicised in accordance with s48 of the 2008 Act (including details of the public consultation events and the locations where the consultation documents could be
	(2) The applicant must comply with subsection (1) on or before commencing consultation under section 42.		

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			inspected free of charge) (see Appendix 18)
Section 47	**Duty to consult local community** (1) The applicant must prepare a statement setting out how the applicant proposes to consult, about the proposed application, people living in the vicinity of the land.	**y**	The Applicant prepared a Statement of Community Consultation (SoCC). An explanation of how the SoCC was developed including consultation with the local authorities within s43(1) is provided in Chapter 6 of the Consultation Report. The draft SoCC can be found in Appendix 8.
	(2) Before preparing the statement, the applicant must consult each local authority that is within section 43(1) about what is to be in the statement.	**y**	Before preparing the statement, the Applicant consulted each local authority that is within s43(1), being: Kent County Council and Swale Borough Council, on the content of the statement. Owing to the proximity of the Development red line boundary to the jurisdiction of Canterbury City Council (approximately 50m at the time of preparing the SoCC), Canterbury City Council were also consulted on the draft SoCC. The PEIR submitted in May 2018 showed a change in the Development site boundary in response to dialogue with the Environment Agency about maintenance of the flood defences

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			along the northern edge of the Development. The site boundary entered the jurisdiction of Canterbury City Council qualifying authority as a host (B) authority. Canterbury City Council and the additional neighbouring A authorities were consulted as part of the s42 consultation from 31 May – 13 July 2018. Prior to the red line boundary change, Canterbury City Council had been treated as a 'B' authority owing to their location adjoining, but outside of the original red line boundary and as set out above were consulted on the draft Statement of Community Consultation (SoCC) together with the host authorities Kent County Council and Swale Borough Council.
	(3) The deadline for the receipt by the applicant of a local authority's response to consultation under subsection (2) is the end of the period of 28 days that begins with the day after the day on which the local authority receives the consultation documents.	**y**	Consultation on the draft SoCC commenced on 02 October 2017 and ended on 31 October 2017 (allowing a 28-day response period from the day after the day on which the document was received). Local authorities were sent hard copy letters and were emailed on 02 October 2017 notifying them of the commencements of the draft SoCC consultation. Responses were received from Kent County Council, Swale Borough Council and Canterbury City Council. A detailed overview of how the Applicant responded to the comments provided in shown in Chapter 6 of the Consultation Report.

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	(4) In subsection (3) "the consultation documents" means the documents supplied to the local authority by the applicant for the purpose of consulting the local authority under subsection (2).	**y**	The consultation documents supplied by the Applicant included: - an explanatory cover email and hard copy - the draft SoCC.
	(5) In preparing the statement, the applicant must have regard to any response to consultation under subsection (2) that is received by the applicant before the deadline imposed by subsection (3).	**y**	The Applicant had regard to all relevant comments received on the draft SoCC. Details of the comments received and how the Applicant responded are provided in Chapter 6 of the Consultation Report.
	(6) Once the applicant has prepared the statement, the applicant must— (za) make the statement available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land,	**y**	The SoCC was publicised across the consultation area as detailed in Chapter 6, Table 7. The SoCC was published on 9 November 2017 in the Kentish Gazette (group) and the Kent Messenger (series). Copies of the SoCC advert as published in the local newspapers are provided Appendix 10. In addition to the above title publications supported by Appendix 10, the SoCC advertisement was also reproduced in the

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	(a) publish in a newspaper circulating in the vicinity of the land, a notice stating where and when the statement can be inspected, and (b) publish the statement in such manner as may be prescribed.		following publications which the Applicant does not have copies of; Faversham News, Whitstable Gazette, Herne Bay Gazette, Medway Messenger. The coverage area provided by these publications is shown in Chapter 7. The Applicant also made the statement available for inspection by the public on the Development website (www.clevehillsolar.com) from 9 November 2017 and in hard copy format at various Local Information Points and Community Access Points (CAP sites) (See Appendix 28).
	(7) The applicant must carry out consultation in accordance with the proposals set out in the statement	**y**	The Applicant undertook consultation under s47 of the 2008 Act in accordance with the SoCC. See Chapter 6 of the Consultation Report for a summary of the actions undertaken by the Applicant to meet the obligations outlined in the SoCC.
Section 48	**Duty to publicise** (1) The applicant must publicise the proposed application in the prescribed manner.	**y**	The Applicant publicised the application in the prescribed manner set out in regulation 4 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations) in accordance with s48 of the 2008 Act on:

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			• 23 and 30 May 2018 in the Sheerness Times Guardian and Sittingbourne News Extra Guardian • 24 and 31 May 2018 in the Kentish Gazette (group). • 31 May 2018 in Fishing News, Lloyd's List, The Guardian and London Gazette Consultation under s48 of the 2008 Act ran in parallel with statutory consultation on the PEIR between 31 May – 13 July 2018. The published notices can be found in Appendix 18.
	(2) Regulations made for the purposes of subsection (1) must, in particular, make provision for publicity under subsection (1) to include a deadline for receipt by the applicant of responses to the publicity.	**y**	The s48 notice included a deadline of 13 July 2018 for receipt of responses to the publicity, meaning a total of 42 days and therefore exceeding the 28 days statutory minimum response time.
Section 49	**Duty to take account of responses to consultation and publicity** (1) Subsection (2) applies where the applicant—	**y**	The Applicant has had regard to all relevant responses in accordance with s49 and has acted upon them where possible. Compliance with s49 (2) is demonstrated in Chapters 10, 11 and 12 of the Consultation Report for Sections 47, 42 and 48 respectively.

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	(a) has complied with sections 42, 47 and 48, and (b) proposes to go ahead with making an application for an order granting development consent (whether or not in the same terms as the proposed application).		Responses received to all feedback received to the Development is set out in the following appendices: - Appendix 2: Responses received to feedback received under s47 - Appendix 3: Responses received to feedback received under s42 All responses received and recorded in Appendices 2 and 3, of this Consultation Report have been prepared following guidance set out in Planning Inspectorate Advice Note 14: Compiling the Consultation Report.
	(2) The applicant must, when deciding whether the application that the applicant is actually to make should be in the same terms as the proposed application, have regard to any relevant responses.		
	(3) In subsection (2) "relevant response" means— (a) a response from a person consulted under section 42 that is received by the applicant before the deadline		

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	imposed by section 45 in that person's case, (b) a response to consultation under section 47(7) that is received by the applicant before any applicable deadline imposed in accordance with the statement prepared under section 47, or (c) a response to publicity under section 48 that is received by the applicant before the deadline imposed in accordance with section 48(2) in relation to that publicity.		
Section 50	**Guidance about pre-application procedure** (1) Guidance may be issued about how to comply with the requirements of this Chapter.	**y**	The Applicant has had regard to the Department for Communities and Local Government (DCLG, 2015), Planning Act 2008: guidance on the pre-application process (as set out in this Appendix).

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			The Applicant has also had regard to Advice Notes prepared by the Planning Inspectorate (as set out in this Appendix).
	(2) Guidance under this section may be issued by the Secretary of State.		
	(3) The applicant must have regard to any guidance under this section.		
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009			
Reg 3	**Prescribed consultees** The persons prescribed for the purposes of section 42(a) (duty to consult) are those listed in column 1 of the table in Schedule 1 to these Regulations, who must be consulted in the circumstances specified in relation to each such person in column 2 of that table.	**y**	The Applicant consulted all persons prescribed in the EIA Regulations who were deemed relevant to this Application, known in the Application as the 's42 consultees'. See Appendix 5 of the Consultation Report. In addition, a number of groups were scoped in by the Applicant for the purposes of formally consulting with. A full list of the prescribed consultees is provided in Appendix 5 of the Consultation Report.
Reg 4	**Publicising a proposed application** (1) This regulation prescribes for the purpose of section 48(1) (duty to publicise), the manner in which an	**y**	The Applicant published a notice which included all the matters set out in paragraph (3). Copies of the s48 notices are provided in Appendix 18 to the Consultation Report. This s48 notice was publicised as follows:

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<td>applicant must publicise a proposed application.</td>
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<td>(2) The applicant must publish a notice, which must include the matters prescribed by paragraph (3) of this regulation, of the proposed application—

(a) for at least two successive weeks in one or more local newspapers circulating in the vicinity in which the proposed development would be situated;

(b) once in a national newspaper;

(c) once in the London Gazette</td>
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<table>
<tr><th>Publication</th><th>1st Insertion</th><th>2nd Insertion</th></tr>
<tr><td>Sheerness Times Guardian and Sittingbourne News Extra Guardian</td><td>23 May 2018</td><td>30 May 2018</td></tr>
<tr><td>Kentish Gazette (group) including Faversham News</td><td>24 May 2018</td><td>31 May 2018</td></tr>
<tr><td>Fishing News</td><td>31 May 2018</td><td></td></tr>
<tr><td>Lloyd’s List</td><td>31 May 2018</td><td></td></tr>
<tr><td>The Guardian</td><td>31 May 2018</td><td></td></tr>
<tr><td>London Gazette</td><td>31 May 2018</td><td></td></tr>
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In addition to the publications in Table 19 supported by Appendix 18, the Section 48 notice was also reproduced in the following publications which the Applicant does not have copies of; Whitstable Gazette, Herne Bay Gazette.
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	and, if land in Scotland is affected, the Edinburgh Gazette; and (d) (d)where the proposed application relates to offshore development— (i) once in Lloyd's List; and (ii) once in an appropriate fishing trade journal.		
	(3) The matters which the notice must include are— (a) the name and address of the applicant; (b) a statement that the applicant intends to make an application for development consent to the Secretary of State;	**y**	Both first and second s48 notices included all of the elements listed under Regulation 4(3) including stipulation of a deadline for responses being 13 July 2018. The published s48 Notices are included in Appendix 18

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	(c) a statement as to whether the application is EIA development; (d) a summary of the main proposals, specifying the location or route of the proposed development; (e) a statement that the documents, plans and maps showing the nature and location of the proposed development are available for inspection free of charge at the places (including at least one address in the vicinity of the proposed development) and times set out in the notice;		

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	(f) the latest date on which those documents, plans and maps will be available for inspection (being a date not earlier than the deadline in sub-paragraph (i)); (g) whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge; (h) details of how to respond to the publicity; and (i) a deadline for receipt of those responses by the applicant, being not less than 28 days following the date when the notice is last published.		

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Infrastructure Planning (Environmental Impact Assessment) Regulations 2017			
Reg 8	**Procedure for establishing whether environmental impact assessment is required** (1) A person who proposes to make an application for an order granting development consent must, before carrying out consultation under section 42 (duty to consult) either— (a) ask the Secretary of State to adopt a screening opinion in respect of the development to which the application relates; or (b) notify the Secretary of State in writing that the person proposes to provide an environmental statement in respect of that development.	**y**	The Applicant submitted a scoping report to the Planning Inspectorate on 11 December 2017, confirming that it intended to provide an Environmental Statement in respect of Cleve Hill Solar Park pursuant to Regulation 8(1)(b) and requested a scoping opinion, pursuant to Regulation 10(1).

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	(3) A request or notification under paragraph (1)(a) must be accompanied by— (a) a plan sufficient to identify the land; (b) a description of the development including in particular— (i) a description of the physical characteristics of the whole development and, where relevant, of demolition works; (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;	**y**	A plan sufficient to identify the land was provided as an appendix to the Regulation 6 letter. A Scoping Report was produced and issued to Secretary of State, which provided a description of the nature and purpose of the Development and an explanation of the possible effects of the Development identified at that stage.
	(3A) A person notifying the Secretary of State under paragraph (1)(b) must provide, at the same time as giving notification, the information		This was complied with in complying with regulation 8(3) above.

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	listed in paragraph (3)(a) and (b).		
Reg 12	**Consultation statement requirements** (1) The consultation statement prepared under section 47 (duty to consult local community) must set out — (a) whether the development for which the applicant proposes to make an application for an order granting development consent is EIA development; and (b) if that development is EIA development, how the applicant intends to publicise and consult on the preliminary environmental information.	**y**	The Applicant stated in the SoCC that the proposed application is EIA development and that a PEIR would be available on the project website, as hard copies, at the consultation events and at Community Access Points (CAP sites) specified in the contact information. The published SoCC can be found in Appendix 9.
Reg 13	**Pre-application publicity under section 48 (duty to publicise)**	**y**	The consultation documents provided to all s42 consultees as listed in Appendix 5 comprised of: • A covering letter (see Appendix 6)

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	Where the proposed application for an order granting development consent is an application for EIA development, the applicant must, at the same time as publishing notice of the proposed application under section 48(1), send a copy of that notice to the consultation bodies and to any person notified to the applicant in accordance with regulation 11(1)(c).		• A copy of the Cleve Hill Solar Park site plans including the proposed site boundary (See Appendix 6) • A USB device containing the full PEIR including a PEIR NTS • A hard copy of the notice publicised in accordance with s48 of the 2008 Act (including details of the public consultation events and the locations where the consultation documents could be inspected free of charge) (see Appendix 18)
Advice Note 16: The developer's pre-application duties (No longer in force but referred to as best practice)			
	Notification of proposed application The Planning Inspectorate encourages developers to notify it as soon as feasible as it assists the Planning Inspectorate in its processing both by allocating staff to particular projects and by storing and	**y**	The Applicant has held frequent meetings with the Planning Inspectorate since its inception and has kept the Planning Inspectorate updated as requested. Meetings in the form of conference calls or face to face meetings have been held on the following dates: • 17/09/2015 • 03/05/2017 • 23/02/2018 • 26/03/2018 • 30/04/2018 • 13/08/2018

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	managing information received relating to a definite proposed project.		• 24/10/2018
	Section 42 Consultation This can be carried out first and changes to the scheme can be made as a result – for example to take account of fundamental environmental issues such as flooding – before the community consultation is carried out. A balance needs to be achieved between providing well developed details which may only be possible after extensive project development work and a less precise definition which can be amended in the light of consultation. The Planning	**y**	The Applicant has carried out extensive pre-application consultation with s42 consultees. The Applicant commenced community consultation in accordance with s47 in November 2017. In parallel to the ongoing s47 consultation, and leading up to the publication of the PEIR, the Applicant has undertaken extensive and ongoing non-statutory consultation with s42 consultees. Details of this non-statutory consultation can be found in Chapter 5 of the Consultation Report. This non-statutory consultation together feedback from phase one s47 consultation, informed changes to the Development as presented in PEIR. The Applicant commenced s42 consultation with s42 consultees on 31 July 2018 in parallel with phase two s47 consultation. The Applicant consulted on PEIR as part of the s42 consultation. The PEIR showed a candidate design for the Development and demonstrated changes to Development design elements in response to the previous ongoing consultation. A consultation period for s42 and phase two s47 responses was given as 31 May – 13 July 2018.

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	Inspectorate will expect the balance between these issues to be carefully considered, and it may be that an approach to the local authority under s47 prior to publishing the SOCC could seek the local authority's advice on whether an early community consultation would be advisable in the circumstances of the case. There is nothing laid down in the 2008 Act or relevant Regulations that requires preliminary environmental information to be provided at the s42 consultation stage. If very little information on the project is		The Applicant purposely ran the s42 consultation and phase two s47 in parallel to enable consultation on the PEIR with s42 consultees and the community. A generous consultation period of 42 days was provided for responses to the PEIR. The Applicant has had regard to all relevant responses in accordance with s49 and has acted upon them where possible as detailed in full in Appendix 2. Compliance with s49 (2) is demonstrated in Chapters 10, 11 and 12 of the Consultation Report for sections 47, 42 and 48 of the 2008 Act respectively. Key Development changes in response to consultation are set out in Chapter 1 of the Consultation Report together with a visual representation of the Development design changes made by the Applicant as illustrated in Figures 1-3 in Chapter 1. The Consultation Report together with this Appendix detail how the Applicant has complied with the provisions of the 2008 Act and other relevant legislation and guidance. This consultation report has been prepared in accordance with s37(7)(c) of the 2008 Act and

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	provided to local authorities, statutory consultees, landowners and others at the s42 stage, the ability to demonstrate that comments have been taken into account in developing the proposal could be hampered. It is therefore possible to comply with the statutory requirements under s46 and s42 of the 2008 Act with less than full information on the application, but unless there is a clear iterative consultation process followed and further documentation provided to consultees during the process the developer will risk being unable to		details the consultation as either ongoing non-statutory consultation or consultation under sections 47, 42 or 48 of the 2008 Act and how consultation responses have been responded to by the Applicant.

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	demonstrate that the scheme was carefully considered in the light of consultation responses received. The consultation report to be submitted with the application is where the applicant will set out how in its view it has complied with its duties (see Advice Note 14: Compiling the consultation report).		
	Section 47 Consultation There is a duty on the developer to first consult the local authority in respect of the content of the SOCC (s47(2)). Their knowledge is key. For example, socio-economic, cultural, historical and other characteristics may influence	**y**	The Applicant consulted the relevant local authorities with regards to the SoCC as detailed in Chapter 6 of the Consultation Report. As detailed in this chapter, the Applicant responded to all comments made.

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	decisions on the geographical extent of consultation and the methods that will be most effective in the particular local circumstances. Local authorities will also hold valuable information on umbrella community groups in the local area which could complement responses from the population generally.		
	Section 47 The SOCC needs to state whether the proposal is EIA development and how the preliminary environmental information is to be consulted upon (Reg 10 of the EIA Regulations),	**y**	The SoCC stated that the Development is EIA development and noted how the Applicant will consult on the PEIR. The Applicant purposely ran the s42 consultation and phase two s47 in parallel to enable consultation on the PEIR with s42 consultees and the community. A generous consultation period of 42 days from 31 May – 31 July 2018 was provided for responses to the PEIR.

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	and so when a developer consults a local authority on the SOCC the local authority will need to have the preliminary environmental information so that its response can be an informed one. The consultation with local authorities under s42 and contact with local authorities on the SOCC under s47 can occur in parallel.		
	Section 47 The appropriate area for consultation must include “people living in the vicinity of the land” (s47(1)). There is a statutory duty on the potential applicant to carry out the consultation as proposed in the SOCC	**y**	The core consultation zone for the Development was identified by the following items: • Using a preliminary zone of theoretical visibility to assess the areas that may experience a degree of visual impact form the proposed development; • Using natural and human geographical boundaries, for example using Junction 7 of the M2 as the most southerly point for the core consultation area, and the most

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	(s47(7)) and therefore the content of that document is important so that the community understands on what and how it will be consulted.		northerly point being the foot of Leysdown-on-Sea; • Including areas of access options, which covered the Head Hill Road, Seasalter Road and Faversham Road Core Consultation Zone A core consultation zone was agreed as outlined in the SoCC and detailed in Chapter 7. This zone centres on the proposed development site and extends outwards to include the nearest villages of Graveney, Goodnestone, Harty (Sheppey) and Oare, as well as the built-up area of Faversham and the majority of Seasalter. Properties in the core consultation zone directly received consultation materials such as leaflets and newsletters through their letter boxes. The core consultation zone comprised of over 12,000 properties and local businesses. Wider Consultation Area The Applicant recognised that there may be some interested individuals or parties that do not live within the agreed core consultation zone. We are committed to ensuring that these people are still aware of the Solar Park proposals and their opportunities to get involved. Means such as media advertising were used to notify residents

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			within the wider local area the pre-application consultation. Informative consultation materials will also be available to view and collect from community access points outside of our core consultation zone.
	Additional guidance on the content of the SoCC To ensure the local community appreciates the context within which they are being consulted, the SOCC should include a succinct summary of the Planning Inspectorate's role as examining authority, and draw attention to the status of National Policy Statements (NPSs). If a relevant NPS is in place, it is important to provide a realistic steer to the local community on the appropriate scope of any subsequent feed-back. It should also	**y**	Section 4 of the SoCC (see copy of the SoCC in Appendix 9) sets out the role of the Planning Inspectorate. The importance of pre-application consultation in relation to the examination process after an application is accepted by the Planning Inspectorate was presented in the SoCC in Section 4. There is no current NPS for solar.

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	highlight the importance of the preapplication consultation in relation to the examination process.		
	Additional guidance on the content of the SoCC The SOCC should provide sufficient detail of the project, referring to both positive benefits to the local community that would result from the development and to the issues which could be considered negative elements of the NSIP so as to encourage participation in the process. The scale of the proposal should be described. The SOCC should also indicate what information will be provided during the consultation process	**y**	A Development description and anticipated scale of the Development are described in Section 3 of the SoCC (Appendix 9) together with a description of the benefits of the Development. Section 5 of the SoCC (Appendix 9) outlines what will be consulted on including the short term and long-term impacts of the Development and benefits. During consultation the community were able to comment on preferred mitigation for the Development.

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	on the scope for any associated land restoration, landscaping, other mitigation or compensatory measures for natural habitats impact.		
	Additional guidance on the content of the SoCC The developer should consider whether the most appropriate consultation will involve multiple stages, and whether there is a role for building knowledge at early stages which could help communities understand either technical or other elements of the proposal. It is more likely that the quality of response and the sense of satisfaction felt in the community that views have been taken seriously will be enhanced by enabling	**y**	In keeping with the iterative multi-stage consultation process the Applicant undertook two phases on community consultation to enable the design of the Development to evolve in response to feedback through consultation. The first phase of community consultation ran between 9 November and 22 December 2017 and the second phase ran between 31 May and 13 July 2018. Ongoing consultation in accordance with the SoCC took place between these phases and feedback was encouraged beyond 13 July 2018.

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	members of the public to give valuable, informed local insights. If the developer decides such methods are appropriate to the scheme, the details should be included in the SOCC.		
	Additional guidance on the content of the SoCC If relevant, the SOCC should also take account of any other major consultation exercises being undertaken in the area, for example in relation to planning applications or development plans proceeding under different legislation. The aim should be to achieve a programme that minimises confusion and possible “consultation fatigue”.	**y**	At the time of publication and through consultation with the local authorities, the Applicant was not aware of any other major consultation exercised being undertaken in the area. By setting out a clear consultation programme in Section 9 of the SoCC and the pre-application process, the Applicant communicated the stages of consultation that the community should expect for the Development.

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	SOCC publicity Once finalised, the SOCC must be publicised and made available for inspection by the public in accordance with section 47.	**y**	Details of the SoCC publication are presented in Chapter 6 of the Consultation Report and explained in this Appendix.
	s48 publicity It is important to be aware of the matters to be publicised about the application under s48 and Regulation 4 of the APFP Regulations. It would be helpful if the published deadlines for receipt of views on the application are as close as possible to deadlines given to landowners and local authorities	**y**	The Applicant fulfilled the requirements listed under s48 and Regulation 4 of the APFP Regulations, as noted above. The Applicant also complied with Regulation 13 of the 2017 EIA Regulations (which is the equivalent of Regulation 11 in the 2009 regulations). A parallel consultation process took place between s42 and s48, commencing on 31 May 2018 and closing on 13 July 2018.

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	etc. in the s42 consultation. If the development is EIA development, applicants should also ensure that they comply with Regulation 11 of the EIA Regulations when the notice is published.		
	s49 duty to take account of responses Under s49 there is a duty on the developer to take account of responses to the consultation under s42 and s47 and publicity under s48. The developer is of course encouraged to carry out on-going consultation with statutory consultees before formally submitting its application; this will assist the	**y**	Compliance with s49 (2) is demonstrated in Chapters 10, 11 and 12 of the Consultation Report for Sections 47, 42 and 48 respectively. Development responses to all feedback received to the Development is set out in the following appendices: - Appendix 2: Responses received to feedback received under s47 - Appendix 3: Responses received to feedback received under s42 - There were no responses received under s48

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	developer to comply with its s49 duty.		
DCLG: Guidance on the pre-application process (March 2015)			
17.	When circulating consultation documents, developers should be clear about their status, for example ensuring it is clear to the public if a document is purely for purposes of consultation.	**y**	The Applicant strived to ensure that the status on any documents prepared to inform the consultation was clear throughout. The PEIR was clearly marked “preliminary” and this was reiterated in public documents.
18.	Early involvement of local communities, local authorities and statutory consultees can bring about significant benefits for all parties…	**y**	The Applicant engaged with local authorities and statutory technical consultees early in the Development process for the Development and maintained ongoing non-statutory consultation as outlined in Chapter 7 of the Consultation Report. The Applicant commenced s47 consultation in November 2017 at an early stage in the Development in order to enable the evolution of the Development’s design in response to consultation.
20.	Experience suggests that, to be of most value, consultation should be: • based on accurate information that gives consultees a clear view	**y**	The Applicant commenced s47 consultation on 9 November 2017 at an early stage in the Development in order to enable the evolution of the Development’s design in response to consultation.

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	of what is proposed including any options; • shared at an early enough stage so that the proposal can still be influenced, while being sufficiently developed to provide some detail on what is being proposed; and • engaging and accessible in style, encouraging consultees to react and offer their views.		At the time of the publication of the SoCC in November 2017 a consultation leaflet expanding on the information presented in the SoCC was mailed out to the consultation area and made available on the Development website and CAP sites. This method of making widely available more detailed Development information was used throughout the pre-application consultation process through consultation leaflets, project summary reports and newsletters. In response to the consultation, over 1153 pieces of feedback were received. The Applicant considered all feedback received and where possible changed the Development design in response to this consultation as set out in Chapter 1 of the Consultation Report.
23.	In brief, during the pre-application stage applicants are required to: • notify the Secretary of State of the proposed application; • identify whether the project requires an environmental impact assessment; where it does, confirm that they	**y**	As set out in this Appendix as well as detailed in the Consultation Report, the Applicant has complied with all requirements listed under point 23 of the DCLG Guidance (2015).

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	will be submitting an environmental statement along with the application, or that they will be seeking a screening opinion ahead of submitting the application; • produce a Statement of Community Consultation, in consultation with the relevant local authority or authorities, which describes how the applicant proposes to consult the local community about their • project and then carry out consultation in accordance with that Statement; • make the Statement of Community Consultation available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the		

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	land where the development is • proposed, as required by section 47 of the Planning Act and Regulations; • identify and consult statutory consultees as required by section 42 of the Planning Act and Regulations; • publicise the proposed application in accordance with Regulations; • set a deadline for consultation responses of not less than 28 days from the day after receipt/last publication; • have regard to relevant responses to publicity and consultation; and		

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	• prepare a consultation report and submit it to the Secretary of State.		
24.	The requirements of the Planning Act and associated Regulations form the framework for the pre-application consultation process. The Government recognises that major infrastructure projects and the communities and environment in which they are located will vary considerably. A 'one-size-fits-all' approach is not, therefore, appropriate. Instead, applicants, who are best placed to understand the detail of their specific project, and the relevant local authorities, who have a unique knowledge of their local communities, should as far as possible work together to develop plans for consultation. The aim should be to ensure that consultation is appropriate to the scale and nature of the project and where its impacts will be experienced.	**y**	The Applicant consulted on a draft SoCC that set out an approach to consultation for the scale and type of Development that the Cleve Hill Solar Park is. All comments received from the local authorities were incorporated into the final SoCC as detailed in Chapter 6 of the Consultation Report. The pre-application consultation process was successful in engaging a large number of community members and generated over 1153 pieces of feedback and welcomed over 900 people to the community consultation events.

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25.	Consultation should be thorough, effective and proportionate. Some applicants may have their own distinct approaches to consultation, perhaps drawing on their own or relevant sector experience, for example if there are industry protocols that can be adapted. Larger, more complex applications are likely to need to go beyond the statutory minimum timescales laid down in the Planning Act to ensure enough time for consultees to understand project proposals and formulate a response. Many proposals will require detailed technical input, especially regarding impacts, so sufficient time will need to be allowed for this. Consultation should also be sufficiently flexible to respond to the needs and requirements of consultees, for example where a consultee has indicated that they would prefer to be consulted via email only,	**y**	The Applicant carried out the pre-application consultation in accordance with the SoCC, as agreed with the local authorities. Owing to the scale of the Development and volume of technical information in consultation documents including the PEIR, the Applicant allowed a 6-week consultation period for the s47 and s42 consultation. The Applicant facilitated an ongoing s47 consultation with the community to enable a continuous dialogue with the community and especially near neighbours on the Development plans and mitigation. The Applicant presented to several interest groups as listed in Chapter 7 of the Consultation Report, in order to share project information and have specialists respond to feedback and enquiries. This included facilitating a topic specific workshop on access and traffic on 19 September 2018. As part of the s47 consultation feedback forms, respondents were asked how they wished to be kept informed. At the phase one s47 community consultation, respondents were asked if they would 'like to receive regular quarterly newsletters to be kept up to date with the progress of the Cleve Hill

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	this should be accommodated as far as possible.		Solar Park development?'. The following options were provided: • 'Yes, via e-mail' • 'Yes, via post' • 'No, thanks'
26.	The Planning Act requires certain bodies and groups of people to be consulted at the pre-application stage, but allows for flexibility in the precise form that consultation may take depending on local circumstances and the needs of the project itself. Sections 42 – 44 of the Planning Act and Regulations11 set out details of who should be consulted, including local authorities, the Marine Management Organisation (where appropriate), other statutory bodies, and persons having an interest in the land to be developed.12 Section 47 in the Planning Act sets out the applicant's statutory duty to consult local communities. In addition,	**y**	Appendix 5 lists the s42 prescribed consultees for the Development which includes those listed in the EIA Regulations as well as those scoped in by the Applicant. Chapter 7 of the Consultation Report as well as the Appendix in the above, details the methodology behind the consultation area.

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	applicants may also wish to strengthen their case by seeking the views of other people who are not statutory consultees, but who may be significantly affected by the project.		
27.	The Planning Act and Regulations set out the statutory consultees and prescribed people who must be consulted during the pre-application process. Many statutory consultees are responsible for consent regimes where, under Section 120 of the Planning Act, decisions on those consents can be included within the decision on a Development Consent Order. Where an applicant proposes to include non-planning consents within their Development Consent Order, the bodies that would normally be responsible for granting these consents should make every effort to facilitate this. They should only object to the inclusion of such	**y**	Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently. • Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the

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	nonplanning consents with good reason, and after careful consideration of reasonable alternatives. It is therefore important that such bodies are consulted at an early stage. In addition, there will be a range of national and other interest groups who could make an important contribution during consultation. Applicants are therefore encouraged to consult widely on project proposals.		Examining Authority will decide which of the above routes is most appropriate.
28.	From time to time a body may cease to exist but, for legislative timetabling reasons, may still be listed as a statutory consultee. In such situations the Secretary of State will not expect strict compliance with the statutory requirements. Applicants should identify any successor body and consult with them in the same manner as they would have with the original body. Where there is no obvious successor, applicants	**y**	No such bodies were identified.

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	should seek the advice of the inspectorate, who may be able to identify an appropriate alternative consultee. Whether or not an alternative is identified, the consultation report should briefly note any cases where compliance with statutory requirements was impossible and the reasons why.		
29.	Applicants will often need detailed technical input from expert bodies to assist with identifying and mitigating the social, environmental, design and economic impacts of projects, and other important matters. Technical expert input will often be needed in advance of formal compliance with the pre-application requirements. Early engagement with these bodies can help avoid unnecessary delays and the costs of having to make changes at later stages of the process. It is equally important that statutory consultees respond to a request for	**y**	Early and ongoing consultation was undertaken with a range of technical consultees as outlined in Chapter 5 of the Consultation Report. The Applicant entered into a Planning Performance Agreement with the local authorities Kent County Council, Swale Borough Council and Canterbury City Council to ensure they have the detailed technical input required.

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	technical input in a timely manner. Applicants are therefore advised to discuss and agree a timetable with consultees for the provision of such inputs.		
34.	Local authorities have considerable expertise in consulting local people. They will be able to draw on this expertise to provide advice to applicants on the makeup of the community and on how consultation might best be undertaken. In addition, many authorities will already have a register of local interest groups, and should be able to readily provide applicants with an appropriate list of such groups for the purposes of consultation.	**y**	The Applicant consulted with the local authorities on a draft SoCC as described in Chapter 6 of the Consultation Report.
35.	The applicant has a duty under section 47 of the Planning Act to prepare a Statement of Community Consultation, and then to conduct its consultation in line with that statement. Before doing so, the applicant must consult on their Statement of Community Consultation with	**y**	The Applicant consulted with the local authorities on a draft SoCC as described in Chapter 6 of the Consultation Report.

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	each local authority in whose area the proposed development is situated. This may require consultation with a number of different local authorities, particularly for long, linear projects. In this situation, the local authorities in question should, as far as practicable, co-ordinate their responses to the applicant. This will ensure that the consultation proposals set out in the Statement are coherent, effective, and work across local authority boundaries		
36.	Even where it is intended that a development would take place within a single local authority area, it is possible that its impacts could be significantly wider than just that local authority's area - for example if the development was located close to a neighbouring authority. Where an applicant decides to consult people living in a wider area who could be affected by the project (e.g. through visual or environmental	**y**	Section 6 of the SoCC details who will be consulted. As stated above, a wider consultation area was included as the Applicant recognised that there may be some interested individuals or parties that do not live within the agreed core consultation zone. Means such as media advertising were used to notify residents within the wider local area of the consultation. Informative consultation materials were also made available to view and collect from community access points outside of the core consultation zone.

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	impacts, or through increased traffic flow), that intention should be reflected in the Statement of Community Consultation.		
37.	In its role as a consultee on the Statement of Community Consultation, the local authority should focus on how the applicant should consult people in its area. The comments that a local authority provides on the Statement of Community Consultation are separate from any views that authority may have on the merits of the proposals. They are also distinct from 'adequacy of consultation' responses. The Planning Act requires local authorities to respond to the applicant's consultation on their proposed Statement of Community Consultation within 28 days of receipt of the request. However, prior to submitting their draft Statement of Community Consultation applicants may wish to seek to resolve any	**y**	The Applicant has met with the relevant local authorities regularly providing ongoing opportunities to update them on the consultation process and feedback received. A statement of common ground regarding consultation has been agreed between the Applicant and local authorities as provided in Appendix 26.

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	disagreements or clarifications about the public consultation design. An applicant is therefore likely to need to engage in discussions with local authorities over a longer period than the minimum requirements set out in the Act.		
38.	The role of the local authority in such discussions should be to provide expertise about the make-up of its area, including whether people in the area might have particular needs or requirements, whether the authority has identified any groups as difficult to reach and what techniques might be appropriate to overcome barriers to communication. The local authority should also provide advice on the appropriateness of the applicant's suggested consultation techniques and methods. The local authority's aim in such discussions should be to ensure that the people affected by the development can take part in a	**y**	The Applicant consulted on the draft SoCC (Appendix 8) to receive comments and suggestions from the local authorities about how to most effectively consult and engage with the community for the Development. The Applicant took all comments into consideration. This is detailed in Chapter 6 of the Consultation Report. The Applicant has also met with the relevant local authorities regularly providing ongoing opportunities to update them on the consultation process and feedback received. Further the Applicant has engaged with over 65 elected members of the local authorities, three local MPs and five parish or town councils to inform them in advance of the wider public consultation the latest project information and updates.

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	thorough, accessible and effective consultation exercise about the proposed project.		
39.	Topics for consideration at such pre-consultation discussions might include: • the size and coverage of the proposed consultation exercise (including, where appropriate, consultation which goes wider than one local authority area); • the appropriateness of various consultation techniques, including electronic-based ones; • the design and format of consultation materials; • issues which could be covered in consultation materials; • suggestions for places/timings of public events as part of the consultation;	**y**	Such topics for consideration were included in the draft SoCC that the Applicant consulted the local authorities on (see draft SoCC in Appendix 8).

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	• local bodies and representative groups who should be consulted; and • timescales for consultation.		
40.	It is expected that in most cases applicants and local authorities will be able to work closely together and agree on the local consultation process. Where significant differences of opinion persist between the applicant and local authority (or authorities) on how the consultation should take place, the Inspectorate may be able to offer further advice or guidance to either party. However, such advice will be without prejudice to any later decision on whether to accept or reject an application for examination.	**y**	Noted. No such areas of disagreement occurred.
41.	Where a local authority raises an issue or concern on the Statement of Community	**y**	Chapter 6 of the Consultation Report details how the Applicant has responded to all comments received from the local authorities to the draft

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	Consultation which the applicant feels unable to address, the applicant is advised to explain in their consultation report their course of action to the Secretary of State when they submit their application.		SoCC. All comments were incorporated into the final SoCC.
42.	Where a local authority decides that it does not wish to respond to a consultation request on the Statement of Community Consultation, the applicant should make reasonable efforts to ensure that all affected communities are consulted. If the applicant is unsure how to proceed, they are encouraged to seek advice from the Inspectorate. However, it is for the applicant to satisfy themselves that their consultation plan allows for as full public involvement as is appropriate for their project and, once satisfied, to proceed with the consultation. Provided that applicants can satisfy themselves that they have made reasonable endeavours	**y**	All relevant authorities being Kent County Council and Swale Borough Council together with Canterbury City Council responded to the draft SoCC as described in Chapter 6 of the Consultation Report. Swale Borough Council agreed with all comments provided by Kent County Council and so no additional comments were provided by Swale Borough Council.

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	to consult with all those who might have a legitimate interest or might be affected by a proposed development, it would be unlikely that their application would be rejected on grounds of inadequate public consultation.		
43.	Local authorities are also themselves statutory consultees for any proposed major infrastructure project which is in or adjacent to their area. Applicants should engage with them as early as possible to ensure that the impacts of the development on the local area are understood and considered prior to the application being submitted to the Secretary of State.	**y**	The Applicant met with the relevant local authorities regularly providing ongoing opportunities to update them on the consultation process and feedback received. Details of the ongoing non-statutory consultation is provided in Chapter 5 of the Consultation Report.
44.	Local authorities will be able to provide an informed opinion on a wide number of matters, including how the project relates to Local Plans. Local authorities may also make suggestions for requirements to be included in the draft Development Consent Order.	**y**	Discussions with both Swale Borough Council, Kent County Council and Canterbury City Council have been ongoing throughout the pre-application process. Following an initial briefing meeting with each Council at the start of the process these discussions have been centrally managed via regular meetings to which each Authority has sent a nominated project manager.

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	These may include the later approval by the local authority (after the granting of a Development Consent Order) of detailed project designs or schemes to mitigate adverse impacts. It will be important that any concerns local authorities have on the practicality of enforcing a proposed Development Consent Order are raised at the earliest opportunity.		The PPA meetings have provided the forum for the discussion of the scheme, changes and mitigation and have provided the basis for discussion of areas of agreement, design changes, technical questions, DCO requirements etc. Further technical discussions with LPA officers have also taken place to discuss specialist technical areas and specific requirements e.g., Archaeology. In relation to Local Plans there has been detailed discussion with all of the LPAs in the context of the policy elements of the Scoping and PEIR and a draft Statement of Common Ground has been prepared which at this stage has identified and agreed all relevant Local Plan Policies and requirements. This will be finalised to include further interpretation after the Local Impact Statements are prepared.
48.	Local authorities are encouraged to discuss and work through issues raised by the proposed development with applicants well before an application is submitted. Agreements reached between an applicant and relevant local authorities can be documented in a statement of common	**y**	Statements of Common Ground are included in in Appendix 26.

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	ground. This will contain agreed factual information about the application and can accompany the application. The statement of common ground can also set out matters where agreement has not been reached. This can then be looked at during examination. More information about this is in the Planning Inspectorate Advice Note 2 concerning the role of local authorities.		
49.	Applicants will also need to identify and consult people who own, occupy or have another interest in the land in question, or who could be affected by a project in such a way that they may be able to make a claim for compensation. This will give such parties early notice of projects, and an opportunity to express their views regarding them.	**y**	The Applicant has consulted with those who own, occupy or have an interest in the land (i.e. s44 landowners) in parallel to the s42 consultation (31 May – 13 July 2018). Dialogue with landowners has continued beyond the 13 July to progress agreements with landowners. Details of the s42 consultation and the ongoing consultation with landowners is provided in Chapters 8 and 11 of the Consultation Report, respectively.
50.	It is the applicant's responsibility to demonstrate at submission of the application that due diligence has been undertaken in identifying all	**y**	A Book of Reference (document reference number 4.3) is included with the DCO application for the Development.

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	land interests and applicants should make every reasonable effort to ensure that the Book of Reference (which records and categorises those land interests) is up to date at the time of submission.		
51.	However, it is understood that land interests change over time and that new or additional interests may emerge after an applicant has concluded statutory consultation but just before an application is submitted. In such a situation, the applicant should provide a proportionate opportunity to any new person identified with a land interest to make their views known on the application. Where new interests in land are identified very shortly before the intended submission of an application, despite diligent efforts earlier in the process it may be difficult at that stage for applicants to consult and take account of any responses from those new interests before	**y**	A request was made to the Land Registry to provide details of any changes in ownership on 29 October 2018. It was confirmed by the Land Registry that no changes had occurred since formal consultation. The Applicant considers that it has rigorously observed its duty to carry out diligent inquiry to inform and support its Application for development consent for the Scheme. However, the Applicant also considers that diligent inquiry is an ongoing process in which the information obtained to date will need to be kept under review and updated at appropriate milestones as the Applicant continues to progress its promotion and delivery of the Scheme.

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	submitting their application as intended. If this situation arises applicants should be proactive and helpful in ensuring that the person understands how they can, if they so wish, engage with the process if the application is accepted for examination.		
52.	Applicants should explain in the consultation report how they have dealt with any new interests in land emerging after conclusion of their statutory consultation having regard to their duties to consult and take account of any responses.	**y**	All ongoing consultation with landowners is detailed in Chapter 13 of the Consultation Report.
53.	Local people have a vital role to play at the pre application stage. People should have as much influence as is realistic and possible over decisions which shape their lives and communities. It is therefore critical that they are engaged with project proposals at an early stage. Because they live, work and socialise in the affected area, local people are	**y**	The Applicant publicised the SoCC in November 2017 and held a first round of consultation in December 2017. This was to engage with the community and near neighbours early in the development of the Development. The Applicant chose to undertake a multi stage and iterative consultation process with the community to ensure feedback from the consultation could influence the design of the Development. This feedback and Development changes made as a result is summarised in Chapter 1 of the Consultation Report.

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	particularly well placed to comment on what the impact of proposals on their local community might be; or what mitigating measures might be appropriate; or what other opportunities might exist for meeting the project's objectives.		
54.	In consulting on project proposals, an inclusive approach is needed to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Applicants should use a range of methods and techniques to ensure that they access all sections of the community in question. Local authorities will be able to provide advice on what works best in terms of consulting their local communities given their experience of carrying out consultations in their area.	**y**	A range of consultation methods were presented in the draft SoCC (see Appendix 8) which was consulted on with the local authorities. A range of online and offline communication methods were used to engage a wide number of range of people in the consultation process for the Development. These included: - Project website - Twitter feed - Hard copy information and notices available at 35 local information points and 8 community access points. - Mailouts to a consultation area of over 12,000 local properties and businesses - Consultation events throughout the consultation area - Stakeholder meetings and presentations - Local media engagement and advertising

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55.	Applicants must set out clearly what is being consulted on. They must be careful to make it clear to local communities what is settled and why, and what remains to be decided, so that expectations of local communities are properly managed. Applicants could prepare a short document specifically for local communities, summarising the project proposals and outlining the matters on which the view of the local community is sought. This can describe core elements of the project and explain what the potential benefits and impacts may be. Such documents should be written in clear, accessible, and non-technical language. Applicants should consider making it available in formats appropriate to the needs of people with disabilities if requested. There may be cases where documents may need to be bilingual (for example, Welsh and English in	**y**	Section 5 of the SoCC (Appendix 9) clearly sets out what the Applicant sets out to consult on with the local community including: short term and temporary impacts during construction, long term operational impacts and benefits.

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	some areas), but it is not the policy of the Government to encourage documents to be translated into non-native languages.		
56.	Applicants are required to set out in their Statement of Community Consultation how they propose to consult those living in the vicinity of the land. They are encouraged to consider consulting beyond this where they think doing so may provide more information on the impacts of their proposals (e.g. through visual impacts or increased traffic flow).	**y**	The Applicant has set out in the SoCC how it proposes to consult with the community and describes who will be consulted within Section 6 of the SoCC. This includes a core consultation and wider consultation area.
57.	The Statement of Community Consultation should act as a framework for the community consultation generally, for example, setting out where details and dates of any events will be published. The Statement of Community Consultation should be made available online, at any exhibitions or other events held by applicants. It should be	**y**	The Applicant has prepared the SoCC in accordance with the relevant legislation and advice. The Applicant made the SoCC available via: - Online on the project website; - Hard copies at the consultation events; - Community Access Points as advertised in the SoCC; - Two rounds of advertisements in local media covering the consultation area.

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	placed at appropriate local deposit points (e.g. libraries, council offices) and sent to local community groups as appropriate.		
58.	Applicants are required to publicise their proposed application under section 48 of the Planning Act and the Regulations and set out the detail of what this publicity must entail. This publicity is an integral part of the public consultation process. Where possible, the first of the two required local newspaper advertisements should coincide approximately with the beginning of the consultation with communities. However, given the detailed information required for the publicity in the Regulations, aligning publicity with consultation may not always be possible, especially where a multi-stage consultation is intended.	**y**	The Applicant publicised the s48 Notice (see Appendix 18) in two consecutive rounds of local media advertisements with the first-round coinciding with the commencement of phase two s47 and s42 consultation on 31 May 2018. The publication schedule of the s48 notices is provided in Chapter 9 of the Consultation Report.
59.	'Guidance on Community Engagement for Onshore Wind	**y**	Noted.

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	Developments' provides useful non statutory guidance on approaches to assist developers and local communities in considering how best to engage with one another. This guidance should be read alongside 'Guidance on Community Benefits for Onshore Wind' which promotes good practice and sets out principles and expectations for developers, local authorities and communities. Both sets of guidance may be of benefit to pre-application consultation for other types of developments.		
68.	To realise the benefits of consultation on a project, it must take place at a sufficiently early stage to allow consultees a real opportunity to influence the proposals. At the same time, consultees will need sufficient information on a project to be able to recognise and understand the impacts.	**y**	The Applicant publicised the SoCC on 09 November 2017 and held a first round of consultation in December 2017. This was to engage with the community and near neighbours early in the development of the Development proposals. This stage coincided with the scoping phase for the Development meaning that there was a detailed level of Development information provided to commence early engagement.

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69.	Applicants will often also require detailed technical advice from consultees and it is likely that their input will be of the greatest value if they are consulted when project proposals are fluid, followed up by confirmation of the approach as proposals become firmer. In principle, therefore, applicants should undertake initial consultation as soon as there is sufficient detail to allow consultees to understand the nature of the project properly.	**y**	Early engagement commenced with technical consultees in 2017 as detailed in Chapter 5 of the Consultation Report. This enabled the Development to evolve in response to this ongoing dialogue and phase one s47 consultation in support of preparing PEIR later consulted on as part of the parallel s47 and s42 consultation.
70.	To manage the tension between consulting early, but also having project proposals that are firm enough to enable consultees to comment, applicants are encouraged to consider an iterative, phased consultation consisting of two (or more) stages, especially for large projects with long development periods. For example, applicants might wish to consider undertaking non-statutory early consultation at a stage where options are still	**y**	The Applicant publicised the SoCC on 9 November 2017 and held its phase one consultation from 9 November to 22 December 2017. This was to engage with the community and near neighbours early in the development of the Development proposals. Pre-application consultation was multi-phased over two phases, enabling feedback from the phase one s47 consultation in winter 2017 to inform the development of the Development proposals presented at phase two s47 consultation in Summer 2018.

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	being considered. This will be helpful in informing proposals and assisting the applicant in establishing a preferred option on which to undertake statutory consultation.		
71.	Where an iterative consultation is intended, it may be advisable for applicants to carry out the final stage of consultation with persons who have an interest in the land once they have worked up their project proposals in sufficient detail to identify affected land interests.	**y**	S44 consultation with landowners took place in parallel with s42 consultation and phase two s47 consultation between 31 May and 13 July 2018.
72.	The timing and duration of consultation will be likely to vary from project to project, depending on size and complexity, and the range and scale of the impacts. The Planning Act requires a consultation period of a minimum of 28 days from the day after receipt of the consultation documents. It is expected that this may be sufficient for projects which are straightforward and	**y**	The Applicant recognised that owing to the scale of the Development, additional time would be beneficial for consultees to respond. As such the consultation periods that were given for the s47, s42 and s48 consultation were 6 weeks, going beyond the 28-day statutory minimum.

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	uncontroversial in nature. But many projects, particularly larger or more controversial ones, may require longer consultation periods than this. Applicants should therefore set consultation deadlines that are realistic and proportionate to the proposed project. It is also important that consultees do not withhold information that might affect a project, and that they respond in good time to applicants. Where responses are not received by the deadline, the applicant is not obliged to take those responses into account.		
73.	Applicants are not expected to repeat consultation rounds set out in their Statement of Community Consultation unless the project proposals have changed very substantially. However, where proposals change to such a large degree that what is being taken forward is fundamentally different from what was consulted on, further consultation may well be	**y**	Noted. No additional consultation rounds outside of what was publicised in the SoCC took place.

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	needed. This may be necessary if, for example, new information arises which renders all previous options unworkable or invalid for some reason. When considering the need for additional consultation, applicants should use the degree of change, the effect on the local community and the level of public interest as guiding factors.		
74.	Where a proposed application changes to such a large degree that the proposals could be considered a new application, the legitimacy of the consultation already carried out could be questioned. In such cases, applicants should undertake further re-consultation on the new proposals, and should supply consultees with sufficient information to enable them to understand the nature of the change and any likely significant impacts (but not necessarily the full suite of consultation documents), and	**y**	No such significant changes occurred.

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	allow at least 28 days for consultees to respond.		
75.	If the application only changes to a small degree, or if the change only affects part of the Development, then it is not necessary for an applicant to undertake a full re-consultation. Where a proposed application is amended in light of consultation responses then, unless those amendments materially change the application or materially changes its impacts, the amendments themselves should not trigger a need for further consultation. Instead, the applicant should ensure that all affected statutory consultees and local communities are informed of the changes.	**y**	PEIR submitted in May 2018 showed a change in the red line boundary in response to dialogue with the Environment Agency about maintenance of the flood defences along the northern edge of the Development boundary. In response the Applicant required to change the red line boundary to scope in the flood defences and an area of the intertidal area to the north of the site. Owing to this change the Applicant consulted the Marine Management Organisation (MMO) on the PEIR. The Applicant also informed the MMO of the consultation on the Statement of Community Consultation (SoCC), of which the MMO were satisfied of the approach.
76.	In circumstances where a particular issue has arisen during the preapplication consultation, or where it is localised in nature, it may be appropriate to hold a non-statutory, targeted consultation. A developer's Statement of	**y**	In Section 10 of the SoCC (Appendix 9) the Applicant sets out a range of consultation methods which enable flexible, continuous and two-way communication channels. Included in these methods, the Applicant proposes to use stakeholder meetings and briefing sessions to inform groups of project updates.

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	Community Consultation should be drafted so that it does not preclude this approach. A more bespoke approach can be adopted, which may allow developers to respond with more agility to the issue at hand. If adopting this approach, the emphasis should be on ensuring that relevant individuals and organisations are included.		Following the phase two s47 consultation the Applicant recognised that there were a large number of enquiries and concerns regarding traffic and transport information for the Development. In response the Applicant held a transport and traffic focused briefing meeting with elected members and local representatives including the action group GREAT.
77.	Consultation should also be fair and reasonable for applicants as well as communities. To ensure that consultation is fair to all parties, applicants should be able to demonstrate that the consultation process is proportionate to the impacts of the project in the area that it affects, takes account of the anticipated level of local interest, and takes account of the views of the relevant local authorities.	**y**	The pre-application consultation process that the Applicant held complied with its commitments as set out in the SoCC (Appendix 9). The consultation reached widely across the community, welcoming over 900 members of the public to the two rounds of community consultation events and receiving 1153 pieces of feedback all of which have been recorded and responded to in Appendices 2 and 3 of this Consultation Report. The Applicant was able to undertake all methods of consultation and engagement it committed to in the SoCC and was able to hold several meetings and presentations with local interest groups, near neighbours, action groups and elected members throughout the pre-application consultation for the Development.

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Consultation Report

Appendix 2a: Applicant Regard to s47 Consultation Responses (Phase One)

Appendix 2a: Applicant Regard to s47 Consultation Responses (Phase One)
Phase One (09 November – 22 December 2018)

Phase One Feedback Form Responses			
a) Local ecology and bird life Please indicate any plant or animal species particularly important to you.			
ID	**Summary of Response**	**Project Change ?**	**Applicant Response**
PhaseOne_FF_002, PhaseOne_FF_008, PhaseOne_FF_010, PhaseOne_FF_005, PhaseOne_FF_014, PhaseOne_FF_016, PhaseOne_FF_018, PhaseOne_FF_022, PhaseOne_FF_023, PhaseOne_FF_028, PhaseOne_FF_029, PhaseOne_FF_033, PhaseOne_FF_034, PhaseOne_FF_038, PhaseOne_FF_039, PhaseOne_FF_040, PhaseOne_FF_049, PhaseOne_FF_044, PhaseOne_FF_054 PhaseOne_FF_057, PhaseOne_FF_060, PhaseOne_FF_062, PhaseOne_FF_063,	Respondents generally commented that all species and the ecosystem at the site are important. Flora and fauna specifically noted included: **Birds:** Wading birds, birds of prey, marsh lauries, buzzards, lapwings, Bewick's swans, marsh harriers , bearded tits, brent geese, short eared owls, barn owls, skylarks, kingfishers, redshanks, greenshanks, oyster catchers, egrets, curlews, herons, yellow wagtails, reed and sedge warblers, reed buntings, cettis warbler, water rail, golden plover, and flocks of linnets and finches. Wigeon, bearded reeling, restharrow, grey Plover, dunlin, black-tailed godwit, merlin, hen harrier, red throated divers. Small birds such as stonechats, corn bunting, yellow hammer.	No	The Applicant thanks the community for the responses it has received. Chapter 9 (Ornithology) and Chapter 8 (Ecology), Environmental Statement (document reference number 6.1.9 and 6.1.8 respectively) and Report to Inform Appropriate Assessment (document reference number 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on ornithology and ecology. Surveys were undertaken between 2014 – 2018 to determine the list of species assessed in consultation with Natural England including a meeting in 2016 acknowledging the data collected. Breeding birds 3 seasons Winter birds over 4 seasons. Plus 16-17

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PhaseOne_FF_066, PhaseOne_FF_067, PhaseOne_FF_072, PhaseOne_FF_073, PhaseOne_FF_074, PhaseOne_FF_075, PhaseOne_FF_078, PhaseOne_FF_082, PhaseOne_FF_083, PhaseOne_FF_084, PhaseOne_FF_085, PhaseOne_FF_086, PhaseOne_FF_088, PhaseOne_FF_101, PhaseOne_FF_103, PhaseOne_FF_105, PhaseOne_FF_107, PhaseOne_FF_115, PhaseOne_FF_117, PhaseOne_FF_120, PhaseOne_FF_121, PhaseOne_FF_122, PhaseOne_FF_124, PhaseOne_FF_129, PhaseOne_FF_130, PhaseOne_FF_131, PhaseOne_FF_133, PhaseOne_FF_134, PhaseOne_FF_138, PhaseOne_FF_140,	**Mammals:** water voles, hares, bats, grazing animals **Reptiles:** newts **Insects:** Butterflies and Moths, grasshoppers, beetles **Flora:** Any plant species local to N. Kent Marshes. Sea plants e.g. orchids, sea poppies, yellow horned-poppy, sea-lavender, wild carrot.		

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PhaseOne_FF_141, PhaseOne_FF_143, PhaseOne_FF_145, PhaseOne_FF_146, PhaseOne_FF_151, PhaseOne_FF_153, PhaseOne_FF_154, PhaseOne_FF_155, PhaseOne_FF_159, PhaseOne_FF_160, PhaseOne_FF_162, PhaseOne_FF_163, PhaseOne_FF_167, PhaseOne_FF_168, PhaseOne_FF_169, PhaseOne_FF_172, PhaseOne_FF_173, PhaseOne_FF_174, PhaseOne_FF_176, PhaseOne_FF_178, PhaseOne_FF_182, PhaseOne_FF_184, PhaseOne_FF_185, PhaseOne_FF_188, PhaseOne_FF_189, PhaseOne_FF_191, PhaseOne_FF_192, PhaseOne_FF_193, PhaseOne_FF_198, PhaseOne_FF_202,			

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PhaseOne_FF_206, PhaseOne_FF_208 PhaseOne_FF_217, PhaseOne_FF_220, PhaseOne_FF_222, PhaseOne_FF_223, PhaseOne_FF_224, PhaseOne_FF_228, PhaseOne_FF_231, PhaseOne_FF_235, PhaseOne_FF_238, PhaseOne_FF_240, PhaseOne_FF_244, PhaseOne_FF_247, PhaseOne_FF_251, PhaseOne_FF_252, PhaseOne_FF_253, PhaseOne_FF_254, PhaseOne_FF_259, PhaseOne_FF_261, PhaseOne_FF_262, PhaseOne_FF_263, PhaseOne_FF_266, PhaseOne_FF_267, PhaseOne_FF_272, PhaseOne_FF_273, PhaseOne_FF_274, PhaseOne_FF_275, PhaseOne_FF_277, PhaseOne_FF_279,			

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PhaseOne_FF_280, PhaseOne_FF_281, PhaseOne_FF_284, PhaseOne_FF_285, PhaseOne_FF_286,			
PhaseOne_FF_045, PhaseOne_FF_052, PhaseOne_FF_061, PhaseOne_FF_066, PhaseOne_FF_093, PhaseOne_FF_102, PhaseOne_FF_113, PhaseOne_FF_004, PhaseOne_FF_024, PhaseOne_FF_058, PhaseOne_FF_087, PhaseOne_FF_210	Mitigation area for birds: the general comment received was that the proposed mitigation area was not big enough and that it was important to leave enough space particularly for migrating birds and to sustain the current population of all species.	Yes	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites. The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity improvements with Natural England, RSPB and Kent Wildlife Trust. This has resulted in an agreed Arable Reversion Habitat Management Area ('AR HMA') for birds of 56 ha, which has increased from 41ha between PEIR and Application submission.
PhaseOne_FF_073, PhaseOne_FF_003, PhaseOne_FF_287	Concern for protected areas: SPA and SSSI, Marine Conservation Area.	Yes	At phase one s47 consultation, land adjacent to the Development is designated as SSSI, SPA and Ramsar the land where the infrastructure associated with the Development will be built is not designated or subject

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			to any restrictions in respect of agricultural management. In response to comments from the HMSG, the additional areas included in the Development since the PEIR, which comprise part of The Swale SPA/SSSI/Ramsar site, will not contain any new development structures; they are included to facilitate ongoing maintenance of the sea wall and to bring biodiversity benefits through more appropriate management of the freshwater grazing marsh in the east of the site.
PhaseOne_FF_007	The area is marshland which in 20-30 years will be taken back to sea. All the plants and birds which use it now are important.	No	Noted.
PhaseOne_FF_009	We no longer have lapwings or red-legged pheasants or hares.	No	Lapwing have been observed on the site as detailed in Chapter 9, Environmental Statement (document reference 6.1.9)
PhaseOne_FF_011	This I believe is an ideal project to help biodiversity for the whole ecosystem if managed correctly.	Yes	Noted. The Applicant refers the community to its Landscape and Biodiversity Management Plan ('LBMP'), Environmental Statement (document reference number 6.4.5.2).
PhaseOne_FF_012	As a member of the RSPB I am interested that the bird life is not driven away.	No	Noted. The Applicant has consulted with RSPB and as part of the HMSG throughout the pre-application consultation for the Development.
PhaseOne_FF_016	Completely inappropriate location - even goes against Hive's own policy on possible sites.	No	The Applicant has provided a detailed description of the site selection for the Development in Chapter 4, Environmental Statement (document reference number 6.1.4).

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PhaseOne_FF_020	This will cause missing landscape links. The RSPB are preserving and managing the next-door marshes and obviously the birds, wildlife and nature don't see the boundaries. They will spill over and be enhanced by the continuation of this landscape. These linkages of landscape are vitally important. Removing hedgerows and generally de-naturing this landscape to become fragmented. Many species, both plants and animals, need extended territories. They need to travel around the landscape in sheltered safety to search for food and/or a potential mate. As the landscape becomes more disjointed, the survival of wildlife will become more difficult and threatened. This landscape is our local heritage and has been used for many year to enhance our life by walking through this wild landscape.	Yes	Chapter 9 (Ornithology) Environmental Statement (document reference number 6.1.9) and Report to Inform Appropriate Assessment (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. A Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) has been undertaken and submitted with the Application. A focus of the RIAA is the loss of functionally linked land for lapwing, golden plover, brent goose and marsh harrier.
PhaseOne_FF_022	Kent Wildlife Trust, CPRE are against the development. RSPB, in their leaflet on Solar Farms, say that they whilst they are in favour of them, they are against sitting them near SSSIs and Ramsar sites.	Yes	The Applicant has consulted with Kent Wildlife Trust, RSPB and CPRE as detailed in the Consultation Report (document reference number 5.1). Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate

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			Assessment ('RIAA') (document reference number 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites. The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity improvements with Natural England, RSPB and Kent Wildlife Trust. This has resulted in an agreed Arable Reversion Habitat Management Area('AR HMA') for birds of 56 ha, which has increased from 41ha between PEIR and Application submission.
PhaseOne_FF_025	The landscape of this area is unique and should be preserved	No	Noted.
PhaseOne_FF_043	humans are animals too and haven't been properly considered	Yes	The Applicant has undertaken a meaningful consultation with members of the public regarding their concerns and priorities for issues relating to the Development. This has resulted in a number of changes, as set out in this Consultation Report.
PhaseOne_FF_048	This area is full of birds, wildflowers and grasses. It is also a wetland - surely not suitable for metal posts and solar panels.	No	The Applicant has provided a detailed description of the site selection for the Development in Chapter 4, Environmental Statement (document reference number 6.1.4).

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PhaseOne_FF_051	Project is too large to conserve ecology, bird life and environment	No	See Chapters 4 (site selection) and 5 (development description) of the Environmental Statement (document reference number 6) for a detailed description of the reduction in scale of the Development and detailed site selection process.
PhaseOne_FF_059	I am very concerned about the impact on migratory and wetland birds on what basis is it possible to talk of 'managing' their response?	No	Noted.
PhaseOne_FF_064	All aspects of the landscape and its particular ecology are important to me	No	Noted.
PhaseOne_FF_069	I would like to see the results of all the surveys once completed. It is really important to use this opportunity to support wildlife, especially the birds that currently use the site.	No	The Environmental Statement (document reference number 6) provides the results of the complete Environmental Impact Assessment ('EIA').
PhaseOne_FF_071	I am not obsessed with this item. There are plenty of good sites for birds, but maybe not open meadows.	No	Noted
PhaseOne_FF_076	Food and Shelter for birds at high tides and foraging for bats and all indigenous species: is this compatible with the East-West orientation of solar panels?	No	See LMBP, Environmental Statement (Environmental Statement (document reference number 6.4.5.2).
PhaseOne_FF_079	Biodiversity and being managed ecologically.	No	Noted
PhaseOne_FF_089	Important but not overly important.	No	Noted

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PhaseOne_FF_097	I have a very specific interest and will therefore be bound to oppose this scheme! I've recently bought my retirement home in a place where I can go walking out at Nagden and the shore as often as possible. Obviously, I don't want to see it covered in solar panels.	No	Noted.
PhaseOne_FF_100	I echo exactly what the RSPB and Kent Wildlife Trust say. Too many species to list here.	No	Noted.
PhaseOne_FF_101	I am one of the local beekeepers and very aware of the volume of hedges, fields, margins to the invertebrate population. Without them, many other ecological processes will fail locally or be adversely affected. This proposal is just too big.	Yes	The Applicant has consulted with the Bumblebee Conservation Trust. The Applicant has proposed embedded mitigation measures to provide net gains in habitat of value to invertebrates is proposed. The retention of existing habitats of value to a range of protected and priority species is proposed, with limited habitat clearance of track and spine road crossings not impacting the favourable conservation status of wildlife at any trophic level. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseOne_FF_108	Have no specialist knowledge	No	Noted.

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PhaseOne_FF_116	Why not use roofs of industrial buildings and waste/industrial land rather than here? Not that I am against this, just need to think different don't we? Reed Marshing areas around here in abundance.	No	Noted.
PhaseOne_FF_126	Have to be assured that the project will enhance the environment. Plan should include walks and rails and observation hides e.g natural pools.	Yes	Noted. In response to comments received to phase one s47 consultation, the Applicant consulted on additional permissive pathways in the Development and the proposal of a community orchard in the PEIR (stage two s47 and s42 consultation). In response to consultation from the phase 2 s47 consultation, the Applicant has scoped in an additional permissive pathway and scoped out the community orchard.
PhaseOne_FF_127	I don't think simply referring to what is on the site is enough. The disruption potential to wildlife will be over a wider area.	No	Chapter 2, Environmental Statement (document reference 6.1.2) discusses cumulative impacts.
PhaseOne_FF_128	This development will have a major impact on the birds that nest in the area and migrate to it. The construction will seriously impact on their routines.	Yes	Following phase one s47 consultation, the Applicant established a Habitat Management Steering Group ('HMSG') with Natural England, Kent Wildlife Trust and RSPB to commence an ongoing dialogue regarding the Arable Reversion Habitat Management Areaand landscape and biodiversity improvements for the Development. Chapter 9 (Ornithology) Environmental Statement (document reference number 6.1.9) and Report to Inform Appropriate Assessment (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well

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			as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
PhaseOne_FF_132	Establishment of linking hedges/ditches/ponds which can provide corridors for flowers/insects/birds etc. Controlling water levels is essential. Wildflower planting? Ways to mitigate impact could include banks as well as ditches. Some ditches could perhaps be widened to provide at intervals to provide boggy areas in corners.	Yes	Generally, the solar PV modules have been set away from aquatic habitats. The baseline arable fields extend to typically 2m from the ditches, and the increase of typically 13m of grassland either side of the main ditches represents a substantial increase in long-term habitat.
PhaseOne_FF_136	Pollinators for soft fruit crops.	No	Noted. The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development. The Applicant has consulted with the Bumblebee Conservation Trust regarding improving the site to benefit pollinators such as bees. As a result, species which are valuable to the shrill carder bee have also been included in the species list.
PhaseOne_FF_139	I would see some merit in extending the Arable Reversion Habitat Management Areawestwards as a wider margin on border with sea wall, at least as far as Castle Coote.	Yes	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites.

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			The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity improvements with Natural England, RSPB and Kent Wildlife Trust. This has resulted in an agreed Arable Reversion Habitat Management Area('AR HMA') for birds of 56 ha, which has increased from 41ha between PEIR and Application submission.
PhaseOne_FF_144	A keen walker, one of my favourite walks is around the coast from Faversham to Whitstable. The visual impact will detract from the stunning experience of this part of Kent.		There will be a minimum buffer distance from the Saxon Shore Way of 63m has been maintained by the Developer, with this buffer increasing to 100m at the Faversham Creek end.
PhaseOne_FF_148	There are a whole series of concerns. The land has been extremely productive which belies its Grade 3b status. Visually, this power station would be exceedingly dangerous. As well as flora would suffer with the proposed east/west arrangement of panels. The heritage of the area is paramount. Solar panels should be put on every new building an also on all factories and offices. That would supply many more acres.	No	Please see the following detailed information as follows: Approximately 95% of the land within the Solar Park where development could take place is classified as Grade 3b, which is not best and most versatile agricultural land, i.e., it is of lower agricultural quality, as detailed in Agricultural Land Classification survey (document reference number 6.4.13.1). With respect to views and visual mitigation please see the LVIA assessment, Chapter 6, Environmental Statement (document reference number 6.1.7).

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			With respect to the impact of the east west layout, please see the LMBP, Environmental Statement (document reference number 6.4.5.2).
PhaseOne_FF_172	I worry about the impact of construction as well as the habitat loss. What species will benefit from the change? Will we see new plants and animals flourish?	Yes	Please see Chapter 8, Environmental Statement (6.1.8). With design changes following the production of the PEIR, reptile mitigation requirements have been reviewed and revised in Section 8.9.7.5 of the Ecology ES Chapter. There are extensive reptile habitats within the core study area, with limited baseline reptile habitat requiring removal at the construction phase. Embedded mitigation, as detailed within the LBMP Appendix A5.2 will offset any initial losses of habitat suitable for reptiles by providing improved habitats and an overall net gain in habitats of value to species such as reptiles.
PhaseOne_FF_177	All, I'd like a larger shoreline area put aside for birds	No	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites. The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity

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			improvements with Natural England, RSPB and Kent Wildlife Trust. This has resulted in an agreed Arable Reversion Habitat Management Area('AR HMA') for birds of 56 ha, which has increased from 41ha between PEIR and Application submission.
PhaseOne_FF_181	All the area outlined is a very naturally balanced eco system incorporating many migratory birds as well as raptors. You cannot annex a small area and expect nature to comply with mans self centred needs. Suggest you find a suitable brown field site.	No	Noted. Please see Chapter 4, Environmental Statement (document reference number 6.1.4) regarding site selection for the Development.
PhaseOne_FF_187	Anything other than humans	No	Noted.
PhaseOne_FF_195	The area is an SSI. Brent geese feed on the grasses here so do Lapwings and have done forever. Skylarks nest there. Marsh Harriers, Merlins hunt across the fields. So do Short Eared Owls and Barn Owls amongst others. Evidence shows that birds do not want to risk damage to their feathers or being caught underneath panels they need to be out in the open. The area attracts a lot of people because it is a designated SSI and protected. A park of this size is totally insensitive	No	At phase one s47 consultation, land adjacent to the Development is designated as SSSI, SPA and Ramsar the land where the infrastructure associated with the Development will be built is not designated or subject to any restrictions in respect of agricultural management. In response to comments from the HMSG, the additional areas included in the Development since the PEIR, which comprise part of The Swale SPA/SSSI/Ramsar site, will not contain any new development structures; they are included to facilitate ongoing maintenance of the sea wall and to bring biodiversity benefits through more appropriate

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	to the unique nature there. I would not have a problem if it was a quarter of the size and backing along farm areas nearest to the road.		management of the freshwater grazing marsh in the east of the site.
PhaseOne_FF_197	it's the combination that is so important - the surrounding habitat and species as well as on the proposed actual site	No	Noted.
PhaseOne_FF_203	I would be interested in the next consultation to have a bit more detail re: section set aside for migrating birds. Do the companies you lease with, such as the RSPP. Previously the birds had access to the whole site.	Yes	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites. The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity improvements with Natural England, RSPB and Kent Wildlife Trust. This has resulted in an agreed Arable Reversion Habitat Management Area('AR HMA') for birds of 56

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			ha, which has increased from 41ha between PEIR and Application submission.
PhaseOne_FF_205	Protection of wildlife on the nature reserves at oare	No	Noted.
PhaseOne_FF_214	It is impossible for the solar park to predict what impact the solar park will have on ecology and bird life. The construction alone will cause destruction to many protected species.	No.	Please see Chapter 8, Environmental Statement (6.1.8) regarding impacts during construction.
PhaseOne_FF_215	The issue itself is important, not any specific species. The sheer size of the proposed development is the most likely concern.	Yes	Noted. Please see Chapter 5, Environmental Statement (6.1.5) for a detailed description of the change in Development scale.
PhaseOne_FF_216	We have to preserve them. Of course, there is more pollution that will also cause a problem	No	Noted.
PhaseOne_FF_226	Hope that habitats will be protected. Good to see some surveys have been done.	No	Noted.
PhaseOne_FF_229	All protected or endangered species	No	Noted
PhaseOne_FF_230	All affected, glad to see your ongoing surveys previous two 5 year results for wintering bird surveys of concern, with great care for amphibians, bats, invertebrates and reptiles in the area.	No	Noted

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PhaseOne_FF_246	Loss of farmland to winter feeding birds (e.g. lapwing and geese) Loss of hunting ground for marsh harriers	Yes	Water birds and marsh harrier are given a large degree of attention in the assessment (chapter 9 of the ES) because they are the species associated with the adjacent European designated site. The wintering and farmland bird communities are identified as Important Ecological Features and an assessment of the potential effects on these species has been provided (document reference 6.1.9).
PhaseOne_FF_258	I am concerned that overwintering birds will be denied necessary habitat. this development is right next to a major wildlife reserve and the farmland nearby is used by important and threatened bird species.	Yes	The Applicant has worked with the nature conservation bodies to design a Arable Reversion Habitat Management Areathat is agreeable to the parties, with a statement of common ground attached in Appendix 26.
PhaseOne_FF_278	Brent geese, marsh harrier and short-eared owl are all important in the area and require open areas. Steps should be taken to ensure that there are wide enough expanses of land to accommodate roosting and hunting.	Yes	The Applicant has worked with the nature conservation bodies to design a Arable Reversion Habitat Management Areathat is agreeable to the parties, with a statement of common ground attached in Appendix 26.

Phase One Feedback Form Responses
b) Archaeology and local heritage

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ID	Comment	Project Change?	Applicant Response
PhaseOne_FF_002, PhaseOne_FF_007, PhaseOne_FF_009, PhaseOne_FF_038, PhaseOne_FF_064, PhaseOne_FF_018, PhaseOne_FF_075 PhaseOne_FF_130 PhaseOne_FF_138 PhaseOne_FF_148, PhaseOne_FF_153, PhaseOne_FF_159, PhaseOne_FF_160, PhaseOne_FF_162, PhaseOne_FF_238, PhaseOne_FF_240 PhaseOne_FF_243 PhaseOne_FF_247 PhaseOne_FF_267 PhaseOne_FF_285	General comments were received about the need to maintain and preserve the archaeological heritage of the site.	No	The Applicant noted the comments received regarding the need to maintain and preserve the archaeological heritage of the site. As part of the Environmental Impact Assessment undertaken for the Development, the Applicant has assessed the cultural heritage and archaeology for the Development site area as presented in Chapter 11 of the PEIR and subsequently in Chapter 11 of the Environmental Statement (document reference number 6.1.11).

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PhaseOne_FF_005, PhaseOne_FF_142, PhaseOne_FF_146, PhaseOne_FF_181, PhaseOne_FF_198, PhaseOne_FF_214, PhaseOne_FF_222, PhaseOne_FF_263	Comments were received about the impact to the Saxon Shore Way and walking experience.		The Applicant noted the comments made regarding the impact to the Saxon Shore Way and walking experience. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience. A minimum buffer distance from the Saxon Shore Way of 63m has been maintained by the Developer, with this buffer increasing to 100m at the Faversham Creek end.
PhaseOne_FF_010, PhaseOne_FF_018, PhaseOne_FF_279	Comments were received about the discovery of the Graveney Boat and preservation of this.		The Graveney Boat is not sited on the Development site but on the neighbouring Graveney Marshes 870m east to the site. Please see Chapter 11, Environmental Statement (document reference 6.1.11).
PhaseOne_FF_024	Should the farm construction reveal a significant archaeological find it is unknown whether this will put a halt to the project's construction.	No	A watching brief report is set out in the Environmental Statement (document reference number 6.4.11.3).

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PhaseOne_FF_029	The marshes and adjoining land is an important resource for cycling , walking and birdspotting for local people and visitors and is an important part of Faversham heritage	No	Noted.
PhaseOne_FF_040	Historical area, evidence of Romans occupation in local areas	No	Noted. Please see Chapter 11, Environmental Statement (document reference number 6.1.11).
PhaseOne_FF_049	The Kent marshes have been an integral part of countryside. The uniqueness of the marshes described in Dickens "Great Expectations" will be lost forever to future generations.	No	This is the respondents view.
PhaseOne_FF_051	Impact would be unnecessarily high in relatively small area	No	Please see Chapter 11, Environmental Statement (document reference number 6.1.11) for an assessment of the impact.
PhaseOne_FF_060	The marshes are significant for food production, notably sheep. The old traditions for managing the marshes have lessons in how to combat climate change and preserve nature	No	Noted. The agricultural land has been used for arable farming.
PhaseOne_FF_078	The present uninterrupted views across the marshes from historic buildings and the local church	Yes.	Noted. Please see Chapter 7, Environmental Statement (document reference number 6.1.7). The change to design, since PEIR, excluding panels in Field Y was in part due to concern raised with respect to the All Saints Church, Graveney. No other effect on heritage significance of Areas was found or considered likely to occur.

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PhaseOne_FF_089	Not really an issue.	No	Noted
PhaseOne_FF_105	A unique countryside which is compatible with the ancient church "All Saints" and period farm dwellings.		Noted. Please see Chapter 7, Environmental Statement (document reference number 6.1.7). The change to design, since PEIR, excluding panels in Field Y was in part due to concern raised with respect to All Saints Graveney Church. No other effect on heritage significance of Areas was found or considered likely to occur.
PhaseOne_FF_124	Construction traffic thundering past Graveney Church could be exceedingly detrimental to its foundations.		A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1)
PhaseOne_FF_126	Giving time for digs will be positive influence on peoples views.	No	Noted. An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).

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PhaseOne_FF_145	I would hope that a GPR survey would be done to ensure that nothing would be lost.	No	A GPR survey was discussed with KCC (statutory consultee). The ground conditions at site are not favourable for this survey methodology. We have used an agreed programme of archaeological investigation with the statutory consultees Historic England and KCC. An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseOne_FF_149	SITE OF THE BATTLE OF GRAVENEY MARSHES	Yes	One element of the WWII defensive system (the undesignated Pillbox) will be preserved in situ. Consultation has been undertaken with KCC regarding archaeological issues and an outline WSI will be submitted for their approval to ensure archaeological matters are appropriately addressed. A reduction in the compound footprint and the removal of panels in Field Y is proposed and this will reduce potential effects on the higher ground where archaeological remains may be more likely to be encountered.
PhaseOne_FF_151	Are there any more bronze age boats hidden beneath the marshes?		No bronze age boats have been found on the Development site.

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PhaseOne_FF_154	Not so important.	No	Noted
PhaseOne_FF_172	Of great interest to me, but not obviously threatened.	No	Noted
PhaseOne_FF_176	Seasalter is a Bronze Age site and of special interest		Please see our Historic Environment Desk Based Assessment (document reference number 6.4.11.1)
PhaseOne_FF_182	The marshes are an important area which provide a critical service by absorbing excess rain water and allow natural flooding to occur in areas which do not impact residents		Noted. Please see Chapter 11, Environmental Statement (document reference number 6.1.11).
PhaseOne_FF_185	There may well be archaeology here. This area in general has a rich pre-history and history. We do not know what may be lost, particularly as archaeological techniques are developing rapidly.	No	Noted. Please see Chapter11, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_197	likely to have ancient salt works as occur on east of Faversham road		Please see our Historic Environment Desk Based Assessment (document reference number 6.4.11.1)
PhaseOne_FF_206	I feel that east Kent is being transformed to its detriment into an industrial site.	No	This is the view of the respondent.
PhaseOne_FF_226	Not sure if the local archaeology group have investigated the site. Hope they will be consulted.	No	The Applicant has consulted with the Kent County Council archaeological department and Historic England regarding the Development.

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			An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseOne_FF_230	Believe this also to be of note. Important to document correctly and explore this further, what is located before and during the construction process.	No	Noted. Noted. Please see Chapter11, Environmental Statement (document reference number 6.1.11).
PhaseOne_FF_254	The countryside all around Faversham is a lovely setting for its role as an ancient market town and port.	No	This is the view of the respondent.

Phase One Feedback Form Responses			
c) Visual impact Are there any local viewpoints you think are particularly important?			
ID	**Comment**	**Project Change?**	**Applicant Response**
PhaseOne_FF_004 PhaseOne_FF_007 PhaseOne_FF_009, PhaseOne_FF_024, PhaseOne_FF_025, PhaseOne_FF_037, PhaseOne_FF_038, PhaseOne_FF_040,	Several comments were received about the scale of the development and if it could be made smaller to reduce the visual impact.	Yes	In response to comments regarding views from surrounding properties and views of the site, the Applicant changed the Development design following phase one s47 consultation, as presented in the PEIR, in the following ways: the Applicant removed modules from south east of public right of way that crosses the south-eastern corner of the site to reduce visibility of the Development from Graveney including the Cleve Hill

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PhaseOne_FF_049, PhaseOne_FF_064, PhaseOne_FF_070, PhaseOne_FF_074, PhaseOne_FF_082, PhaseOne_FF_098, PhaseOne_FF_119, PhaseOne_FF_122, PhaseOne_FF_015,			Road area and Sandbanks Road. The Applicant also removed modules from above the 12 m AOD contour on Graveney Hill to reduce the potential for modules to be visible above the crest of the hill, both from the areas described above, but also for the properties accessed from Cleve Hill Road, Crown Cottages and Graveney Hill Farm. The Applicant removed modules from the south west of the site to the north east of Nagden to reduce visibility from the properties at Nagden and for the users of the rights of way at Nagden. The Applicant removed panels from the sloping land north of Nagden to reduce visibility from Nagden and from the Saxon Shore Way on both sides of Faversham Creek. The Applicant removed modules from the land immediately north of Warm House on the southern boundary to reduce visibility from the property. See Chapter 1 of the Consultation Report (document reference number 5.1) and Chapter 7 of the Environmental Statement (document reference number 6.1.7). In total, the Applicant has reduced the area covered by panels in the developable area from phase one s47 consultation to what is presented in the final Environmental Statement (document reference number 6) from 56.5% to 45.5%.

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PhaseOne_FF_014, PhaseOne_FF_016, PhaseOne_FF_017, PhaseOne_FF_028, PhaseOne_FF_036, PhaseOne_FF_057, PhaseOne_FF_064, PhaseOne_FF_088 PhaseOne_FF_078, PhaseOne_FF_093, PhaseOne_FF_102, PhaseOne_FF_103, PhaseOne_FF_109, PhaseOne_FF_121, PhaseOne_FF_003, PhaseOne_FF_034, PhaseOne_FF_044, PhaseOne_FF_058, PhaseOne_FF_069 PhaseOne_FF_072, PhaseOne_FF_169, PhaseOne_FF_181, PhaseOne_FF_178, PhaseOne_FF_187, PhaseOne_FF_189, PhaseOne_FF_206, PhaseOne_FF_280, PhaseOne_FF_284	Several comments were received about the spoiling of views from the coastline, Saxon Shore Way, footpaths across the site and views on to the Swale Estuary.	Yes	It is reported in the Environmental Statement, Chapter 7 (document reference number 6.1.7) that the site is within Graveney Marshes AHLV and that there are effects on users of the Saxon Shore Way and other public rights of way. These are reported in document reference number 6.1.7 and supporting appendices Environmental Statement, Technical Appendices 7.1-7.7 (document reference number 6.4.7.1-7). The Applicant has established a minimum buffer distance between the solar panels and Saxon Shore Way of 63m. The Applicant removed panels from the sloping land north of Nagden to reduce visibility from Nagden and from the Saxon Shore Way on both sides of Faversham Creek. Mitigation screening has been developed to provide screening where possible that is in keeping with the existing landscape characteristics and planting in that area. For example, not planting hedgerows or trees on the northern part of the development, along the Saxon Shore Way has been reflected in planting grasses and scrub type habitats. Mitigation proposed is illustrated and reported within the LBMP of the ES.

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PhaseOne_FF_084	Several comments were received about glint and glare from the panels	No	Solar PV modules are designed to absorb light and not reflect it. An assessment of glint and glare effects is provided in Chapter 17, Environmental Statement (document reference number 6.4.17.1).
PhaseOne_FF_005, PhaseOne_FF_100, PhaseOne_FF_198	Several comments were received about the concern for the loss of long ranging marsh views.	No	In terms of screening the development whilst retaining open views, the context of this is to provide low level screening to remove views of the development whilst retaining views of large skies and wider views to the Isle of Sheppey and the surrounding landscape when viewed from a range of viewpoints, whilst understanding that such viewpoints are representative and receptors experience the landscape in a dynamic way with areas of screening and openness in the current landscape experienced along the existing public rights of way for instance as well as wider views. Proposed planting also provides a context to more distant views creating a landscape setting for the development through creation of layers within the landscape.
PhaseOne_FF_006, PhaseOne_FF_008, PhaseOne_FF_023	Several comments were received about the size of the panels themselves and them being visually unacceptable.	No	The panels range from heights between 1.2m and 3.9m above ground level to allow for the varying potential extreme flood levels across the site. Chapter 5, Environmental Statement (document reference number 6.1.5) Project Description contains more information on heights of the panels. Effects on the visual amenity and recreational users are assessed in Chapter 7, Environmental Statement (document reference number 6.1.7). The height of the sea wall ranges from approximate heights of 5.5m to 6.29m and therefore provides significant screening reducing indivisibility in the wider landscape.

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			The Applicant provided photomontages of the solar PV modules based on a worst-case candidate design at phase 2 s47 consultation and in the PEIR.
PhaseOne_FF_029, PhaseOne_FF_058, PhaseOne_FF_138, PhaseOne_FF_146, PhaseOne_FF_174, PhaseOne_FF_281,	Several comments were received about visual impact along Faversham Creek, including opposite Shipwrights Arms and at Hollowshore.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_048, PhaseOne_FF_059, PhaseOne_FF_060, PhaseOne_FF_162	Several comments were received about the precious and unique nature of the landscape at the site.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_010	Cleve Hill, Graveney Hill. The solar farm on the flat marshland will be conspicuous from land sloping up to the village Hall and across to the east of the Seasalter Road. Any development on Cleve Hill slopes will be very widely visible.	Yes	In response to comments regarding views from surrounding properties and views of the site, the Applicant changed the Development design following phase one s47 consultation, as presented in the PEIR, in the following ways: The Applicant removed modules from south east of public right of way that crosses the south-eastern corner of the site to reduce visibility of the Development from Graveney including the Cleve Hill Road area and Sandbanks Road. The Applicant also removed modules from above the 12 m AOD contour on Graveney Hill to reduce the potential for modules to be

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			visible above the crest of the hill, both from the areas described above, but also for the properties accessed from Cleve Hill Road, Crown Cottages and Graveney Hill Farm. Following the Phase Two consultation, the Applicant has decided not to develop on a further 4.4 ha of land on Cleve Hill. Resulting in the decision to not develop on a total of 13.6 ha of land on Cleve Hill.
PhaseOne_FF_011	I do not like the visual impact of solar panels but see it as a trade-off.		Noted.
PhaseOne_FF_012	Covering grazing land will not be attractive to the eye.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_018	From my house all the way to the sea. From the seawall back inland and towards Cleve Hill.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_033	The Saxon Shore Way, Castle Coote. I would like to see a lowing hedge along the boundary with the Saxon Shore Way. It would need species like hawthorn to break up the outline.	No	In terms of screening the development whilst retaining open views, the context of this is to provide low level screening to remove views of the development whilst retaining views of large skies and wider views to the Isle of Sheppey and the surrounding landscape when viewed from a range of viewpoints, whilst understanding that such viewpoints are representative and receptors experience the landscape in a dynamic way with areas of screening and openness in the current landscape experienced along the existing public rights of way for instance as well as wider views.

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PhaseOne_FF_035	No - all viewpoints, from Faversham, hills to south and from east.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_039	The whole area is incredibly beautiful and there is no doubt this development will detract from the beauty. Most people access the area from near the Sportsman pub, and few walk the whole coastline to Faversham, so it is probably true that the area between the Sportsman and Castle Coote is the area I would feel most strongly should be protected.	Yes	Noted. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). The Applicant has since increased the size of its Arable Reversion Habitat Management Areaby removing 16 ha of Fields H, I and J out of Development and in to the Arable Reversion Arable Reversion Habitat Management Area. This has increased the distance between the Saxon shore way at the Sportsman Pub and the solar PV infrastructure.
PhaseOne_FF_043	The view from our house will be destroyed	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). The Applicant has also undertaken a Residential Visual Amenity Assessment (RVIAA, document reference number 6.4.7.5).
PhaseOne_FF_045	Planting native species hedging around the site with as wide a buffer zone as possible, especially around the houses at Nagden.	Yes	Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), which include native species planting at Nagden.
PhaseOne_FF_067	Will it make any noise? As this is one of the few areas where you can hear cars!		Noise during the operational phase of the development is assessed in the Environmental Statement, Chapter 12: Noise and Vibration Section 12.6.2 (document reference number 6.1.12).

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			The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100% capacity, during both daytime and night-time periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be lower than the limits set out in the Chapter.
PhaseOne_FF_071	As the panels will be 2metres above the ground, visual impact is an important consideration.	No	Noted. Panel heights range between 1.2m and 3.9m above ground level. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_073	View from Victory Wood.	Yes	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). The Applicant displayed a photomontage from Victory Wood at phase two s47 consultation and in the PEIR.
PhaseOne_FF_075	Open green spaces are very important. No attempt has been made to "soften" the buildings in the existing Cleve Hill substation with hedgerows etc.	No	The questions refer to the existing Cleve Hill substation, which is not owned by the Applicant. The proposals for the bund for the Development (the Solar Park) will go some way to screen views of the existing substation at Cleve Hill from certain locations.

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PhaseOne_FF_076	The impact on footpaths around and across the site will be immense. All might be enhanced by signage to describe what is going on. Visual evidence of wildlife improvement would be good	No	Noted – the Applicant welcomes comments and suggestions as to what improvements can be made on the Development site. At phase 2 s47, the Applicant presented plans for additional permissive pathways to increase connectivity across the site, which has resulted in an additional permissive pathway connecting the east of the Development site.
PhaseOne_FF_079	Faversham creek, Standard Quay, Faversham.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_080	Pretty much all of them		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_086	Walking the shoreline to look at an array of panels where birds feed and nest. You could come up with something better than a wire fence to screen it.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2). The Applicant has maintained the proposed use of Deer fencing around the Development.
PhaseOne_FF_087	360 degree fencing? No thank you. Surely the southern, east and west flanks can be coppiced and trees planted?	No	The Applicant has maintained the proposed use of Deer fencing around the Development. Screening and mitigation proposals are presented in the Landscape and

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			Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_089	Lot less visual than wind farms or overhead power lines		Noted.
PhaseOne_FF_094	This is a wonderful spot. The wildlife, beauty and special location should be preserved.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_105	When driving along the beautiful country road leading to Faversham from Seasalter, the peace, tranquillity and pastoral view is important. Lovely to see cattle + sheep - life!		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). The Applicant proposes a dual use of the Development site by using sheep for grazing.
PhaseOne_FF_110	The view from the ham marshes across nadgen marshes looking seaward and the impact on the setting of the view of Faversham town and the approach via the creek into the town.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_113	I love the view from the Thanet Way looking across Graveney marshes to the Isle of Sheppey.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_114	Black Shiny countryside. No thanks		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7,

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			Environmental Statement (document reference number 6.1.7). An assessment of glint and glare effects is provided in Chapter 17, Environmental Statement (document reference number 6.1.17).
PhaseOne_FF_115	over the salt marsh on walk to Faversham		Noted.
PhaseOne_FF_117	The proposed area is highly visible for many miles from the ridge running across the north		Effects on the visual amenity and recreational users are assessed in Chapter 7, Environmental Statement (document reference number 6.1.7). The height of the sea wall ranges from approximate heights of 5.5m to 6.29m and therefore provides significant screening reducing indivisibility in the wider landscape.
PhaseOne_FF_121	Concerned on what is open fields along the Saxon Way to only seeing rows and rows of panels.	No	A minimum buffer distance from the Saxon Shore Way of 63m has been maintained by the Developer, with this buffer increasing to 100m at the Faversham Creek end.
PhaseOne_FF_124	All		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_126	Only those looking outwards i.e. coastal.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_127	The view from elevated points e.g. Wraik Hill will need to be taken into account also.	Yes	The Applicant has included viewpoints from higher ground including Wraik Hill and Victory Wood as shown in Chapter 7, Environmental Statement (document reference number 6.1.7).

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			The Applicant presented photomontages of these viewpoints at phase two s47 consultation in the PEIR.
PhaseOne_FF_128	The whole area has a beauty which will be spoilt		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_129	All viewpoints are important, so every effort to minimalize impact should be made.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_130	Terrible		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_131	From the hills - e.g. crest if Thanet Way from Sheppey and East Coast from the sea wall.		See Environmental Statement, Volume 3: LVIA Visuals (document reference number 6.3)
PhaseOne_FF_132	Need to come up with ways to break up the monolithic blanket look and offer relief. Would also help if there was another path running N/S	Yes	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2). At phase 2 s47, the Applicant presented plans for additional permissive pathways to increase connectivity across the site, which has resulted in an additional

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			permissive pathway connecting the east of the Development site.
PhaseOne_FF_133	The whole of the planned development area. The Saxon Shore Way has excellent views.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_134	Will be an eyesore		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_137	This kind of landscape is often undervalued but it lifts the spirits		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_140	Yes, all of it. Salt Marsh and Wild areas are rare in and around Faversham		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_141	This is overwhelming in size and impact. It could be shrunk further inland, it would be less intrusive on the wetlands.	No	In total, the Applicant has reduced the area covered by panels from phase one s47 consultation to what is presented in the final Environmental Statement (document reference number 6) from 56.5% to 45.5%
PhaseOne_FF_142	Apart from above, not particularly a concern personally but it is to local people.		Noted.

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PhaseOne_FF_143	View from Swale and coast.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_145	I feel that the relatively low height should not cause a nuisance. Existing coastal access should be maintained or improved.	No	At phase 2 s47, the Applicant presented plans for additional permissive pathways to increase connectivity across the site, which has resulted in an additional permissive pathway connecting the east of the Development site.
PhaseOne_FF_149	THE MARSHES BY THE SWALE ARE FANTASTICALLY BLEAK. FROM THE RAISED POSITION OF THE SAXON SHORE WAY THERE ARE WONDERFULLY DESOLATE VIEWS ACROSS THE FIELDS, CRISS-CROSSED BY DRAINAGE DITCHES. ALSO, AN AMAZING, UNINHABITED PLACE FROM WHICH TO WATCH SUNSETS.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_150	How to preserve the integrity of the area. The marshes are a big part of the area.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_151	Seascape		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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PhaseOne_FF_153	Boundary of scheme is too close to the sea wall and Saxon Shore Way.	Yes	The Applicant has established a minimum buffer distance between the solar panels and Saxon Shore Way of 63m. In some parts of the Development site this buffer distance is as wide as 100m.
PhaseOne_FF_154	Hollow Shore. Saxon Shore Way		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_155	This is one of my favourite walks. I am concerned about the view from the Oare Marshes and the path alongside the South Swale nature reserve and the view from the footpath and through the fields.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_156	Nothing spectacular to be lost		This is the view of the respondent.
PhaseOne_FF_159	This is an AONB - it will ruin a wild and uniquely beautiful area which should be preserved		The Development itself is not in a protected area and not located in an area of outstanding natural beauty ('AONB'). Reference has been made to the special qualities of the AONB in Section 7.3.1.1 in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_160	We were told the walk would have either a tall hedge or a solar panel blocking views! The circular walk that has the red line going around it is so beautiful and ecologically attractive. Solar panels are normally ugly to look at - never beautiful!		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_163	This is visually outstanding beautiful area. Food for the soul!		These are the views of the respondent. Visual effects of the Development are assessed and supported by

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			viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_164	The proposed scheme is too large. Smaller developments on the built environment would be much more responsible in terms of environmental/social/visual impact.	Yes	In total, the Applicant has reduced the area covered by panels from phase one s47 consultation to what is presented in the final Environmental Statement (document reference number 6) from 56.5% to 45.5%.
PhaseOne_FF_165	Views from Shoreline paths and footpaths that goes through centre	Yes	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). There are no pathways that run throughout the centre of the Development. The Applicant will not close any public rights of way that run across the Development to the west and the Applicant has added a permissive pathway to the east of the site, connecting the north and south of the site. The Applicant has produced an additional photomontage of views from the public right of way to the west of the Development site area as shown in Environmental Statement, Volume 3 – LVIA Visuals (document reference number 6.3)
PhaseOne_FF_172	Views across from Oare Marshes; view from Saxon Shore Way. The existing pylons are beautiful in their way. Will the solar park be?		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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PhaseOne_FF_176	The flat lands themselves, the site proposed for development. This part of the coast is the last undeveloped stretch of coastline in this part of NE Kent and should remaining developed so that nature can have its place here undisturbed by human interventions. This project poses to be a massive blight on the landscape and in full view, due to the nature of the terrain for literally miles around.	No	These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_177	All		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_182	The viewpoints from the creek and the Saxon Shore way are very important to the area, both for local residents and visitors to both Graveney and the surrounding area		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_185	This will have a distinct and detrimental local visual impact.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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PhaseOne_FF_186	almost by definition solar parks are ugly. Can the surrounding boarders/ fences be planted appropriately to mitigate against this in past?	Yes	These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_188	Views from the public footpath should be protected. Walking between hedges will be a lesser experience - so mitigation of this as much as possible is vital	Yes	These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). The Applicant has produced an additional photomontage of views from the public right of way to the west of the Development site area as shown in Environmental Statement, Volume 3 – LVIA Visuals (document reference number 6.3) Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_192	This will obliterate this part of north Kent countryside. It's not even creeping industrialisation.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_193	It's not going to obstruct the view.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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PhaseOne_FF_195	I think there should be designated areas, barren over-farmed land which each community should have as their own local sustainable energy resource. Why should our beautiful and unique nature suffer to have a solar park on such a scale it is counter intuitive.	No	The Development site is an area of agricultural land classified as Grade 3b which is not best and most versatile agricultural land, i.e., it is of lower agricultural quality. The Development site is not designated. These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_197	visual assessment poor - it is a highly visible site		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_201	The whole shore from The Walker's POV - Walking beside a massive sameness where there used to be a country view		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_208	concerned that the whole area will have a blinding effect, and no one will want to walk anywhere a round		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_209	The view across the estuary		All viewpoints can be seen in Environmental Statement, Volume 3 – LVIA Visuals (document reference number 6.3). This includes a viewpoint from the Isle of Sheppey which looks across the Swale Estuary towards the site.
PhaseOne_FF_214	The view from Saxon Shore - to Graveney across open fields, from Sandbanks Lane to Faversham, all areas are stunning countryside views.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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PhaseOne_FF_216	I think such a large farm will be monstrous - you need to grow a forest around it	No	These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_217	It is countryside and two-metre-high monstrosities should never form part of it.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_220	They are ugly!		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_222	Down the hill towards Broom Street.	Yes	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). In response to comments regarding views from surrounding properties and views of the site, the Applicant changed the Development design following phase one s47 consultation, as presented in the PEIR, in the following ways: The Applicant removed modules from south east of public right of way that crosses the south-eastern corner of the site to reduce visibility of the Development from Graveney including the Cleve Hill

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			Road area and Sandbanks Road. The Applicant also removed modules from above the 12 m AOD contour on Graveney Hill to reduce the potential for modules to be visible above the crest of the hill, both from the areas described above, but also for the properties accessed from Cleve Hill Road, Crown Cottages and Graveney Hill Farm. Following phase two s47 consultation, the Applicant removed solar PV modules in Field Y, therefore further reducing views from Broom Street.
PhaseOne_FF_223	View from Monks Hill Road to Swale Estuary	No	Noted. All viewpoints can be seen in Environmental Statement, Volume 3 – LVIA Visuals (document reference number 6.3).
PhaseOne_FF_228	I think walking down from the sportsman and cycling through Graveney is one of the most beautiful country scenes in this area. I think your plan is too big and should be kept west from the track west of Cleve Hill and not extend further east from Cleve Hill. This is the only wilderness type location in the area. Other coastal areas are urban. I would be devastated if we lost this.	No	These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). The Applicant has since increased the size of its Arable Reversion Habitat Management Areaby removing 16 ha of Fields H, I and J out of Development and in to the Arable Reversion Arable Reversion Habitat Management Area. This has increased the distance between the Saxon shore way at the Sportsman Pub and the solar PV infrastructure. Further, significant screening and mitigation proposals are presented in the Landscape and Biodiversity

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			Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_230	Consideration for set aside around perimeter with landscaping/ sensitivities for wildlife to enhance the local area for walkers and community.	Yes	A minimum buffer zone of 63m is proposed between the Development and Saxon Shore Way.
PhaseOne_FF_235	If you use green panels, they will be less visible. Current polytunnels are worse visibility	No	Unfortunately, green panels are not in production. These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_238	Hideously unattractive		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_240	The whole area and across to Sheppey		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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PhaseOne_FF_243	The whole area is very important		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_244	The Saxon Shore walk is one of the most beautiful (and unknown) in the whole of Kent, and indeed around Britain's coast. It would be awful if the only thing people could now see are solar panels. Do you have any plans to plant trees around the edges so that the only thing that walkers see is glare?	No	A minimum buffer zone of 63m is proposed between the Development and Saxon Shore Way. In terms of screening the development whilst retaining open views, the context of this is to provide low level screening to remove views of the development whilst retaining views of large skies and wider views to the Isle of Sheppey and the surrounding landscape when viewed from a range of viewpoints, whilst understanding that such viewpoints are representative and receptors experience the landscape in a dynamic way with areas of screening and openness in the current landscape experienced along the existing public rights of way for instance as well as wider views. Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_246	I am concerned about the visual impact around the shore of Faversham Creek and The Swale but most of all the impact on the residents of Nagden.	Yes	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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PhaseOne_FF_247	The whole area. You need to understand that the vastness of this area makes it the beautiful place it is.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_250	Building on 800+ acres will have a profoundly negative visual impact on what is a unique and beautiful open space.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_251	YES		Noted.
PhaseOne_FF_252	The entire path along the sea wall. Also views from the top of Victory Wood.	Yes	Viewpoints from the Saxon Shore Way and Victory Wood are included in the assessment presented in Chapter 7, Environmental Statement (document reference number 6.1.7). The Applicant showed photomontages of both locations at phase two s47 consultation and in the PEIR.
PhaseOne_FF_254	The peaceful sweep of the coastline as you walk along the sea wall and the complementary contrast of the sea/land between The Sportsman and Castle Coote and beyond.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_257	Using our limited natural resources for solar panels is a simplistic approach to solving the need for renewables. This sort of project should be aligned to urban renewal.		These are the views of the respondent.

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PhaseOne_FF_258	We have another solar arm near Greenfield which causes extreme dazzle at certain times from reflected sunlight. The scale of the Cleve Hill development is a real concern.	No	An assessment of glint and glare effects is provided in Chapter 17, Environmental Statement (document reference number 6.1.17).
PhaseOne_FF_259	The space, the land, the sea		Noted.
PhaseOne_FF_261	I regularly drive, cycle and walk along the back road from Whitstable to Faversham particularly because I like the peaceful environment and the scenery and bird life. I would be very concerned if this was spoilt by a solar farm, which even though low-level will very ugly compared to what is currently there. The Graveney church environment looks as though it will be spoilt as well.	Yes	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). This includes a viewpoint from the All Saints Church, Graveney. Since phase one s47 consultation, the Applicant has removed solar PV modules from fields Y and Z, thus removing all modules from the elevated land at Cleve Hill and to the base of the hill. This has reduced views of the Development from All Saints Church in Graveney.
PhaseOne_FF_262	The area is a bleak and uniquely beautiful landscape. The Solar panels will change this to a bleak and ugly space. The Saxon Shore Way will be ruined for the 2 miles or so of walking past what will be an industrial eyesore.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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PhaseOne_FF_263	The view Eastwards from Oare marshes, where I live is of unbroken saltmarsh all the way to Seasalter/Whitstable. One of the joys here is seeing flocks of geese (Brent Geese I think) flying in from Nagden/Graveney marshes just along the coast. The full extent of the marshes is seen from the hillside above Hernhill, this is one of the highlights of my cycling route from Oare to Canterbury.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_266	both south and north		Visual effects of the entire Development site are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_267	Solar farms should be obscured from view and should not pollute hills, mounts, walking paths,....	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). Further, significant screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_273	The complete landscape needs to remain unspoilt.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

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			Further, significant screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_275	This is an area of outstanding beauty that will be destroyed by acres of panels		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_277	None more than others		Noted.
PhaseOne_FF_279	The Graveney marshes are a beautiful part of our coastal landscape. A structure this size will obliterate that.		These are the views of the respondent. Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseOne_FF_285	Solar panels are unsightly and can so easily be placed out of the way on top of commercial buildings		These are the views of the respondent.
PhaseOne_FF_286	The sightlines along Faversham Creek and its entrance. The view from Hollowshore across the creek entrance and the view from the Saxon Shore Way		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).

Phase One Feedback Form Responses			
d) Traffic, access and construction Are there any particular lessons you think we could take from previous developments in the local area? Should the scheme be built, would you prefer a shorter and more intensive construction programme or a longer and less intensive programme?			
ID	**Comment**	**Project Change?**	**Applicant Response**

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PhaseOne_FF_002, PhaseOne_FF_034, PhaseOne_FF_097, PhaseOne_FF_108, PhaseOne_FF_109, PhaseOne_FF_111, PhaseOne_FF_216, PhaseOne_FF_223, PhaseOne_FF_277 PhaseOne_FF_080	Several respondents expressed a preference for a shorter, more intensive construction period.	No	Noted. The Construction Traffic Management Plan, is available in the Environmental Statement, (document reference number 6.4.14.1).
PhaseOne_FF_008, PhaseOne_FF_039, PhaseOne_FF_177, PhaseOne_FF_196, PhaseOne_FF_246, PhaseOne_FF_286 PhaseOne_FF_045	Several respondents expressed a preference for a longer, less intensive construction period.	No	Noted. The Construction Traffic Management Plan, is available in the Environmental Statement, (document reference number 6.4.14.1).
PhaseOne_FF_035, PhaseOne_FF_146, PhaseOne_FF_194, PhaseOne_FF_243, PhaseOne_FF_285	Several respondents expressed that they were undecided, or did not know their preference for a construction period.		Noted. The Construction Traffic Management Plan, is available in the Environmental Statement, (document reference number 6.4.14.1).
PhaseOne_FF_014, PhaseOne_FF_023, PhaseOne_FF_071, PhaseOne_FF_128, PhaseOne_FF_208	Several respondents stated that the roads are not wide enough to accommodate large vehicles alongside cyclists and walkers, and already in a poor condition.	No	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).

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PhaseOne_FF_018, PhaseOne_FF_058, PhaseOne_FF_063, PhaseOne_FF_121, PhaseOne_FF_128, PhaseOne_FF_134, PhaseOne_FF_138, PhaseOne_FF_140	Several respondents expressed that they are concerned about the impact on congestion in the area.	Yes	The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. Predicted traffic volumes are discussed within Chapter 14, Environmental Statement (document reference number 6.1.14). The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_007	The road planned to be used should have been removed 5 years ago. It should be built on another site.		This is the view of the respondent.
PhaseOne_FF_009	Fix the roads when you are done. Roads need resurfacing since London Array wrecked them!	Yes	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_010	The road through Graveney has already taken the brunt of the London Array development. Because of the local businesses in farming and caravan		Noted.

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	developments in Seasalter we already get excessive numbers of over large vehicles.		
PhaseOne_FF_012	During the building people living close will be inconvenienced and disturbed by noise.		Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) discusses any potential transport related environmental effects associated with the construction of the proposed solar park. It identifies no significant residual environmental effects resulting from the proposed construction traffic.
PhaseOne_FF_013	There is inevitable traffic where any construction takes place.		The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. Predicted traffic volumes are discussed within Chapter 14, Environmental Statement (document reference number 6.1.14).
PhaseOne_FF_016	No footpaths or pavements for those walking to school. I walk 3 young children down Sandbanks Lane every day, not appropriate to use these types of road.		The Applicant has undertaken a traffic assessment for the Development in consultation with Kent County Council, who are responsible for the local roads and paths network. This assessment is presented in Chapter 14, Environmental Statement (document reference number 6.1.14)
PhaseOne_FF_017	Neither		(As above regarding construction times)

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PhaseOne_FF_024	The surrounding road network is fragile to say the least. The Cleve Hill Solar Farm project will do nothing but increase the damage to the local roads, contribute to increased congestion, increased levels of danger for cyclists, pedestrians and horseback riders who all use the roads frequently. There was a distinct lack in information presented at the Sheppey meeting.	Yes	The Applicant has undertaken a traffic assessment for the Development in consultation with Kent County Council, who are responsible for the local roads and paths network. This assessment is presented in Chapter 14, Environmental Statement (document reference number 6.1.14). The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. At each of its consultation events, the Applicant provide the same consultation materials for viewing. In response to phase one s47 comments that more information was required on traffic, the Applicant produced a non-technical fact sheet on traffic in addition to the new information presented in the PEIR and PEIR NTS. No traffic will be going through or on Sheppey in relation to the Development.
PhaseOne_FF_025	This scheme should not be built it is too big and destructive in an area that is already over built. A much smaller project would be more appropriate.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The

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			Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_040	It's too big, covers a huge area of local wildlife occupation	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_048	Do not build it.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseOne_FF_051	Traffic impact during construction and after would be huge and time taken on construction would make no overall difference	No	The Applicant has undertaken a traffic assessment for the Development in consultation with Kent County Council, who are responsible for the local roads and paths network. This assessment is presented in Chapter 14, Environmental Statement (document reference number 6.1.14). The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_057	This was dreadful for the people living in Graveney, and they are dreading the solar project. Tell us more about the options.	Yes	The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. In response to comments from phase one and phase two s47 consultation about requiring more information about the traffic for the Development, the Applicant held a traffic

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			focused workshop with the community on 19 September 2018.
PhaseOne_FF_064	Anything to minimise environmental impact and disruption to locals	Yes	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_075	We already have many farm lorries and caravan transport lorries using local roads. Road surface already poor. Speed must be kept to a minimum. Road is narrow and winding. The road is well used by cyclers. This must be considered.	Yes	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_078	I would need more information as to the alternative programmes. Better traffic monitoring for construction vehicles in terms of speed and agreed working hours. Smaller vehicles to minimise damage to the highway and verges	Yes	The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. In response to comments from phase one and phase two s47 consultation about requiring more information about the traffic for the Development, the Applicant held a traffic focused workshop with the community on 19 September 2018. The Applicant has proposed a series of mitigation in the CTMP to reduce congestion

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			during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_084	Feel for the residents where the lorries will be going. Does it need separate access other than a "B" road.	No	Access options north and south of the existing Cleve Hill substation are presented in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
PhaseOne_FF_086	Just one caravan movement to the caravan parks can cause traffic chaos on the Head Hill Road. There have also been cyclists injured on the narrow stretch just after the Oast houses.		The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_087	This seems to be a big "don't know" when questioned for more information.		The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. In response to comments from phase one and phase two s47 consultation about requiring more information about the traffic for the Development, the Applicant held a traffic focused workshop with the community on 19 September 2018.
PhaseOne_FF_089	Lot less disruption than many other building projects		Noted.

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PhaseOne_FF_100	The emphasis needs to be on road safety and no lorries etc causing disturbance at night or in nesting season. And for any damage to be immediately fixed and avoided in the first place.	Yes	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1). Safety Highways safety is an integral part of the assessment of impacts as presented in Environmental Statement: Chapter 14, Access and Traffic (document reference number 6.1.14). The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.
PhaseOne_FF_105	The current lane (road) is totally unsuitable for any heavy or continuous vehicle. We're already "over-vehicled" by traffic using the road as a cut-through.	No	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_114	Very limited site access without impact on local traffic.	No	Alternative access routes and methods are assessed in Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document

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			reference number 6.1.4), and Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseOne_FF_119	All access to this site is unsuitable. Large lorries are a danger - Graveney bridge immediately springs to mind.	No	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). This includes proposals to avoid HGV traffic movements during school start and finish times.
PhaseOne_FF_120	Traffic flow at peak times on A299 New Thanet Way. Strength of roads/verges to cope with construction traffic	Yes	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).

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PhaseOne_FF_124	Mud on the roads from construction traffic. There is needs to be a frequent street cleaning programme to wash this down and keep the public road safe. Also, attitude of construction drivers needs to be respectful to local drivers and not bullish and impatient.	Yes	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).
PhaseOne_FF_126	Access so that traffic flow in/out of Faversham is not affected. We cannot cope now and house developments are aggravating situation.	Yes	Predicted traffic generation from the proposed development and vehicle routing is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). The environmental effects of the construction traffic have been assessed in the context of both local roads and the strategic road network and no significant residual environmental impacts are predicted. In addition, a Construction Traffic Management Plan, available in Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1), has been produced to support the DCO application which sets out a number of mitigation measures.
PhaseOne_FF_129	Shorter programme for earlier commissioning. Consider transport of materials to the coast by water.	No	Alternative access routes and methods are assessed in Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4), and Chapter 14:

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			Access and Traffic (document reference number 6.1.14).
PhaseOne_FF_131	Issues around maintenance and de-commissioning strategy?		The volume of traffic expected to be generated once the site is operational and during decommissioning is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental effects from additional road traffic are predicted.
PhaseOne_FF_135	I think you could have provided estimates of construction traffic impact. You dodged this on the board and it will be of huge concern. You will need to address this ASAP.	Yes	The Applicant provided predicted construction traffic numbers in the PEIR as part of the parallel s42, s47 and s48 consultation. At the Phase Two community consultation events there were traffic specific fact sheets and exhibition displays which provided these numbers. Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseOne_FF_141	Depends on the relevant routes.		Noted. It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement,

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			Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted.
PhaseOne_FF_142	Make the transport as sustainable as possible.	No	Alternative access routes and methods are assessed in Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4), and Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseOne_FF_145	During construction, please keep roads free. A shorter scheme would be seen better.	Yes	A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). This includes proposals to avoid HGV traffic movements during school start and finish times.
PhaseOne_FF_151	There needs to be great care on the Seasalter Road - it needs widening! Get it over and done with.	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) discusses any potential transport related environmental effects associated with the construction of the proposed solar park. It identifies no significant residual environmental effects resulting from the proposed construction traffic.
PhaseOne_FF_153	Construction program that causes as little ecological disturbance as possible to this area.	Yes	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic.

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			The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction.
PhaseOne_FF_154	Not sure. Shorter and more intensive construction programme with as much protection for the environment as possible.	Yes	Noted. Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic. The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction.
PhaseOne_FF_156	Hopefully only in the short term i.e. building		The volume of traffic expected to be generated once the site is operational is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental effects from additional road traffic are predicted.
PhaseOne_FF_159	Traffic to build and maintain the substation caused structural damage to the properties in Graveney.	Yes	Noted. The assessment of construction noise and vibration is contained within Environmental

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			Statement, Chapter 12: Noise and Vibration, Section 12.6.1 (document reference number 6.1.12). Both Chapter 12: Noise and Vibration (document reference number 6.1.12) and Chapter 14: Access and Traffic (document reference number 6.1.14) identify that no significant residual environmental impacts from construction traffic are predicted. Furthermore, the Applicant has proposed a number of mitigation measures in relation to construction traffic movements that are detailed within the Construction Traffic Management Plan (document reference number 6.4.14.1). Contained in this, the Applicant has proposed to carry out a road condition assessment prior to construction in order to ensure the road is in good condition at the start and end of construction.
PhaseOne_FF_160	The Graveney Cleve Hill substation created huge upheaval to locals. All structures need materials and transport to get it from A to B. Our roads struggle with the larger trucks already.	Yes	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted.

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			Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_162	Look to use alternative modes of transport - Sea, Helicopter, Railway better than roads. Shortest possible time period to build.	No	Alternative access routes and methods are assessed in Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4), and Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseOne_FF_168	While I, like many, believe that solar power is essential, I don't believe that an 890-acre farm on a conservation site is not what the lad has been set aside for. At least, a somewhat smaller farm would be of less disturbance to this very unique and protected area.		All the Development infrastructure is included in the 890-acre farm referenced. This arable land does not feature any nature conservation sites. Furthermore, of the 387.6 ha developable area only 45.5% will be covered by solar panels. 56 ha are included as Arable Reversion Habitat Management Areaspecifically for managed for the use of overwintering birds who use the adjacent nature conservation sites. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration

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			of Alternatives (document reference number 6.1.4).
PhaseOne_FF_176	Anything that happens here should be of the lowest possible impact to protect migrating and breeding birds and other wild animals and the ecosystem here. Ideally nothing should happen to this site since it is farmland for sale that borders the protected wildlife reserve and should be purchased to extend the wildlife area of this important and unusual ecosystem. The development requires the regular use of massive lorries and HGV's along one of Britain's narrowest and most winding roads. Ridiculous arrogance using diggers on the mudflats to lay pipelines for the London Array a few years ago which sank a cost hundreds of thousands of pounds to hire security guards to watch was a clear embarrassment and perfect example of a lack of respect for the natural environment at this site. More trucks in this area will cause huge disturbance for locals and the many visitors to this area, who are coming to see this unspoilt stretch of coast anyway. It's going to upset a lot of people if it does	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic. The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.

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	go ahead and will have a detrimental impact on tourism on this stretch of coast.		
PhaseOne_FF_178	Not relevant as such a large installation shouldn't be built		Noted. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4).

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PhaseOne_FF_181	2014 you started surveys December 2017 we were informed of your intentions there would appear to be a distinct lack of transparency from the start which does not give me confidence for transparency in the future. The scheme should not be built.		The Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1) includes details regarding the timing and weather conditions during each survey. Surveys covered the core survey area and were carried out by experienced ornithologists.
PhaseOne_FF_182	The problems we had with the London Array development included erosion of our verges which were not reinstated and many other traffic issues, including lorries not complying with speed limits and using our drive to turn their vehicles. A survey should be done with the villagers to identify the lessons learned so they can be avoided with any future development. A longer, less intensive programme would be preferred.	Yes	The Applicant has welcomed feedback and experiences from the construction of the London Array substation construction. This has included feedback from community and prescribed consultees, and feedback received from a focussed transport workshop held with elected members on the 19 September 2018. A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_185	There will be increased traffic on narrow, local roads already in poor condition. This is a key consideration for the development.	Yes	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document

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			reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_187	Yes, don't do it!		Noted.
PhaseOne_FF_188	Work tidily! Don't make a mess of the surrounding area, no matter how 'uninhabited' it appears. People need spaces that feel cared for		The Applicant has proposed a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_189	Whichever is less damaging to the wild life.	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic. The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.

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PhaseOne_FF_191	Longer programme might give wildlife more time to adjust	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic. The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.
PhaseOne_FF_195	I don't agree with the scale, this costs the environment which is antithetical to creating sustainable power. If the solar park were a quarter of the size and ran along the back of the fields towards the road then that would be ok in my view and I would support that but I would want wild hedging planted around it so that at least birds could nest and also large swathes of wild flowers to attract pollinators. I feel cynically that this is really about money.	Yes	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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			Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. This includes the addition of 3.64 km of native hedge row screening planting around the site. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements.

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PhaseOne_FF_197	use sea access	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) contains an assessment of the most suitable construction transport method, including consideration of sea-based transport.
PhaseOne_FF_198	You would ruin fragile landscapes by driving heavy construction vehicles over this land. This is an area that is calm, still and quiet.	No	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_202	Whichever option is less intrusive for local residents	No	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted.

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			Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_206	The roads in this area are already struggling with increased lorry movements. This site will only make it worse.	No	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_207	One-way system would be good.	No	Mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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PhaseOne_FF_214	I find it hard to believe that there is no traffic access plan yet! Considering the horrendous traffic that was generated by the sub-station, I would have thought this would be a priority in planning. It is not acceptable that they will be using the same route to access Cleve Hill as before!		The Applicant provided predicted construction traffic numbers in the PEIR as part of the parallel s42, s47 and s48 consultation. At the Phase Two community consultation events there were traffic specific fact sheets and exhibition displays which provided these numbers. Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseOne_FF_217	For a country road it is already overused. Residents suffered badly when wind farm was built.	No	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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PhaseOne_FF_222	Traffic lights on the bridge. School holidays		Mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_226	Shorter and more intensive. Can local road access be improved for the purpose?	No	Mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). Contained in this, the Applicant has proposed to carry out a road condition assessment prior to construction in order to ensure the road is in good condition at the start and end of construction.
PhaseOne_FF_230	Definitely should go ahead, prefer a smaller scale given current use for food production and further consideration for wildlife. Larger bands of use for this preferred. Given other developments forecasted and pressures on air pollution and traffic congestion a longer, less intensive programme is preferred.	No	Mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_235	Road maintenance - Cleve Hill works destroyed the road & KCC won't fix it properly.	Yes	The Applicant has welcomed feedback and experiences from the construction of the London Array substation construction.

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			This has included feedback from community and prescribed consultees, and feedback received from a focussed transport workshop held with elected members on the 19 September 2018. A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). Contained in this, the Applicant has proposed to carry out a road condition assessment prior to construction in order to ensure the road is in good condition at the start and end of construction.
PhaseOne_FF_238	Too much heavy traffic - damage to roads and hedgerows.	Yes	A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). Contained in this, the Applicant has proposed to carry out a road condition assessment prior to construction in order to ensure the road is in good condition at the start and end of construction.

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PhaseOne_FF_240	Cannot comment as have never built such a scheme		Noted.
PhaseOne_FF_247	It should not be built		Noted.
PhaseOne_FF_251	NO IT IS RIDICULOUS		Noted.
PhaseOne_FF_252	The answer would depend entirely on season and your definition of short.		Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic. The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.
PhaseOne_FF_254	With care and preparation, construction materials might be brought to site by sea. The road between Graveney and Seasalter is presently unsuitable for the amount of traffic it carries but too great an upgrade would impact adversely on traffic volume. A cycleway is also desirable.	No	Alternative access routes and methods are assessed in Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4), and Chapter 14: Access and Traffic (document reference number 6.1.14). The proposed route is considered the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document

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			reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_262	Construction should be as gentle as possible		A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_263	The end result would be the same in either case, but the proposed development would have a significant impact on the residents of Goodnestone and Graveney		A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_266	no preference except no building at all		Noted.
PhaseOne_FF_267	No disruption and roads that are left intact.	Yes	A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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			Contained in this, the Applicant has proposed to carry out a road condition assessment prior to construction in order to ensure the road is in good condition at the start and end of construction.
PhaseOne_FF_274	Build but leave a 200-metre strip, at least, along the bank		Noted.
PhaseOne_FF_276	Not enough information to decide		The Applicant provided predicted more detailed information including construction traffic numbers in the PEIR as part of the parallel s42, s47 and s48 consultation. At the Phase Two community consultation events there were traffic specific fact sheets and exhibition displays which provided these numbers. Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseOne_FF_278	Ideally, work would be carried out in late summer to lessen impact on nesting or overwintering birds. For that reason, work necessary during the rest of the year should be less obtrusive and less intensive.	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic. The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number

			6.4.10.2) will be implemented during construction including the Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.
PhaseOne_FF_279	The London array traffic during development destroyed the seasalter road and has never been repaired. Houses along the road had structural disturbances caused by the traffic.	Yes	The Applicant has welcomed feedback and experiences from the construction of the London Array substation construction. This has included feedback from community and prescribed consultees, and feedback received from a focussed transport workshop held with elected members on the 19 September 2018. A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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PhaseOne_FF_281	Traffic should be restricted to certain times of day (i.e. not too early, not too late and not during school pick up and drop off times). Mud and debris on the road should be actively managed by the company, and any damage to the roads from an intensification of use should be repaired during the build phase, and resurfaced when finished. Verges should be maintained appropriately if traffic ends up using it due to size of vehicles. Safe pedestrian walkways should be considered due to sizes of vehicles - something that is desperately needed between Goodnestone and Graveney for cars, let alone large site traffic! A 20-mph speed limit should be imposed past houses and particularly past the school, the latter is an aspiration for the village. Weekends should be avoided. The railway bridge is a pinch point, very narrow and visibility poor. Safety would be a concern.	Yes	A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). This includes proposals to avoid HGV traffic movements during school start and finish times.
PhaseOne_FF_282	a) it's very muddy. b) the sooner it's operational the better, so, short and intensive is better.	Yes	A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
Phase One Feedback Form Responses			
e) Flooding and flood defences			

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ID	Comment	Project Change?	Applicant Response
PhaseOne_FF_005, PhaseOne_FF_040, PhaseOne_FF_051, PhaseOne_FF_063, PhaseOne_FF_128, PhaseOne_FF_274, PhaseOne_FF_277,	Several respondents stated that they believe the sea wall has not been maintained in places, condition is poor and in need of improvement and maintenance.	No	This is the opinion of the respondent. On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed.
PhaseOne_FF_016, PhaseOne_FF_009, PhaseOne_FF_078, PhaseOne_FF_162, PhaseOne_FF_197, PhaseOne_FF_252,	Several respondents stated that they support the Environment Agency's plan for managed realignment in the area which forms part of the Medway Estuary and Swale Strategy, and that they believe the project is incompatible with this plan.	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy:

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			• We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm. As such, the Development is not in conflict with most recent version of the MEASS.
PhaseOne_FF_014, PhaseOne_FF_011, PhaseOne_FF_043, PhaseOne_FF_048, PhaseOne_FF_071, PhaseOne_FF_130, PhaseOne_FF_080, PhaseOne_FF_243, PhaseOne_FF_231, PhaseOne_FF_276,	Several respondents stated that the area is prone to flooding and sea surges and sea levels are rising.		The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_007	Climate change analysis suggests the area will flood totally in 20 years.		The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.

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PhaseOne_FF_008	The area is supposed to flood. To take excess water away from Faversham. Building on flood plains cause problems. This could encourage more developers to want to build along the creek.		The Site does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The EA currently have responsibility for the maintenance of the defences and have agreed that the operator of the Development should economically contribute to the future maintenance of the defences. Given that the existing defences provide a level of protection up to the 1:1000-year flood event, there is no requirement for the defences to be raised beyond their current height.
PhaseOne_FF_024	It is so far unknown whether flood defences are to be included in the Cleve Hill Solar Farm project. If defences are put in place though, existing defences in Seasalter will need to be revised and improved.	No	On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed.
PhaseOne_FF_038	Important		Noted.

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PhaseOne_FF_054	protection from flooding such as that in Faversham in summer 2017 when Faversham Creek burst its banks		The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_064	Future proofing needs to be factored in	No	The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_072	The sea wall is badly in need of repair. As global warming is leading to higher tides and seas. The sea has been in once. It will come again as global warming will lead to higher seas and more violent storms.	No	This is the opinion of the respondent. On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance,

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			the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_075	If this goes ahead, it will be in your own interests to ensure the sea wall is adequate.	No	On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences.

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			The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed.
PhaseOne_FF_076	I am concerned about rising sea levels and the possibility of one-off North Sea surges overtopping sea defences. Could the solar park still operate?	No	The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_086	Do these panels need flood protection, if there was an overtopping of sea wall. Possible consequences for the site?	No	The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.

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PhaseOne_FF_089	I can't see it will make any difference with or without the project.		Noted.
PhaseOne_FF_105	Was of the impression that no defences were envisaged for the area involved as it would be allowed to go back to natural flooding!	No	The EA's "The Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C"", Section 4.2 (Comments on specific Benefit Areas) document states that, “Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We [the EA] will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm”. As such, the Development is not in conflict with most recent version of the MEASS.
PhaseOne_FF_126	Would need assurance that flooding in Faversham is not aggravated.	No	The Site does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The EA currently have responsibility for the maintenance of the defences and have agreed that the operator of the Development should economically contribute to the future maintenance of the defences. Given that the existing defences provide a level of protection up to the 1:1000-year flood event, there is no requirement for the defences to be raised beyond their current height.

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PhaseOne_FF_131	Particular concern with rising sea levels and potential managed flood proposals. Impact on maintenance of the existing seawall. Anticipated impact researched in 2150 project.	No	On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.

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PhaseOne_FF_134	I don't understand how this site is 100% safe given the risk of storm surge at some point in this area.		The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_140	Flood defences will need renewing. Bund is slowly sinking inundation is likely.	No	On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix

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			that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_141	The existing sea-wall-bank is slowly subsiding so should be maintained but not re-built.	No	This is the opinion of the respondent. On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the

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			current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_142	Only in so far as solar investigates Co2 emissions which contribute to flooding!		Noted. The effects of climate change on flood levels are taken into account in the Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10) and Technical Appendix: Flood Risk Assessment (document reference number 6.4.10.1).
PhaseOne_FF_143	hard to believe that a storm surge overtopping the sea walk would be catastrophic		The Development has been designed to withstand a 1:1000-year flooding event, by raising all electrical infrastructure off the ground. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from

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			flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_151	This is low grade agricultural land subject to flooding. Good for wading birds, has flooded for 2000+ years		The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_156	I'm sure this is more important to you		Noted.
PhaseOne_FF_159	The area will flood on a regular basis therefore the panels will have to be raised causing further impact.	Yes	The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_169	What happens to a solar park if flooded? What happens if the high tide is combined with strong Northerly Gale as in 1953? The weather is becoming more erratic.		The Development has been designed to withstand a 1:1000-year flooding event, by raising all electrical infrastructure off the ground.

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			The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_176	The defences we have aren't in question. This is a protected area and includes a bird reserve so there would need to be more consultation.		The Development infrastructure is not situated on any protected wildlife reserves. Furthermore, in response to ongoing consultation with Natural England, RSPB and KWT in the HMSG, 56 ha are included as Arable Reversion Habitat Management Areaspecifically for managed for the use of overwintering birds who use the adjacent nature conservation sites.
PhaseOne_FF_181	The scheme covers 2 massive marsh areas which are natural sponges for flooding and water run off		The Development infrastructure is not situated on any marshland. Furthermore, the Site does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding.

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PhaseOne_FF_182	The marshes provide a natural flood defence by providing the facility for flood water to be stored safely without impacting local residents. What research has been done to identify the impacts on this natural service from the installation of solar panels. Research is also needed to understand what impact flooding would have on the solar panels themselves, should this situation occur		The Development infrastructure is not situated on any marshland. Furthermore, the Site does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The Development has been designed to withstand a 1:1000-year flooding event, by raising all electrical infrastructure off the ground. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_193	Don't see a problem		Noted.
PhaseOne_FF_197	as area is likely to enjoy managed retreat seems worst possible place of electrical equipment place for electrical equipment	No	The EA's ""The Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C"", Section 4.2 (Comments on specific Benefit Areas) document states that, “Should the plans for the solar farm at

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			Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We [the EA] will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS.
PhaseOne_FF_198	As the area is liable to flood, you would presumably have to raise the panels up to protect them. This would make it uglier.	Yes	The Development has been designed to withstand a 1:1000-year flooding event, by raising all electrical infrastructure off the ground. The panel tip heights range between 3m to 3.9m above ground level to allow for the varying potential extreme flood levels across the site. The Environmental Statement Chapter 5: Development Description (document reference number 6.1.5) contains more information on heights of the panels. The Applicant has assessed the visual impact of the Development including the solar panels as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseOne_FF_214	Another area that should be a priority but at current has the same answer as many of the FAQs. "We are awaiting the outcome..." Not good enough!		On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance,

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			the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed. The Applicant provided more detailed information regarding flood protection in the PEIR as part of the parallel s42, s47 and s48 consultation.
PhaseOne_FF_216	Important - Much too low at present		Noted.
PhaseOne_FF_223	Over the area of Cleve Hill		Comment unclear.
PhaseOne_FF_224	Maintain flood levels to drains and marshes.	No	The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_230	Pleased this is considered - interested in further details of your ongoing assessments.		The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix

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			that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_240	not informed enough		Noted.
PhaseOne_FF_251	CRUCIAL		Noted.
PhaseOne_FF_254	The sea wall, built when I was a child, has contributed to the landscape in a positive way. After 60 years it probably needs yet more maintenance again. I'd like to see it retain accessibility for cycling but not for motorbikes.	No	This is the opinion of the respondent. On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed.
PhaseOne_FF_262	If flood defences are improved at the Nagden end will this mean the site will become brownfield at some point?		No improvement works are proposed as part of the Development.

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			The Applicant is seeking the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed.
PhaseOne_FF_263	I can't remember how the area in question was affected but several years back all of the Faversham marshes were underwater during a particular combination of a spring tide and a weather induced tidal surge in the North Sea.		Noted.
PhaseOne_FF_267	This development is not compatible with the current proposed flood measures	No	The EA's ""The Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C"", Section 4.2 (Comments on specific Benefit Areas) document states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We [the EA] will not take responsibility for continued maintenance of the defences in this area.

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			• A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_269	With various increases to the sea levels the flooding threat is "large" in my mind. We have lived in this area since 82 and witnessed the tidal increase. What I would not want to see was the introduction of a "shale shifting" system like Dungeness.	No	On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of

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			the existing flood defences in the event that Cleve Hill Solar Park is constructed.
PhaseOne_FF_279	With any luck the marshes will be returned to salt flats and flood the whole area.	No	The EA's ""The Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C"", Section 4.2 (Comments on specific Benefit Areas) document states that, “Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We [the EA] will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm”. As such, the Development is not in conflict with most recent version of the MEASS. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from

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			flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseOne_FF_281	Some of the village households are within the flood risk zone. There would have to be clear evidence that development of any kind would not put houses more at risk.	No	On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed. The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable.

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PhaseOne_FF_282	Surface water management. Think about managing surface water and how this change when the water is funnelled by the panels and drips of only one edge	No	These issues are addressed in the Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10).

Phase One Feedback Form Responses			
F) Tourism			
ID	**Comment**	**Project Change?**	**Applicant Response**
PhaseOne_FF_082, PhaseOne_FF_185, PhaseOne_FF_223	Several respondents stated that they are concerned about the visual impact which the site will have upon the popularity of the area for tourism.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
PhaseOne_FF_040, PhaseOne_FF_064, PhaseOne_FF_058, PhaseOne_FF_093, PhaseOne_FF_133, PhaseOne_FF_140, PhaseOne_FF_169, PhaseOne_FF_181, PhaseOne_FF_220, PhaseOne_FF_222, PhaseOne_FF_238, PhaseOne_FF_267	Several respondents stated that they are concerned about the impact which the development would have upon the popularity of the area for walkers, particularly on the Saxon Shore Way.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseOne_FF_012, PhaseOne_FF_082, PhaseOne_FF_143,	Several respondents stated that they believe any reduction in wildlife particularly	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important

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PhaseOne_FF_162, PhaseOne_FF_185, PhaseOne_FF_191, PhaseOne_FF_192, PhaseOne_FF_267	ornithology, will result in a reduction in popularity of the area.		ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
PhaseOne_FF_017, PhaseOne_FF_187, PhaseOne_FF_261	Several respondents stated that they believe the proposed development will reduce the tranquillity and 'wilderness' of the area, which will reduce tourism.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseOne_FF_014, PhaseOne_FF_078, PhaseOne_FF_130	Several respondents stated that they believe it will impact tourism in the area.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.

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PhaseOne_FF_011, PhaseOne_FF_254	Some respondents suggested using the development as an eco-tourism site.	No	Noted.
PhaseOne_FF_214, PhaseOne_FF_277	Some respondents expressed that they wish for walking and access routes to be maintained.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseOne_FF_002	to maintain and protect original sites	No	All PRoWs which run through the site will be preserved by the Development.
PhaseOne_FF_008	Walking on sailing is important to this area.	Yes	Noted. All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseOne_FF_016	The Local Plan wishes to encourage tourism and Faversham has become popular with visitors - this will	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.

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	not help in any way and will put people off the area.		
PhaseOne_FF_018	The landscape is an area of significant beauty and a natural resource/public amenity of great value to visitors and residents.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseOne_FF_043	An area loved by many local residents will become industrialised	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.

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PhaseOne_FF_051	Seasalter is an important holiday home area, as well as having substantial essential housing, and given the shortage of low-cost housing in the area this must be preserved.	No	Noted. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseOne_FF_063	Once completed, there should be no real impact.		The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseOne_FF_076	If this site could be held up as a prime example of integration of renewable energy production with wildlife habitat possible some small scale food production it might inspire others to engage with climate change and the possibilities of renewable energy, i.e. energy saving.	No	Noted.
PhaseOne_FF_079	Roads are widely used by local and visiting cycle groups, especially at weekends throughout the year.	Yes	Core working hours are set out in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) while the timing of construction vehicle movements is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Core working hours are proposed to be between 07.00 until 19.00, Monday to Friday and 07.00 until 13.00 on a Saturday

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			(unless in exceptional circumstances where need arises to protect plant, personnel or the environment). In addition to this, a start-up and close down period for up to an hour before and after the core working hours is proposed. This does not include the operation of plant or machinery likely to cause a disturbance. All construction traffic movements will be within the core working hours. It is proposed that the project will not accept HGV deliveries to site or let HGVs leave the site between the hours of 08.30 to 09.30 and 15.00 to 16.00 to avoid Graveney Primary School start/finish times.
PhaseOne_FF_084	Improving signing and access to Saxon Shoreline would be good. What about a cycle way?	No	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive

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			path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseOne_FF_086	Walkers, bird enthusiasts - access to the marshes is paramount. The Freewheel Pub at Graveney has a "marsh walk" - without full access, what then?	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseOne_FF_087	Concern that site boundary appears to intersect Saxon Shore Way along Faversham Creek. Please confirm full access to walkers etc	No	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseOne_FF_089	Do people actually go sightseeing to see solar parks?		The Development's amenity proposals have been intended to preserve and improve local recreational amenity, rather than increase tourism to the site.
PhaseOne_FF_105	Many visitors to the local Church find the whole ambiance of the surrounding countryside in keeping with the life of the village.	Yes	Following Phase One community consultation, the Applicant removed solar panels from 9.2 ha of Fields Y and Z. Further to this, following the Phase Two consultation, the Applicant removed solar panels from a further 4.4 ha of Field Y. This was in part due to concern raised with respect to Graveney Church. Field Y has now been removed in entirety

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			from the Proposed Development. This will help to reduce encroachment above the former marsh, and help to allow the church to be seen in a rural context (in this direction). Other changes include a separation of panel block edge from the Proposed Development Boundary, with suggested screening to soften the edges of the Development. No other effect on heritage significance of Areas was found or considered likely to occur.
PhaseOne_FF_110	The wilder area of nagden marshes is part of the tourism attraction within easy reach of Faversham. A slightly reduced footprint towards Graveney would remove this impact from view.	Yes	In response to these concerns the Applicant removed panels from 9.2 ha at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.7km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseOne_FF_124	Cycling on local roads. Walkers on footpaths. Special care needs to be made regarding the popularity of these roads by cyclists and walkers. Lorries + cyclists do not mix.	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.

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			Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area. A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_126	If area becomes an environment where people can walk and cycle. This is good but would appreciate active tourism.	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this

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			basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseOne_FF_138	Blight on face of Faversham Creek		This is the opinion of the respondent. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseOne_FF_145	Keep coastal access and add a visitor centre possibly for the swale birds	No	Noted. The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseOne_FF_151	Footpaths - walkers and bird spotters to be encouraged.	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to

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			south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
PhaseOne_FF_159	This area is much loved by walkers/bird watchers and families who enjoy the beach and views at seasalter which will be blighted by the panels	Yes	This is the opinion of the respondent. The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.

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			The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2). The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseOne_FF_176	I think that the majority of walkers and birdwatchers (for which this area is famous) will want to return off this development goes ahead. Of course this will impact the tourist industry and restaurants in the local area.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.

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PhaseOne_FF_182	The Saxon Shore Way is a very popular walking, running and cycling area for locals and visitors. The surrounding landscape will be completely ruined by the installation and the potential reduction in visitors will have an impact on both Graveney and the surrounding towns and villages	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseOne_FF_193	Those who want to walk along the seawall will still walk along the seawall		This is the opinion of the respondent.
PhaseOne_FF_198	Faversham and surroundings is just starting to develop its appeal to inhabitants. This would industrialise and ruin its appearance.		This is the opinion of the respondent. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseOne_FF_201	Important to town, and walking the Saxon Shore way is a part of that	No	Noted. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).

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PhaseOne_FF_228	A PowerStation is not nearly as beautiful as Seasalter marshes and beach. There are seals here too. Walkers frequently walk to where the track after figure 5 is. Rather than set a precedent to blight beautiful landscapes with a powerstation, the energy board should have all new buildings and roofs covered in solar panels.	No	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road
PhaseOne_FF_230	Certainly a lot of emphasis and work to promote out coastline and coastal path. Continue to work to support and enhance this for a pleasant and enjoyable location to visit.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road
PhaseOne_FF_240	Basically this would ruin the area as regards people coming to the area on a tourism basis	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
PhaseOne_FF_243	Tourism is a key industry in this part of Kent. The site is very close to The Sportsman one of the best eateries in the UK	No	Noted.

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PhaseOne_FF_246	The long-distance Saxon Shore Way attracts many walkers. Don't make this corner of Kent a "let's skip this bit" for people!	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseOne_FF_251	CRUCIAL		Noted.
PhaseOne_FF_252	Loss of visual amenity likely to have a detrimental impact on numbers of walkers. This is presently significant and will impact negatively on the local pubs and cafes.	No	The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience. There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
PhaseOne_FF_258	This development will not be good for tourism. Many people like to walk that area to relax and birdspot. Re-locate the solar farm to a less sensitive site.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
PhaseOne_FF_263	Birdwatching, walking, boating and local history are important tourist attractions in the Faversham area. A walk around the Saxon Shore Way	No	This is the opinion of the respondent. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement,

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	or the entrance by boat into Faversham Creek would be significantly and irrevocably spoiled by this development.		Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseOne_FF_275	This will create an ugly landscape and deter tourist from visiting the area	No	This is the opinion of the respondent. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7). There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
PhaseOne_FF_281	Clearly anything with detracts from the natural environment in terms of wildlife and views will put off tourism in the local vicinity and put people off from visiting local wildlife reserve.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most

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			cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2). The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).

Phase One Feedback Form Responses			
Other (please detail)			
ID	**Comment**	**Project Change?**	**Applicant Response**
PhaseOne_FF_001, PhaseOne_FF_109, PhaseOne_FF_197	Some respondents expressed that they believe the land should remain agricultural land as it still produces food.	No	Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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			The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4).
PhaseOne_FF_016, PhaseOne_FF_182	Some respondents expressed concern for a reduction on house prices as a result of the development.	No	The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.7km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference number 6.4.7.5).

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PhaseOne_FF_040, PhaseOne_FF_058, PhaseOne_FF_059, PhaseOne_FF_082, PhaseOne_FF_134	Several respondents expressed that the scale of the proposed development is too large.	Yes	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report.

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			As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1 of this Consultation Report.
PhaseOne_FF_140, PhaseOne_FF_081, PhaseOne_FF_285	Several respondents stated that they believe solar panels should be placed on industrial buildings or rooftops.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4).
PhaseOne_FF_007	Visual impact, please use Tesla type tiles on all roofs, subsidize if necessary, encourage less use. It would be better to put solar tiles-like the Tesla tiles on every roof in the country and save the countryside for ecology and bird etc life.		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7). The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4).

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PhaseOne_FF_008	Renewable energy - The area covered is far too larger for the few households. 110,000 homes is not many.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4).
PhaseOne_FF_010	This area offers wide open vistas and huge spaces to alleviate the crowded atmosphere of the larger environment of the south east. The solar farm will inflict a very man-made intrusion to this.		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.
PhaseOne_FF_011	You have a 25-year eco test site that due scale needs to be used. Should be paid for by HLS or eco-tourism	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4).
PhaseOne_FF_013	Having continuous electric when all the current nuclear producing stations have to be decommissioned.		This comment is not relevant to the planning application.

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PhaseOne_FF_018	You have conducted wildlife surveys but not studied human use of this environment.	No	The Environmental Statement (document reference number 6) assess the impact of the Development upon human populations as well as wildlife.
PhaseOne_FF_024	There is a great deal of suspicion felt with this project. It's infuriating that the London Array was constructed in such a way to leave behind two national grid access points, almost as if this monstrosity was part of the original scheme. And there's nothing worse than being lied to. So do local people really have a say in this project? Or is it a done deal and this is just part of the big spend?	No	As set out in the SoCC, the Applicant is committed to undertaking an iterative design process for the Development in response to consultation. The Applicant has responded to all feedback received in this Consultation Report in accordance with s49.
PhaseOne_FF_031	There is no real need for this installation to be in this suggested position when there is so much brownbelt available. This is simply profit before consideration of the		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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	devastating impact of the development on the surrounding area		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be

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			panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1 of this Consultation Report.
PhaseOne_FF_039	We all acknowledge the need for renewable, clean energy. But this needs to be balanced against visual impact and the needs of nature and humans in this area. A solar park of half the size moved away from the coastal boundary would be a good compromise.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4).
PhaseOne_FF_043	Why does Graveney have to suffer so much?		This is the opinion of the respondent.

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PhaseOne_FF_044	I am concerned that there will be a pretty-well continuous stretch of panels over the whole, huge, area. It does not appear that there will be anything like green corridors across the area, and i feel this is important. Reducing the area actually covered by the panels from its currently proposed amount (while offering this as a concession to the local council and asking for a corresponding increase in the area of panels on local houses as a quid pro quo) would improve the scheme as far as i am concerned.	Yes	The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
PhaseOne_FF_048	This is a money making venture capitalising on the London array substation with no real understanding		This is the opinion of the respondent.

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	of the aesthetic value of the land.		
PhaseOne_FF_060	This is a completely inappropriate site for the development of this project. its scale is too vast, it will destroy habitat and harm the quality of life for residents and visitors. Solar farms should be developed on the roots of industrial building such as warehouses and supermarkets.		Environmental Statement, Chapter 4: Site Selection, Development Design presents the alternative sites considered. The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_064	I have remaining questions about the scale of the installation, viability and benefits to local people		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4).
PhaseOne_FF_067	Cleaning panels of bird shit. Will that need detergents and chemicals?		The Environmental Statement: Chapter 5, Development Description (document reference number 6.1.5) sets out cleaning methods proposed for the PV modules. This would be completed with ionised or distilled water.

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PhaseOne_FF_071	Whilst I understand the business case for scale, I believe this is too large for the site. extra space between banks of panels would enhance the project	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Between each solar panel table there is a gap of 2.5 metres.
PhaseOne_FF_072	Size. The area is too large and visually invasive with no means of breaking up the impact and screening it.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_073	I do not agree that a solar farm should go here. This land is agricultural land and we need it to provide food. If it was not going to be used for food, as a number it should be managed for your discerning natural wildlife	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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	as a wetland habitat. Solar panels should be on roods which has no other use.		
PhaseOne_FF_076	It's a nice idea to gain resource production honey/mushrooms including local farmers.	No	These comments were noted. Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) sets out the final proposals for biodiversity management of the site.
PhaseOne_FF_078	Alternative Sites - No information has been provided regarding other potential alternative sites. Cleve Hill would appear to be the most convenient, easiest and most prodiverse location for the developers.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered. The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_085	I have birdwatched this site for 40 years and have many records and		Noted.

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	memories of what it used to be like.		
PhaseOne_FF_087	The size of this plan is outrageous. Please think again, there are derelict industrial parks where these parks can be developed.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_089	I firmly support this project at 86 years of age. Hope I am still alive to see it finished.		Noted.
PhaseOne_FF_091	The visual impact is terrible in such a huge site. Not in favour		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7). The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number

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			7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_093	run by non UK companies means all profits are exported. No benefits for local area		Both Hive and Wirsol are UK based companies. The Applicant is detailed in Chapter 1: Introduction, Section 1.4 (document reference number 6.1.1). There will be some economic benefit captured locally, particularly during the construction period in hotels, local retailers. There is also the possibility of supply chain benefits at a sub-regional level. However, it is not possible to assess the precise scale of these locally at this stage.
PhaseOne_FF_097	This is what happens when you believe that the free-market will solve our energy problems. Any sane society would have government subsidy for energy investment, but especially in an ecological and economic crisis. Subsidies would, for example, enable you to reconfigure you economic model so that you weren't restricted to building immediately next to the		No comment needed.

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	substation and 400kv time. But you know that anyway.		
PhaseOne_FF_098	I am concerned about the lack of community benefits, has the scheme considered supporting STEM subjects in local schools, apprenticeships and so on.		Comment noted.
PhaseOne_FF_102	Concerned that the panels installation gives a precedence planning wise that will allow other built developments to replace the panels or nearby!		Any other applications are subject to same legislation…
PhaseOne_FF_120	Technology limitations - Efficiency of the panels. Cheap mass produced panels being less efficient - Maximising generated	No	This is the opinion of the respondent.

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	output per metres squared used.		The purpose of the solar panels used in the Development is to produce as much clean, renewable energy as possible. Therefore, it would not be beneficial to use inefficient technology.
PhaseOne_FF_122	Concerned about the type of panel being used as there will be no space/light for any animals/plants etc underneath. Can an alternative be used?	No	The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1. The layout design is presented in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). The design presented in this chapter is the design that has been assessed in Environmental Statement Chapters 7: Landscape and Visual Impact Assessment (document reference number 6.1.7)

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			Chapter 8: Ecology (document reference number 6.1.8) Chapter 9: Ornithology (document reference number 6.1.9) and Chapter 10: Hydrology, Hydrogeology, Flood Risk and Ground Conditions (document reference number 6.1.10).
PhaseOne_FF_124	School and housing on seasalter road. The noise impact of the construction traffic on the Seasalter Road will be hugely detrimental to the wellbeing and health of schoolchildren and residents.	Yes	This is assessed in the Environmental Statement, Chapter 16: Air Quality, section 16.4 (document reference number 6.1.16). Mitigation is proposed in respect of construction dust, in the Environmental Statement, Chapter 14: Access and Traffic, section 14.4.5.1 (document reference number 6.1.14) and in non-road mobile machinery in Environmental Statement, Chapter 16: Air Quality, section 16.4.5.3 (document reference number 6.1.16). A Construction Environmental Management Plan (CEMP) is provided in the Environmental Statement, Technical Appendix: Construction Environmental Management Plan (document reference number 6.4.10.2), which includes dust management measures. Some measures are detailed in the Environmental Statement, Chapter 16: Air Quality section 16.4.5.1 (construction and decommissioning dust) and 16.4.5.3 (non road mobile machinery) (document reference number 6.1.16). No measures are required for construction traffic emissions, given the negligible predicted impact.

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			The Applicant has proposed a number of mitigation measures in relation to construction traffic movements that are detailed within the Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseOne_FF_126	I feel it could be a win/win situation if the site is developed with consideration of how people might still access the flora/fauna.	No	In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
PhaseOne_FF_127	The kind of landscape that will be lost is precisely the reason that so many		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape

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	residents are passionate about living here.		and Visual Impact Assessment (document reference number 6.1.7), this considers the existing open nature and characteristics of the site.
PhaseOne_FF_131	The openness of the area provides massive issue of well-being which is not solely captured by e.g. number of people walking lengths of Saxon Shore Way.		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), this considers the existing open nature and characteristics of the site.
PhaseOne_FF_143	CO2 burden of setting up and clearing away panels and possibly batteries not stated '110,000 houses' . Ignores total energy consumption per house.	No	The Applicant has assessed the influences of the development on Climate Change in Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15). The sources of information used in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15), are referenced in the chapter. Aspects for which CO2 costs are not available are identified.
PhaseOne_FF_156	Is this really the best use of this land?		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development

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PhaseOne_FF_159	There must be other sites in the area on brownfield sites which would not blight the area in the same way		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_163	If this project goes ahead it will affect a number of walkers who regularly walk the coastal path. Who wants to walk next to a field of solar panels?		The Environmental Statement, Chapter 7: Landscape and Visual Impact (document reference number 6.1.7), and Chapter 13, Socioeconomics, Tourism, Recreation and Land Use, section 13.5.2.2 (document reference number 6.1.13), set out the assessed impacts on users of the footpath network around the site.
PhaseOne_FF_169	Is it possible to move the solar panels further away from the footpath along the sea wall? i.e 100 yards further inland and possibly then plant willows at edge of park, rather like Somerset levels which are attractive. Also the possibility of moving some of the solar panels away	No	The concluding text in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.8 (document reference number 6.1.7), has been revised to ensure the scale of the Development is acknowledged. The embedded mitigation proposals will assist to some degree in screening the development over time but it is acknowledged that some areas of the development site will be visible due to the open nature of the landscape, particularly to the north of the site, close to the Saxon Shore Way.

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	from housing at the back of the park.		
PhaseOne_FF_176	This development is highly inappropriate and detrimental to the area's economy. The yield from the panels will not match the loss in tourism that will occur. I strongly oppose this development for all the reasons I have included. A site which does not impact the fragile ecology and the wildlife will have to be found. This sit is not suitable for such a development and far from touting sustainability as its central premise, it is, in fact proposing to undermine the self-sustaining natural order of nature, the birds and wild life her, simply		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report.

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	for financial gain. It is a wolf in sheep's clothing and needs to be viewed as such in. The visual rape of this beautiful landscape is not sustaining either, it is a horrific violation of a place that exudes natural beauty and peace that is very hard to find along this stretch of coast. A site needs to be found that can be screened from view and this site can be seen for may many miles around it is entirely inappropriate. I object to this development in the strongest terms and will continue to object at every opportunity.		As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1 of this Consultation Report.
PhaseOne_FF_185	This area as a whole is already suffering from increased building with it having a detrimental impact as well as the loss of green space. This		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the

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	project takes more green space away.		Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development
PhaseOne_FF_186	We need solar power of renewables desperately. As solar farms look so awful, design is essential in gaining public support	No	Comment noted. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land

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			use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
PhaseOne_FF_189	How would it effect traffic on the Faversham to Whitstable road.		Information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseOne_FF_193	I don't see how any of the birds or animals are going to drop dead because of a few solar panels. Get a life people. They'll live quite happily underneath them.		This is the opinion of the respondent.
PhaseOne_FF_194	General: Although the above aspects are significant for me, the importance of this development in addressing climate change, I think far outweighs possible difficulties.		Noted.
PhaseOne_FF_195	As I said this is an area of Special Scientific Interest		Noted.

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	there is a lot I don't know about.		
PhaseOne_FF_198	We are currently losing many areas of natural beauty. You are contributing to the ruin of our local area. I want you to do proper viability studies on the use of roofs and brownfield sites for solar. You may find considerable local support for this.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development
PhaseOne_FF_214	The information available is very poor, considering the vast scale of the project. As a local resident, I found the consultation meeting a waste of time, giving no more information than what was in the leaflet.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant

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			recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_230	Scale-pleased you have chosen our area and importance of sight due to maximum sun light. Given lots of other projects and land requirements concern to look after nature air quality and farmland.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development
PhaseOne_FF_231	Important that access to coastal path is retained/improved	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.

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PhaseOne_FF_247	I think you also need to take into account the mental health of humans	No	The Applicant has undertaken a meaningful and personal consultation process, to allow members of the public numerous opportunities and a variety of methods to convey their feelings about the Development. The Applicant has also sought to listen to the products for this feedback and take it in to account in design wherever possible.
PhaseOne_FF_258	I have heard that farmers can change the designated usage of the land after a number of years with a ground based solar farm. This then allows the farmer to sell of the same land off for housing development, at a massive profit to the farmer, and at the expense of good farmland. Is this the case?		This is not relevant to this planning application.
PhaseOne_FF_259	It will make that area unsightly. Surely there are other places that it could be put where it can be seen less.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number

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			7.3) which presents more detail in respect of the viability and benefits of the Development The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseOne_FF_263	The extent of the impact on the South Swale nature reserve is unknown but the loss of more coastal habitats in this part of Kent which will result from this development will inevitably be detrimental.		The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Areaof c.56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures

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			implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
PhaseOne_FF_267	ALTERNATIVE SITES AND SETTING A DEADLINE OF 22 DECEMBER IS DESIGNED TO LIMIT RESPONSES TO INFLUENCE THE OUTCOME OF YOUR QUESTIONNAIRE		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development In order to provide more time for responses, a consultation period of 6 weeks was provided, which exceeds the minimum statutory 28 days.

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PhaseOne_FF_281	Development of the countryside will always be an extremely emotive subject. Overall, I think the principle of renewable energy is strongly supported by the public, but the location of this project does not seem to be appropriate for the scale of the proposals. 900 acres is extreme, and has been perceived as “greedy” and will always provoke a negative reaction. The local infrastructure (roads etc...) was not designed for such intensive use. The area, whilst rural, is actually well populated, and the scheme affects the residents of Graveney and Goodnestone directly, and however it is dressed up – stops the countryside being countryside. Other solar farms, away from	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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	populated areas and accessible from more appropriate public highways are much less contentious (although the land is more expensive and will affect profit margins). There are multiple development sites along the Thanet Way and old Thanet Way between Faversham and Reculver. Other options for development need to be evidenced, in terms of alternative locations (and the reasons why they may or may not be discounted), different design options at Cleve Hill to reduce impact, a reduced scheme (which would likely attract more public support), better provision for wildlife evidenced by independent impact assessments that are made publicly		

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	available, and STRONG evidence of provision for community betterment / enhancement for Graveney and Goodnestone. The value and “saleability” of homes during the build phase will be affected, and the houses that are immediately adjacent will be affected for as long as the solar park is there. This should not be ignored. Pollution from the increased HGV's should be considered for children, elderly and people in the village with health conditions.		
Phase One Feedback Form Responses			

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Other Comments			
ID	**Comment**	**Project Change?**	**Applicant Response**
Phase One_FF_001	How to balance power production and food production when there are alternatives to solar farms but not land to grow our food without being reliant on imports		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.
Phase One_FF_002	to lobby parliament to make it compulsory for existing warehouses and large buildings to have solar panels as well as new builds.		This is not relevant to this planning application.

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Phase One_FF_003	I think renewable energy is very important but it is equally important that habitats are not destroyed and the visual setting of Faversham in the marshes is retained. The area for solar panels should be reduced substantially.	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Areaof c.56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7). In response to consultation the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as

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			summarised in Table 1, Chapter 1.

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Phase One_FF_004	I was disappointed to realise that you have allowed such a limited time scale for feedback at this very busy time of year. I am hopeful that you will still be able to take my comments into account and put me on your mailing list please.	No	In order to provide more time for responses, a consultation period of 6 weeks was provided, which exceeds the minimum statutory 28 days.
Phase One_FF_007	Cherish the land and all wildlife before we ruin and lose it all.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).

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Phase One_FF_009	Resurface the roads	Yes	The Applicant has proposed a number of mitigation measures in relation to construction traffic movements that are detailed within the Construction Traffic Management Plan (document reference number 6.4.14.1). Contained in this, the Applicant has proposed to carry out a road condition assessment prior to construction in order to ensure the road is in good condition at the start and end of construction.
Phase One_FF_010	All of these do not outweigh the negative effects of the solar farm. They are pointless "dressing up" in an attempt to alleviate great damage. They also show the attempt to distract and mislead the local people into thinking the benefits of any of those will be cost effective.		This is the opinion of the respondent. The Applicant has assessed the impact of the Development in the Environmental Statement (document reference number 6).

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Phase One_FF_011	Bio diversity test site and showing what eco-tourism can do. The site offers many niche income streams thanks to its possible biodiversity.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).

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Phase One_FF_012	Will the bird life disappear? An archaeological survey should be undertaken especially after the Graveney Boat was discovered on nearby marshland.	No	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Areaof 56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
Phase One_FF_013	People do not know where our electric comes from at the present time, it is time the population knew how short of electric we will be in 8-10 years' time.		Comment noted.
Phase One_FF_014	No leave it as it is and go away!		This is the opinion of the respondent.

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Phase One_FF_015	Your consultation event at Seasalter church should have included an evening session, so that people who work during the day would have attended!	Yes	The Applicant held consultation events at a range of times and venues during the Phase One community consultation events in order to cater for people with different working patterns. This included events which ran until 8pm in Sheppey and Graveney, and 7.30pm in Faversham. In response to feedback received during the Phase One consultation the Applicant also held a Saturday event in Faversham during the Phase Two consultation period on Saturday 16 June.
Phase One_FF_016	It is way too big. Unfair to lose so much farmland (countryside for a scheme which actually isn't very green (carbon footprint?). Wildlife won't come back (or move to one corner), this is a proven fact.		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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Phase One_FF_017	You as a business are not making a sacrifice for the village. You will make the local area more accessible with many more footpaths going through the area. You will be devaluing my house and you will need to recompense. All villagers must become shareholders in your business with free electric for the period the solar farm is on the land. You spend £400m on your scheme, you spend £40m on Graveney before you even start. That's the deal!	No	This is the opinion of the respondent. The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.7km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference number 6.4.7.5).

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Phase One_FF_018	Supporting the village with rooftop installations of solar panels for those who want it. Very careful landscaping to address visual impact. There is no box for "other" feedback. But essentially, this is a project in the wrong place for the community, residents and wildlife. It is only in the right place for you. And whilst it does not receive subsidy in real terms, it does benefit from the significant public subsidy that led to the construction of the Cleve Hill substation - you should be more honest about that.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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Phase One_FF_022	Why did you include Whitstable in the area you sent out letters to? People from Whitstable knew nothing about the consultation meetings as a result. Are there going to be public meetings after Christmas where your team will answer questions put to them from the floor by public.	No	The Applicant included Seasalter in its core consultation zone, as set out in Chapter 7 of this Consultation Report (document reference number 5.1). The core consultation zone for the Development was identified by: • using a zone of theoretical visibility to assess the areas in the 'vicinity' of the land which may experience a degree of visual impact form the Development ; • using natural and human geographical boundaries, for example using Junction 7 of the M2 as the most southerly point for the core consultation zone, and the most northerly point being the foot of Leysdown-on-Sea; • including areas of access options, which covered the Head Hill Road, Seasalter Road and Faversham Road the core consultation area, which included 12,800 local homes and businesses, the following consultation activities took place: • Direct mailings of consultation materials and newsletters • Two rounds of community consultation events • Displaying hard copy Development information available across 8 Community Access Points ('CAP sites') (listed in the SoCC and listed in Appendix 28) • Advertising across 35 local information points (listed in Appendix 28) • Holding ongoing near neighbour and stakeholder meetings • Placing site notices • Displaying all consultation materials on the Development website • Providing consultation updates via Twitter Whitstable was included in the wider consultation area for

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			the Development, as set out in Chapter 7 of this Consultation Report (document reference number 5.1). In the wider consultation area, the following consultation activities took place: • Advertising across media channels covering the core and wider consultation area • Engaging with the wider Kent media as well as regional and national media through press releases and radio, TV and interviews • Making hard copy Development information available at 8 CAP sites • Advertising across 35 local information points • Holding stakeholder meetings throughout the wider consultation area such as meetings with Canterbury Greenpeace Group, Canterbury Green Party, and with Rosie Duffield MP. • Using online and social media techniques: dedicated Development website and twitter account.

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Phase One_FF_023	Are we going to get cheaper electric when this is completed? If you're worried about not having enough electricity, it is a bit like everything else in England. It is so over populated, maybe a lot cheaper to get rid of the immigrants - would make a lot more sense to me and many other Englishmen. P.S I know you can't do anything about this, I'm just saying.	No	This is the opinion of the respondent.
Phase One_FF_031	Not interested in any supposed benefit to the local area when there is so much to be lost		Noted.
Phase One_FF_033	Renewable energy projects should have subsidies. ALL the fossil fuels and nuclear fuel are subsidised		This is the opinion of the respondent.
Phase One_FF_039	putting something back into the community (e.g. undergraduate bursaries)	Yes	During the Phase Two community consultation, the Development consulted on proposals for additional permissive pathways around the site and a proposed community orchard. The analysis of the feedback received can be viewed in Chapter 10 of this Consultation Report (document reference number 5.1)
Phase One_FF_040	Put solar panels on residential or commercial roofs	No	This is not relevant to this planning application.

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Phase One_FF_043	Link to ongoing research activity. Enhance local utilities - broadband, local houses have inefficient heating solutions and vehicles are all fossil fuelled. If the ambition is clean energy then help those most affected to be cleaner?		Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has assessed the influences of the development on Climate Change in Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15).
Phase One_FF_044	We understood that at the next consultation event it would be possible to see just how tall the panels would stand - this is important as far as our appreciating how intrusive they will be. I would also like a better idea of how shoulder-to-shoulder they will stand and what prospect there is of wildlife continuing to exist among them - we have in the past seen encouraging pictures of sheep grazing amongst structures in solar areas, but that seems impossible here. Is that so? Of course, we wold like to see improved management practices and trust that you will yourselves be doing your utmost in this area.	No	As part of the parallel section 42, section 48 and section 47 consultation in May 2018, the Applicant produced photomontages of viewpoints at a current, 1 year and 10-year time period. Photomontages at the current, 1 year and 10-year time periods were also produced for residential property clusters at Warm House and Nagden as part of the Residential Visual Amenity Assessment (document reference number 6.4.7.5). All these photomontages were presented as part of the PEIR and were available to view online, in hard copy at the designated CAPsites, and in person at one of the community consultation events.

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Phase One_FF_048	Renewable energy is very important but so is the countryside for many reasons - wildlife, eco system and human wellbeing. Solar panels should be on buildings or in industrial parks - not in fields. Please rethink this scheme and do not build it.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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Phase One_FF_049	The public right of way should be upgraded - almost impassable in winter. To protect the environment adjacent to the right of way across the site (and appease the wrath of the many walkers) a "nature" zone of say 75m either side of the right of way (i.e. panel free) with a border of planting (trees/hedges). This would maintain a natural "feel" to the walkers who frequently use the path and help maintain the indigenous bird population. This screening has been approved by the Abbeyfield solar park, where multiple rows of beech/birch hedging have been planted. Eventually, these will form a "softer" natural "fence" around the site. Please do this adjacent to the right of way footpath.	No	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13). There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Phase One_FF_050	Despite all the solar power schemes, marvellous though they may be, there seems slim chance of the cost of energy coming down with the current structure of		The aim of the Applicant is to become one of the lowest cost producers of electricity in the UK. If built, the Development could provide enough affordable and clean electricity to power over 91,000 homes.

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	control by the few major energy suppliers.		
Phase One_FF_058	Your people tell us there will only be 50m from the sea wall o the start (deer fence) of the Solar Park. It is most important to have a much wider area south of the sea wall as a wildlife corridor. The KWT S Swale Reserve is only the narrow strip from the sea wall to the dyke, and a much wider green zone is essential along the whole strip, for both resident and migrating birds. PLEASE consider leaving a much wider strip along the North limit of the park, and along Faversham creek.	Yes	In the application design the Development has a minimum distance of 63 metres to the Saxon Shore Way. In places this is as high as 100 metres.

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Phase One_FF_059	50% reduction in scale in the interest of wildlife conservation/habitat	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as

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			summarised in Table 1, Chapter 1 of this Consultation Report. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).

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Phase One_FF_060	This stretch of the Saxon Shore Way doesn't need enhancing. it is a wonderful grassy track which does not need interpreting. The gates are also fit for purpose. leaving the area alone is the best way to support biodiversity.		The Saxon Shore Way and all PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
Phase One_FF_063	What is the impact on wildlife when the panels are arranged as you denote, i.e. east west rather than south facing? The size of the project is massive and as such is likely to garner more opposition than usual.		The east-west layout design is presented in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). The design presented in this chapter is the design that has been assessed in Chapter 8: Ecology (document reference number 6.1.8) Chapter 9: Ornithology (document reference number 6.1.9).

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Phase One_FF_065	I am not supportive of the scale of this scheme as it is currently proposed and going right up to the boundaries particularly footpaths and Saxon Shore Way	Yes	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. There will be a minimum separation of 63 metres to the Saxon Shore Way, in some places this is as much as 100 metres.
Phase One_FF_067	Maintaining the Saxon Shore Way, with clear access and signage would be very valuable to the local community - currently it is a bit confusing and unwelcoming, so any improvement would be popular. Maybe add a visitor centre, cafe etc - like Ingrebourne Valley. Boards explaining history and wildlife - make the park a positive addition to the community. It is an opportunity.	No	The Saxon Shore Way and all PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).

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Phase One_FF_072	Improving the local narrow lanes to reduce traffic risk during construction and thereafter. Putting something back into Faversham and Graveney, we are the 'poor neighbours' when it comes to Swale Borough Council	No	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
Phase One_FF_074	If the planning application is accepted, I would like to see a lot of native wildflowers growing - good for invertebrates. The fence around the site will be important to get right.	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).

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Phase One_FF_076	Is there any local employment? New housing should be built with solar panels. Existing housing should be encouraged to install solar panels. Less need to cover green fields.	No	There will be some economic benefit captured locally, particularly during the construction period in hotels, local retailers. There is also the possibility of supply chain benefits at a sub-regional level. The beneficiary is the climate, and consequently users of the ecosystems that depend on it, in having electricity produced by a means that does not involve emissions of climate changing gases during operation, as set out in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15).
Phase One_FF_077	Green Energy is important to me - I use it, invest in it. So, I would like this to proposal to go ahead. But I really need it to be approved by people/associations with more ecological and wildlife expertise than myself.		Noted.
Phase One_FF_079	The initiatives marked are important to the present landscape but in my opinion cannot be sustained or improved given the scale of the proposed project.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development

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Phase One_FF_081	As with other government policies designed to go along with more air traffic and emphasis of more use of cars (e.g. fuel duty freeze very increased fares) we should be looking at different approaches to living instead of always looking at 'growth' (only of benefit to Banks and Businesses). We have to stop the lunacy sometime!		Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has assessed the influences of the development on Climate Change in Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15).
Phase One_FF_082	Put your "solar park" somewhere else	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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Phase One_FF_085	Make sure enough land to support birds and geese. Cycle-way?	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Areaof 56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.

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Phase One_FF_086	This proposal could be a showpiece development demonstrating how nature and green energy generation can compliment one another. It does not want to be the opposite.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
Phase One_FF_087	Please don't do it. Put some big windmills up, at least the ground around can be used. 25-30 years is not long enough to call this green energy, only to do it all again.		This is the opinion of the respondent.
Phase One_FF_088	Disposal of panels at end of life? No experience to date/ Disposal of batteries? Manufacturing Co2 emissions? An awful lot to be considered. This might be sustainable but is it green?		The Applicant has assessed the influences of the development on Climate Change in Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15). The sources of information used in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15), are referenced in the chapter. Aspects for which CO2 costs are not available are identified.

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Phase One_FF_094	how the economics work to local advantages why such a huge project can be restricted as necessary. Solar panels should be on buildings, NOT on fields		There will be some economic benefit captured locally, particularly during the construction period in hotels, local retailers. There is also the possibility of supply chain benefits at a sub-regional level. The beneficiary is the climate, and consequently users of the ecosystems that depend on it, in having electricity produced by a means that does not involve emissions of climate changing gases during operation, as set out in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15).
Phase One_FF_095	I understand the need for alternative energy supplies but this is a place of great beauty and I wonder that you cannot find another spot, away from the coast for this panel farm.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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Phase One_FF_101	Supporting local wildlife initiatives	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. This includes working with the Bumblebee Conservation Trust regarding the 'Making a buzz for the coast' project. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2). The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the

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			agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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Phase One_FF_102	Improving biodiversity is important for everyone. The current land use is not great, but its a lot better than how things would be if this project is given the go ahead.	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
Phase One_FF_103	I believe that there should be more focus on expanding solar energy potential within the built environment. Food production active processes and biodiversity that can not be protected or thrive if the countryside is essentially seen as an economic space (SHORT TERM GAIN LONG TERM RISK)		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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Phase One_FF_104	No improvement could prevent the catastrophic impact of your project on the area		The Applicant has assessed the impact of the Development in the Environmental Statement (document reference number 6).
Phase One_FF_106	Use this as an opportunity: plant trees, shrubs and hedging to try and minimalize the barren look of the proposed area. So encourage what wildlife survives, to have some natural habitat. Make it smaller?!?	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
Phase One_FF_111	The issue of importance is the loss of the coastal environment and covering it with solar panels. Accept that some renewable generation coupled with storage is required but the area proposed is too large.		These are the views of the respondent. Visual effects of the Development are assessed in Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7) and supported by Environmental Statement, Volume 3: Visualisations (document reference number 6.3).
Phase One_FF_119	This will be an ugly scar on an AONB for only one purpose - Profit!!		This is the opinion of the respondent.

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Phase One_FF_125	Whilst I agree that solar energy is the way to go and that this seems to be a good site with a careful plan, my main concerns are about the potential detrimental effects on the local community while the construction work goes on. This needs as much care if not more than the site itself.	Yes	A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
Phase One_FF_127	Developing it as an SSI would be an excellent way to demonstrate a positive business/environment development.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2). In addition to this, in April 2018, the applicant extended the application boundary to include 35.1 ha of SSSI freshwater grazing marsh to give the Applicant the ability to manage that land to be of additional benefit to biodiversity over and above the existing baseline.

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Phase One_FF_131	Leave Creek Area alone	No	Visual effects of the Development are assessed in Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7) and supported by Environmental Statement, Volume 3: Visualisations (document reference number 6.3).
Phase One_FF_134	The best improvement you can make it to find somewhere else. E.g. try the badlands around existing power stations.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Phase One_FF_136	Create new public footpaths as well as look after existing ones. i.e. improve don't just deal with existing. The site is huge. Deliver funding for active travel projects nearby e.g. Faversham 20s Plenty project, as well as improved walking and cycling schemes. Sponsor a transport plan for the area. An active travel-based Transport Plan would be a compatible project alongside this renewable energy project and wouldn't cost very much. 20s Plenty has been estimated at £60,000.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a ‘round’ walk from Seasalter Road

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Phase One_FF_139	I am concerned that local residents are not receiving consultation documents. Central Faversham resident did not receive one. No social media. As a marketeer, I do not believe you are communicating effectively locally. The designed site is way too big. Take away from Creek Side and away from Saxon Shore Way.	No	A core consultation zone and a wider consultation area were identified for the Development and presented in the draft SoCC for the local authorities to comment on. All local authorities were satisfied with the proposed consultation area (see Table 50). In response to consultation, the Applicant created a Twitter profile to share information, news, events and other activities on 12 December 2017. The minimum distance between the Development and the Saxon Shore Way is 63 metres. Visual effects are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and consider effects on the Saxon Shore Way and footpaths within and around the site.
Phase One_FF_140	1. Make permissive access to sea wall west of castle coote via existing farm track. 2. Improve access onto sea wall at castle coote end of public right of way (viewpoint 2). 3. Open up a permissive access to Cleve Hill Road utilising existing gated farm track midway between viewpoints 2 and 3.	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
Phase One_FF_141	None of this would be an enhancement. The Saxon Shore Way has been there many years with no problems, so its fine. The land management has not driven away the birds etc.		The Saxon Shore Way and all PRoWs which run through the site will be preserved by the Development.

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Phase One_FF_143	Support for other practical environmental projects in the area/ or community investment opportunities (with priority for locals).	No	During the Phase Two community consultation, the Development consulted on proposals for additional permissive pathways around the site and a proposed community orchard. The analysis of the feedback received can be viewed in Chapter 10 of this Consultation Report (document reference number 5.1)
Phase One_FF_148	Community ownership and other community benefit. Mitigation of visual impact.	No	In response to these concerns the Applicant removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.64 km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference number 6.4.7.5).
Phase One_FF_150	THIS AREA DOES NOT NEED ANY "IMPROVEMENT". THE SAXON SHORE WAY IS A NATIONAL TRAIL. ALONG BY THE SWALE/GRAVENEY MARSHES, THE FACT THAT THERE IS JUST THE SEA DEFENCES, A FEW FENCES AND GATES IS ENOUGH "HUMAN INTERVENTION".		The Saxon Shore Way and all PRoWs which run through the site will be preserved by the Development.

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Phase One_FF_151	How about making the site smaller so not such a great impact on local communities.	Yes	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as

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			summarised in Table 1, Chapter 1 of this Consultation Report.

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Phase One_FF_152	Enhanced local bus services	No	Noted.
Phase One_FF_153	Small portion into community ownership and/or community funding.	No	During the Phase Two community consultation, the Development consulted on proposals for additional permissive pathways around the site and a proposed community orchard. The analysis of the feedback received can be viewed in Chapter 10 of this Consultation Report (document reference number 5.1)

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Phase One_FF_156	I support renewable energy development but this very large and I worry about the impact on the environment. It is also an important walking area (a national walking trail) and the views will be very compromised.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as

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			summarised in Table 1, Chapter 1 of this Consultation Report. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.

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Phase One_FF_157	I have very little idea how efficient solar panels are at turning solar energy into usable power - better than chlorophyll? Bigger boxes and slots in them for the forms		The Applicant has assessed the influences of the development on Climate Change in Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15). The sources of information used in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15), are referenced in the chapter. Aspects for which CO2 costs are not available are identified.
Phase One_FF_158	Maintaining import sight lines		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
Phase One_FF_159	See previous page. Also this is an important rote for dog walkers. Please ensure it is a safe environment for dogs to continue using public foot paths off lead.	No	The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
Phase One_FF_161	What benefits will local residents get? Why would I agree to this? What benefits will the shareholders get? How much financial benefit will stay in UK? This is too large - can reducing the size be economically viable.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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Phase One_FF_163	Make sure the solar park area can be made accessible as possible to the public.	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
Phase One_FF_164	I strongly support the ideology of renewable energy. But this is not just a case of 'NIMBY'. Drained marshland is undervalued in this country. It offers a specific and beautiful wild habitat/environment and supports a variety of animals and plant species. I Strongly oppose this plan. I feel the government needs to think more long term, more sustainably. Other incentives to public and private energy users to reduce consumption. Integrate renewables into brown/urban sites. Offshore wind renewables. Please do not ruin our beautiful landscape.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Phase One_FF_165	Measures must be taken to reduce the visual impact, and to positively counter the ecological		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment

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	impact. The site must also be capable of being dismantled and returned to its current condition with no permanent long-lasting damage being done.		(document reference number 6.1.7), the ecological impact at Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8). The decommissioning strategy is outlined in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Phase One_FF_166	The proposal for any solar panels in this area are inherently wrong.		The is the opinion of the respondent.
Phase One_FF_168	Why isn't there more incentives for solar panels on residential properties? The area for the proposed site is far too big.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Phase One_FF_173	NB - More rights of way are way-marked on the site itself than are shown on your big site map.		The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
Phase One_FF_175	Maintaining food security. Lowering carbon footprint of location		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4).

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			The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.
Phase One_FF_176	I can't see why it's necessary to build (and this is a form of building) on land that hasn't been built on before. There are plenty of "brownfield" sites that could be used. I'm also very concerned about what would happen to the land at the end of the useful life of the solar installations. How could the contract enforce proper clearance and disposal? How could it be absolutely ensured that the land wouldn't then be designated "brownfield" and therefore become available for other forms of development? The solution in my view is to a) use land already developed; b) avoid unspoilt, habitat-rich areas; c)		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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	design smaller developments which have far less harmful impact.		
Phase One_FF_177	None of this will make up for the impact the development will have.		The Applicant has assessed the impact of the Development in the Environmental Statement (document reference number 6).
Phase One_FF_179	The people that use this area are very happy with the way the land is the moment		Comment noted. The Applicant has assessed the impact of the Development in the Environmental Statement (document reference number 6).

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Phase One_FF_182	Leave the area natural and find another site.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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Phase One_FF_183	I don't believe any of these are improvement. The public rights of way are entirely adequate as they are. You cannot improve land management practices unless you understand the impact you are making and I don't believe, from the lack of information you provided at your meetings, that you are in a position to do this. You need to be able to demonstrate to us why this site should be chosen for this installation as there is no evidence to suggest this and you were unable to answer this, or many other, questions at your meetings.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. T The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
Phase One_FF_185	BRING IT ON!		No response required.
Phase One_FF_186	This section seems to indicate that the construction process is a PR exercise and a complete sham.		This is the opinion of the respondent.
Phase One_FF_187	I'd like to see more initiatives made to ensure new builds, offices etc are self-sufficient. So, for me, your project is only		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).

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	problematic visually and its wildlife impact.		
Phase One_FF_188	Please don't use agricultural land, a wonderful habitat, peace and quiet. Hire roof space - all the infrastructure is available on one roof - hire the roof and serve the power.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.
Phase One_FF_189	Land drainage and ditch management accountability is important. If these spaces are to support existing farmland, the management of them needs to be robust.	Yes	As outlined in Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions, Section 10.6 (document reference number 6.1.10) the diverted ditch dimensions will be the same or better than the baseline scenario ensuring no loss of flow conveyance
Phase One_FF_190	Educational visits are good/essential but should not be a driving force.	No	Noted.

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Phase One_FF_192	Suggest that many more areas are set aside for wildlife and the density of panels reduced. A computer graphic of how you expect the site to look like is a must. Why is this not yet available?	Yes	Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2). In addition to this, in April 2018, the applicant extended the application boundary to include 35.1 ha of SSSI freshwater grazing marsh to give the Applicant the ability to manage that land to be of additional benefit to biodiversity over and above the existing baseline. As part of the parallel section 42, section 48 and section 47 consultation in May 2018, the Applicant produced photomontages of viewpoints at a current, 1 year and 10-year time period. Photomontages at the current, 1 year and 10-year time periods were also produced for residential property clusters at Warm House and Nagden as part of the Residential Visual Amenity Assessment (document reference number 6.4.7.5). All these photomontages were presented as part of the PEIR and were available to view online, in hard copy at the designated CAPsites, and in person at one of the community consultation events. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design

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			changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
Phase One_FF_196	The solar parks I have seen are fenced in like prisons and I think that is unacceptable.		The deer fencing proposed is 2m high with security camera height is 3m high. These are reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) along with the dimensions of all equipment associated with the Development. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
Phase One_FF_198	how you would monitor and audit and regularly report on all the ecological aspects for as long as the panels remain, what energy conservation measures you would fund from your profits, especially for the less well off		Plans to provide biodiversity benefits on the Site are included within 'embedded mitigation' detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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Phase One_FF_199	Please do not build this farm on our beautiful landscape. If you have to build a solar farm, please consider scaling back your plans so that a smaller area will be spoiled. An improvement would be to use existing brownfield sites or the roots of large warehouses or even houses.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as

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			summarised in Table 1, Chapter 1 of this Consultation Report.

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Phase One_FF_202	Depends what you mean by 'enhancing' - Not if it means making paths less rural	No	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. This new permissive pathway will be in keeping with current PRoWs in the area.
Phase One_FF_204	How are the latest technologies in storage of solar power being used?		The Rochdale Envelope parameters for the energy storage facility are clearly set out in Environmental Statement Chapter 5: Development Description (document reference number 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK.
Phase One_FF_207	While I am not against solar panels, I think the proposed site is too large and do not think an area of beauty as this is the right location for it.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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Phase One_FF_215	SIZE! The proposed site of 890 acres is ridiculous and will have a huge impact on our countryside. There are no proven fats from previous solar parks that an area of this size will be able to generate enough electricity to power 110,000 homes, this is all just projected figures and not facts!		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as

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			summarised in Table 1, Chapter 1 of this Consultation Report.

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Phase One_FF_218	Leave the countryside alone. It puts up with traffic that leaves a train of dead animals and birds. It, and the wildlife has suffered enough.		Noted.
Phase One_FF_219	Suggest you speak to [redacted] with reference to pollinators for soft fruit crops.		Noted.
Phase One_FF_221	The only obvious improvement would not to build a solar park on this proposed site!		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Phase One_FF_225	Plenty of wildlife habitat to be retained. Do not increase drainage. Plant up lots of wild flowers	Yes	Plans to provide biodiversity benefits on the Site are included within 'embedded mitigation' detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
Phase One_FF_228	I think the whole scheme is a good one, if all issues are covered and protected		Comment noted.

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Phase One_FF_229	Solar panels on roofs instead of landscapes. Don't build power stations on beautiful areas of wilderness that the public and wildlife enjoy.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Phase One_FF_231	all of the above - great project, get the community involved as well as the partnerships you are already involved in - KWT etc. Great work keep up with this. School visits to show your project, environment, nature, how it can all work together for the better of our environment	No	During the Phase Two community consultation, the Development consulted on proposals for additional permissive pathways around the site and a proposed community orchard. The analysis of the feedback received can be viewed in Chapter 10 of this Consultation Report (document reference number 5.1)
Phase One_FF_232	Allocating percentage of profits to local community projects and organisations	No	During the Phase Two community consultation, the Development consulted on proposals for additional permissive pathways around the site and a proposed community orchard. The analysis of the feedback received can be viewed in Chapter 10 of this Consultation Report (document reference number 5.1)

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Phase One_FF_233	More off-road cycle paths linking to route 1	No	Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.

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Phase One_FF_237	it is a pity it is not known what noise will be emitted- i.e. whistle		The Applicant has avoided potential noise impacts relating to the Development by designing out potential noise pollution upon receptors. This has been done by placing transformers away from the nearest receptors, and surrounding the energy storage facility and substation compound with a 7m high bund. The Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) set out the predicted noise levels and outlines the mitigation proposals. Noise during the operational phase of the development is assessed in the Environmental Statement, Chapter 12: Noise and Vibration Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100% capacity, during both daytime and night-time periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be lower than the limits set out in the Chapter.
Phase One_FF_241	but all the above are dependent on the scheme happening, it should not have to be addressed as other bodies already take care of these things.		Comment noted.

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Phase One_FF_244	I am opposed to this development so find this difficult to respond to		Comment noted.
Phase One_FF_247	Working with county and national wildlife organisations	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
Phase One_FF_248	I feel you people want everything manicured. The word ‘park’ says it all to me. This area is wilderness. This is what makes it special		This is the opinion of the respondent.
Phase One_FF_250	Issues affecting the operation and management of our shell fishery		
Phase One_FF_252	THIS PROPOSAL IS TOTALLY INAPPROPRIATE		This is the opinion of the respondent.

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Phase One_FF_253	How can land management practices support biodiversity when arable fields are taken out of production and covered in panels		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2). Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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Phase One_FF_259	Undertake comprehensive studies to understand and respond to the needs of the wildlife that use the site throughout the year. Adapt or relocate the solar farm to ensure that the wellbeing of the wildlife is not compromised.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
Phase One_FF_268	The Saxon Shore Way is fine as it is. Land management practices which enhance biodiversity would not include building a solar farm!		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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Phase One_FF_272	down-sizing the land degradation		The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
Phase One_FF_273	Do not put a solar park in Graveney --- the destruction of the marshes and adjoining land is unacceptable.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Phase One_FF_275	defence against illegal refugees who may pass through this area.	No	Noted.

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Phase One_FF_278	Preserving the habitat for existing birdlife.	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Areaof c.56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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Phase One_FF_279	This has no place at this location. I thought it was a sick joke on hearing of this possibility!		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Phase One_FF_280	Improving the area left to encourage wildlife of all sorts.	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).
Phase One_FF_281	Finding a way to disguise the panes	Yes	3.7km of native hedge row screening is planned for southern boundary of the site, the Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).

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Phase One_FF_285	Don’t build on an ecologically important area. Fund solar panels on every roof in the country before using green field sites.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2).

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Phase One_FF_287	Environmental and wildlife enhancements throughout the whole village and surrounding areas, making good and enhancements to road infrastructure, free or reduced energy for the villages to partly offset the effect on house value etc..., compensation along the lines of part 1 claims for those immediately adjacent, amenity areas in the park for the public to include bridleways and cycle paths, enhanced community facilities in the village such a children's play area, village hall, solar panels for the school to generate their own electricity and encourage new generation of support for renewables.	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference number 6.4.5.2). The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose

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			promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.

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Phase One_FF_288	People still don't 'get' renewables and why they are necessary.		Comment noted.
Phase One_FF_291	Absolutely NOT have "educational" (brain-washing) visits	No	Noted.
Were your questions answered satisfactorily by our team?			
ID	**Comment**	**Project Change?**	**Applicant Response**
PhaseOne_FF_018	Your team were defensive and aggressive and did not take into account the strong feelings and emotions felt by local residents.	No	The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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PhaseOne_FF_024	The team at the Sheppey event were perfectly charming and accommodating, but I was disappointed not to find the level of detail I was hoping for. I am particularly concerned about the impact such a huge project is going to have on the local infrastructure and it was these details which were absent. Presenting all the positives is all well and good, but I felt there was a distinct lack of understanding for how people who enjoy this area of outstanding natural beauty might feel about it being taken away.		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.

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PhaseOne_FF_030	obvious bias as expected		This is the opinion of the respondent. The Applicant explained in face-to-face meetings and at community consultation events the standards to which all Environmental Impact Assessments undertaken by the Applicant are kept. Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference 6.1). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.

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PhaseOne_FF_031	I found the representative condescending who belittled our concerns		This comment is noted. The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
PhaseOne_FF_040	Unable to attend as had a prior engagement		Noted.
PhaseOne_FF_042	Unable to attend, as already had a prior engagement		Noted.

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PhaseOne_FF_044	YES, they answered fully but the answers were not always satisfactory!		Noted. The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_047	Questions answered fully though maybe the answers were not always what we felt were satisfactory!		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_048	No, it is obviously a money-making venture.		This is not relevant to the planning application.

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PhaseOne_FF_057	there seems to be very little decided about how much space will be left for wildlife apart from the 'mitigation' area on map. It is very important to leave a wide space along the north side between the deer fence and the sea wall. 50m is nothing like enough.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseOne_FF_058	Partly. Team too young to be aware of wider issues.		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.

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PhaseOne_FF_060	Partly. This was not a consultation event, but a public relations exercise		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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PhaseOne_FF_064	Partly. It is obvious that the team cannot answer all nuanced questions at the moment		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_074	Team members I spoke to were very pleasant and helpful but as, at this early stage not everything has been decided, answers were somewhat limited.		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_076	Partly. I really didn't have enough time to give them. Took information away.		Noted.
PhaseOne_FF_078	No. There was so much important information available		Noted.

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PhaseOne_FF_080	Partly. Did not really take us forward		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_086	The person I spoke to could not give me answers on recycling of old units and what happens to them, heights of units, whether animals could graze or grass grow etc. A lot more needs to be questioned.		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.

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PhaseOne_FF_087	An awful lot of "don't knows".		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_091	I did not attend		Noted.
PhaseOne_FF_104	You have your agenda, which is not the same as mine.		Noted.
PhaseOne_FF_115	They were busy elsewhere		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.

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PhaseOne_FF_136	Partly. Little of substance at this stage to get to grips with.		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_142	No. Information on compulsory purchase?		
PhaseOne_FF_147	I came to read and observe		Noted.
PhaseOne_FF_149	Partly. No benefit for the local community.	Yes	During the Phase Two community consultation, the Development consulted on proposals for additional permissive pathways around the site and a proposed community orchard. The analysis of the feedback received can be viewed in Chapter 10 of this Consultation Report (document reference number 5.1)
PhaseOne_FF_154	Partly. I am very concerned about the size of this proposed project.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which

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			presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_159	All answers were affected by it's "early days"		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.

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PhaseOne_FF_161	Partly. Seems to be a conflict of interest between the solar park proposal and the MEASS Environmental Agency proposals	No	The Environment Agency's “Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, “Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm. As such, the Development is not in conflict with most recent version of the MEASS.
PhaseOne_FF_164	Partly. other forms of carbon neutral energy generation are available - Is this the most efficient use of this land? Even growing woodland is carbon neutral.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_167	Would have liked direction		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.

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PhaseOne_FF_173	Some were, some weren't.		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_189	I'd like to see a computer graphic slowing the proposed development	Yes	As part of the parallel section 42, section 48 and section 47 consultation in May 2018, the Applicant produced photomontages of viewpoints at a current, 1 year and 10-year time period. All these photomontages were presented as part of the PEIR and were available to view online, in hard copy at the designated CAPsites, and in person at one of the community consultation events.
PhaseOne_FF_190	You are obliterating the countryside - no comment.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseOne_FF_193	Yes, but totally geared to a fait accompli and a bias against the natural habitat and birds. Inaccurate information was given about the hunting territory of the Marsh Harrier, it hunts along the fields, as do Short Eared Owl, Barn Owl, Merlin, Kestrel		The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Areaof 56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. The surveyors are highly skilled ornithologists with many hundreds of hours of flight activity survey experience.
PhaseOne_FF_195	no detail financial case available, need a full business case. Other info too general		Noted.

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PhaseOne_FF_196	It was informative about your reasons for building the project. It was not informative about research done on other options and ways to protect our beautiful local landscape.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_206	Yes, those that they knew the answers to		Noted.
PhaseOne_FF_222	Mainly concerned about wildlife disturbance		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseOne_FF_227	All questions fully answered		Noted.

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PhaseOne_FF_228	n/a team busy with lots of enquiries - great to see such a good turn out		Noted.
PhaseOne_FF_230	would like to know more about the impact on bird life		The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Areaof 56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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PhaseOne_FF_243	So Much Spin		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_244	Couldn't find anyone free to talk to.		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.
PhaseOne_FF_245	They answered the questions, but did not satisfy my concerns. There are other things we as humans could do instead of destroying an area that is full of wildlife, an absolutely fantastic area for human rejuvenation. We know that animal agriculture is the main cause of climate change. This needs addressing rather than trying to plaster over a festering spot...the issue remains the same. HOWEVER, my concerns for this area are due to		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and

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	the above...use land more wisely I implore you...this is not the way. Solar should be constructed in areas of brown field land and on new buildings. Don't let nature play the price again.		Biodiversity Management Plant (document reference 6.4.5.2).
PhaseOne_FF_251	I was not at the consultation, I have looked at your leaflet showing the plans		Noted.
PhaseOne_FF_263	No information was forthcoming on estimated profits, and no indication of the potential effect of the solar farm on views of the countryside from places of interest, for tourists & locals.		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views and landscape. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseOne_FF_268	replies were obviously favoured by the project		This is the opinion of the respondent.

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PhaseOne_FF_269	The facilitators were - masters in divulging "half-truths" - unwilling to answer all questions - not prepared to provide complete information in short -- their response was disrespectful and lacked transparency		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_270	I am concerned by the landscape. You will never recapture the view. At the moment for years Seasalter has been marsh land and when there was a high tide it would flood which enriches the wild life especially birds which people came from near and far to view.		Noted. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views and landscape. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).

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PhaseOne_FF_271	I listened into ?'s asked by others more to hear how the resident reacted to the answer given. The few questions I asked were answered as expected.		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.
PhaseOne_FF_277	The notification of the event was too short and the times available not conducive to working people, the next should be held at the weekend.	No	The Applicant issued a community newsletter (see Appendix 24) to the 12,800 properties and local businesses across the consultation area on 8 May 2018, three weeks before the beginning of the consultation period and five weeks before the consultation events.
PhaseOne_FF_282	No answers given just we will do more surveys and develop our plans		The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees.

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PhaseOne_FF_287	Obviously, living 180 miles away, it was not possible to attend one of these events		Noted.

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PhaseOne_FF_288	I believe in solar energy and I don't wish to appear a NIMBY, but I do have concerns about the Cleve Hill Solar Park - It will ruin an ancient landscape - Much of the targeted site itself lies within the Natural England-designated Greater Thames Estuary Natural Area and Character Area. It will have a vast impact on: o the way the land meets the shoreline o the saltmarsh o Views from the Saxon Shore Way o Views of the historic entrance to Faversham Creek o Views across from Hollowshore Questions – How close exactly will the solar park border be to the Creekside, particularly when it runs alongside Faversham Creek and its entrance? How high will the solar panels be? I have read that they will need to be higher than usual as the site is a flood plain – how visible will they be looking across flat land? - It will have an impact on wildlife on the site borders an extensive Site of Special Scientific Interest (SSSI),	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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	Special Protection Area (SPA) and Ramsar-designated site. o noted as an Area of Greatest Habitat Opportunity (enhancement) and as a Biodiversity Opportunity Area. o the Cleve Hill site adjoins two Kent Wildlife Trust reserves – Oare Marshes and South Swale – while the Royal Society for the Protection of Birds manages large chunks of the nearby Seasalter Levels. o Glad to see you have included a Arable Reversion Habitat Management Areafor Golden Plover, Lapwing, Geese, Little Tern, Marsh Harrier Questions – the mitigation area seems very small in comparison to the site – is this really sufficient for such important declining species? What are the RSPB's views on this method and the likely success? o the arable land (wheat fields particularly) that the park will cover up also had a number of less important but nevertheless declining species which frequented it – Goldfinches, Sparrows, Tits etc.		

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	What measures will there be to recover their habitats? Conclusions regarding how I would like the proposal modified: - The site should be reduced in size - The section along Faversham Creek and its entrance to be removed from the proposal - Border of the site running parallel to the shoreline throughout should be moved back away from the shoreline. - Double the size of the Arable Reversion Habitat Management Area		

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PhaseOne_FF_289	Why does this have to be where it is. I regularly run along the sea wall there. It is open, stunning and full of nature. Why can't this come in land more and not ruin this fabulous area? I am not against solar but why does it have to be in such a stunning area?		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Have you seen an operational ground-mounted solar development before?			
ID	**Comment**	**Project Change?**	**Applicant Response**
PhaseOne_FF_010	Passing site, not detailed informed visit		Noted.
PhaseOne_FF_019	Display could have given better idea of what panel arrays would look like and its size (height).	Yes	At part of the parallel Section 42, Section 48 and Section 47 consultation in May 2018, the Applicant produced photomontages of viewpoints at a current, 1 year and 10-year time period. All these photomontages were presented as part of the PEIR and were available to view online, in hard copy at the designated CAPsites, and in person at one of the community consultation events.
PhaseOne_FF_022	Poorer folk within our society should be subsidised and have access to cheaper energy tariffs.		This is not relevant to the planning application.

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PhaseOne_FF_031	I work in an industry which installs solar panel farms and see how the construction phase decimated the local area and wildlife		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseOne_FF_044	YES but it was on a much smaller scale and the panels were all south facing, which made it feel there was more room for nature to carry on around and under the panels		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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PhaseOne_FF_047	Yes, but it was a lot smaller than your proposal and all the panels were parallel south facing. This made it seem less oppressive than your proposal - there felt to be more scope for nature to carry on below and around the panels.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseOne_FF_057	Why have Aldi, M&S, Home Bargains etc. been allowed without solar panels on the roofs? If all the new buildings had compulsory solar panels, there wouldn't be so much need to ruin open countryside		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseOne_FF_058	Yes. Smaller scale close to Faversham but thankfully out of site.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_060	Yes. They consume valuable resource in the form of the land they occupy and if not carefully sited are alienating and blighting intrusions into the natural landscape.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_076	Yes, but nothing of this scale.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseOne_FF_078	Yes. However, these were of a more modest scale which integrated well with the local landscape and communities.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_080	Yes, not impressed!		Noted.
PhaseOne_FF_086	Rather than placing in fields previously used for farming, put them by sides of motorways and derelict land.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_093	UGLY< poor use of agricultural land		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseOne_FF_103	I consider that wind farms are the least environmentally friendly of the sources of renewable energy. I am particularly concerned over their destructive effect on bird life and on the area, they stand in.		Noted.
PhaseOne_FF_104	Blights the natural countryside. The demand for energy is always going to be greater than availability with increased population and resulting development.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_117	Yes, Ugly		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).
PhaseOne_FF_121	Yes. On the way to Thanet		Noted.
PhaseOne_FF_123	They look like a prison compound - very unattractive and not wildlife friendly. This is a special wildlife site with other footpaths through and round it and needs careful and extensive landscaping.		The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.

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PhaseOne_FF_130	Don't know - I have seen small-scale solar plants, I have no idea whether that is what you mean here.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_132	Yes, we have a recent small-scale GMSD just outside town.		Noted.
PhaseOne_FF_133	Yes. The above questions - I do not feel it is measurable to include these questions. I do not want my opinions used as part of your planning application.		Noted.
PhaseOne_FF_145	Yes. Too big in size.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseOne_FF_147	Yes. All of the above options are obvious but does NOT mean this site is appropriate.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_148	OWLS HATCH ROAD, HERNE BAY		Noted.
PhaseOne_FF_154	Yes. I have never seen such a large solar development. It is a beautiful, environmentally sensitive area, so I am very concerned about the impact.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_155	Yes. Not pretty - Frankly should be on other infrastructure for all sorts of reasons		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).
PhaseOne_FF_158	Yes. A total blot on a rural landscape.		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).
PhaseOne_FF_161	No, only from a distance		Noted.

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PhaseOne_FF_164	Yes. Very few people, I can argue, dispute the need for renewable energy - However this is a huge site and an important one for wildlife.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_170	Only from a train. I was hoping to see scale drawings/artists' interpretations of the arrays, to give a feel for what it would be like to walk through a field of them, and also information on noise (do they hum?) and how they will connect to the substation (overhead wires?).		At part of the parallel Section 42, Section 48 and Section 47 consultation in May 2018, the Applicant produced photomontages of viewpoints at a current, 1 year and 10-year time period. All these photomontages were presented as part of the PEIR and were available to view online, in hard copy at the designated CAPsites, and in person at one of the community consultation events.
PhaseOne_FF_179	Only from aerial photos which look like a major manmade disaster on the surrounding countryside. This kind of installation has no place in the location of two natural marsh lands.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseOne_FF_186	Yes, and the site is a mess. There is a distinct lack of care by the company for the environment around the site. I would hope that this development, if it proceeds would be handled more sensitively.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_187	My chief concern is the size of this project. It is far too large for a what is now a beautiful nature reservation site.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_191	Don't know what all the fuss is about		Noted.
PhaseOne_FF_193	Fenced in like a prison. Not compatible with nature, foxes, hedgehogs etc.		The Applicant has maintained the proposed use of Deer fencing around the Development. Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseOne_FF_196	The existing local solar farm is an area of barren land, fenced off to all (for obvious safety reasons) which effectively sealed off an		Noted.

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	area of our natural landscape for use.		
PhaseOne_FF_199	Seen plenty of small solar farms but nothing on this massive scale		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_222	Solar farm behind Sewerage Farm		Noted.
PhaseOne_FF_226	I think they spoil the landscape. An alternative would be for all new buildings to have solar.		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).
PhaseOne_FF_238	Not beautiful		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).

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PhaseOne_FF_269	Please change the previous section so that comments can be added as well. It has been posed in such a way to elicit responses which will be used to support your development and not the dissatisfaction from the Graveney residents. I do not agree with solar farms on land. I have seen an operational ground - mounted solar farm.		Noted.
PhaseOne_FF_271	From our car on the Thanet Way but it is nowhere near as large as this one will be.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseOne_FF_277	Visually very unattractive		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).

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Consultation Report

Appendix 2b: Applicant Regard to Section 47 Consultation Responses (Phase Two and Further)

Appendix 2b: Applicant Regard to Section 47 Consultation Responses (Phase Two and Further)Phase Two Section 47 Feedback via Letter, Email and Phone

Phase Two Information Line Responses						
2. EIA Process and Methodology						
ID	**Stakeholder Name (and title)**	**Date**	**Time**	**Nature of Enquiry**	**Project Change?**	**Applicant Response**

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CH_Freepost_485	Member of public	30/06/2018	10.30am	Firstly, the assessment was carried out by Arcus Consultancy Services. At all meetings we have had with yourselves, Arcus have been attending with you as your representative, you have employed them to carry out a vast amount of the environmental and visual impact work to date. As stated by them in one of our first meetings, they are independent of you and therefor supposed to provide an unbiased view. However, as a business they have an interest in the proposal proceeding as should planning be approved then other developers including yourselves in other projects will likely use them again, businesses are built on reputation. We therefore feel that Arcus have pressure on them to stretch the truth and spin information whenever needed in favour of the developers.		Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference number 6). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.

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CH_Freepost_485	Member of public	27/06/2018	10.30am	On a separate note regarding the vagueness of the conclusion, in the PIER documentation you have used a lot of times wording such as 'likely effect' or 'probable' or more commonly 'not likely to have significant effect'. What happens when this is built and then there turns out to be differing effects to the findings in your PIER. I guess you have covered your back as you have used words like likely!		The EIA has been produced with reference to EIA Regulations and other technical guidance.
CH_email_560	Member of public	12/07/2018	5.41 pm	The Applicant's evidence does not appear to comply with the needs to follow the Rochdale Envelope because it is not stated what the actual maximum extent of the proposals would be, so this information needs to be clearly provided with further consultation on this updated information. So if the Applicant still intends to proceed with submitting an Application they need to revise the information and re-consult.		The Rochdale Envelope parameters are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) as Design Principles and Realistic Worst-Case Design Parameters for the purposes of assessment. The Rochdale Envelope approach is clear in its intent to produce an Environmental Statement (document reference number 6) that assesses the likely significant effects of a realistic worst-case design such that the effects of the as-built development are of the same, or no greater

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						magnitude than those assessed in the Environmental Statement.
3. Consultation						

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CH_email_418	Member of public	06/06/2018	9.56 am	Proposals for Solar Park at Cleve Hill Firstly I thank you for sending the Community Newsletter on the second round of consultations. Unfortunately I am not available for any of the dates and I had hoped that the information contained in the newsletter would have gone some way to answering the questions from the first consultation; most of which were responded from your staff and representatives as 'don't know'. Taking each point in turn from your newsletter I have the following questions.		The Applicant is confident that the consultation undertaken to date has, as a minimum, complied with the SoCC and the requirements of the Act, but has actually gone further than those requirements to ensure an effective and meaningful consultation process.
CH_email_418	Member of public	06/06/2018	9.56 am	What we've learnt No surprises here and the fact that no positive feedback is recorded is indicative of a lack of support for the project by the local community.		A full analysis of the consultation feedback received is presented in Chapter 11, Consultation Report (document reference 5.1)
CH_email_418	Member of public	06/06/2018	9.56 am	I note that this second consultation finishes on Friday 13 July. Does this mean we can ask questions up to this date or is this your expiry date for responding to concerns?		As detailed across the suite of consultation documents, the Applicant specified clearly the consultation period 31 May - 13 July 2018 and that the Applicant would accept responses as part of

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						its ongoing consultation beyond 13 July 2018.
CH_Freepost_479	Member of public	22/06/2018	12.34pm	The timing of your consultation feedback forms seems cynical. The first arriving just before Christmas, when it is likely to be put aside to be completed but subsequently overlooked in the rush of Christmas. The second arrives as the holiday season begins. People will fill it in when they get back or hopefully forget about it when it disappears under the junk mail on their return.		The Applicant has held two rounds of consultation, allowing 6 weeks for each phase of comments from: 09 November - 22 December 2017 and from 31 May - 13 July 2018. The Applicant purposely avoided the consultation periods over the August summer holidays and Christmas holidays.
CH_Freepost_485	Member of public	27/06/2018	10.30am	Formal response to the public consultation for the development of the Cleve Hill		No response required

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CH_Freepost_485	Member of public	28/06/2018	10.30am	solar park this letter is from myself and my family who have had several dealing with throughout this process and is the formal response to the consultation process form the residents of Warm House, Warm House Lane, Graveney, Faversham, Kent, ME13 9DL and who are one of, if not the worst, affected properties from the development.		Noted. A summary of the consultation held with neighbours to the Development is provided in Chapter 7 Consultation Report (document reference 5.1)
CH_Freepost_485	Member of public	29/06/2018	10.30am	Following the publication of the PEIR documents and the final public consultation events we wish to highlight several issues and concerns we have both with this project as a whole and the way in which Hive Energy UK has carried out consultation to date. We have also raised further questions we would like answered.		No response required.

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CH_Freepost_485	Member of public	30/06/2018	10.30am	Background: I purchased this house with my husband Barry in 1976 at which time it was derelict Shepherds cottage from when the development site was marshland and used for grazing. We spent the next 7 years restoring the house and developing the gardens and have spent a very happy 42 years here. We raised 2 children, Clare and Keith and ran a picture framing business from barns in the grounds. It has been a lovely place to live and has been our life's work to get the property and gardens to the state they are in now. The location has been very isolated and has provided a peaceful and safe environment for the majority of our life's.		Noted.

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CH_Freepost_485	Member of public	01/07/2018	10.30am	Sadly in April 2017, my husband passed away, following which, my son Keith and his wife Angela has decided to purchase some land and barns from me to build their home close by, this was 2 fold. One to allow them to have a lovely home which they could build in an area they love plus it was to support me as I get older to help me with the garden (1.125 acres) and have family close to me. As I am also struggling to now live on a single income, the money I received from selling the land and barns to them would have taken away my financial worries and allowed me to pay off the small mortgage I still have on the property.		Noted.
CH_Freepost_485	Member of public	02/07/2018	10.30am	To facilitate the above, Keith and Angela sold a property the owned to fee up the capital required for the project. This completed on 13th October 2017. The following week I received the letter and first notice of your plans through which are required.		Noted.

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CH_Freepost_485	Member of public	27/06/2018	10.30am	Feedback: Below are our concerns and questions:		No response required.
CH_Freepost_485	Member of public	28/06/2018	10.30am	Length and time to respond to PEIR documents – (30th May to 13th July) 43 days to read through all documentation (2500 odd pages plus other substantial documents referenced), attend public consultations, meet with yourselves and other groups to discuss the documents and produce and send a formal response! This is clearly not enough time, especially as a lot of the information is of a technical nature. As residents we must do this in out spare time, this is not our full time occupation.		The Applicant provided a 42-day consultation period, which is longer than the 28-day statutory requirement for consultation responses.
CH_Freepost_485	Member of public	29/06/2018	10.30am	Public consultation processes – Phase one: The information displayed at this consultation was very poor, there was very little detail, all the images shown only showed the lovely countryside and wildlife as it is now, there was not even an image or photograph of a solar panel. The scale of the		The Applicant is confident that the consultation undertaken to date has, as a minimum, complied with the SoCC and the requirements of the Act, but has actually gone further than those requirements to ensure an effective and meaningful consultation process.

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				project was not shown in relation to anything else.		
CH_Freepost_485	Member of public	30/06/2018	10.30am	Phase Two: By this time you had published the PEIR documents, which were on display, but we have grave concerns in the way that graphics where shown, predominantly again to hide the scale of the impact of the project which were some of the main concerns raised during Phase One. Below are 2 examples of graphics shown at the event: ILLUSTRATION OF SOLAR PANELS & LORRY AND VAN ILLUSTRATIONS		The information presented in the consultation documents has provided detailed information on the proposals and has been consistent with what has been presented in the PEIR. The Applicant has received similar comments from GREAT and The Faversham Society that certain simplified schematics have been misleading as they have not been drawn to scale. Across our literature the Applicant has been very clear which figures have been drawn for illustrative purposes and have clearly labelled and annotated these figures.

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CH_Freepost_485	Member of public	02/07/2018	10.30am	The 2.5m gap between the panels is larger in this graphic that in the 3 or 4 metres height of the panels, the image above would make the sheep the world's largest if this was to scale. You are also only showing 2 tables of panels with lots of grass and wild flowers. The reality would be that the entire image above would be covered with tables of modules with very little grass and flowers visible (PIER page 5-8, point 38 states the tables will run continuously without breaks). In addition, the colours used are not representative, they will be galvanised steel piles and black glass, not calming colours like you have used in the image.		As above
CH_Freepost_485	Member of public	03/07/2018	10.30am	Another graphic shown relating to the worries regarding traffic and particularly the HGV's passing through the village.		As above
CH_Freepost_485	Member of public	27/06/2018	10.30am	The scale of the HGV is clearly incorrect, in this graphic the minibus is shown as approximately 30% the length of an HGV, the HGV even looks squashed!		As above

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CH_Freepost_485	Member of public	28/06/2018	10.30am	There are numerous examples of how you have tried to hide or not get across the scale of this which is dreadful. When the first of the images was raised with you at the public consultation event you just held up your hands and said “oh yes, a lot of people have said that and we got that one wrong”, the worrying point is that you know exactly what you are doing, it would have been obvious this was wrong but as you are aware you do not get a second chance to correct this, this is the image people who are not paying much attention to the technical detail in the PIER will remember and your job of hiding the scale and impact of the development is complete!		As above

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CH_Freepost_485	Member of public	28/06/2018	10.30am	Consultation Phase Two feedback form – In the feedback form produced for the phase two consultation process one of the questions asked is 'have you seen an operational ground-mounted solar development before?' Once again, this is misleading the general public as you are implying that this park will be like others they have already seen, however, by your own admission this is the first park of its kind.		There is no reference in the feedback form regarding similarities to other solar parks.
CH_Freepost_485	Member of public	29/06/2018	10.30am	If you are not stating clear facts correctly and wording information/questions in a leading or false way then the consultation and PIER documents are not a fair representation of the proposed development and are heavily biased towards gaining public support through deceitful measures.		The Applicant is confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Across its consultation materials, the Applicant has referenced where information has been sourced to provide transparency of information.

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CH_Freepost_485	Member of public	29/06/2018	10.30am	This has been aggravated by the lack of compassion and empathy shown to us as a family, the environment and local community by the 4 companies involved. This has been our home for over 42 years!		The Applicant has remained sympathetic to the many neighbours and residents is has endeavoured to meet on several occasions throughout the pre-application consultation for the Development as detailed in Chapter 57 Consultation Report (document reference 5.1). The Applicant is confident that the consultation undertaken has been professional and gone beyond the statutory requirements.
CH_Freepost_485	Member of public	02/07/2018	10.30am	As per advise by the Planning Inspectorate, should we be unhappy with the way the developer has carried out the public consultation we have copied in the local planning authority, as well as highlighting the facts to yourself to respond. We also feel it is important to make our MP aware of the issues and for the opposition group GREAT Graveney to see out concerns to date.		No response required.
CH_Freepost_485	Member of public	03/07/2018	10.30am	In addition, we request that a full copy of this letter is included within the Consultation Report which will accompany the Application you		Full consultation response included in Appendix 27.

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				submit to the Planning Inspectorate.		
CH_Freepost_485	Member of public	27/06/2018	10.30am	We now look forward to meeting with you on the 4th July 2018.		Noted.
CH_email_513	Member of public	05/07/2018	6.01 pm	Unfortunately, due to your phase 2 consultation period being held over such a short period (13-16 June) we were unable to attend any of your events. We believe this was a deliberate attempt to reduce the numbers of interested parties and dissenters from attending these sessions and would ask that you consider extending any future consultation events to enable a larger number of people to attend. We are writing to strongly object to your Cleve Hill Solar Park proposal on the following grounds:		The Applicant undertook the phase two s47 consultation from 31 May 2018 - 13 July 2018, allowing 42 days for consultation responses. The Applicant publicised the consultation events two weeks before holding them. A full description of the consultation is provided in Chapter 7, Consultation Report (document reference 5.1)

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CH_email_532	Member of public	11/07/2018	12.37pm	6. The consultation documentation does not attempt to give the full facts and figures but is a public relations attempt to gloss over the details. It is not immediately apparent how large the individual panels will be, how many there will be, how large the battery storage containers will be nor how many of them. It would seem to me, and I have been personally responsible for many public consultations for unpopular developments, that this is deliberate, disingenuous and mis-guided. The pro-forma response document supplied by the developer avoids nearly all the contentious issues, yet this will no doubt be used by many individuals and then quoted by the developer as evidence of public support or neutrality.		This is the view of the respondent. The Applicant is confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees

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CH_email_541	Member of public	11/07/2018	10.21pm	We attended the public consultation session at Graveney Village hall on 14th June and have been residents of Graveney for 11 years. We have met with your team previously and have spoken openly about our reasons for opposing the solar power station but aim to set these out, along with our issues with the consultation to date, as clearly as we can in this letter. This letter deals with our views in relation to this particular solar development and its scale and location. We believe that solar has a place in the UK amongst other energy sources, but that there are far more suitable locations available e.g. industrial roof spaces, residential roof spaces, unused land between and along the edges of major roads and railways.		Noted.

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CH_email_541	Member of public	11/07/2018	10.21pm	1. Effectiveness of the consultation First and foremost, the information provided at the consultation was poor. The full PIER documents were published and available at the public consultation but their length prohibited many from being able to read and digest the full information in the time available to respond. For those few who had the time to wade through either the shortened version or the full version of the PIER documents (over 2500 pages!) they would have found misleading information and conflicting information from that presented around the room at the consultation meeting and in the promotional materials distributed.		The Applicant recognised that some consultees would wish to read and comment on the detail within the PEIR, which is why it was provided in full at the community consultation events, at the Community Access Points and online on the project website. However, the Applicant also recognised that some consultees would not have the time or inclination to digest and comment on the full PEIR, and therefore its content was summarised in the non- technical summary of the PEIR, a number of topic-specific factsheets, and the large-format displays used at the community consultation events. As set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, "preliminary environmental information" means information which is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development). The

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						consultation undertaken by the Applicant has discharged that duty.

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CH_email_541	Member of public	11/07/2018	10.21pm	The high level statements made in promotional materials do not give enough detail and the illustrations are misleading. For example the graphic of how the solar panels will look, where they were not to scale and making it look like the height of the panels were nowhere near what they will be in reality. Four meters high appeared smaller than the 2.5 meter distance between panels. Plus there was a very large sheep grazing which again took away from the true scale. Not only this, but your more detailed information appears to say that the panels will run continuously without breaks, making the graphic even more misleading as it shows 2.5 meters between panels. There will clearly be little room for sheep to graze or for anything to grow. There are many other examples of misleading information e.g. the scale of the lorries compared to the minibus in that illustration. How can consultees make a judgement		This is the view of the respondent. The Applicant is confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees

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				based on this misleading information?		

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CH_email_541	Member of public	11/07/2018	10.21pm	Within the PIER documents there was also very misleading information. For example the photograph used to show how wild flowers would grow between the panels was based on a completely different system than that proposed in this development (PIER volume 1 pages 10-40). Other pictures show the continuous east west design and you can see from that that there would be no space for wild flowers to grow (PIER volume 1 pages 5-10). You were clearly not expecting many people to look at the more detailed documents and certainly not in great detail (how could they in the timeframe available?). Therefore the consultation is not effective and also deceitful.		The information presented in the consultation documents has provided detailed information on the proposals and has been consistent with what has been presented in the PEIR. Across our literature the Applicant has been very clear which figures have been drawn for illustrative purposes and have clearly labelled and annotated these figures.

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CH_email_541	Member of public	11/07/2018	10.21pm	Finally, we have found our dealings with the developers entirely unsatisfactory and they show no concern for local residents and a total lack of understanding of the issues that are being raised. Their stance has always been that this will not have any ill effect on the area and the people which is a completely selfish approach. They are just focussed on pushing this through without wanting to understand the damaging effects on people's lives. This is an unacceptable way to conduct yourself. Yours faithfully		The Applicant has remained sympathetic to the many neighbours and residents is has endeavoured to meet on several occasions throughout the pre-application consultation for the Development as detailed in Chapter 57 Consultation Report (document reference 5.1). The Applicant is confident that the consultation undertaken has been professional and gone beyond the statutory requirements.

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CH_email_552	Member of public	12/07/2018	3.39 pm	General observations on the consultation documents 1.The main PEI Technical Report is not user-friendly. It is verbose and much of it contains a fog of detailed technical (and some pseudo-technical) language over 466 pages - difficult to wade through and respond to adequately within the short response period (6 weeks) allowed. The team that put it together desperately needs to learn the importance of plain, clear English. As it stands, the document seems designed to deter an informed response from consultees. Most members of the general public would struggle to understand it. The use, for example, of such phrases as "main design iterations" (Chapter 4.1.5) is meaningless to most consultees. An iteration is a repetition - so what are main design repetitions? Or do you mean "changes"?		The Applicant recognised that some consultees would wish to read and comment on the detail within the PEIR, which is why it was provided in full at the community consultation events, at the Community Access Points and online on the project website. However, the Applicant also recognised that some consultees would not have the time or inclination to digest and comment on the full PEIR, and therefore its content was summarised in the non- technical summary of the PEIR, a number of topic-specific factsheets, and the large-format displays used at the community consultation events. As set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, “preliminary environmental information” means information which is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development). The

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						consultation undertaken by the Applicant has discharged that duty.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Misleading and Inadequate Information The response from [redacted], who obviously know the site intimately, shows that the information you have provided is seriously misleading.		The Applicant is confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees.
CH_email_560	Member of public	12/07/2018	5.41 pm	I note that the public information events were held over four days in one week in June, which meant that people unavailable that week, such as myself, were unable to access that information. This means that the community Consultation was inadequate and does not meet the Planning Act requirements.		The Applicant made all consultation materials available from 31 May - 13 July 2018 in the following ways: on the Development website, across the Applicant's 8 CAP sites, at the four consultation events held and upon request.

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CH_email_618	Member of public	13/07/2018	3.58 pm	Proposed Solar Park at Cleve Hill, Graveney Marshes 1. I am writing by way of feedback to your consultation exercise on the proposed Solar Farm at Cleve Hill Graveney Marshes. I have attended your presentation (phase 2) at Faversham and read your consultation documents.		Noted.
CH_email_626	Member of public	13/07/2018	5.44 pm	3. Limited literature: to make informed decisions on the impact on wildlife/biodiversity.		The Applicant made all consultation materials available from 31 May - 13 July 2018 in the following ways: on the Development website, across the Applicant's 8 CAP sites, at the four consultation events held and upon request. This included detailed information on wildlife and biodiversity as presented in the PEIR and accompanying PEIR NTS.

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CH_email_537	Helen Whately	11/07/2018	4.45 pm	Thank you for continuing to kep me informed about your emerging proposal for the Solar Farm at Cleve Hill. I was pleased to attend your recent exhibition in Graveney and have also had an opportunity to speak to members of the local community to understand their views on the plans as they evolve.		Noted with thanks.
CH_email_595	Faversham Town Council Town Clerk	13/07/2018	12.56pm	CLEVE HILL SOLAR PARK Consultation Phase Two Feedback Faversham Town Council (FTC) wishes to register an interest in the ongoing Public Consultation, and wishes to be kept appraised of all news and activity for the proposed Cleve Hill Solar Park, prior to any planning application being submitted		The Applicant has maintained informing Faversham Town Council throughout the pre-application consultation and up to submission of the Application.
CH_email_595	Faversham Town Council Town Clerk	13/07/2018	12.56pm	Faversham Town Council reserves the right to make further representations as the next phase of Public Consultation gets under way.		Noted.

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CH_email_608	Member of public	13/07/2018	3.08 pm	Thanks for your email confirming receipt. It seems rather convenient that CHSP has the opportunity to decide whether comments are "appropriate" or not for a response. Can you please send me a copy of the policy and procedure you use in making this decision.	No	All comments have been considered as part of the development process, as reported in the Consultation Report (document reference 5.1).
CH_email_552	Member of public	12/07/2018	3.39 pm	Development Consent Application, Solar Park at Graveney, Kent: Response to Consultation Thank you for sending details on CD-ROM regarding the above application.		Noted.
CH_email_419	Member of public	06/06/2018	10.05am	I look forward to hearing from you.		Noted.
CH_email_532	Member of public	11/07/2018	12.37pm	I am happy to expand upon any comments made herein.		Noted.
CH_email_418	Member of public	06/06/2018	9.56 am	I look forward to hearing from you.		Noted.

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4. Site Selection, Development Deign and Consideration of Alternatives						
CH_email_419	Member of public	06/06/2018	10.05am	There are derelict and decommissioned industrial and brown field sites that can be utilised for this type of construction. Kingsnorth Power Station, Manston Airport both in Kent spring readily to mind. There is no need to destroy the site at Cleve Hill.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_Freepost_485	Member of public	30/06/2018	10.30am	Site selection – NGET connection (PIER volume 1 – chapters, page 4-1) – regarding site selection you state that a large number of sites had been identified by a team of project developers but that this site was primarily chosen as it was the only one that has 'such close proximity to the 400KV national grid electricity transmission (NGET) network with the ability to accommodate similar generation capacity to the development (>350MWp).' As also stated by yourselves on several occasions this connection makes it possible to proceed with this development as a private company with no Government subsidy and it would not be visible elsewhere because it is so expensive to connect into the National Grid.		No response required

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CH_Freepost_485	Member of public	01/07/2018	10.30am	Our concern with the above is that the UK citizen we thought that planning law in this country was in place to protect the UK and particularly its green spaces from developers with deep pockets. Surely, if this is allowed to go ahead because of the easy and cheap NGET connection then this is the equivalent of big business being able to bypass what would be normal planning law for financial gain rather that what is actually best for the UK and it's land use and in our view would set dangerous precedents for future developments on this scale.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_Freepost_485	Member of public	02/07/2018	10.30am	Proximity to local population (PIER volume 1 – Chapters, page 4-3) – you state 'The local of the solar park, coastal on the north and west sides, with open land to the east and agricultural land immediately to the south is favourable for development. The above characteristics limit the number of properties adjacent to or within 200m of the solar park to less than 10 dwellings.' As a developer with only 10 dwellings that are majorly affected by this development, why have you not shown more compassion to the people who's lives you are ruining, not only if this gets approval but from the moment the development first came to light. As a developer who has surely gone through this process previously you must understand the impact your company and its employed consultants have. You have shown no understanding or empathy through this process and are purely engaging with us so that when the application is submitted you can tick the box that says you		The Applicant is confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. This includes three face-to-face meetings with this respondent. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat

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				consulted with local residents and the public.		enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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CH_email_513	Member of public	05/07/2018	6.01 pm	1. You suggest Cleve Hill is the only viable option for this development yet, just a few miles away, is the former site of Kingsnorth Power Station which has recently been demolished – the plans for which were public knowledge long before you started your research in to the Cleve Hill site. This is a far more suitable site and we would like your reasons for not considering that site. In fact, there are many other brownfield sites that would be far more suitable for a solar farm.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_520	Member of public	09/07/2018	12.13pm	8. Agricultural land in what was the fruit belt of the Garden of England is under threat in all directions, with Faversham being asked to provide more land for housing than other areas of Swale. Of course, those houses need services, but those should not be provided at the expense of more agricultural land, which I note the applicants have tried to designate as poor, when it has been defined as moderate, and where local farmers say better management would improve on that rating.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_520	Member of public	09/07/2018	12.13pm	9. There is, of course, a need and sympathy for the cause of Green Energy, if solar farms can be so designated, but it is my belief it should be possible to utilise land other than that which is of ecological and agricultural importance. Other European countries have been experimenting with laying solar panels in the centre and alongside roads. Kent has motorways and dual carriageways where central reservations and edges could be used for such a purpose. Indeed, as the main attraction to the developer is the ready link to the National Grid (obviously a huge saving on start up costs) why not explore the possibility of using the south facing M2 and A299 to link this site? It cannot be beyond the ingenuity of man to provide for energy needs without spoiling our already diminishing countryside. The financial gain to KCC Highways (rather than to a private landowner) would bring much needed revenue to the county. Legislation that all new housing		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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				developments should have solar panels (if necessary with a subsidy to developers) would further ease the burden on land. Other major sites such as Kingsnorth Power Station and the decommissioned areas of Dungeness, previously industrialised in the cause of electricity, should be available for development and already have access to the grid.		

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CH_email_532	Member of public	11/07/2018	12.37pm	1. The use of this totally rural greenfield site, important for bird life, for walking and leisure and for the overall balance of the environment in North Kent is wholly inappropriate for an industrial development on this scale.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_532	Member of public	11/07/2018	12.37pm	4. If such a development makes sense financially, then it should be located at an existing brownfield site such as the site of former power stations, of which there are sites in North Kent, and where there is already significant infrastructure, connectivity to the grid and a receptive flood protected environment.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_556	Member of public	12/07/2018	4.10 pm	5. Alternative Sites We are not aware that consideration has been given to the use of other brownfield sites - such as the decommissioned Kingsnorth power station, which already has links to the National Grid - rather using a vast stretch of green agricultural countryside that is adjacent to designated protected areas.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Inadequate Justification for using Graveney Marshes Other Potential Sites The Applicant does not provide sufficient detail of why other potential sites have been rejected which is a key requirement for proposed Nationally Significant Infrastructure Projects.(NSIP) For example suitable sites available in Kent which have National Grid connections are the recently demolished Kingsnorth coal-fired power station on Hoo Peninsular, or the site of a former oil-fired power station (demolished in 2015) and a former oil refinery on the Isle of Grain. These would still suffer from the inefficiency of transmission losses, but would be nearer areas of higher power demand.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_560	Member of public	12/07/2018	5.41 pm	If the existing spare capacity available in the existing London Array sub-station at Cleve Hill needs to be used then the significant improvements in the efficiency of offshore wind turbines would make building the cancelled second phase of the London Array offshore wind power station more viable than it was when phase one was built. There is also the option in due course to repower the Whitstable Flats original turbines with more efficient versions.		London Array states on its website (http://www.londonarray.com/the-project-3/phase-2/) that the final capacity of London Array Offshore Wind Farm Phase 2 was expected to be in the region of 200 MW, and that technical and environmental challenges including ornithological issues, shallow water, longer cable routes and an exclusion zone for aggregates operations affected the viability of the scheme. This led to London Array requesting the termination of the agreement of lease for Phase 2 area and cancelling the remaining grid capacity reserved at the National Grid Cleve Hill Substation. Phase 2 of London Array Offshore Wind Farm is therefore not a viable alternative.

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CH_email_560	Member of public	12/07/2018	5.41 pm	6 Inadequate Overall Assessment Canterbury City Council in their response to the IPC say: "3.2.1 The EIA should consider the potential for cumulative effects associated with other major development in the area, including development that is under construction; applications which have been permitted or submitted but not yet determined; projects on the PINS Programme of Projects; schemes identified in development plans; or other developments which are reasonably likely to come forward. A full assessment of alternatives must be included within the ES." These aspects and in particular the 'full assessment of alternatives' have not been adequately covered, and I offer some that should have been considered.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_560	Member of public	12/07/2018	5.41 pm	7 Alternatives OFGEM recognises that the energy market is changing. For example, more than a quarter (and increasing) of all generation capacity is connected to distribution rather than transmission (grid) networks but the electricity transmission system is 100 years old and no longer fit for the future because a 'smart grid' is needed (https://www.ofgem.gov.uk/system/files/docs/2017/11/tcr_working_paper_nov17_final.pdf). They also recognise that role of the consumer needs to be expanded: “The potential of smart grids are huge. They could revolutionise the way we generate and use energy, enabling new forms of generation to connect and bringing customers into the heart of the equation with their ability to shift demand and balance the system.” The Smart Power industries		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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				Alliance (SPIA) represents the coming together of the industries driving forward the decarbonisation of the UK economy, to give households, business and community's greater control over the way that they use and consume their energy especially for those users who develop both their own supplies and their own back-up. A prime example are mission critical operations such as hospitals and data centres who need rapid response back up to keep working. A major change in grid operations is that 'Demand Side Response' (DSR) is being encouraged and becoming more economic. The Green Alliance (http://www.green-alliance.org.uk/Negawatts) reports that there is cross party consensus supporting DSR, and the House of Commons Energy and Climate Change Select Committee states that demand side measures are		

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				potentially the cheapest methods of decarbonising our electricity system, and have been supported by the House of Lords informal working group on the draft Energy Bill. The UK already has more than 4 GW of stored power in Uninterruptible Power Supplies (UPS) and payment for DSR will increase the availability of that power. Using that capacity to export to the grid helps pay for the cost of such backup and makes the grid more reliable. All hospital backup generators have to be regularly tested to ensure that they work when required but this is an additional cost and inconvenience so there is a clear case to earn money while ensuring the regular testing and reliability of systems (see for example: DEIF (UK) "http://www.deif.com/whitepapers/are-you-ready-for-demand-side-response" www.deif.com/whitepapers/are-		

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				you-ready-for-demand-side-response). A data centre example is Yandex, Finland and Helsinki Energy who have an agreement whereby Yandex gets paid to use their UPS to power the data centre to reduce the load on grid, and this uses very simple frequency-based control - if grid frequency drops the UPS comes on. In addition there is increasing capacity on the interconnectors so the existing 4 GW capacity would at least double, and may ultimately rise to 12GW by 2022 (www.ofgem.gov.uk/electricity/transmission-networks/electricity-interconnectors), and further increase if Iceland is connected. This competition makes the Applicant's proposal even less viable and so less justifiable against the damage it would cause		

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CH_email_560	Member of public	12/07/2018	5.41 pm	An example of inefficient PV location is the South West region, which has highest installed PV capacity (2.8 GW Regional_renewable_electricity_2016 from gov.uk) in England because several large PV power stations have been established there, but as local electricity demand is relatively low this causes National Grid problems – and increases transmission losses. The solar panels proposed by the Applicant are no different from those available for domestic properties but there are lengthy cables connecting the panels to the interconnector in contrast with smaller scale systems where the power is connected directly to the point of use. In “A Countryside Friendly Smart Grid”, CPRE recommends that we should: “aim to reduce reliance on wasteful forms of centralised electricity generation and transmission”; and that: “’a ‘smart grid’ should be: “encouraging the		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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				growth of energy storage, renewable heat and small-scale, decentralised energy generation and microgeneration, allowing such generation to be fed into the electricity distribution network and providing incentives such as a feed-in tariff; and radically reducing energy consumption through the use of demand management measures such as 'smart metering'". Similarly Kent County Council's (KCC) Energy Security Select Committee reports that KCC helped to establish a Low Carbon Community network, and give support to community energy projects and are also investigating establishing KCC as an energy supplier to the local community. Community Energy schemes are spreading rapidly, because of their great benefits for both reliability and reduced consumer costs. Evidence on this is available is available from many sources, including Community Energy England and Community Energy		

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				South, and these show that such schemes have enormous and widespread benefits in contrast to the claimed benefits of the proposed solar power station just going to the Applicant.		

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CH_email_560	Member of public	12/07/2018	5.41 pm	Professor Sue Roaf, who is also a non-executive director of the UK's oldest solar company, AES Solar ltd, says: "Our order books (for domestic solar) are healthy", and "Where better to spend a small part of a pension pot than to put in a solar water heater, PV electrics and a battery system, thus decoupling the household from soaring energy prices from the grid" (Guardian letters, 6/7/2018). As someone who first installed PV in 2001, and since expanded the system so that I now generate far more than our total annual usage, and who also first had an electric vehicle (EV) in the 1980's, I have kept up to date with the major and rapid changes relating to home generation and electric vehicles (EVs). EVs are now being used as two-way stores – both to power the vehicle and to supply the house but also for supplying the Distribution Network at times of high demand. Intelligent use of		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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				vehicle to grid technology can actually improve the battery life (www.current-news.co.uk/news/v2g-found-to-improve-the-lifetime-of-electric-vehicle-batteries). Second-hand EV batteries are now being used for battery back-up in the house, and this further reduces battery costs both for the EV and the backup system, giving even better economics for the system. Use of Economy 7 tariffs, where the mains electricity cost is around one third of the day rate, also improves the benefits. The Applicant needs to justify this very large single site for a power source rather than the more resilient, economically and environmentally beneficial schemes for local people using a system of distributed sources of PV (or other renewables) on houses and business. In contrast the Applicant's proposal will not reduce consumer costs, and does not help the resilience of		

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				the local distribution network. Hence this solar power station proposal is in wrong place. Having a direct grid connection is useful, but if that one connection goes down, both the PV and the battery storage will be useless, and this is a very real risk as shown by the grid failures referred to above.		

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CH_email_560	Member of public	12/07/2018	5.41 pm	Converting excess electricity capacity to hydrogen for injecting in to the gas grid would be more efficient than battery storage, would displace fossil gas, and reduce the need for diverting electricity for heating use (Alan Whitehead, Shadow Minister for Energy & Climate Change 'Supporting the hydrogen economy\'81\'68 New Statesman 2018). Unfortunately there are no National Grid gas pipelines near Graveney Marshes, but locating such a large solar power station near such a pipeline would provide a far more flexible resource than just using the 400 kV electrical connection (www.nationalgrid.com/uk/about-grid/our-networks-and-assets/gas-and-electricity-network-routes).		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_560	Member of public	12/07/2018	5.41 pm	8 Loss of Land The damaging impact of the proposal on productive farmland would be further exacerbated by loss of the farming activity that currently occurs. The UK needs to expand food production, and not reduce it, so destroying the productivity of this large area is unacceptable. The fact that the land is used for arable farming, rather than for grazing, means it is better quality land and so needs strong protection to keep it in use for such purposes. In terms of land use, 20% of Kent is already developed, a higher than average proportion in England, so land loss is a serious issue for food production. The local area is also losing large areas of greenfield land for houses, so renewables on the new buildings makes best use of scarce land. Other locations, for example, the		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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				defunct Manston Airport has large roof areas as well as the concrete runways etc..		

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CH_email_570	Member of public	12/07/2018	8.53 pm	In the South East, yes we have countryside, but nothing like this. Please do not take this unique area away from so many people and so much nature. If 'you' -Clive Hill Solar Park- care about the future of the planet, 'you' want to make a difference, and if 'you' are a true environmentalists, then I wonder why 'you' are so shortsighted. This is not about "Not in my back yard". This is about nowhere, not like this. Solar is not going to reverse climate change…it is sticking a plaster over a festering wound. I would be happy to offer a solution, if you are interested.		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_618	Member of public	13/07/2018	3.58 pm	12. I believe that there are alternative brownfield sites available such as Kingsnorth and that there are many industrial and commercial sites such as shopping centres and large car parks which could accommodate solar panels and associated infrastructure as in other countries and in a more widely distributed way and hence with less unacceptable environmental and visual impact. Your proposals do not really explain why this site has been chosen.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_626	Member of public	13/07/2018	5.44 pm	4. Greenfield-to-brownfield: slow creep into a battery storage industrial site.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_626	Member of public	13/07/2018	5.44 pm	4. Greenfield-to-Brownfield I also have concerns about what happens to the site once the economic or physical life of the solar PV panels comes to an end. If this development goes ahead does this site suddenly become a brownfield site? The developers must provide a scenario analysis on what happens at this point. It would be an enormous shame if the site – strategically located near to the Cleve Hill substation and the English Channel– became a battery storage park for future electricity interconnectors from Europe by virtue of being transformed into a brownfield site without consultation. Adequate protections, including the requirement for further consultations on this point, need to be in place before this project goes ahead to ensure residents have a say on the future of the site beyond the project's lifespan.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. The Rochdale Envelope parameters for the energy storage facility are clearly set out in Environmental Statement Chapter 5: Development Description (document reference 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK.

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						There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have the same magnitude effects, or effects of lesser magnitude than those included in the Environmental Statement (document reference 6.1). The Applicant has also assessed the influences of the development on Climate Change in Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15). The sources of information used in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15), are referenced in the chapter. Aspects for which CO2 costs are not available are identified.

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	1. The sacrifice of green and open land to energy production without adequate consideration of alternatives with lower impact on nearby human communities and wildlife habitats and populations: Within the development site shown on the site plan (and as described in the 'Preliminary Environmental Information Report' dated May 2018 ('the PEIR') and the Non-Technical Summary ('NTS') also dated May 2018) the land is currently primarily a combination of arable land and freshwater grazing marsh, bordered on the North by coastal flood defences. Whilst supportive of low carbon, renewable energy production we consider that the first and best option should be to use the built environment for the location of solar electricity energy generating facilities, for example on rooftops of both commercial and residential property, and over car parks or on Brownfield land.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_595	Faversham Town Council Town Clerk	13/07/2018	12.56pm	The PEIR states that many other sites have been assessed and that Cleve Hill has been selected due to the proximity to the National Grid infrastructure. However there are many decommissioned Power Station Sites in the South of England with just as suitable access to the Grid that surely would lend them to be re-used rather than blighting open countryside, which contains SSSI,s and RAMSAR sites etc.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_524	Open Spaces Society	09/07/2018	2.58 pm	3) The land may not be of high quality, however any cropping for food for human or wild life consumption will be impacted.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_524	Open Spaces Society	09/07/2018	2.58 pm	6) I have campaigned in the local press for solar panels to go onto the roofs of factories, supermarkets, leisure centres, village halls and doctor's surgeries which is where they should be.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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CH_email_447	Member of public	14/06/2018	2.37 pm	I am a fan of solar energy anything to reduce the cost incurred by using fossil and while I like the idea of a solar farm I am concerned about the environment in the location proposed, widlife, loss of other use etc. What is the direct benefit to the local houses in the facinity of the solar farm, I can see the benefit to the local community and council income? Also why use farm land rather than installing panels on property roofs as they are screaming to be used? When you think about the prospect of the electric meter in your house being owned by the electricity company why not solar panels on the roof as well, then the house cold benefit from a discounted electricity and the remainder goes to Cleve Solar Park, just seems to make more sense to me. I look forward to hearing from you.	No	The Applicant has included an extensive landscaping and biodiversity management plan (document reference 6.4.5.2). The Applicant has consulted with the nearest neighbours to the site and will not develop on 13.6ha on Cleve Hill as well as setting back solar PV modules at Nagden and at Warm House. The Applicant has also included 3,64km of hedgerow planting.

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CH_email_454	Member of public	17/06/2018	8.57 pm	Just wanted to register my objection to your proposals. Why not use a brownfield site elsewhere - not this beautiful and unspoilt piece of land? As far as I can see, the plans are deeply unpopular across Faversham - so perhaps you need to reconsider? Best wishes	No	Comment noted. Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development (document reference 6.1.4).

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CH_email_462	Member of public	19/06/2018	1.15 pm	Thank you for your Consultation Phase Two information. My feedback is as follows:- I still struggle with the fact that the existing land use, of growing grain, is being lost to a much reduced agricultural operation. The UK must grow its own food and to lose such a large area seems a backward step as we need food in advance of electricity. A sufficient Ecological Assessment has not been undertaken given the importance of the North Kent Marshes SSSI for bird life. The site is simply too large and will fragment this SSSI. I assume that Kent Wildlife Trust will comment of the proximity to their Nature Reserve at Oare and Seasalter but from a layman's point of view the proposal adversely affects these areas to too great an extent. I believe that the solar panels are	No	Thank you for your comments. The site is arable land which has been classified as Grade 3b, which is lower quality agricultural land. Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development (document reference 6.1.4). The Applicant has consulted KWT throughout the pre-application consultation process. Please see the LVIA, which assess the visual impact of the Development in document 6.1.7. The Applicant has consulted with the EA throughout the pre-application consultation in addition to the statutory s42 consultation as detailed in Chapter 5 of this Consultation Report. The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic

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				far too high for such a flat area and hence will have a significant adverse impact on this large area. Lastly I think that to extend the site to include the seawall area is totally wrong as the Environment Agency:- • Has already issued their long term plans for The Medway and Swale Estuary, which involved breaching the seawall in two places along the proposed site's border • Should remain totally independent to follow through on their own plans and they may now come under undue pressure to work with the narrower needs of the Solar Farm I would suggest that if the border is not reduced to its original line then Cleve Hill Solar Park should not be majoring that the plans are "non-subsidised" as quoted in the consultation, unless they accept that the sea wall will be breached as currently proposed. Any undue influence on the Environment Agency to change their plans will		and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable. The majority of the Development is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme events. Only the electrical compound is designed to withstand a breach of the existing defences. It is therefore clearly in the asset owner's interest to maintain the current standard of defences, to at least the same standard that the EA currently do. The Applicant therefore increased the Development site boundary to include the flood defences as shown in Figures 1-3, Chapter 1. This was consulted on in the PEIR. Subsequently a position between the EA and the Applicant has been reached as included in Appendix 26.

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				effectively mean that the Solar Farm would be subsidised.		

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CH_email_562	Member of public	12/07/2018	6.21 pm	I have studied your application and reports and as local resident I very strongly oppose your plans because it is in wrong place and industrialising the wild marshes is too big a price to pay for the benefits I also concerned about flooding having experienced the 1953 floods at first hand	No	Comments noted. Please see the Applicant's flood risk assessment in Chapter 10 of the Environmental Statement (document reference 6.1.10).

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CH_email_575	Member of public	13/07/2018	7.28 am	I wish to object to your proposal of the huge solar park you are planning to build on Graveney marshes. I have lived with my family in Graveney for the past 14 years. We moved here because it is a beautiful and peaceful part of the country. Like a majority of villagers we enjoy walking in the village and in the surrounding areas. We particularly like to walk along the Saxon Shore Way. We like to watch the wildlife and enjoy spotting different birds like the Marsh Harriers that frequent the marshes. If your planned solar park goes ahead it will totally destroy this beautiful part of our countryside. How awful it will be to walk along and instead of seeing sheep grazing, birds flying, bees pollinating the wild flowers we see the horrendous 4 meter high solar panels obliterating the landscape for as far as the eye can see ? Surely to God there must be a better location for this monstrosity ?	No	These are the views of the respondent. Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development (document reference 6.1.4)

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				Let me ask you this ..... How would you feel if it were being built where you live ?		

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CH_email_576	Member of public	13/07/2018	8.43 am	. I am writing to object to your proposed solar farm development at Cleve Hill , Graveney . I am wholly in favour of renewable energy and have applied for solar panels on the roof of my house , but I can see NO REASON why the panels should be put on virgin land . This area of land is PRECIOUS . It is rare in that it is unspoilt , and should be respected and treasured as such . To ruin it as you suggest , is a violation . Solar panels could just as easily go on a brownfield site , or on rooves of already constructed buildings . I simply DO NOT UNDERSTAND why you imagine they should go here . I thoroughly object to your proposal .	No	These are the views of the respondent. Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development (document reference 6.1.4)

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CH_email_577	Member of public	13/07/2018	8.50 am	I write to express my utter dismay at this proposed development. I am in favour of alternative of course but not at the price of destruction of a wonderful open habitat that supports amazing amount of wildlife. To me it is so much more important that nature continues to thrive in this area. I think the development of this Solar Park is unnecessary, extreme in its size and that the developers have not taken into account the destruction but are focussed on the monetary gain to be made by their plans.	No	These are the views of the respondent. Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development (document reference 6.1.4)

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CH_email_590	Member of public	13/07/2018	11.33am	I object to the proposal of a solar farm on Graveney Marshes, because its construction means the destruction of a greenfield site, home to a plethora of flora and fauna. I agree wholeheartedly and have campaigned before for and increase in renewable energy, and therefore having to oppose it pains me greatly. I believe that your public consultations weren't well publicised enough, and that information about this project has be sparse, leading mush of the pubic to believe that opposition comes against solar energy and not your plan to build on this site. Why is it not possible to build on and alongside the growing number of brownfield developments surrounding whitstable, and other towns in Kent? This would limit the environmental impact, and give some purpose to the unaffordable eyesores already littering the roads into our towns. There are questions that need to be answered.	No	Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development (document reference 6.1.4). Please also see the Applicant's Consultation Report (document reference 5.1) which details the publicity of the Development, where the Applicant has widely publicised the project across its consultation area including extensive local advertising.

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CH_email_596	Member of public	13/07/2018	1.02 pm	You cannot dress this up as a green initiative! There will be utter devastation of land and wildlife beyond the obvious eyesore. There are many other more suitable sites.This is not progress, it's blatant profiteering!	No	These are the views of the respondent.

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CH_email_604	Member of public	13/07/2018	2.15 pm	Having attended the consultation event in Faversham Guildhall in June I am firmly of the opinion that this development should not go ahead. Whilst not opposed to the development of solar parks in principle the scale and location of this one are totally inappropriate. I am of the opinion that such large scale developments are unnecessary especially in unspoilt landscapes such as Graveney Marshes. I understand that large car parks with solar panels exist both abroad and in this country. In the south east we have many such car parks such as at Ebbsfleet and Ashford International stations and I am sure there must be alternative brownfield sites. The size cannot fail to have a far reaching effect on the environment, reducing the amenity value for those living in the area, those who currently use the area and even those further afield. I do not think the visualisations from various viewpoints were truly representative of the impact of the	No	Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development and alternatives (document reference 6.1.4). Please also the Applicant's Needs Statement (document reference 7.3). The Applicant has reduced the area of solar PV modules from 56.5% to 45.5% of the developable area. The Applicant has also undertaken extensive environmental surveys and studies as presented in its Environmental Statement (document reference 6.1) and has consulted with statutory and local nature conservation bodies on these.

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				panels given their height and the extent of the area covered. Views towards the sea from vantage points on higher ground will be totally dominated by the panels. From a closer perspective anyone using footpaths near or through the area will either be walking near or through rows of high panels instead of the unspoilt, open land. The character of the open landscape will change to that of a vast, unsightly industrialised area. Whilst I understand that plans for improved local amenities including additional permissive pathways and a community orchard have now been included I do not feel these would compensate for the loss of amenity. The effect on wildlife would also be devastating. I understand there is specific concern for Marsh Harriers in the area as well as many other species of birds along with over 30 species of rare invertebrates. While it is proposed that there could be grazing land under the panels it is my opinion that this would not compensate for the		

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				habitat that exists at present with its abundance of wildlife. In conclusion I would prefer to see development of solar power on smaller less obtrusive sites to mitigate the effect on natural areas such as Graveney Marshes.		

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CH_email_609	Member of public	13/07/2018	2.54 pm	I am a resident of Graveney and came to your consultation day held at the Village Hall on 14th June. I did complete a form whilst at the event, however having recently revisited Graveney Marsh and the proposed development site again, I am now emailing my concerns to you to include in this part of your consultation. I oppose the development of the proposed site for the following reasons: The site itself, is a rare example of coastal wilderness in the South East and has a peace and beauty that will be ruined by any development on it. The land is home to a variety of wildlife and during my last walk there with my family we saw a Marsh Harrier, a Lapwing (see photo attached) several Marsh Warblers, Marsh fritillary caterpillars and may different sea birds. I am gravely concerned that the impact on all of the wildlife on	No	The Applicant will ensure an ecological watch during the construction process to avoid species such as the marsh harrier. Please see the Applicants Needs Statement (document 7.3) which sets out the need for the Development and also see Chapter 4 of the Environmental Statement which describes the site selection and alternatives for the project (document reference 6.1.4). At the peak of the construction period there will be 40 HGV vehicles daily, so 80 two-way movements for the peak period only. The Applicant has included a Construction Traffic Management Plan in its plans which considers road users safety and how to reduce traffic impacts (document reference 6.4.14.1).

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				this important site, would be significant if your development went ahead. I did speak with your Ornithologist at the consultation on the 14th June and he himself admitted that a single nature habitat space, significantly smaller than currently available would be a struggle for some species. How would you move everything there anyway? He also told me that if a single Marsh Harrier nest is discovered then no building work can be carried out around that site for some distance, apparently there are at least 3 breeding pairs. Who will be observing this risk to them during the development? That would require some one at ground level searching every square inch of the site. I find it very upsetting indeed that corporations from outside of our area can come in and threaten it's peacefulness, natural beauty and rich and important wildlife. This project is purely about making		

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				money for someone and at the permanent loss of a special natural site which is home to so many protected species. I cannot believe that there isn't a more suitable brown site you could build this on, for instance the derelict Manston airfield in Thanet. The next reason I object to this development is the traffic pollution and extreme danger the numerous HGV lorry journeys through Graveney village poses to it's residents. Has a traffic pollution risk assessment been carried out? You are aware no doubt that there is a school in the middle of the Village with a playground that runs alongside the main road, this is the pupil's only outdoor play space. Has a traffic and road safety assessment been carried out? As I pointed out to one of your members of staff at the consultation meeting, there are limited footpaths throughout Graveney village and none at all between here and the nearby		

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				Goodnestone which daily has fruit pickers walking down them between the farms. Many residents walk their dogs along the piece of road beyond Murton place towards the church and to access Odin's path. It is a popular footpath and used daily by people. There is a blind bend in this part of the road, making traffic from either direction a potential risk to pedestrians, but currently traffic is so infrequent, and mostly just cars, that there is passing space. At your consultation, I was told that there would be at least 75 HGV lorries passing through the village each way, every day for at least 18 months. That's 150 HGV journeys per day and that does not include all of the lower goods vehicles, vans and cars associated with your project that will also clog up our roads. The road through Graveney to Seasalter is also a national cycle route and very popular with cyclists, so much so there is even		

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				a cycle themed pub in the village where they stop for lunch. The small village lanes and roads around here already have to cope with cars, cyclists, pedestrians, tractors (from the nearby fruit farms) and the occasional bus. Adding 150 + HGV journeys to this route is a recipe for disaster and I strongly believe someone will be seriously hurt or killed by one of your vehicles. Lastly I appose the development of the Solar panel site on the grounds that it will detrimentally affect the villager's quiet enjoyment of their homes. This would breach environmental health laws as everyone is entitled to "quiet enjoyment of their home" and I refer you to the Noise Act of 1996 which I am sure you are aware of. Permitted level at night time is to be no more than 10db over what it would have been if your development had not been built (i.e currently) from reading the Save Graveney Marshes leaflet, it		

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				states that there will be thousands of inverters producing 98 dB (A) each and the largest battery in this country producing 100 dB(A). This clearly is not a quiet development that 'blends' into the landscape either visually or in sound. As a sufferer of Tinnitus, I am very worried that your development will produce a constant humming noise that will mean I am no longer able to live peacefully in my home, enjoy my garden or go for walks in the countryside on my doorstep. I fully appreciate I am a lucky person to live in such a beautiful place, it's why I moved here, but I would not have done so had I known that your development was being planned. "The permitted level is determined by reference to the underlying level of noise. The underlying level of noise is indicative of the level of noise that would otherwise be present in the absence of the noise causing complaint. There will be cases where the level of noise complained of is clearly		

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				substantially above the level of noise that would otherwise be present and where there will be obvious gaps or lulls in the noise. In such cases it should be possible to assess, by judgment or measurement, that the underlying level of noise is at least 10dB below the LAeq, 5min of the noise from the offending dwelling. " https://www.lemosandcrane.co.uk/dev/resources/noise-act-guidance.pdf Therefore for all the reasons outlined above, I am absolutely opposed to the Cleve Hill Soloar Ltd development or any other development on the Graveney Marshes. I think it is wholly inappropriate to build such a huge site on a unique part of England's coastline and you clearly don't care about the hundred's of people locally, and thousands of other living nearby, who will be negatively affected by your development. I would be most grateful if you		

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				could acknowledge receipt of my email and I have copied my MP Helen Whately and GREAT for their information also.		

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CH_email_631	Member of public	13/07/2018	8.47 pm	I object to this large area of natural environment and wildlife being covered in large solar panels. What is wrong with putting this type of thing on the roofs of large buildings. There are ample buildings in London where no one is going to see these monstrosity's	No	Comment noted. Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development and alternatives (document reference 6.1.4).
CH_email_632	Member of public	13/07/2018	8.50 pm	I cannot believe that this site is even being considered when there are brownfield sites available such as the old Kingsnorth power station site. I have lived here my whole life and often enjoy spending time in this area walking and cycling, the proposed folly would be a disaster for the local wildlife and nature reserves. Solar panels should be on roofs not on farmland, nature reserves or green and pleasant surroundings.	No	Comment noted. Please see Chapter 4 of the Environmental Statement which describes the site selection process for the Development and alternatives (document reference 6.1.4).

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CH_email_635	Member of public	13/07/2018	10.32pm	I am writing to object to your proposal to build a solar farm on Graveney Marshes. Your plans take no account of how special the area is and just what devastation, both to the area, wildlife and the public, this will cause. Please do the decent thing and withdraw from this process.	No	These are the views of the respondent. Please see the Applicant's Environmental Statement (document reference 6.1) for the Applicant's full surveys and assessments.

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CH_email_636	Member of public	13/07/2018	10.39pm	This landscape and habitat has developed over millennia. It is an estuarine landscape which has it's own special visual character of sunsets, moonlight and sunrises over the meeting of land and water which provides delicate, ethereal qualities of mists, reflections,storms and stillness which come and go with the changes in time and weather. This plan has no place here in such a beautiful landscape which is there for all to enjoy, not least those walking the Saxon shore way. In respect of Faversham and surrounding villages there is evidence, both here and in Europe that historic towns and villages of character which have maintained and developed these assets and their ENVIRONS, were more successful than those which had gone for short term gains which tended to be inimical to their future. It proved to be that people wished to visit these places but not if they had to approach them through a landscape of spoliation.	No	These are the views of the respondent. Regarding the reason for the Development and site selection, please see the Applicants Needs Statement (document reference 7.3) and Chapter 4 of the Environmental Statement (document reference 6.1.4).

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				There are some interesting developments in France where such towns are not only preserving their environs but creating a variety of low impact and visually attractive routes to encourage visitors. It is this sort of creative and empathetic thinking we require in the Garden of England. The famous scientist and explorer Baron Von Humboldt, 1769-1859, made a study of such man made operations which took no account of either their effect on the immediate environment, nor on the fact that these are going on everywhere at an accelerating rate worldwide. He concluded that if this continued apace, which it was, and still is, it could start to kill the planet in our lifetime. Read 'The Invention of Nature, The Adventures of Baron Von Humboldt' byAndrea Wolfe. Finally France has introduced legislation that all new industrial buildings must be roofed with solar panels, so why not here instead of		

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				ruining the countryside and the habitat of flora and fauna above and below ground.		

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CH_email_638	Member of public	13/07/2018	10.58pm	I'm writing to raise my concerns about the Proposed Cleve Hill Solar Farm. My reasons for objecting are: 1) The proposed site on the North Kent salt-marshes is special providing a habitat for both migrating and British birds as well as small mammals. 2) The scale of the proposed solar farm is similar in size to Faversham. This would turn a vast area of the countryside into an industrial site. The scale of the solar farm is vast. 3) The proposed solar farm would blight the view from the surrounding areas, including the Isle of Sheppey and the Swale. 4) The issue of flood management and also the implications of flooding to Faversham needs further investigation and consideration. 5) The Coastal Path is an important recreational recourse for both local residents and tourists, the development of the site would spoil that path,	No	Comment noted. The Development is sited on lower grade agricultural land (Grade 3b) and the total area of the developable land (arable land) covered by solar PV modules is 45.5%. The Applicant has undertaken a LVIA in Chapter 7 of the Environmental Statement (document reference 6.1.7). The Applicant has undertaken a flood risk assessment for the Development as shown in Chapter 10 of the Environmental Statement (document reference 6.1.10) and has consulted extensively with the Environment Agency, resulting in the position paper in Appendix 26 of the Consultation Report (document reference 5.1.1).

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				6) The proposed development is on agricultural land which should be kept for that purpose and not changed to industrial Whilst the need to consider green energy sources is important the cost if this site was to be developed is to high,		

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5. Development Description						
CH_call_465	Member of public	19/06/2018	3.00 pm	Calling from [redacted], wished to know what the actual output per year for Cleve Hill Solar Park would be, and if 350MW quoted was peak output.	No	Please see the final project description Chapter 5, Environmental Statement (6.1.5).

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CH_email_410	Member of public	04/06/2018	3.32 pm	Please find below my responses to the questions contained in the feedback form recently delivered to my property (address at foot of email): A. I regularly visit the area (walking) and am a resident of Faversham. B.Unable to attend Phase 2 consultation events as on holiday. C. I strongly agree that climate change is an important issue, we need more renewable energy, and storing renewable energy is important. However I strongly disagree that renewable energy needs to be produced subsidy-free - the government should do much more to promote all forms of renewable energy, including the provision of subsidies. This would lessen the need for organisations like yours to argue the benefits of economies of scale, leading to the excessive size of the solar installation you propose.	No	Thank you for your comments, which have been noted. The Applicant acknowledges the importance of local footpath network. The Applicant encouraged responses via post, email and online as set out in the consultation leaflet for those who could not attend the events.

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				I have seen an operational ground-mounted solar development, some distance to the east of the Faversham water treatment plant. Although considerably smaller than the site you propose, it is a visible mark on the landscape. D. Project-specific feedback: Ecology and bird life - the installation of such a large solar site will inevitably have a detrimental effect on local flora and fauna. In my opinion the best way to mitigate the impact would be to create a much smaller installation. If this is not economically viable (ie hugely profitable to the developers) then find another site. Visual impact, traffic access etc - the creation of a solar installation that is virtually the same size as Faversham itself creates it's own problems. It is simply far too large. In conclusion I strongly object to the proposals and would add that I		

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				feel the structure of the consultation form itself is manipulative - the questions and style of the form are designed to provide the affirmative answers Cleve Hill wants.		

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CH_email_411	Member of public	04/06/2018	3.36 pm	I am favourably impressed by the consultation & information material I have received. As a local resident who, until retiring, ran a publishing consultancy from his present address, my main interest is technical - in fact years ago I was involved in publishing and translating one of the first books on solar energy by the Swiss author Sabady. I've long since had six solar panels installed on my roof, with inverter and battery! Your recent (May 2018) leaflet under '2. Our proposals' lists 'option for battery storage technology'. Surely this deserves more coverage? Is not the storage of electric power going to be of prime importance particularly during the winter months? And how will it be stored? Also, has the storage of energy by mechanical means been considered or investigated? Surely this is one key to 'affordable clean electricity'? Interesting that you are working with Birmingham and Lancaster	No	Thank you for your comments, which have been noted. The Applicant provides further information of the energy storage component of the Development. The Rochdale Envelope parameters for the energy storage facility are clearly set out in Environmental Statement Chapter 5: Development Description (document reference 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have the same magnitude effects, or effects of lesser magnitude than those included in the Environmental

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				Universities. May I ask what departments or individuals? I regret that I won't be around to attend your consultation event in Faversham on 16 June. I'm already committed to attending a meeting that day in Eastbourne. Best Wishes,		Statement (document reference 6.1).

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CH_email_419	Member of public	06/06/2018	10.05am	I am resending this message so that it falls within the second round consultation programme. I thank you for the second newsletter re your proposals and wish to raise the additional concerns: 1. You have provided only one feedback form per household. Presumably this is to reduce the number of concerns you have to report? 2. Battery Storage - Please make up your mind. You state you plan to use battery storage, then you state it is an option and finally you set aside an area on your site plan. So is this a plan, an option or a decision that has already been made? 3. Community Orchard - Not giving away too much here - how many trees, what varieties etc. etc. The area seems quite small in comparison to everything that you intend to take away from the community. We cannot be bought that easily!	No	Thank you for your comments, which have been noted. The Applicant provides further information of the energy storage component of the Development. The Rochdale Envelope parameters for the energy storage facility are clearly set out in Environmental Statement Chapter 5: Development Description (document reference 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have the same magnitude effects, or effects of lesser magnitude than those included in the Environmental Statement (document reference

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				I look forward to hearing from you Thankyou		6.1). The Applicant has provided several means for responses to be received including our online version of the feedback form. The Applicant has encouraged responses to the idea of a community orchard and what this may look like. The Applicant received strong feedback against the proposal for the community orchard.

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CH_email_425	Member of public	07/06/2018	4.47 pm	This looks like a very interesting project and we certainly need to reduce reliance on fossil fuel energy production by using more renewables. I wondered how many acres or hectares of ground are needed to house the solar panels required to generate the power you are hoping to achieve, I can see the plan and map layout but cannot get a feel for the size of area under panels? Many thanks and good luck	No	The final Development area for the site is 491.2 ha with a developable area of 387.6 ha. This is clearly shown in the latest project newsletter.

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CH_email_444	Member of public	14/06/2018	12.02pm	One area that concerns me is the red line now including the sea wall and part of nature reserve, and while I understand the mitigation area, why would the developer be the best person to manage this? Is it thought that work is required on the sea wall prior to development or during development? I note the Environment agency comments on maintenance, and appreciate that it is part of reason red line has moved. Did I read correctly that the site will be grazed by sheep? I'm not sure that herding sheep in a solar park is even feasible. Is there a section on how the solar park will operate, i.e. grazing, panel cleaning, herbicide usage, environmental monitoring, security proposals etc? Kind regards		The Applicant has consulted with the EA throughout the pre-application consultation in addition to the statutory s42 consultation as detailed in Chapter 5 of this Consultation Report. The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable. The majority of the Development is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme events. Only the electrical compound is designed to withstand a breach of the existing defences.

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						It is therefore clearly in the asset owner's interest to maintain the current standard of defences, to at least the same standard that the EA currently do. The Applicant therefore increased the Development site boundary to include the flood defences as shown in Figure 1, Chapter 1. This was consulted on in the PEIR. Subsequently a position between the EA and the Applicant has been reached as included in Appendix 26. The Applicant has experience in grazing sheep across many of its existing sites and is considering sheep grazing for the Development.

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CH_email_450	Member of public	15/06/2018	9.12 am	Given that actual power generated is considerably less than installed capacity, how much actual power output do you expect to achieve from Cleve Hill Solar?		The amount of electricity generated annually by the solar PV modules is expected to be approximately 303,000 MWh (303 GWh). This is based on a smaller installed capacity than the candidate design so is considered to be a conservative estimate.

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CH_email_453	Member of public	16/06/2018	1.09 pm	I'm a local resident and often walk/cycle/drive around this area. While I'm in favour of finding viable and sustainable alternatives to fossil fuels, and therefore support some of the principles behind this project, there are issues I question. I attended the first consultation event and sent feedback afterwards. Size: I'm still not convinced of the need for this "park" to be so large. The impact will be huge because of the size, whatever steps are taken to minimise it. I understand that, in the absence of significant government support, economies of scale are important for a commercial enterprise, but these have to be balanced against the impact. Such a vast area, changed beyond all recognition, is not appropriate on a green field site and especially one in such a lovely location. Green Field Site: I notice that emphasis was placed during this consultation on the fact that the	No	In response to the comments received from the community and prescribed consultees to the phase one Section 47 consultation, the Applicant reduced the overall area of solar PV modules as subsequently consulted on in PEIR: Phase 1 Section 47 consultation (Winter 2017). The area covered by solar PV modules was 56.5%. A Arable Reversion Habitat Management Area (AR HMA) of 41ha was proposed. Parallel Section 42 and Phase 2 Section 47 consultation (Summer 2018). The area covered by solar PV modules was reduced to 49.8%, owing to: - 9.2ha of solar PV modules removed at Cleve Hill - Set back from properties at Nagden and at Warm House - 5-8m distance between panels and ditches

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				farmland which would be covered in solar panels is over-farmed, subject to heavy pesticide use, and therefore in poor condition. Whether this is the case or not is irrelevant; soil condition can be improved, but once a green field site has been built on it is extremely rare for it to be returned to pasture or arable use. This park should not be built on a green field site. Some might dispute that these panels count as buildings, but the largest of them are as tall as houses and when I asked why this had to be, the answer shocked me: because the area could be subject to flooding so the panels must be elevated. This is another very powerful reason why this site isn't suitable. In summary: replace this park with a number of much smaller farms, built on brown field sites (such as the Grain power plant) and you will have my support.		Following comments to PEIR (31 May - 13 July 2018), the area covered by solar PV modules was reduced to 45.5%, owing to: - A further 4.4ha of solar PV modules removed at Cleve Hill (making a total area removed from development of 13.6ha) - An increase of the AR HMA from 41ha to 56 ha - 15m distance between panels and ditches across most of the site. The Applicant has set out it site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4).

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CH_email_461	Member of public	19/06/2018	12.18pm	Thank you, You have referred me to the sources of information I had derived my questions. The concerns only related to the information provided, there are large numbers of unknown nature impacts which the documents are relatively good at explaining, and /or areas where you don't wish to commit, for reason of commercial flexibility (new tech for example) and sensitivity. I am in no doubt, the plans will change, some of it developer led. I'll feed back specific concerns on the relevant official feedback form. Kind regards		Comment noted

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CH_email_470	Member of public	20/06/2018	1.32 pm	Can you confirm and point me to the point in the PEIR which states the life expectancy of the Park before it would be decomissioned as cant see this anywhere.		Please see Chapter 5 (Development Description) of the Environmental Statement (document reference 6.1.5).

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CH_email_474	Member of public	22/06/2018	8.24 am	Unfortunately I was unable to attend any of your recent consultations in the area, but as a resident of Faversham and a keen supporter of green energy, I would like to offer my observations on your proposed development. 1. I totally agree that the UK needs to invest in renewable energy generation 2. I would not object to the project on aesthetic grounds 3. But aren't we repeating the same mistakes made by the fossil fuel industry when we opt to cover significant swathes of wildlife habitat with solar panels? 4. Shouldn't we be taking a multi-purpose approach to the issue? Wouldn't it be better to fit solar panels to existing industrial & domestic structures eg https://www.flexi-solar.com/ Flexisolar - Lightweight, Flexible Solar Panels FlexiSolar offers innovative solar car park structures & electric vehicle (EV) charging stations. Solar Car Park & EV Electric Vehicle Charging Stations	No	The Applicant has set out its site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4). With regards to funding, the Development is privately funded and will not receive Government subsidies as there are no longer subsidies for solar PV developments. The Applicant has undertaken extensive flood modelling of the Development site as set out in Chapter 10 of the Environmental Statement (6.1.10) and has designed a project which is deliverable financially and practically.

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				www.flexi-solar.com 5. 6. While I would far rather have your solar farm than fracking at Graveney, have you considered Dungeness as an alternative to Graveney? Surely the Nuclear Decommissioning Authority would welcome and support the opportunity to make constructive use of a power station that no longer generates power! 7. While we are assured that "this project is non-subsidised & will not receive government funding", what happens if it runs into financial difficulty? The burden of cost will then fall to the UK tax payer. I understand that the panels are being placed on a flood plain which ups the odds of added costs (insurance for example). Thank you for taking the time to consider these points and I look forward to your response.		

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CH_email_480	Member of public	25/06/2018	3.09 pm	Thank you for this reply. Please note that we are supporters of your proposals but the information provided is generic and the 350MW output is a peak figure not the annual average. We understand the annual average is in the region of 300GWG/annum?		The amount of electricity generated annually by the solar PV modules is expected to be approximately 303,000 MWh (303 GWh). This is based on a smaller installed capacity than the candidate design so is considered to be a conservative estimate.

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CH_email_487	Member of public	28/06/2018	8.48 pm	I'm shocked and concerned that any company could conceivably think that this is an ok site for this proposal. I can except that there needs to be sites and on some farm land if managed in the right way there could actually be more wildlife present after works than before. That is not and will not be the case on this whole area. Anyone who is involved in moving this forward has to take a long look at there outlook on how we manage our land and our lives for the long term. And all of your actions have to be justified. I have been taking my children bird watching here for many years. This is a very special place,barn owls, short ear owls often almost guaranteed at the right time of year and sometimes 4-5 spotted on a walk. Barnacle and Brent geese, marsh harrie. All a short walk from whitstable and Faversham. Plus much much more. This is not the right place and is not something that should even be considered by any reasonable company or organisation.	No	The Applicant has set out it site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4). The Applicant has undertaken extensive ornithological surveys of the site from 2014-2018, with the complete assessment provided in Chapter 9 of the Environmental Statement (document reference 6.1.9).

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CH_email_494	Member of public	30/06/2018	5.49 pm	am saying NO !! to building a solar farm that will be bigger than Faversham on the beautiful marshes near Graveney in Kent . No no no .		Comment noted

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CH_email_497	Member of public	02/07/2018	10.25am	Having read the article in the Daily Mail I am absolutely astounded at your proposals. You are clearly taking little account of the feelings of the local community and indeed you appear to have raised the profile to an extent that now receives worldwide condemnation. Searching through the literature provided I can find no mention of Mr Musk or Tesla in any of your consultation documents. The solar park/power station is bad enough but this battery facility is totally outrageous. Concerns for health and safety, fire, toxic pollution - you name it and its there right on the doorstep of peoples homes. Have you consulted with the local emergency services should there be an industrial incident at this site? Can you also clarify now who is the developer here? Have we been talking to the organ grinder or the monkey?	No	The Applicant is formed of experienced solar developers: Hive Energy and Wirsol Energy. The Applicant cannot verify anything that the Daily Mail has reported but is aware of the article, which includes many false assumptions. The Applicant provides further information of the energy storage component of the Development. The Rochdale Envelope parameters for the energy storage facility are clearly set out in Environmental Statement Chapter 5: Development Description (document reference 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK.

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				I look forward to hearing from you with regard to my continued concerns		

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CH_email_502	Member of public	02/07/2018	9.18 pm	I am a resident of Faversham, and see my self as a keen environmentalist, and do not object to solar power in its own right. However I do object to your proposals for many reasons. 1. Its too large, the solar panels are huge and will cover beautiful marshland. 2. Its in a very important wild life area{ a rare wetland habitat}, and will have a detrimental effect on our local wildlife, land, and eco-structures. 3. Surely you should be exploring using brown field sites? 4. I am concerned about the deterioration of the land under your solar panels. I hope for some response to this email.		In response to the comments received from the community and prescribed consultees to the phase one Section 47 consultation, the Applicant reduced the overall area of solar PV modules as subsequently consulted on in PEIR: Phase 1 Section 47 consultation (Winter 2017). The area covered by solar PV modules was 56.5%. A Arable Reversion Habitat Management Area (AR HMA) of 41ha was proposed. Parallel Section 42 and Phase 2 Section 47 consultation (Summer 2018). The area covered by solar PV modules was reduced to 49.8%, owing to: - 9.2ha of solar PV modules removed at Cleve Hill - Set back from properties at Nagden and at Warm House - 5-8m distance between panels and ditches

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						Following comments to PEIR (31 May - 13 July 2018), the area covered by solar PV modules was reduced to 45.5%, owing to: - A further 4.4ha of solar PV modules removed at Cleve Hill (making a total area removed from development of 13.6ha) - An increase of the AR HMA from 41ha to 56 ha - 15m distance between panels and ditches across most of the site. The Applicant has set out it site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4). Please also see the Landscape and Biodiversity Management Plan (document reference 6.4.5.2), which sets out a range of mitigation to improve biodiversity levels from the baseline (which is intensively farmed arable land). This has been developed in consultation with the key nature conservation bodies.

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CH_email_505	Member of public	03/07/2018	4.52 pm	I attended both of your Faversham consultation events, initially with interest but I have concluded that I must oppose your application to build a solar park at Graveney. My reasons for objecting include the following: 1. Your plans would constitute a gross overdevelopment of the site which - while currently classed as farmland - is essentially a marsh and as such provides habitat for a wonderful range of wildlife which your project would inevitably destroy. 2. The site you wish to develop sits between wetland areas with RAWSAR designation and this close proximity renders your plans inappropriate for this location. 3. Your site abuts the Saxon Shore Way and runs right up against the sea wall; totally unsympathetic proposals next to a much visited national public footpath. 4. Your rationale for expanding the area covered by panels in order to “better manage the	No	The Applicant has set out its site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4). Through consultation with the HMSG, feedback was provided to the Applicant that inclusion of the SSSI site to the east of the AR HMA would be beneficial to include within the Development site boundary, linking together with the AR HMA. The additional area included in the Development at PEIR, which comprise part of The Swale SPA/SSSI/Ramsar site, will not contain any new development structures; they are included to facilitate ongoing maintenance of the sea wall and to bring biodiversity benefits through more appropriate management of the freshwater grazing marsh in the east of the site

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				wetlands" seems disingenuous at best, utterly bogus at worst.		

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CH_email_507	Member of public	03/07/2018	5.27 pm	I would like to strongly object to this proposal. This is an exceptional part of Kent enjoyed by many. It would be appalling to ruin this ancient countryside with this highly inappropriate project that would not only be a total eyesore but would have a devastating affect on the wildlife. Stop now! Find a more suitable site for this.	No	Comment noted

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CH_email_522	Member of public	09/07/2018	9.56 am	Can you please tell me why the solar farm has to be built here ? Why can't solar panels be fixed to rooves of sky scrapers and office blocks and light industrial units , in areas already spoilt by industry ? Why do you need to build it on unspoilt land ? Also , I live in Whitstable , which will obviously be affected by your proposed development , and there is very little information available or visible here . I would have liked to know earlier , when there was still a chance to attend consultations . Please let me know of any further discussions	No	The Applicant has set out its site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4). The Applicant held community consultation events in Seasalter as part of its phase one and phase two consultation as detailed in the Consultation Report (5.1). Also explained in the consultation report is the consultation process undertaken in accordance with the SoCC, which has been agreed with KCC, Swale Borough Council and Canterbury City Council.

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CH_email_530	Member of public	10/07/2018	7.16 pm	Sir, whilst I acknowledge the need for, and applaud the development in principle of large PV installations, I cannot agree that Cleve Hill blanket coverage is the way to go. It is a zero sum equation: cover that amount of lush grazing marsh in its entirety - and destroy critical habitat for much 'red listed' fauna. No amount of mitigation will offset this. Is there no maritime based solution a la London Array? I applaud your aims in principle - but there must be a better site with less impact on precious, fragile and threatened wildlife. Not a Nimby-I promise! Best wishes	No	The Applicant has set out its site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4). The site of the Development is arable agricultural land, not used for grazing, and it classified as Grade 3b (lower grade agricultural land). The Applicant has set out in its Landscape and Biodiversity Management Plan (document reference 6.4.5.2) a series of mitigation to improve biodiversity on site.
CH_email_538	Member of public	11/07/2018	6.28 pm	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted

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CH_email_539	Member of public	11/07/2018	6.38 pm	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted
CH_email_540	Member of public	11/07/2018	9.26 pm	I am opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted

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CH_email_542	Member of public	11/07/2018	10.29pm	I am a resident of Faversham. I am broadly in agreement with the plans as I believe in the necessity for clean power. I have some significant concerns that I should like to register. Firstly, I believe the extent of coverage is too great. More consideration needs to be given to leaving more of the natural land uncovered and accessible. The storage facility concerns me, as there may be white noise generation and this can travel and cause discomfort to residents. I would respectfully suggest that this storage facility is sited at least partially underground where any noise may be absorbed. The idea of a community orchard is rather a sop. Kent has many orchards and some are clearly surplus to requirements. Any land that is to be granted to the community should be left wild and a further nature reserve created to protect wildlife.	Yes	The Applicant has reduced the scale of the coverage of solar panels from 56.5% of the developable area to 45.5% of the developable area. The Applicant has also set out a series of mitigation and landscape management improvements to improve biodiversity in its Landscape and Biodiversity Management Plan (document reference 6.4.5.2). The Applicant has assessed noise from all equipment for the Development in Chapter 12 of the Environmental Statement (6.1.12). The Applicant also proposes to surround the electrical compound with an earth bund to reduce noise and views from the compound. The Applicant has not progressed with the community orchard in response to the negative comments received by the community to the idea. The Applicant has scoped in an additional permissive pathway to increase connectivity from Seasalter Lane. There will be no overhead pylons in association with the Development. The

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				Too many of the suggestions made are tentative. Residents need promises that are meaningful. Proper walkways and cycle paths would be popular. Walking by the shore is very important. Therefore access needs to be genuine and not limited. No mention is made of how many more pylons will be erected, and that area already has many straddling the marshes and fields. Will more be erected? I am pleased that the panelled areas will have screening. Please could these be formed from natural hedgerows to encourage wildlife habitat for birds and insects. To whom is your company accountable? If problems arise how can we be assured that your company will respond responsibly? I look forward to receiving your response in due course.		Applicant has included an additional 3.64km of hedgerow planting in its proposals as shown in the Landscape and Biodiversity Management Plan (document reference 6.4.5.2).

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CH_email_543	Member of public	11/07/2018	10.51pm	I wanted to register my objection to this project with you. I am not writing this as an objector to solar power, quite the contrary I am a great supporter, I have panels on my house and I think that it should be compulsory for new builds in this area to include them. Furthermore I think the installations along the Thanet Way on “dead land” between the old and new roads are ideal. However I do object to your proposed development, it is in not acceptable to tarnish an area of such natural beauty and wildlife importance with such a significant installation.	No	Comment noted
CH_email_544	Member of public	12/07/2018	3.26 am	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life,the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this	No	Comment noted

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CH_email_545	Member of public	12/07/2018	5.26 am	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life,the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this	No	Comment noted
CH_email_546	Member of public	12/07/2018	9.57 am	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life,the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this	No	Comment noted

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CH_email_547	Member of public	12/07/2018	11.06am	I unfortunately was away when you had your open events so was hoping you could answer a few of my questions about the solar park. Firstly I am in favour of clean energy like many people but I am curious as to why these solar panels could not be placed on already baron land or on some of the industrial buildings in the area. Kent is fortunate enough to still have a lot of green places and I think it's important we all work to keep it that way. I have lived in Faversham my whole life and fear that in a few decades time when these panels become redundant and removed that the land will be bought by property developers, when houses are built we will lose that land forever. I know that Kent Wildlife Trust have been working with you to create more space for wildlife, are	Yes	The Applicant has set out its site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4). The Applicant has set out in its Landscape and Biodiversity Management Plan (document reference 6.4.5.2) a series of mitigation to improve biodiversity on site, which has been consulted on with local nature conservation bodies including KWT.

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				there any plans to make it possible for more wildlife to survive here or designing the solar panels in a way that will allow animals to live beneath/around them? Over 90% of England's wildflower fields have been destroyed and as you may know pollinators are dying at alarming rates, that land is filled with bees and wildflowers. There must be away for these solar panels to exist without causing so much destruction, it is possible for us to coexist with wildlife whilst creating clean and renewable energy as we have seen with the Singapore Gardens by the bay (obviously this is far too extravagant for Faversham but you get my point!). I understand these things are planned years in advance but if you could provide me any further information or reassurance it would be much appreciated.		

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CH_email_548	Member of public	12/07/2018	11.30am	Although I agree in principle to the need for renewable energy, the proposed Cleve Hill Solar Park is massively out of scale for the area, and in totally the wrong place, and should not be allowed here. Solar panels should be put on roofs of new buildings, and on brownfield sites, and not be using an area of wildlife and scenic importance. The Graveney Marshes and surrounding area are very important for birds, both wintering, and breeding, and also it forms part of a corridor through the Swale Estuary, where there are other designated wildlife areas. Industrial constructions such as this should not be built close to other areas protected for wildlife. I attach a list of the birds we have ringed/encountered on the proposed site, from 1990-2017, a total of over 15,000. The ringing totals only comprise a very small percentage of the birds using the	No	The Applicant has reduced the scale of the coverage of solar panels from 56.5% of the developable area to 45.5% of the developable area. Please see Chapter 4, Environmental Statement for a detailed explanation of the site selection process for the Development (document reference 6.1.4). The Applicant has undertaken bird surveys of the site from 2014-2018. The Applicant also proposes areas of up to 100m separation from the Saxon Shore Way.

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				site, but indicate the importance of the area to birds of a large variety of species. The whole area should be left intact, but if this development does go ahead, it should be on a much smaller scale, leaving at least 250m of green inland from the sea wall all along the northern and western boundaries.		

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CH_email_553	Member of public	12/07/2018	2.41 pm	I am majorly apposed to the proposed solar power plant at Cleve hill as this is way too big, it will destroy wildlife, the landscape, the Saxon shore way, leisure opportunities and heritage, there are far better places to put this!!	No	Comment noted
CH_email_557	Member of public	12/07/2018	4.22 pm	I totally disagree with this proposal	No	Comment noted
CH_email_558	Member of public	12/07/2018	5.10 pm	I object to this development on the grounds of the fact it is in unspoilt (as yet) countryside, will be detrimental to the wildlife, will be visually intrusive on the coast, will increase the flood risk, is not needed as part of the renewable energy supply which is supplied elsewhere, and risks setting a precedent for development on marshes.	No	Comment noted
CH_email_561	Member of public	12/07/2018	5.47 pm	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted

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CH_email_563	Member of public	12/07/2018	6.24 pm	I oppose your proposals strongly the area to be used is far too big	No	Comment noted

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CH_email_571	Member of public	13/07/2018	5.46 am	I would like to object very strongly to the proposal to build a huge solar power station with large battery on the Cleve Hill site. Please include my objections in your final consultation report. My reasons include the following: 1. I do not believe sufficient research has been done into appropriate solar power-production which will produce power in a highly efficient way. There are much better methods of producing solar power without using huge, tall and ugly panels. Scientific research in other countries suggests roadways can incorporate solar power production, for example. It is not necessary to devastate a local beauty spot when in just a few years, better technology will become widespread. It may be cheaper now to build the power station on the marshes, but it would be better to invest wisely, build power sources that are sustainable and that do not have such negative consequences for	No	Thank you for your comments. In response: 1. Please see the Applicant's Needs Statement (document reference 7.3), which accompanies the Application 2. The Applicant explains in detail the site selection and alternatives for the Development as set out in Chapter 4 of the Environmental Statement (document reference 6.1.4). 3. The Applicant aims to develop one of the lowest cost generators of electricity in the UK and to provide clean, affordable and renewable power to people's homes. 4. The Applicant has consulted on the idea of a community orchard and additional permissive pathways. In response to the feedback the Applicant has changed the community orchard to an area of lowland meadow and has added a permissive pathway, creating a round walk from Seasalter Road. 5. The Applicant has undertaken a LVIA as presented in document

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				local communities. 2. Brownfield sites, roofs, or motorway/roadsides would be better locations for this type of power station. 3. This is a private business opportunity which will be profit-making. It is not right to make money out of ruining a local, well-loved natural landscape, thus diminishing a free resource for local people, and providing profit for a corporate organisation, and a small number of private, wealthy individuals. 4. This will not provide any income for the local community except for business rates. There is no local benefit at all for the scheme. 5. This is a beautiful natural and unspoilt area that provides a well-loved place for walking and other healthy pastimes in a rural landscape. The Saxon Shore Way would be completely ruined at this section if the power station were to be built. 6. In the future, when the power station is dismantled, the ancient, delicately-balanced natural		reference 6.1.7 and as consulted on at PEIR, including visualisation from the Saxon Shore Way. 6. Please see Chapter 5 of the Environmental Statement, which includes details regarding decommissioning (document reference 6.1.5). The at the time of decommissioning, a decommissioning plan will have to be approved by the relevant authorities. 7. Please see Chapter 10 of the Environmental Statement, which assesses the cultural heritage of the Development sites (document reference 6.1.10) 8. The Applicant has reduced the number of HGVs since PEIR to 40 vehicles a day and has consulted on a construction traffic management plan (document reference 6.4.14.1). 9. The Applicant has reduced the scale of the Development from 56.5% of the arable developable land containing solar PV modules to 45.5%. The Applicant has undertaken a LVIA as presented in document reference 6.1.7 and as

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				landscape will be irreparably ruined. 7. Faversham is a unique and lovely coastal heritage small town surrounded by natural landscape and its very nature would be completely changed if the plan were to go ahead, and it were to have such a huge industrial site next to it. 8. Building and maintenance traffic would ruin the quiet and beautiful areas of Seasalter and Graveney. Faversham, which is already developing a traffic problem, will also be affected en route. 9. The solar power station is much too large and its visual impact will be very unpleasant. 10. There are many birds and other natural species, many of which are rare and protected, on the site. I do not believe there has been sufficient research to ensure they will not be diminished or affected in other ways. 11. Grasses, flowers and insects such as bees will also be reduced as the solar panels will cover such		consulted on at PEIR. 10. The Applicant has undertaken extensive bird surveys from 2014-2018 and has consulted with statutory and local nature conservation bodies regarding the assessment and the proposed Arable Reversion Habitat Management Area. 11. The Applicant has consulted with statutory and local nature conservation bodies throughout the pre-application process and have consulted on a landscape and biodiversity management plan (LBMP, document reference 6.4.5.2) which contains embedded mitigation to improve biodiversity on site from the baseline. 12. The Development site is on an area of lower grade agricultural land (Grade 3b) where the landowner seeks to diversity its land use.

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				a huge area. This will of course have a knock-on effect into other life-forms, and reduce the beauty of the area, in addition to the reduction of natural diversity. 12. Farming areas would be lost, which currently produce valuable crops.		

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CH_email_572	Member of public	13/07/2018	6.31 am	I am writing in response to the piece in the local paper. I keenly support the Faversham Footpaths Group's opposition to this development. May I please make five points why I do so: • By common consent the nation is facing an obesity crisis and an escalating number of people with mental health issues. All agree that walking ~ especially in the countryside ~ is an effective way of alleviating these problems. The footpath along the coast from Whitstable to Faversham and beyond is very, very rare. It is difficult to find a comparable local path that combines accessibility from dense urban areas with such an intense experience of sea, land and sky. • Apart from reducing pressure on the NHS the walkers also contribute to the local economy. The planned development compromises irredeemably the attractiveness of the path and its beneficial impact on people's wellbeing. There will simply be	No	The Applicant will not be closing any PRoWs as part of the Development. In response to consultation the Applicant has added an additional permissive pathway to improve walking connectivity from Seasalter Lane. Please see details of the Applicant: Hive Energy and Wirsol Energy, in Chapter 1 of the Environmental Statement (document reference 6.1.1) who have significant collective experience of delivering multiple solar PV sites across the UK and internationally.

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				fewer walkers • If solar energy is the way forward then why does the government not make it compulsory for the developers of new housing estates to incorporate solar panels in the roofs of their houses? If this policy were adopted the need for solar farms such as Cleve Hill might disappear. • The attitude of the developers to arable farming is not even-handed. Bio diversity can be achieved by a proper partnership between nature and farming. Can we really afford to take this land out of food production? • Does this company have the capacity to deliver this very ambitious scheme? What is their track record in developing highly complex schemes? If this scheme is built how many long-term jobs will be created? I apologise for writing so late in the day. I was born in Faversham nearly eighty years ago so have		

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				some felt for the damage this development will do.		

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CH_email_573	Member of public	13/07/2018	6.40 am	RE: Solar Farm, I understand that you are coordinating objections to the proposed solar farm on the Graveney marshes. I object in the strongest possible terms to this development. There are few areas left undeveloped on the North Kent coast and depriving the community of this beautiful landscape would be a tragedy. Considering the scale of the other housing developments in the Faversham area, this is surely a step too far. If it is necessary further develop solar power, why not combine further progress with the housing development and place the panels on the roofs of the new homes.	No	Please note, this response has been sent to the Applicant.

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CH_email_574	Member of public	13/07/2018	6.41 am	RE: Solar Farm, I understand that you are coordinating objections to the proposed solar farm on the Graveney marshes. I object in the strongest possible terms to this development. There are few areas left undeveloped on the North Kent coast and depriving the community of this beautiful landscape would be a tragedy. Considering the scale of the other housing developments in the Faversham area, this is surely a step too far. If it is necessary further develop solar power, why not combine further progress with the housing development and place the panels on the roofs of the new homes.	No	Please note, this response has been sent to the Applicant.

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CH_email_578	Member of public	13/07/2018	8.59 am	I'm writing to object to the siting of your enormous solar panel plant on Graveney Marshes You may not realise but this site is an important natural resource for Londoners who seek the peace, tranquillity and beauty of the Kent countryside Any infrastructure must be sympathetic to this and not an enormous factory style plant deposited without thought for the environment I protest on behalf of all Londoners who walk, cycle and sail in this beautiful area [redacted]		Objection noted.
CH_email_600	Member of public	13/07/2018	1.17 pm	I am writing to object most strongly to this development, which, in its current form, is completely over scale, obtrusive, wastes agricultural land, and completely alters the ecological balance of a unique area for dubious returns.	No	Comment noted

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CH_email_601	Member of public	13/07/2018	1.21 pm	I am writing to object most strongly to this development, which, in its current form, is completely over scale, obtrusive, wastes agricultural land, and completely alters the ecological balance of a unique area for dubious returns.	No	Comment noted

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CH_email_606	Member of public	13/07/2018	2.26 pm	Despite being supportive of renewable energy we are very concerned that the potential benefits will be greatly outweighed by the impact, potential risk and harm. We would BOTH like to object to this proposal as long-term residents of Faversham on the following grounds: 1. The scale and location. This is unprecedented. At nearly 900 acres the site would be larger than Faversham and Graveney combined. The sacrifice of this unique landscape without consideration of alternatives and the impact and effect on the landscape, marshes, nearby communities, and identified species of rare wildlife would be permanent. You cannot give convincing reassurances to local people as nothing like this proposal exists anywhere else for comparison. It is an experiment with Faversham and Graveney as the combined subjects. 2. The flood risks. Living in Faversham we are well aware of	No	Of the developable area of solar PV modules is 387ha (950 acres), 45.5% of this area will be solar PV modules. The Applicant does not intend to increase the height of the sea wall. As agreed with the EA, the asset owner for the Development will assume responsibility for continued maintenance of the defences in this area. Given that the existing defences provide a level of protection up to the 1:1000-year flood event, there is no anticipated requirement for the defences to be raised beyond their current height. Please see Chapter 11 of the Environmental Statement for a detailed assessment of the archaeology and cultural heritage of the site, which has been consulted on with Historic England and KCC (document reference 6.1.11). Please also see the Applicants LVIA and accompanying visualisations in Volume 3 of the Environmental Statement (document reference 6.1.7 and supporting appendices 6.3). The Applicant has worked to

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				how this impacts and the proposal does not sufficiently address the risk to Faversham and Graveney should you raise the height of the sea-wall to protect your assets. Additional concerns relate to the building of a huge battery area surrounded by an earth bund which will also increase the risk of flooding 3. There will be impact on Archaeology and the creation of something so vast would compromise Faversham and local villages' historic significance. 4. Height of the solar panels. At almost 4m they will be visible and resemble a giant industrial development 5. Disruption during construction and impact on local infrastructure. The local roads would not cope with the increased levels of traffic which would ensue together with the increased noise, light and air pollution.		reduce traffic volume numbers from those presented in PEIR. These are presented in Chapter 14 and mitigation to reduce congestion and the impact to local infrastructure is presented in the Applicant's Construction Traffic Management Plan (document reference 6.1.14 and CTMP in 6.4.14.1).

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CH_email_610	Member of public	13/07/2018	3.01 pm	I am emailing to register my complaint to the proposed development called Clever hill solar park. Although I object on many grounds, my main objection is the scale of this development and its impact on the local area and residents within the Graveney and Faversham area, particularly with regard the flood defences' The Saxon shoreway is part of the area's heritage and serves as an attraction to visitors to the area. I myself came to live in Faversham from London 27 Years ago due to the proximity to the coast. The sheer scale of this development will put local road networks under more strain as this is already an area where large scale development plans have successfully been applied for on land adjacent to the A2 putting further on an already struggling network of roads close to the proposed site. The small roads around the marshes were not built for lorries with the tonnage necessary to transport such large structures. All of this without even	No	Comment noted. Please see the response above.

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				mentioning the rich wildlife fauna and flora that this development will destroy.		

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CH_email_612	Member of public	13/07/2018	3.11 pm	We are supportive of renewable energy but we are very concerned that the potential benefits of the Solar Farm will be outweighed by the environmental damage . You cannot have “progress” at any cost ! We object to this proposal for 5 main reasons: 1. The unprecedented size of the farm, we understand it covers 1000 acres. The sacrifice of this unique landscape without consideration of alternatives and the impact and effect on the landscape, marshes, nearby communities, and identified species of rare wildlife would be permanent. It is impossible for you to give convincing reassurances to local people as there is no precedent. Faversham and Graveney are being used as Guinea Pigs we fear. 2. The flood risk. We are aware of how this impacts and the proposal does not sufficiently address the	No	Of the developable area of solar PV modules is 387ha (950 acres), 45.5% of this area will be solar PV modules. The Applicant does not intend to increase the height of the sea wall. As agreed with the EA, the asset owner for the Development will assume responsibility for continued maintenance of the defences in this area. Given that the existing defences provide a level of protection up to the 1:1000-year flood event, there is no anticipated requirement for the defences to be raised beyond their current height. Please see Chapter 10, Environmental Statement for the Applicant's flood risk assessment. The presence of an earth bund is designed to protect the electrical compound from a breach event. Please see the Applicants LVIA and accompanying visualisations in Volume 3 of the Environmental Statement (document reference 6.1.7 and supporting appendices in 6.3). The panels heights vary from 2.1 - 3.9m. The Applicant has worked to reduce traffic volume

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				risk to Faversham and Graveney should you raise the height of the sea-wall to protect your assets. Additional concerns relate to the building of a huge battery area surrounded by an earth bund which could also increase the risk of flooding. 3. Height of the solar panels. At almost 4m they will be visible and resemble a giant industrial development. This will spoil a natural landscape and frankly look hideous. 4. Disruption during construction will impact on the local infrastructure. The local roads cannot cope now so the increased levels of traffic will increase noise, light and air pollution. 5. Noise and general pollution from the site once built….Solar energy is not an inert process. There will be a “background noise” …..where are the assessments of the frequency this process creates? and how far will it		numbers from those presented in PEIR. These are presented in Chapter 14 and mitigation to reduce congestion and the impact to local infrastructure is presented in the Applicant's Construction Traffic Management Plan (document reference 6.1.14 and CTMP in 6.4.14.1). Please see Chapter 12, Environmental Statement (document reference 6.1.12) for a complete noise assessment.

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				travel…resonating noise is one of the worst forms of pollution and will make the lives of people who can hear it very miserable indeed.		

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CH_email_613	Dunkirk Parish Council	13/07/2018	3.12 pm	I write in support of the objections raised by Graveney parish council and those of CPRE. Members of Dunkirk Parish Council have many reservations about the scheme and have asked me to oppose the scheme in the strongest possible terms. We would wish to view more comprehensive details as the overviews we have seen are too vague.	No	Please see the complete Environmental Statement accompanying the DCO application on the Applicant's website (document reference 6.1).

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CH_email_616	Member of public	13/07/2018	3.46 pm	I am a local resident of Faversham and I am opposed to the construction of the Solar facility at Cleve Hill. My concerns echo those raised by the Faversham Society and I would like to quote their objections in my response as I agree fully with them all. • Unprecedented Scale – What is being proposed on the outskirts of our town is an extremely large industrial development, as big if not now bigger, than Faversham itself. A development of this scale cannot fail to have a profound negative effect on the environment and reduce the economic and amenity value to those both living in and using the area. We will need to be convinced by the economic and environmental logic of building a single site at this scale. If the logic for constructing a plant of this size is so convincing why are there not similar developments anywhere else in Europe and beyond? Moreover, this is an	No	In response to the comments received from the community and prescribed consultees to the phase one Section 47 consultation, the Applicant reduced the overall area of solar PV modules as subsequently consulted on in PEIR: Phase 1 Section 47 consultation (Winter 2017). The developable area (i.e. only the arable land) covered by solar PV modules was 56.5%. A Arable Reversion Habitat Management Area (AR HMA) of 41ha was proposed. Parallel Section 42 and Phase 2 Section 47 consultation (Summer 2018). The developable area (i.e. only the arable land) covered by solar PV modules was reduced to 49.8%, owing to: - 9.2ha of solar PV modules removed at Cleve Hill - Set back from properties at Nagden and at Warm House

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				experimental development. We understand that it is 15 times the size of the largest UK solar farm and we are told that neither the developer nor the builder has attempted a solar installation on this scale before. During the consultation process, there have been many changes to the proposal. Plans for the battery installation are still unclear. We are disquieted that our marshes are being used for this experiment. We are also worried that if the Cleve Hill development is allowed on this far- eastern edge of our Borough, it will create a precedent that over time, will allow marshland to the west to be sacrificed until the whole of Swale's north Kent coastline becomes an industrialised zone. 2. Implications of Site Enlargement – there has been a significant increase in the size of the proposed site during the consultation period. This has been		- 5-8m distance between panels and ditches Following comments to PEIR (31 May - 13 July 2018), the developable area (i.e. only the arable land) covered by solar PV modules was reduced to 45.5%, owing to: - A further 4.4ha of solar PV modules removed at Cleve Hill (making a total area removed from development of 13.6ha) - An increase of the AR HMA from 41ha to 56 ha - 15m distance between panels and ditches across most of the site. The Applicant has sought to continue to provide PRoWs at the Development site by committing to keeping the existing PRoWs across the site and by adding an additional permissive pathway. The Applicant has consulted with RSPB and KWT throughout the pre-application process for the Development.

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				achieved by developers including a Site of Special Scientific Interest and the seawall, the latter to enable the developer to negotiate with the Environment Agency in order to mitigate the risk of managed retreat on the operator's assets. (panels, batteries and other plant) This has enabled the developer to now claim that the panels will only cover 55% of the site (as if this in some way reduces their impact) and to include the extra land and the SSSI as part of their calculations concerning the benefit to the environment that they suggest the power station will create. This raises serious issues regarding responsibilities and wider governance. 3. Flood Risk –These marshes are a protective floodplain for Faversham. The seawall is currently the responsibility of the Environment Agency and therefore under democratic control. If the Agency were to delegate responsibility to the operators of the site for the flood defences, they		In response to comments from RSPB and KWT as part of the HMSG, the Applicant has scoped in an area of 35.1ha of SSSI freshwater grazing marsh in the Development site boundary to be able to better manage this area for birds and wildlife. The Applicant has consulted with the EA throughout the pre-application consultation in addition to the statutory s42 consultation as detailed in Chapter 5 of this Consultation Report. The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable.

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				would be able to raise the height of the wall at will in order to protect their assets. This lack of public accountability for such important actions is unacceptable. We also have concerns about the impact of insulating such a large area of land from inundation – most particularly on increasing the flood risk in Faversham town – already prone to flooding. The marsh area has long been a coastal floodplain. Proper quantitative modelling of the long-term risks of the flooding of our town and surrounding villages is required. In addition, it is our understanding that a large battery area (apparently the size of 15 football pitches) that developers intend to construct, will be built so as to block the existing drainage ditch which separates Graveney and Cleve Marshes. Moreover, the whole area is to be surrounded by a high earth bund. This will increase the risk of flash-flooding across and more particularly		The majority of the Development is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme events. Only the electrical compound is designed to withstand a breach of the existing defences. It is therefore clearly in the asset owner's interest to maintain the current standard of defences, to at least the same standard that the EA currently do. The Applicant therefore increased the Development site boundary to include the flood defences as shown in Figure 1, Chapter 1. This was consulted on in the PEIR. Subsequently a position between the EA and the Applicant has been reached as included in Appendix 26. Two alternative energy storage scenarios are available for assessment, a battery powerpack solution, as included in the PEIR,

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				beyond the site in the downpours that are occurring with increasing frequency. • The governance of the SSSI – We are equally disquieted about the fact that because of the recent enlargement of the site the future of an important SSSI will be put into the hands of a private sector developer. We know that the way that SSSIs are managed is critical and without oversight, by a public body we are not confident that the incentives of the developer and operator would ensure the long-term protection of the site. The SSSI appears to have been included to assist the developer in increasing the biodiversity of the site merely by acquiring land already managed for diversity. • The Height of the Solar Panels The proposed site was originally tidal saltings and is a Category 3a Rising sea levels and more violent weather events both threaten the site. As a consequence, if construction were to go ahead, the		and a containerised solution, similar to other energy storage sites recently deployed in the UK.

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				developer has said the panels need to be 'around' 4 metres high, just short of the height of a double-decker bus.* This would be a severe detriment to the amenity value of the marshes to all those local people and visitors who use them. The industrial landscape created by the panels will also be completely visible from viewpoints such as Graveney Hill and Graveney Church, from Oare village, from the Isle of Sheppey and from all vantage points around Estuary View just to the south of Whitstable. On the lower ground, the Society questions the developer's assertion that the panels will not be visible above the sea wall. This hides the panels' effect on the amenity value of the Saxon Shore Way, shortly to become part of the Coastal Path, because this path runs atop the wall, not on the shoreline below. Even so, the panels will be visible above the seawall when walking towards Nagden Cottages from		

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				Faversham on the east side of the Creek and from Faversham to Hollow Shore on the west side of Faversham Creek – including the views from Oare Nature Reserve at Harty Ferry. • Archaeology The Historic Environment Desk Based Assessment commissioned by the developer reveals that the site and its immediate environs make an important contribution to the historical and cultural setting of the town and that the creation of a large power station – albeit solar – would ignore Faversham's historical importance and compromise the setting of the town and its neighbouring villages to the north, Graveney and Goodnestone. We have evidence of medieval saltings and of a historically significant duck shoot that would be obliterated by the panels. We have seen no assessment of the damage to the archaeology of the area covered by the site.		

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				• Noise and Disruption If developers are forced to halt work over each summer's bird nesting season and to avoid disturbing overwintering birds, it is likely that the work will be spread over perhaps three or four years. This means that for residents close to the site and those living on or using the roads leading to it, there will be unacceptable noise and disturbance caused by construction traffic to and from the site over a long period. The Faversham Society is also concerned about the level of disruption that will continue during the normal running of the power station. Although there is some technical detail, we have seen little intelligible analysis about the cumulative level of noise generated by the inverters, transformers, battery packs and other elements of the energy production process. Neither is there a convincing presentation about the level of, noise, light and air quality pollution		

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				caused during the construction phase. • Access and Traffic This is a very large site that would not only be covered with new solar installations but would also require substantial works to provide the roads, new ditches and the electrical plant – including a substantial compound for battery storage. The Faversham Society is concerned that the roads to the site, in particular, Head Hill Road and Seasalter Road are not suitable for the weight and frequency of traffic required to transport such a high volume of materials and equipment to the site. We are unclear about future responsibilities for road maintenance, repair and general restitution. The developers have provided no information about the level of traffic to be expected nor any modelling on the effect that this will have not only on roads leading to and from the site but those in the wider area such as the M2, the A2 and the		

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				Thanet Way. Society members know that it only takes a little extra traffic or a small accident to reduce the entire local road network to a standstill. • Wildlife Although the noise and disturbance is a cause of anxiety for residents and the loss of amenity value distressing for those all who currently use the marshes, there is a much more serious and detrimental impact on wildlife. Construction of roads and excavation of ditches, the creation of culverts, clearing of the ground by removing plants and topsoil and installation of equipment would result in the whole site being unavailable as nesting habitat for ground-nesting birds nor as a feeding /foraging habitat for birds, bats and other animals and insects over a long period. The site forms part of the North Kent Marshes Environmentally Sensitive Area. It is also directly adjacent to the Swale Ramsar site which is designated because it has		

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				an important assemblage of bird and plant species. The site will also affect the Swale Special Protection Area and the Swale Site of Special Scientific Interest, the South Swale Nature Reserve and the Swale Estuary Marine Conservation Area and on the opposite side of Faversham Creek, the Oare Marshes Nature Reserve managed by the Kent Wildlife Trust. Source: www.kentwildlifetrust.org.uk/campaigns/planning-and-development/cleve-hill-solar-park The Faversham Society's initial analysis suggests there should be particular concerns about the following species: Brent geese, lapwing and golden plover Natural England has identified the marshes as important wintering sites for these species.		

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				Avocet, Wigeon, Dunlin, Redshank, Shelduck, Teal, Little Egret, Grey Plover, Knot, Ruff, Black Tailed Godwit, Bar Tailed Godwit, Curlew, Short Eared Owls, Hobby and Peregrine Falcons These marshes represent for these species nationally significant habitats that would be detrimental to the populations if lost. The birds use many parts of the site, not only the western end. There are breeding birds such as skylarks, dunnocks and yellow wagtails together with reed buntings, oystercatcher and lapwings nesting all over the site. Most of these are ground-nesting birds and rely on insects found in the existing vegetation to feed their young. Marsh Harriers Functionally linked to Ramsar site for breeding Water Voles and reptiles Natural England has pointed to the need to address the impact on these protected species		

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				Rare Invertebrates The marshes provide habitat for over 30 species of rare and scarce species of species of beetle, bugs, flies, bees and planthoppers which are either of regional or national significance Bats Species Nine species of bat are present on the marsh including soprano pipistrelles, common pipistrelles, noctules and Daubenton's bats The developers propose to preserve and improve a small part of the marsh at the eastern end of the site specifically for Brent geese, lapwing and golden plover. (It is worth noting that this includes the additional area within the SSSI to the east of the site proposed in the original scheme.) The Faversham Society considers that this gesture would not compensate for the loss of wildlife habitat across the whole site and cannot be considered mitigation for this wider destruction of habitat. The Society notes that a recent European Court of Justice ruling		

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				regarding Habitats Regulation Assessment suggests that a full 'appropriate assessment' will have to be completed to prove that there is no harm to the Swale Special Protection Area beyond reasonable scientific doubt for the scheme to be acceptable. • Soil and Soil Erosion Developers propose to create what they have called 'grazing land' under the panels with a mix of grasses and wildflower They propose the grazing of sheep. Even if this were to prove possible, such plans are less than adequate compensation for the loss of such a large, grazing marsh so productive of wildlife. The solar panels will prevent the soil from absorbing rainwater and will concentrate the flows so that rainwater will cascade onto the ground, causing soil erosions and general degradation. Moreover, the Society has yet to be assured that the ground beneath the panels will have sufficient sunlight to permit much vegetation and		

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				therefore animal life beneath the canopy of panels. We have seen no evidence to allay our fear that a 'desert' will be created over a very large area. Comparison with other solar panel sites is of little relevance because of the size, height and density of panels proposed for Cleve Hill. • Landscape, Amenity and Economic Value The site forms part of a Kent Area of High Landscape Value and a Swale Area of High Landscape Value. The site is visible from long distances including Wraik Hill on the A299 at Whitstable, from Estuary View, from Boughton Hill on the A2 and from Oare village to the west of Faversham Creek – all which have extensive views encompassing the whole marsh, grazing land, fruit farms and orchards. It is an area of high amenity and economic value. However, the developer's intentions will completely change this view of open arable and wildlife marshland to a landscape		

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				with column after parallel column of dark panels stretching into the distance from almost every point of view. This extent of this change is hidden because of the photograph viewpoints that the developers been included in their promotional material for the public to assess the full impact of the proposal. Those images chosen by the developers suggest that the panels will only be seen when people are close to them rather than showing the more important views of the middle and longer distance. We believe that a 3D computer model allowing the public to 'see' the site from all viewpoints would allow a more realistic assessment of impact. The size of the site and the multiple points from which the panels and other site infrastructure will be visible will change the character of what has been a huge, open area of grazing and arable marshland into a heavily industrialized and developed		

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				landscape. This will create a loss of inestimable value to visitors and to local people, not just in the immediate future but for generations. This will have a knock-on effect on the local economy. The Faversham and Graveney Marshes 'brand' attracts a large number of visitors – whether interested in history, marine life, birds or general recreational walking – to this part of Swale. Although developers assert that for Kent the impact will be negligible, we have seen no analysis of the short and longer economic impact the development will have on Faversham and the businesses that support and service our visitors. • Footpaths The entire footpath through the site from Nagden Cottage to the seawall near Castle Coote, would – if the development goes ahead as proposed – run between lines of solar panels 4 metres high		

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				making it impossible for walkers to see over them. Any additional permissive paths provided as part of the development would have similarly stark industrial views. As we have noted above, the Saxon Shore Way runs along the top of the seawall, and so any walker from Faversham to Seasalter would start by looking along the parallel ranks of solar panels and then as they turn east looking over row after row of panels stretching east to west to the back of the marsh. The monotony would only be relieved as walkers passed gaps for the spine road and the drainage ditches. At the eastern end of the site, walkers' next view would be the battery compound and sub-station across the grazing marsh. Walking the Saxon Shore Way from the Seasalter Road end, there would be views of the sub-station and other works and across the marsh towards the solar panels extending to the sea wall. New security fencing and surveillance is also expected to be installed along		

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				all footpaths which would add to the unsightliness and serve to intensify the hostile industrialised atmosphere across the marshes. The character of all of these well established and much-used footpaths that are part of the Saxon Shore Way would be changed beyond recognition. On a more detailed point, we would want to be assured that the footpath across the site from Nagden to Castle Coote would remain open during the construction phase. The Faversham Society considers that the detrimental impact on the amenity of users of the footpaths both through and around the Cleve Hill Power Station would be unacceptable both in the short term during building works and in the longer term once the panels were connected to the grid and battery storage was installed. • Identification and Mitigation of Long-Term Risks There are two questions about		

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				which the Society, local elected representatives and in time the wider public will need more assurance. Our first concern is the business assumptions on which the development is based. As we have seen recently with the Swansea Bay Tidal Lagoon scheme, huge and developments like the Cleve Hill Power Station are highly dependent on the demand for and the pricing of electricity over the long term. We believe the assumptions made by the developers about this should be made public. We want to know how sensitive those assumptions are to national and global shifts in the energy market over what timescale. We also want to know what account developers have made for the growing acceptance that the days of old national grid-based approaches to energy production and supply are numbered because they will be supplanted by the much more cost-effective and environmentally 'green', distributed generation,		

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				This vulnerability to national and global events over the long term leads to our second major concern. If the site ceases to be economically viable – and most especially if the developer's company fails and goes into administration – who will be responsible for decommissioning the plant and restoring the marshes to their original condition? Without explicit reassurances and guarantees from developers and planning authorities, the risk of having a very large and redundant industrial plant covering such a large area would be unacceptable to the Faversham Society, to the public at large and most likely to their elected representatives. We are concerned that there has been no information about the public health and security risks associated with the development. We understand it is proposed to construct the largest battery in the world covering ground equal to that of 15 football pitches. We		

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				would like to know about the environmental risks of fire and/or explosion and what arrangements will be made to mitigate the effects. It may surprise developers to learn that the people of Faversham and their elected representatives are particularly sensitive to the risk of large industrial explosions and the social, economic and environmental damage they wreak. • Alternatives Sites There are numerous alternative brownfield sites – even in this corner of the country. Kingsnorth and the Hoo Peninsular are obvious candidates. The Faversham Society needs clarification about why the Cleve Hill site has been chosen above others. If – as has widely been rumoured – it is attractive to developers solely because of the spare capacity on an existing and underused national grid connection, we do not believe that this is sufficient justification for the devastation which such a large –		

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				albeit solar – power station will create. We also understand that although there can be economies of scale with other forms of energy production, this is not the case for solar energy since solar technology (panels and batteries) can be scaled incrementally, having numbers of smaller sites would deliver much the same returns. We would like to see the differences in long-term viability between a far less intrusive multi-site model and the single site devastation that is being proposed for Cleve Hill and the surrounding marshes. Losses and Benefits As we have made clear, this unprecedentedly large solar power station will have a profound negative impact on the people that live in Faversham and the surrounding villages. Although it is these local people who will suffer the losses if this development goes		

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				ahead, it appears that as currently conceived, it provides no direct benefit for them either in the short or long term. That lack of attention to what in other large development schemes would be known as 'planning gain', demonstrates the lack of regard or concern that developers and builders of the Cleve Hill solar power station have for the interests of the people of Faversham and the surrounding villages.		

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CH_email_620	Member of public	13/07/2018	4.16 pm	I have attended one of the consultations on the proposal for Cleve Hill Solar Park. Briefly I would like to say that I wholeheartedly object to the proposal for the development of a Solar Park and/or battery storage facility. The scale of the proposed site is enormous and would dwarf, to my knowledge any other development and indeed local communities within the area. Looking at the size of the solar panels these are going to be aesthetically unappealing, along with the fencing and battery storage unit , these will have a negative impact on the character of the area. The land at present as I see it is of great importance to local wildlife, birds especially. The proposal of a community orchard and as I understand a small area designated for management of some birds is inadequate, especially when considering the	Yes/ No	The Applicant has reduced the scale of the Development from 56.5% of the arable developable land containing solar PV modules to 45.5%. The Applicant has undertaken a LVIA as presented in document reference 6.1.7 and as consulted on at PEIR. The Applicant has also increased the Arable Reversion Habitat Management Area for birds from 41ha to 56 ha. The Applicant has scoped out the community orchard in response to feedback, to be replaced by lowland meadow. The Applicant has reduced the number of HGVs since PEIR to 40 vehicles a day and has consulted on a construction traffic management plan (document reference 6.4.14.1). The Applicant has undertaken a non-motorised user assessment as presented in Chapter 14 of the Environmental Statement (6.1.14) and has undertaken a socio-economic assessment (document reference 6.1.13). The Applicant has consulted with the community since November 2017 as detailed

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				area currently available. The construction process will involve a large amount of extra traffic , on already heavily congested infrastructure, which is already strained to the maximum, and this without the impact of all the current building programmes being undertaken in the surrounding areas. This is without the added pollution that will be created during the 12 to 24 month construction programme. The way to reduce construction traffic is to not allow this development in the first place. There are also the nearby human population to be considered . I feel we should be looking for more viable sites on a much smaller scale , without blotting such an enormous area. After all this is for a commercial gain by a profit making organisation. I found it disingenuous to suggest that the land at present was " not being used for anything useful " as per		in the Consultation Report (document reference 5.1). The Applicant explains in detail the site selection and alternatives for the Development in document reference (6.1.4).

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				one of your representatives at the consultation in Guildhall Faversham . Just because the land is not a Ramsar site or protected, doesn't mean it is not valuable. To be clear ;I do not mean in a financial sense. I see very little in the proposal that would benefit the local community. I object to this proposal! These objections are just small in number ; there are plenty of other example which I am sure others will of expressed .		

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CH_email_621	Member of public	13/07/2018	4.20 pm	Investing in renewable energy is a vital way forward to tackle climate change and development of alternatives to fossil fuels, however the proposed solar farm at Cleve Hill is not a suitable contribution. The location of the project is a poor choice giving the nature and importance of the land it is sitting on. The sheer size and scale of the proposed development heightens it negative impact and makes it even more unsuitable choice of location. The proposed development would quite simply be detrimental to the environment, the local communities, and flora and fauna. The proposed solar farm is at least as big as Faversham if not bigger. The size of the proposed farm has no precedent in the UK being several times larger than largest solar farm currently in operation. The size is unusual for Europe as well. My understanding is that the developers have not built a solar farm of this size before. It is concerning that what seems to be an experiment in scale has been chosen for such a sensitive site.	No	Please see Chapter 4, Environmental Statement for a detailed explanation of the site selection for the Development (6.1.4). Of the 387ha of developable arable land, 45.5% will be solar PV modules. Through consultation with the HMSG, feedback was provided to the Applicant that inclusion of the SSSI site to the east of the AR HMA would be beneficial to include within the Development site boundary, linking together with the AR HMA. The additional area included in the Development at PEIR, which comprise part of The Swale SPA/SSSI/Ramsar site, will not contain any new development structures; they are included to facilitate ongoing maintenance of the sea wall and to bring biodiversity benefits through more appropriate management of the freshwater grazing marsh in the east of the site.

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				I am concerned that the proposed development could set a precedent leading to further inappropriate developments on Swale coastline. During the process of consultation, the site was expanded to include a nearby SSSI and the sea wall. That control of the sea wall would be in private hands rather than the Environmental Agency is disquieting, given that a priority could be given to protect private assets rather than mitigate the impact of the sea of on communities living in the Swale as would be expected of the Environmental Agency. Furthermore, the area of land that the proposed solar farm would be sited on will be affected by sea levels rise and has potential use as compensatory land as part of management strategies to mitigate sea level. Recent research from Durham University suggest that coastal wetlands in the southeast could disappear as early as 2040. The risk of sea level rise is real and immediate. Proper modelling of the risks to		The Applicant has consulted with the EA throughout the pre-application consultation in addition to the statutory s42 consultation as detailed in Chapter 5 of this Consultation Report. The Applicant has undertaken extensive flood modelling for the Development site area resulting in varying heights the panel structures are from off the ground being between (1.2 – 2.1m) off of the ground). The site infrastructure is designed to remain above and function to a 1:1000 year plus climate change wave overtopping scenario. Only the electrical compound is designed to withstand a breach of the existing defences. In response to comments from residents and neighbours in close proximity to the Development, key changes to mitigate visual impact of the Development include: - The removal of 9.2ha of solar PV modules from development parcels Z and a portion of Yes on the elevated ground at Cleve Hill to reduce views from neighbouring

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				communities is needed. Any assessment should include the risk of flash flooding should the drainage ditch that separates Graveney and Cleve Marshes be blocked and the impact of the building of the bund. The fact that an SSSI would under private rather than public control is another cause for concern. This can only negatively impact on the SSSI and there is potential for another SSSI to lose its status due to inappropriate development. The height of the panels needed to protect them from weather and seas, means that screening will be ineffective. The panels will be visible from nearby properties, the Saxon Shore way (a favourite walk of mine), and the surrounding countryside, transforming the appearance to something akin to an industrial area. This is an area designate as both Kent Area of High Landscape of Value and Swale Area of Landscape of Value. The impact of the view on the surrounding has potential to significant impact on the amenity		properties and the village of Graveney. (This was increased a total area removed from development of 13.6ha in total following comments to PEIR); - A minimum of 68m of setback to neighbouring properties at Nagden including a screening plan of proposed lowland hedgerow; - A minimum of 66m of set back and a proposed woodland area (as agreed with the owners) at Warm House; - A minimum buffer distance from the Saxon Shore Way of 63m; - Across the Development, the Applicant proposed 3.52km of native hedgerow planting for screening (which was increased to 3.64km in the final Application). The Applicant has undertaken a LVIA and Residential Visual Amenity Study as presented in the Environmental Statement (document references, 6.1.7 and 6.4.7.5). The Applicant has undertaken extensive ecological studies

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				and economic value of the landscape. The building of the solar farm will also destroy archaeological heritage including medieval saltings and would greatly impact on the fabric of the historic landscape of Faversham, Graveney, and Goodnestone. It is deeply worrying that information about the impact on archaeology and heritage has not be made easily available. There would be significant impact of building the solar farm on the neighbouring communities, due to noise, diesel fumes, and traffic movements. There has been little information about the long term levels of noise, light and air pollution once the station is operational. The area is part of the North Kent Marshes Environmentally Sensitive Area. The site will also affect the Swale Special Protection Area and the Swale Site of Special Scientific Interest, the South Swale Nature Reserve and the Swale Estuary		including regarding designated sites as set out in Chapter 8 of the Environmental Statement (document reference 6.1.8). The Developer has assessed run off as presented in Chapter 10, of the Environmental Statement (document reference 6.1.10) and has presented an extensive landscape management plan (LBMP, document reference 6.4.5.2).

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				Marine Conservation Area and on the opposite side of Faversham Creek, the Oare Marshes Nature Reserve managed by the Kent Wildlife Trust. These designations show just how important the area is for flora and fauna. The small area of marsh offered to be improved by the developer wildlife is not enough to mitigate against the significant impact this scheme would have. England, like the rest of the world, is facing a significant decline in wildlife with many species threatened with extinction. Building on sites that could make a real difference to the survival of species is not the way forward. The nature of the solar farm would destroy habitat. The developers propose that sheep could graze under the panels yet it is not clear that the density of the panels would allow light to reach plants and soils underneath. Grazing of sheep is no compensation for the loss of wildlife that must occur should the solar farm go ahead. It is also possible that the solar farm will		

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				prevent soil absorbing rainwater leading to runoff and other issues, creating further impact. These are but some of the reasons why I feel that this proposed development is inappropriate and should not go ahead. Graveney and Cleve Marshes are not a suitable location for this project. Another location should be sought, preferably one that is brownfield.		

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CH_email_627	Member of public	13/07/2018	5.46 pm	I am writing to voice my objections to the Cleve Hill Solar Farm. Whilst I am well aware of the need for renewable energy and generally in favour of schemes that move us away from our current reliance on fossil fuels, I think it is misguided to choose to site such a massive development on an area of such beauty and local importance. My family lives in Faversham and are very regular visitors to Graveney marshes, revelling in the spectacular wide open spaces and huge skyscapes that the area affords. There is absolutely no doubt that this would irreversibly blight a unique landscape and provide absolutely no benefit to the local community, On your site, the best you seem to be able to offer is that it will contribute £1million to the local economy annually, which is derisory - surely we're all financially aware enough to know how little that represents in real terms, compared to what we will be losing. With an abundance of alternative	No	Comment noted

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				brownfield sites available in Kent, a development such as this smacks of profiteering - no doubt Graveney marshes would be an easy place to build from your point of view, delivering maximum profitability for minimum effort. Schemes for alternative energy are generally to be applauded and supported, but no when they come at such a huge environmental cost. Saving the planet by destroying the environment is a contradiction too far - I wholeheartedly object.		

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CH_email_628	Member of public	13/07/2018	5.47 pm	I am very concerned about the proposed development on the edge of Graveney marshes. It will devastate the beauty of a landscape which is a resource of inestimable value to the people of Faversham and for people who travel to Faversham to walk, cycle, kayak and sail here precisely because of its rare beauty. Since there is no precedent for a development of this size in the UK we do not know its potential impact on wildlife species that nest on the edge and feed on the land that would be covered by solar panels. Of course there is a need for renewable energy but there is no reason why brownfield sites such as the former Kingsnorth power station or the soon to be decommissioned Dungeness power station should not be considered as alternative sites where there would not be equivalent degradation of the natural landscape.	No	Please see Chapter 4, Environmental Statement for a detailed explanation of the site selection for the Development (6.1.4). Of the 387ha of developable arable land, 45.5% will be solar PV modules.

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				Graveney marshes are too precious for wildlife, too beautiful to be desecrated and the development is too big.		

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CH_email_630	Member of public	13/07/2018	7.27 pm	I wish to object strongly to the proposed solar panel site on many grounds. (To call it a it is a farm or a plant suggests a rural idyll) 1000 acres of solar panels/battery is incomprehensible on this site. I understand the reasoning behind putting it there-the area having been blighted already by the London Array site Flood risk/wildlife habitat/homes etc Anyway, there are too many reasons. I will go into more detail when necessary.	No	For clarification, of the 387ha of developable arable land, 45.5% will be solar PV modules.

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CH_email_633	Member of public	13/07/2018	9.06 pm	I am writing this email to lodge my objection to the Cleve Hill Solar development. I am totally against the proposal to build a massive solar power station in Graveney for innumerable reasons. My main objections are that the size of the proposed development is disproportionate in the extreme and is in an area that is inappropriate. Graveney is an area that is special in many ways with the marsh land giving home to many species of animals. It is a vital part of the environment around the Faversham area and if it were to be lost it would have a devastating effect on wildlife and human life alike. I feel that the benefit that may be gained through increased renewable energy is outweighed by the devastation that will be brought to the important marsh area and its surrounding. In addition it will impede those who use the area for enjoyment and recreation. Faversham is already suffering under the weight of development and is in danger of soon no longer being a town that is	No	Comments noted. The site itself is an area of lower grade arable agricultural land. The Applicant has developed an extensive Landscape and Biodiversity Management Plan (LBMP, document reference 6.4.5.2) in consultation with nature conservation bodies, which proposes a series of habitat management and mitigation to improve biodiversity from the current baseline.

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				surrounded by any open spaces at all let alone those of special scientific interest. If this development goes ahead we will be destroying our priceless environment which will be lost for any future generations and wildlife. I am hopeful that you will take these views on board.		

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CH_email_634	Member of public	13/07/2018	10.17pm	I am writing to object to your proposals for a solar farm in Graveney. I do not understand how you can consider that this would be a suitable location for such an industrialised development and object to it in the strongest terms possible. This is clearly just a money making option by utilising the capacity left by the London Array development which flies in the face of the green energy and caring for the environment. The way your company has approached the consultation has been shambolic and has deliberately kept relevant details away from the public eye. I urge the Secretary of State to reject your application.	No	Comments noted. The Applicant disagrees that information has been deliberately kept from the public's attention. The Applicant has undertaken a comprehensive and multi-phase consultation process in accordance with its SoCC, as agreed with KCC, Swale Borough Council and Canterbury City Council. The Applicant has detailed the pre-application consultation process in its Consultation Report (document reference 5.1). The Applicant has most recently consulted on its PEIR and PEIR NTS and has continued its surveys and studies as provided in its Environmental Statement (document reference 6.1).
CH_email_637	Member of public	13/07/2018	10.40pm	lease accept this email as my strong objection to your proposed development.	No	Comment noted

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CH_email_639	Member of public	13/07/2018	11.47pm	I would like to provide some feedback on the proposed development of the Cleve Hill Soler Power Plant. I visit the area regularly and I went to one of your public consultation events. I also looked through your glossy brochures. You have indeed some mitigation strategies for the impact on the marsh harriers that breed there. We mostly saw them in the western part of the proposed development area. (This is also where they breed this year.) The problem with your Arable Reversion Habitat Management Area is that it is on the eastern side of it. For foraging birds, that clearly is not a big problem as such. However, the difference is how they are being used and disturbed by humans. There is a considerable amount of people who park near the Sportsman and walk from there (like we do), not few of them with dogs. A high number of them don't go very far - but they would all go past your	No	To clarify, the Applicant is proposing an increased AR HMA area of 56 ha as well as including the SSSI area to the east in response to consultation with the Habitat Management Steering Group. There would be no permanent lighting associated with the Development. Bird surveys across all seasons and day and night were undertaken from 2014-2018. Please see Chapter 5 of the Environmental Statement regarding the Development description and energy storage technology (document reference 6.1.5). Please see the Applicant's Needs Statement (document reference 7.3) regarding the need for the Development. The Applicant cannot comment on other projects. The Applicant has not been made

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				proposed AR HMA. I am not saying it is wrong to have that there, but I cannot see the marsh harriers using that as breeding ground when their current breeding ground is occupied by solar panels. I would expect that area to be too crowded and too disturbed for them. I would like to object to the "uninterrupted sea of solar panels" and request a second Arable Reversion Habitat Management Area towards the western end, where there is less disturbance from people and dogs. (I have seen wildlife being killed by dogs there.) It would appear to me that an AR HMA near the Castle Coote area would be beneficial in that respect. I also noted that there was no mention of the short-eared owl which has in the past bred in that area. For a while, this was a regular occurrence until some years ago a breeding pair unfortunately was poached. (This		aware of any incident from Wirsol. The Applicant encourages the respondent to re-submit the complaint to Wirsol and to the Development information lines at info@clevehillsolar.com

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				was before your survey.) We did not see them for a while after that but they have returned and have bred there during your survey period. (I should find photographic evidence for that.) Again, they breed in or near the Castle Coote area, so having a second AR HMA there would be great. I did not read anything about lighting. Am I correct that there would be no lighting other than during construction? I don't think there is a need for that. (Other than perhaps "security": No thanks, please don't.) You did do a bird survey, but did you survey the "night life" as well? You propose the installation of high-power electrical equipment, which hums. Actually, it is quite noisy. What is the impact of that one. g. bats? You mention the battery in your "Major accidents and disasters" section. I am sure you will follow the manufacturer's instruction		

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				regarding fire safety. But if that should really go wrong and the batteries burn or even explode, that would be quite toxic. Literally. But then, you would not be here. "That won't happen" I hear you say? You mean like neither laptop nor mobile phone ever ignited on their own while in their owner's pocket? And finally - this is a bit of a double-edged sword: We do have a need for renewable energy. In that respect, I have never understood why the London Array never had it's phase two built. That is something I would have fully supported. (Different company who built it, I know). There were questions about the impact on the red throated diver. As far as I understand it, the only requirement on the developer was to survey that for two years I think before a final decision was made. Apparently that was too costly for the developer. Really? One could argue that I just don't		

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				want it in my back yard. Well, it isn't, but I have spoken with the Lady on who's back yard it borders. Literally. So yes, we have a need for renewable energy. This development, however, is far too bit. And apart from the points already raised above, one can argue that it shouldn't really be on a greenfield site at all. The Wirsol webpage shows one of their solar power plants next to a motorway. It doesn't matter there; the landscape is destroyed there by the motorway anyway. And on the Hive Energy webpage: "Solar car parks and shelters". That is where they belong. Over car parks. On roof tops. Are there really not enough offices and industrial buildings which are big enough to make it worthwhile? During my visit of your public presentation event, I was told that a solar power plant needs to be		

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				the that big to make it profitable without subsidy. However, the Wirsol web page lists 5 projects under the headline "Non-Subsidised Projects": Cleave Hill and four others. Interestingly, the four others are all below 30MW. Clearly something does not add up correctly. And finally, I was mis-treated at your public consultation event that I attended. I contacted Wirsol and got no replay. I contacted the headquarter and was promised a reply within a week. That didn't happen. I had to chase that up before getting any response. So, if complaints are raised in the future, do they just get ignored as well? If so: No, I don't want that development at all.		

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CH_email_641	Member of public	14/07/2018	00.00am	As individuals, some of us have fed back to your 2nd round consultation through various channels. This feedback is about us as a family, and our house and our home. Firstly, whilst we are supportive of the need to put less CO2 in the atmosphere, we do not think that the proposal is a good way to achieve this. We strongly object to the proposal and do not want the land to become industrialised. We want the land to become more biodiverse through the MEASS approach of managed realignment. It should be returned to the saltmarsh that it once, and that the place names refer to: Nagden, Graveney and Cleve Marshes. The threat of having this development dumped on our doorstep has left us feeling upset and distraught. We moved here to be in the countryside and this	Yes/ No	The Applicant has developed an extensive Landscape and Biodiversity Management Plan (document reference 6.4.5.2) in consultation with nature conservation bodies, which proposes management and mitigation to improve biodiversity from the baseline. The Applicant has consulted with the EA throughout the pre-application consultation in addition to the statutory s42 consultation as detailed in Chapter 5 of this Consultation Report. The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable.

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				proposal is a devastating imposition from people with no connection to this area. We think that the way that we have been dealt with at times to be unreasonable. You, the developers, are saying to the industry press that this proposal is "a pioneering scheme" [1], and boasting about "how much more we could get on the site for an east-west layout" [2]. No one has ever built a facility like this before - it is off the scale in terms of size, height, style, battery and so on. And yet you have the temerity to tell us in our own home that solar parks do not affect house prices for people living nearby. People in the local area who are already trying to sell their houses have been blighted. We are seriously concerned about the effect this will have on the value of our home and find it utterly unacceptable to hear about comparisons with tiny solar farms being used to dismiss this concern.		The Applicant has undertaken an extensive pre-application consultation as detailed in the Consultation Report (document reference 5.1). The Applicant disagrees that information has been hidden and has made information available throughout the process including consulting on PEIR and PEIR NTS at phase two Section 47 consultation. The Applicant is not aware of any evidence to suggest that house prices are impacted by solar developments and has discussed this with neighbours throughout the meetings held. The Applicant has developed a Construction Traffic Management Plan (CTMP, document reference 6.4.14.1) which includes a series of mitigation to reduce traffic impacts and congestion as consulted on with KCC Highways and the community through the PEIR and at specific meetings held on 18 and 19 September.

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				This proposal should absolutely not go ahead. But we understand from guidance from the Planning Inspectorate that even if we oppose, we should still make suggestions at this stage. So, if it does go ahead, we would want: A totally different approach from you as developers. Stop hiding information, misleading people, producing biased communications. Start engaging, listening, and being sympathetic to the people who are most affected by this. - compensation for the loss in value on our house, and the same for all neighbours - compensation for the inconvenience during the construction for all affected by it We want to note that for people living in the rural countryside there are challenges with being green which you ought to be aware of and which you could do something		The Applicant is in continuous engagement through its trade bodies and Government to promote further deployment of low carbon technological solutions such as the one listed. In addition, please see the Applicant's Need Statement as set out in Document Reference 7.3. The Applicant supports the initiatives raised in the comments and encourages support for these sustainable energy and technology projects. The Applicant will be providing over £1million a year in business rates to the council, meaning a guaranteed minimum investment for the council of £25million if the Development should remain for a minimum of 25 years. Please see a detailed description of the alternatives considered for the Development in Chapter 4 of the Environmental Statement (document reference 6.1.4). The Applicant has reduced the developable area (i.e. arable area)

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				about as part of your Corporate Social Responsibility. It would be ironic to have a power station producing clean energy surrounded by inconvenienced neighbours who are stuck using fossil fuels. - support for all families in the wider local area in making themselves greener. - make it possible for us all to stop using oil and gas heating - make sure we all have efficient and insulated homes - make it possible for us all to stop using petrol/diesel cars and switch to electric Continuing this theme, work with the town of Faversham and the local area to help make it one of the greenest in the country. - provide support for public car charging ports in key areas - ensure that the local area benefits properly - by making the town and villages shareholders in the venture so that the benefit is properly shared. - anything else that supports this		for solar PV modules from 56.5% coverage to 45.5% and has increased the AR HMA from 41ha to 56 ha. The Applicant has set out an extensive landscape and biodiversity plan (document reference 6.4.5.2). A position between the EA and the Applicant has been reached as included in Appendix 26 of the Consultation Report (document reference 5.1.1).

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				aim. We want the wildlife to be far better supported. - reconsider the east/west layout, and go for south-facing - provide much more habitat and much more open spaces - find a way to work with the EA so that the managed realignment approach can still be accommodated.		

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CH_email_642	Member of public	14/07/2018	7.10 am	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted
CH_email_658	Member of public	17/07/2018	9.35 pm	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted
CH_email_659	Member of public	17/07/2018	9.36 pm	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted

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CH_email_669	Member of public	19/07/2018	2.53 pm	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted
CH_email_674	Faversham Creek Trust	20/07/2018	2.39 pm	I have been asked to contact you on behalf of Faversham Creek Trust, of which I am a Director & Trustee. I apologise for the late response from the Trust, we have been running the Faversham Nautical Festival which coincided with your deadline last week, and we hope you will accept this late submission. We wish to record that we fully endorse the responses of the Faversham Society and the CPRE to the proposals for Cleve Hill solar installation. Yours faithfully	No	Comment noted

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CH_email_679	Member of public	23/07/2018	6.16 pm	I think it is a v good idea and not concerned about the minimal impact on wildlife - a few voles and skylarks ... Renewable energy is far more important! Well done and fingers crossed for the planning decision.	No	Comment noted
CH_Freepost_644a	Member of public	16/07/2018	10.00am	[Postcard] No to solar power station	No	Comment noted
CH_Freepost_644b	Member of public	16/07/2018	10.00am	[Postcard] No to solar power station	No	Comment noted
CH_Freepost_644c	Member of public	16/07/2018	10.00am	[Postcard] No to solar power station	No	Comment noted
CH_Freepost_644d	Member of public	16/07/2018	10.00am	[Postcard] No to solar power station	No	Comment noted
CH_Freepost_644e	Member of public	16/07/2018	10.00am	[Postcard] No to solar power station	No	Comment noted
CH_Freepost_644f	Member of public	16/07/2018	10.00am	[Postcard] No to solar power station	No	Comment noted

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CH_Freepost_644g	Member of public	16/07/2018	10.00am	[Postcard] No to solar power station	No	Comment noted
CH_Freepost_644h	Member of public	16/07/2018	10.00am	[Postcard] No to solar power station	No	Comment noted

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CH_email_504	Member of public	03/07/2018	11.31am	A) About You [redacted] Our interest is as local residents. We belong to the following groups: Faversham Walking Group (both) Kent Wildlife Trust (both) Faversham Running Club (JR) B) Our Consultation Process We have not attended any consultation event due to work commitments/holidays but have followed it closely through local press/social media/leaflets through door. C) How we get our electricity Climate change is an important issue – Don't Know The UK needs more renewable energy – Don't Know Producing energy that is subsidy-free is important – Don't Know	Yes/ No	The Applicant has consulted with statutory and local nature conservation bodies throughout the pre-application process and have consulted on a landscape and biodiversity management plan (LBMP, document reference 6.4.5.2) which contains embedded mitigation to improve biodiversity on site from the baseline. The Applicant has also increased the Arable Reversion Habitat Management Area for birds from 41ha to 56 ha. The Applicant has undertaken a LVIA as presented in document reference 6.1.7 and as consulted on at PEIR. The Applicant proposes significant screening measures in its LBMP including 3.64km of hedgerow planting. The Applicant has reduced the number of HGVs since PEIR to 40 vehicles a day and has consulted on a construction traffic management plan (document reference 6.4.14.1). The Graveney Boat is not sited on the Development site but on the neighbouring Graveney Marshes 870m east to the site. Please see

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				Storing renewable energy is an important part of renewable energy production – Don't Know The reason for the above answers is that there is no box for slightly agree/disagree. Although we may agree partly on some of the quotes, we don't want it to be seen that this gives our agreement to the project. Yes – we have seen an operational ground-mounted solar development before Further comments – PARK is the wrong word – it is a noisy power station D) Project-specific feedback Ecology and bird life: This should not be near protected habitat areas. This is a very important area for wildlife and our concern is over the loss of over-wintering and breeding habitat for many species of red listed and Schedule 1 birds, particularly		Chapter 11, Environmental Statement (document reference 6.1.11). The Applicant has undertaken a non-motorised user assessment as presented in Chapter 14 of the Environmental Statement (6.1.14) and has undertaken a socio-economic assessment (document reference 6.1.13). In response to the consultation, the Applicant has scoped in an additional permissive pathway creating a round walk from Seasalter Road. The Applicant has scoped out the community orchard in response to feedback.

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				ground nesters like skylark. Migrating birds including marsh harriers and little terns use the salt marshes and mudflats in the area. We are concerned on the impact of wildlife in general with the loss of natural habitat. Visual impact: How can you screen something that is larger than Faversham itself? Traffic access and construction: Traffic is gridlocked on Faversham's roads already without creating additional traffic, particularly with all the new housing earmarked for this area. An installation of this size on this area will reduce the flood defences and increase the risk of flooding to Faversham and beyond. Archaeology and local heritage: Concerned over the loss of Graveney Marshes – the location of where the Graveney boat was found which is of historical interest, together with the location of the		

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				last gun battle of World War II. Tourism: Negative impact on the Saxon Shore Way which is regularly used by walkers, runners and cyclists. Recreation and local amenity: See Tourism above. Other: Surely, if all the new housing being scheduled for Faversham and the surrounding area has solar panels fitted as part of its building criteria, there would be no need for this so-called 'park'! If a 'park' is required then a better location would be one of the decommissioned colliery sites. Local amenity proposals: We regularly walk (or run) through the site, walk the Saxon Shore Way and watch birdlife. If the site goes ahead then it must have pathways, cycle paths and bridle paths.		

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				We have not visited a community orchard. We are not likely to be interested in supporting a community orchard. Based on the proposals we have seen our views on Cleve Hill Solar Park are: STRONGLY OBJECT. Updates by email please.		

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CH_email_418	Member of public	06/06/2018	9.56 am	Why Solar Why indeed – when we suggested at the first consultation that this was nothing more than a money-making exercise it was the only question that you were able to answer in the affirmative. The site chosen does not fit with this type of construction.		Please see the site selection process detailed in Chapter 4, Environmental Statement (document reference 6.4)
CH_email_418	Member of public	06/06/2018	9.56 am	Innovation No government funding = easiest solution and not necessarily the best solution – shareholders come first. CO2 emissions. Please can you advise the emissions in the production of the solar panels, the shipping of the panels, the road transport of the panels and the erection and siting of the panels, including the emissions in the production of the tonnes of cement that will be required to undertake this project		This is the view of the respondent. The production of panels is not a planning matter relevant to the Application.
CH_email_418	Member of public	06/06/2018	9.56 am	Battery storage – where? How large will the buildings be? What will be done to mitigate leakage? What protection to ground water will be put in place?		The energy storage element of the Development is detailed in Chapter 5, Environmental Statement (document reference 6.1.5).

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CH_email_418	Member of public	06/06/2018	9.56 am	East-West Layout – First impression is whose child drew this picture - please treat the community with a little more respect! I am staggered to see the height of the panels at up to 4 metres. This is outrageous and nowhere have we seen anything similar. We find this totally unacceptable. Can you also advise the size of the panels?		As detailed in the Development literature and Chapter 5, Environmental Statement (document reference 6.1.5) - panel heights vary between 2.1m and 3.9m.
CH_email_418	Member of public	06/06/2018	9.56 am	You state you are reducing the number of panels. Since you were not able to advise on the number of panels at the first consultation please can you give some numbers. Also, the map included in your newsletter is of little help in understanding the revised layout. Please supply a map with more detail showing battery storage and everything else relating to this project.		The energy storage element of the Development is detailed in Chapter 5, Environmental Statement (document reference 6.1.5). The Applicant has reduced the area of the Development covered by solar PV models from 56.5% to 45.5%.
CH_email_419	Member of public	06/06/2018	10.05am	in the unhappy event that this project comes to fruition, what is your decommissioning strategy? What happens if you put the company into administration? Who is left with the cost of clearing the site?		Details of the decommissioning of the Development are detailed in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).

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CH_email_419	Member of public	06/06/2018	10.05am	Finally, I wish to urge you once again to walk away from this ill conceive development. The North Kent Marshes is one of 22 Environmentally Sensitive Areas recognised by the UK government's Department for Environment, Food and Rural Affairs (DEFRA). Your project comes at a time when Michael Gove announces the need for an increase in National Parks and just a few months after the Prime Minister went public on the need to protect our open spaces.		These are the views of the respondent. The Applicant provides full details of the ecology assessment and ornithology assessment as well as visual assessment in its Environmental Statement (document reference 6).

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CH_Freepost_479	Member of public	22/06/2018	12.34pm	I am writing to object to your plans for a solar park on Graveney marshes. This complex is not a park, it is vast, intrusive and will be built on agricultural land. This area is a breathing space for town of Whitstable and Faversham, both of which are becoming increasingly built up and popular. This huge industrial will effectively merge both towns adding to the miss-match of development and sprawl along the Themes Estuary. The area then changes from agricultural land to a brownfield site and is unlikely to ever be farmland again. The complex will oust wildlife. I've seen and heard cuckoos on this land and skylarks, lapwings and swallows to name but a few. This morning I saw 6 herons flying in loose formation over the marshes. Where are they to go? The seabirds that roost on the mudflats around the Swale and also flock inland to follow the plough and feed on the fields after harvest. When walking the Saxon Shore way in high summer, clouds of butterflies fly up at every step. I		These are the views of the respondent. The Applicant provides full details of the ecology assessment and ornithology assessment as well as visual assessment in its Environmental Statement (document reference 6).

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				presume all this isn't supported by the coastal path itself but up on the surrounding 'low grade' agricultural land as a habitat.		

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CH_Freepost_479	Member of public	22/06/2018	12.34pm	I wish to register a strong objection to the proposed development.		Objection noted.
CH_Freepost_485	Member of public	03/07/2018	10.30am	Statement on Renewable energy: We would like to make it clear at the outset that we are very much in favour of renewable energy and understand that solar, along with all other clean energy production forms an important part of the UK's future energy needs. Our concerns and issues raised in this letter deal purely with the scale and location of this project and in particular the way in which Hive Energy UK has carried out the public consultation process.		Noted.

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CH_Freepost_485	Member of public	27/06/2018	10.30am	Grading of land (PIER Volume 1 – chapters, page 4-4) – You state 'Approximately 95% of the land within the solar park where development could take place is classified as Grade 3b, which is not best and most versatile agricultural land, i.e., it is of lower agricultural quality, and so is well suited to the development.' The actual grading wording for 3b (Moderate Quality Agricultural Land) is: 'Land capable of producing moderate yields of a narrow range of crops, principally cereals the grass of lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year'. Nowhere does the official grading state 'and so is well suited for development'. In fact, the wording you have chosen to use could be applied to any of the grade of land which is not grade 1, which is excellent. This farmland has been farmed all the time we have lived at this property (and many years before this) and has provided crops such as corn,		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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				rapeseed, barley and broad beans among others. The image below shows corn being harvested in 2017! SEE IMAGE ATTACHED		

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CH_Freepost_485	Member of public	27/06/2018	10.30am	Battery Storage – Energy Storage Facility (PIER Volume 1 – Chapters, page 5-17) – you state "the candidate development design in this PIER for the energy storage facility comprises an approximately 350-megawatt hour (MWh) battery array which will be located within the electrical compound adjacent to the west of the Development substation.'		The energy storage element of the Development is detailed in Chapter 5, Environmental Statement (document reference 6.1.5).
CH_Freepost_485	Member of public	28/06/2018	10.30am	The above battery will be the world's largest by a factor of 3. Currently, the world's largest battery is in Australia, also of a modular lithium design supplied by Tesla. As this was the world's largest when it was proposed, designed and installed it obtained lots of publicity, the battery was only 129MWh.SEE IMAGE ATTACHED		The energy storage element of the Development is detailed in Chapter 5, Environmental Statement (document reference 6.1.5).

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CH_Freepost_485	Member of public	29/06/2018	10.30am	Our concern is not so much with the size of the battery storage facility as this is a good option in conjunction with an equal size Solar Park, but that no sense or comparison has been alluded to. In the diagram above you show the image of a powerpack arrangement showing 10 cabinets, there will be 7,440 cabinets!		The energy storage element of the Development is detailed in Chapter 5, Environmental Statement (document reference 6.1.5).
CH_Freepost_485	Member of public	30/06/2018	10.30am	Another benefit of the battery at Horndale Power Reserve in Australia was that the owners of the battery (which is connected to a wind farm) have an import/export connection to the National Grid., this allows them to purchase energy from the Grid to charge the batteries when it is in surplus and therefore cheap and sell it back to the Grid at a higher price when there is shortage, thereby trading energy presumably obtained from all forms of energy creation (not just green energy).		No response required.

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CH_Freepost_485	Member of public	01/07/2018	10.30am	Is this why in (PIER volume 1 – chapters, page 5-19) you state 'the connection to the National Grid will be an import/export connection to facilitate the charging of the energy storage facility.' If so, why is this not mentioned or discussed in more detail?		The energy storage element of the Development is detailed in Chapter 5, Environmental Statement (document reference 6.1.5).

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CH_Freepost_485	Member of public	02/07/2018	10.30am	Lack of scale alluded to in the Non-Technical summary – Due to the sheer quaintly of information, much of it of a technical nature we can certainly understand the need for an NTS, however, people that choose to go through this is opposed to the full PIER (lucky people) will be missing quite a lot of crucial information, none of the following is mentioned in the summary document:		The Applicant recognised that some consultees would wish to read and comment on the detail within the PEIR, which is why it was provided in full at the community consultation events, at the Community Access Points and online on the project website. However, the Applicant also recognised that some consultees would not have the time or inclination to digest and comment on the full PEIR, and therefore its content was summarised in the non- technical summary of the PEIR, a number of topic-specific factsheets, and the large-format displays used at the community consultation events. As set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, "preliminary environmental information" means information which is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development). The

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						consultation undertaken by the Applicant has discharged that duty.

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CH_Freepost_485	Member of public	03/07/2018	10.30am	· Scale of the development, no comparisons made e.g.		The Applicant recognised that some consultees would wish to read and comment on the detail within the PEIR, which is why it was provided in full at the community consultation events, at the Community Access Points and online on the project website. However, the Applicant also recognised that some consultees would not have the time or inclination to digest and comment on the full PEIR, and therefore its content was summarised in the non- technical summary of the PEIR, a number of topic-specific factsheets, and the large-format displays used at the community consultation events. As set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, "preliminary environmental information" means information which is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development). The

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						consultation undertaken by the Applicant has discharged that duty.

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CH_Freepost_485	Member of public	27/06/2018	10.30am	· Europe's largest solar park		The Applicant recognised that some consultees would wish to read and comment on the detail within the PEIR, which is why it was provided in full at the community consultation events, at the Community Access Points and online on the project website. However, the Applicant also recognised that some consultees would not have the time or inclination to digest and comment on the full PEIR, and therefore its content was summarised in the non- technical summary of the PEIR, a number of topic-specific factsheets, and the large-format displays used at the community consultation events. As set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, "preliminary environmental information" means information which is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development). The

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						consultation undertaken by the Applicant has discharged that duty.

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CH_Freepost_485	Member of public	28/06/2018	10.30am	· World's largest lithium battery by a factor of 3 (the NTS does not even state MWh's)		The Applicant recognised that some consultees would wish to read and comment on the detail within the PEIR, which is why it was provided in full at the community consultation events, at the Community Access Points and online on the project website. However, the Applicant also recognised that some consultees would not have the time or inclination to digest and comment on the full PEIR, and therefore its content was summarised in the non- technical summary of the PEIR, a number of topic-specific factsheets, and the large-format displays used at the community consultation events. As set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, "preliminary environmental information" means information which is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development). The

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						consultation undertaken by the Applicant has discharged that duty.

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CH_Freepost_485	Member of public	30/06/2018	10.30am	Conclusion – Despite making an extensive review of the PIER documents submitted we still have only managed to cover a small portion of the 2500 off page submitted (not to mention all the referenced works from other sources). We will not have time to review all documents before the deadline to respond of 13th July and have therefore decided to raise the main issues we have so far, so that you have time to review them prior to our scheduled meeting at Warm House and 4th July at 17:00, where hopefully, you will be in a position to address a lot of the points raised.		Noted. The Applicant met with the respondent on 4 July 2018 as planned.
CH_Freepost_485	Member of public	01/07/2018	10.30am	Both my daughter Clare Mead and her husband Richard and my son, Keith Pryke and his wife Angela have signed this letter as we feel very strongly that as a company you need to re-look at how you, and your partners and employed consultants act in relation to the impact you have on the lives of residents caught up in your plans.		The Applicant has remained sympathetic to the many neighbours and residents is has endeavoured to meet on several occasions throughout the pre-application consultation for the Development as detailed in Chapter 57 Consultation Report (document reference 5.1). The Applicant is confident that the consultation undertaken has been

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						professional and gone beyond the statutory requirements.
CH_email_513	Member of public	05/07/2018	6.01 pm	For these reasons we strongly object to your proposal and urge the Secretary of State to decline your application. Yours faithfully		Objection noted.
CH_Freepost_519	Member of public	06/07/2018	10.00am	4. Will there be a written undertaking to restore area back to rural environment when after, at most, 20 years the solar park will be defunct and non-recyclable. To clear up and make safe the chemical spillage and leafage that would have occurred after time with such an enormous coverage!		Details of the decommissioning of the Development are detailed in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).

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CH_Freepost_519	Member of public	06/07/2018	10.00am	5. The power from this proposed site will not necessarily be sold for local or regional use but likely highest bidder probably in the E.U. Ruin our country side for the benefit of monetary gain.		The power generated by the Development will be fed into the National Grid system. This is the respondent's views and is not a planning matter.
CH_email_520	Member of public	09/07/2018	12.13pm	1. The scale of this proposal, now extended to 1,000 acres, means that the village of Graveney and its important church (a building from the 12th century standing on the site of an earlier Saxon church) would be dominated by an industrial site, which matches in area the adjacent town of Faversham.	Yes	Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference 6.1.7). This includes a viewpoint from the All Saints Church in Graveney. Since phase one s47 consultation, the Applicant has removed solar PV modules from fields Yes and Z, thus removing all modules from the elevated land at Cleve Hill and to the base of the hill. This has reduced views of the Development from All Saints Church in Graveney.

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CH_email_520	Member of public	09/07/2018	12.13pm	I urge the Inspectorate to refuse this application. Yours faithfully,		Noted.
CH_email_532	Member of public	11/07/2018	12.37pm	I wish to make the following points in respect of the consultation process for Cleve Hill Solar Park. I am a supporter of alternative sources of energy, and personally believe that the UK will require a mix of many types of power generation including solar energy. I strongly object to the proposed development at Graveney Marshes for a number of reasons, the most significant I outline below.		Objection noted.
CH_email_532	Member of public	11/07/2018	12.37pm	2. The scale of the development is beyond the comprehension of many local people, that is not meant arrogantly, but the size of the individual panels, the number and scale of the buildings on the site will change the landscape for ever.	Yes	In total, the Applicant has reduced the area covered by panels from phase one s47 consultation to what is presented in the final Environmental Statement (document reference 6) from 56.5 to 45.5%.

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CH_email_532	Member of public	11/07/2018	12.37pm	3. The panels will be larger in aspect than many houses and there is planned to be many thousands of them. The total area proposed is larger than the area of the nearby market town of Faversham, which is a planning proposal that would normally be rejected instantly, but in this case will be considered not locally but nationally with the inherent risks of no local knowledge. It could be argued that the scale of the development has been increased in order to avoid local decision making.		The Applicant's aim is to create clean, affordable renewable energy for over 91,000 homes. The Development well exceeds the National Significance threshold for onshore developments of 50MW.
CH_email_532	Member of public	11/07/2018	12.37pm	8. Technical progress is necessary. I was an expert member of The Institution of Civil Engineers “State of the Nation” reports into infrastructure during the early 2000’s which strongly urged Government to take action over the lack of strategic policy regarding power supplies. I am an advocate of solar energy. I am however opposed to an industrial development on what has been reported to be 1000 acres of farm		Noted.

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				land, meadow and marshes in a completely rural landscape.		
CH_email_541	Member of public	11/07/2018	10.21pm	Formal Response to the Public Consultation for the Development of Cleve Hill Solar Park This letter sets out our formal response to your phase two consultation process from the residents of[redacted]		Noted.

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CH_email_541	Member of public	11/07/2018	10.21pm	7. Size of the Solar Power Station The scale of the solar power station is completely unreasonable and proves in itself that it is unsustainable to use current technology to be able to produce effective 'green' energy without trashing large areas of the country. The development is bigger than the town of Faversham and yet will only generate electricity 11% of the time and requires the world's biggest battery in order to store the electricity for use at peak times. This scheme generates money for a few people without giving anything back to the communities which are being destroyed. What are you doing for the village school, for the people of Faversham who will lose out on tourism, for the people of Graveney who will have to look at it every day and who will see the value of their properties reduced? This project centres around greed for those few people who are going to make a lot of money out of it, it	Yes	These are the views of the respondent. For clarification the Development is designed to generate clean, renewable power. There is no evidence to suggest that solar farms impact property prices positively or negatively. The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.7km of native hedge row screening to mitigate the potential visual impact of the development.

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				is not in the public interest and sets a dangerous precedent for the rest of the UK as there is currently no strategic direction from the Government so we could see other large scale developments like this one on other equally inappropriate locations, scarring our landscapes unnecessarily.		The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference number 6.4.7.5).

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CH_email_552	Member of public	12/07/2018	3.39 pm	Although I do not live in the area affected by the proposed industrial development, I know it well and strongly object to the whole venture. I have no quarrel with solar power, but this is on far too large a scale, creating unacceptable visual and ecological impact; Its proposed location on a highly sensitive site - the immediate hinterland to the nature reserve on the south shore of the Swale, and its proximity to the nature reserve in Sheppey, on its north shore - is environmentally irresponsible; and your claim - that a south of England location is the only one suitable for a solar park - is ridiculous. There are successful solar parks (on a more acceptable smaller scale) here in Lincolnshire, where space for such ventures is far less limited than the Cleve Hill site; we have more clear sunny days here than in Kent, and summer days are longer than in Kent, giving maximum effectiveness of solar panels. Solenergi FUSen A/S have had a solar plant way north at Vestby, in		Please see a detailed description of the site selection for the Development in Chapter 4, Environmental Statement (document reference 5.1).

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				Norway, since 2014, and Wirsol - part of your own consortium - have an 80 hectare solar park in Denmark - so please do not claim that sites farther north are unsuitable or try to justify your Graveney project by giving the impression that only a southerly site, and only this particular southerly site, will be appropriate for this massively overscale project.		

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CH_email_556	Member of public	12/07/2018	4.10 pm	We support the idea of solar power but consider that the proposed solar farm/power station is totally unacceptable in this particular location. We still have many serious concerns about the proposals as presented at the second consultation.		Please see the site selection process detailed in Chapter 4, Environmental Statement (document reference 6.4)

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CH_email_556	Member of public	12/07/2018	4.10 pm	1. The scale of the proposal and its effect on the local countryside This proposal fails to take account of the visual beauty of the Graveney marshes and its attraction to walkers, artists, birdwatchers and tourists. Faversham, with its long history and attractive old buildings, is increasingly a destination town. Visitors come to explore not just the town but the surrounding area as well. The Saxon Shore Way from Faversham round to Seasalter is a well-advertised walk and, should this become part of the English Costal Path, the area is likely to become even more popular. Along this footpath people can presently enjoy huge horizons, both out to sea and inland but the enormity of the present proposal will cause unacceptable damage and loss of amenity to the entire Graveney marsh area, as well as to the neighbouring towns of Faversham, Whitstable and Canterbury.		Please see the LVIA presented in Chapter 7, Environmental Statement (document reference 6.1.7) and socio-economic assessment in Chapter 13, Environmental Statement (6.1.13).

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CH_email_556	Member of public	12/07/2018	4.10 pm	We do not think sufficient evidence has been provided to justify the building of the UK's biggest solar farm/solar power station in this particular location. As we understand it, from the limited evidence supplied of what this proposal will look like, the concentrated east-west solar panel orientation, with panels as high as double-decker buses, will create the appearance of roofs to massive industrial warehouses. No model has yet been produced to show the local community what this proposal will ACTUALLY LOOK LIKE.	No	The Applicant presented detailed photomontages and the LVIA assessment in the PEIR for consultation. Please see the LVIA presented in Chapter 7, Environmental Statement (document reference 6.1.7) for the complete LVIA assessment and accompanying technical appendices in volume 6.3.
CH_email_556	Member of public	12/07/2018	4.10 pm	We are not aware that consideration has been given to the potential impact that the enormity and scale of this proposal, as it currently stands, will have on Faversham's tourist industry.		Please see the socio-economic assessment in Chapter 13, Environmental Statement (6.1.13).

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CH_email_556	Member of public	12/07/2018	4.10 pm	The boundary of the original proposal has now been extended to 1,000 acres to include an already existing Site of Special Scientific interest. We do not understand how such an extension of the site consequently mitigates the adverse impact of the proposal on bird species and their loss of habitat.	No	At phase one s47 consultation , land adjacent to the Development is designated as SSSI, SPA and Ramsar the land where the infrastructure associated with the Development will be built is not designated or subject to any restrictions in respect of agricultural management. In response to comments from the HMSG, the additional areas included in the Development since the PEIR, which comprise part of The Swale SPA/SSSI/Ramsar site, will not contain any new development structures; they are included to facilitate ongoing maintenance of the sea wall and to bring biodiversity benefits through more appropriate management of the freshwater grazing marsh in the east of the site.

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CH_email_556	Member of public	12/07/2018	4.10 pm	We are also concerned about the impact of noise from the solar park/power station on the wildlife, particularly as details about the storage batteries and the transformers have yet to be finalised.	No	The Applicant has avoided potential noise impacts relating to the Development by designing out potential noise pollution upon receptors. This has been done by placing transformers away from the nearest receptors, and surrounding the energy storage facility and substation compound with a 7m high bund. The Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) set out the predicted noise levels and outlines the mitigation proposals. Noise during the operational phase of the development is assessed in the Environmental Statement, Chapter 12: Noise and Vibration Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100% capacity, during both daytime and night-time

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						periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be lower than the limits set out in the Chapter.

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CH_email_560	Member of public	12/07/2018	5.41 pm	In view of all the Objections, and the variety of more appropriate alternatives, I look forward to hearing that you will now withdraw your Application.		Objection noted.
CH_email_560	Member of public	12/07/2018	5.41 pm	The 2-meter-high fencing and security lighting is highly intrusive to all views of the site, but especially to users of public footpaths, including the well-used Saxon Shore Way which forms part of the National Coastal Path. This would also be the longest industrial site along this path. The Applicant has not met any of these restrictions, so the Application must be refused	Yes	The Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) sets out the type of fencing which will be used by the Development. The Applicant has proposed to use mammal-friendly deer-fencing which will include mammal gates every 50 metres to prevent any loss to connectivity.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Apart from the land disturbance from placing the equipment on the land, the cable connections from the panels to the 73 transformers and from them to the Substation will 1.1 metres underground (Table 5.4 and para 5.34.6) and so will further disturb the soil and vegetation, affecting the biome and drainage . The wild life fencing is planned to be 2 metres high (para 5.3.4.7) which would keep out more than deer, in fact all animals and birds larger than the mesh size, causing further disruption to the ecology.	Yes	The Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) sets out the type of fencing which will be used by the Development. The Applicant has proposed to use mammal-friendly deer-fencing which will include mammal gates every 50 metres to prevent any loss to connectivity.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Negawatts' is a term used for paying for measures that reduce demand, such as replacing inefficient lighting or appliances with more efficient ones, and thus reduce electricity consumption. This also reduces carbon emissions because electricity use whether from fossil fuels or renewables is reduced. Ernst & Young may not be the first name that comes to mind for electrical supply expertise, but being forward looking they have seen the benefits of Negawatts. (www.ey.com/gl/en/industries/power---utilities/ey-negawatts-the-answer-to-the-volatile-grid)		The Applicant confirms this is a typo and should be 'Megawatts'.

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CH_email_560	Member of public	12/07/2018	5.41 pm	A Nationally Significant Infrastructure Proposal (NSIP) can only be permitted if the damage caused by the Proposal is clearly outweighed by the expected benefits. The ecosystems, biomes and species are irreplaceable so their value is infinite and incalculable. In contrast the benefits from the scheme is some extra solar electricity for the grid, which could be more easily provided on the roofs on the thousands of new houses and commercial developments being built in Canterbury and Swale and would have greater local employment benefits. These panels would cause no damage to ecosystems because they are new houses. Such justification has not been provided so Proposal cannot be accepted.		The Development has been assessed in accordance with the relevant EIA regulations and laws for NSIP projects and will be decided on in accordance with the Planning Act 2008 and relevant planning and environmental policy, where the Development significantly exceeds the 50MW threshold for nationally significant projects.

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CH_email_560	Member of public	12/07/2018	5.41 pm	This needed to be worked out and the development justified in that context; there was a difference in national and local designations." This suggests that if a smaller scheme had been proposed the restrictions would be greater – and therefore the proposal would be more likely to be refused. Hence the Applicant appears to have deliberately chosen the larger size to fall within NSIP classification and thereby over-ride protection for valuable aspects of Graveney Marshes and its surrounding habitats.		Noted. These are the views of the respondent.

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CH_email_570	Member of public	12/07/2018	8.53 pm	I found out about the solar park/farm some months ago now. I cannot convey how heart-breaking this is. A plan to cover acres of a unique and beautiful area, in plastic— I had lived in Whitstable for around 8 years before moving to Canterbury, 11 years ago. However, since the 1950's generations of my family have holidayed in Seasalter. Although, nowadays, I live some about[redacted] away from Graveney, over the years I have spent many hours there. Walking my dogs and being absorbed by the wildlife, enjoying the peace. Rare in this corner of Kent.		Noted. These are the views of the respondent.
CH_email_570	Member of public	12/07/2018	8.53 pm	My favourite time of year is winter. Winter on Graveney Marshes is rough and wild. I love it.		Noted. These are the views of the respondent.

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CH_email_570	Member of public	12/07/2018	8.53 pm	I've looked at solar and I believe it is not the sole answer. There are so many more things to look at without plastering the countryside with plastic... Not very profitable- (initially) but brownfield sites MUST be used. We need to save arable land to feed people. And to give people the opportunity to experience the peaceful freedom these marshes provide. Kent Wildlife Trust responds to Kent County Council's proposal to dispose of open space (2016). They themselves have recently stated that "we must ensure that we look after nature and our open spaces".		Noted.
CH_email_618	Member of public	13/07/2018	3.58 pm	2. I strongly oppose this application and I set out some of the main reasons below;		Objection noted.

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CH_email_618	Member of public	13/07/2018	3.58 pm	Scale 3. The scale of the proposed development, bigger in fact than Faversham itself, is entirely unacceptable. If it were to go ahead it would have a hugely detrimental effect environmentally and in terms of visual impact.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_618	Member of public	13/07/2018	3.58 pm	4. Like the great majority of people I welcome more of our energy being generated from renewable sources and wish to see carbon emissions reduced. I fully understand the need for governments to take action concerning climate change. However, I am concerned that solar power whilst it has its place as part of a range of renewable energy sources, a large-scale development such as is proposed here is not the way to go in the UK given its unsuitable climate. The fact that it appears that this proposal requires such a vast development in order apparently to be economically viable supports this view. I do not believe that the resulting loss of amenity and wildlife habitat is a price worth paying.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_618	Member of public	13/07/2018	3.58 pm	Uncertainty 5. The nature and scale of the proposals has been uncertain, increasing and experimental in nature. It is apparently some 15 times the size of the largest UK solar farm and it is concerning that during the consultation process, there have been numerous changes to the proposal and there is much uncertainty regarding the proposed battery installation. It is extremely worrying that this special landscape is being used for such a large-scale experiment as this.		The Applicant - Cleve Hill Solar Park, is comprised of two highly experience solar farm developers: Hive Energy and Wirsol Energy. The Development is not an experiment project. As a NSIP, the Development has the potential to provide over 91,000 homes with clean, affordable energy. Please see a detailed description of the Development in Chapter 5, Environmental Statement (document reference 6.1.5).
CH_email_618	Member of public	13/07/2018	3.58 pm	6. I am also concerned that if Graveney Marshes are lost to this development it will create a precedent that over time, will allow more of Kent's marshland to succumb to industrialisation.		All future applications will be subject to the same planning process.

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CH_email_625	Member of public	13/07/2018	5.38 pm	Ref: Proposed Solar Park Cleve Hill, Graveney Kent Dear sirs, I apologise for the lateness of submission of this letter reference the above but I understand that the closing date is today 13th July 2018 and I hope you will take my views into consideration. I have looked at the proposal and as an engineer I am shocked by the sheer size of the proposed park.		The Applicant has taken into the consideration the late response and recorded the response in its overall analysis presented in Chapter 10, Consultation Report (document reference 5.1).
CH_email_625	Member of public	13/07/2018	5.38 pm	From what I can see, reference the scale and impact of this project, the whole thing is experimental. If nothing this size has ever been considered before, then it is experimental and I am not your experimental animal. Neither are all the other people, animals, birds etc. that live around this area. Best regards		The Applicant - Cleve Hill Solar Park, is comprised of two highly experience solar farm developers: Hive Energy and Wirsol Energy. The Development is not an experiment project.

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CH_email_626	Member of public	13/07/2018	5.44 pm	Subject: Cleve Hill Solar Farm Phase 2 Consultation Dear Cleve Hill Solar Community Relations Team, I wish to register my objection to the scale of the proposed Cleve Hill Solar (PV) Farm to be located north of Faversham near Graveney, Kent. I am not opposed to unsubsidised renewable energy generation and neither am I a Nimby or a BANANA (Build-Absolutely-Nothing-Anywhere-Next to-Anything). I wholeheartedly support the increased use of renewable and solar energy sources in the UK. But as the “largest solar park in the UK” and as with any “first of its kind” project there are unknowable risks and I am not assured that the proposals have sufficient mitigations in place		The Applicant has assessed the potential impacts of the Development in the Environmental Statement (document reference number 6.1)

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CH_email_640	Member of public	13/07/2018	11.50pm	Cleve Hill Solar Park Phase 2 Consultation Whilst a supporter of initiatives to increase the UKs production of green energy I am concerned that the scale of this proposed operation will result in the industrialisation of a significant proportion of the Swale North Kent Marshes landscape and have a significant impact on the wildlife of the area.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
CH_Freepost_645	Member of public	16/07/2018	10.00am	Dear sir or madam, I wish to register my very strong objection to this proposed building of a massive unsightly solar park which would cover across acres of beautiful Kent marshes. This would a great shame to cover an area of natural beauty essential jar, animals, and rare birds.		Objection noted.

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CH_Freepost_645	Member of public	16/07/2018	10.00am	Also, I fell it would be a disgrace to destroy this beautiful part of Kent for future generation to come. Your sincerely		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
CH_email_526	Faversham Lib Dems	10/07/2018	8.44 am	The Liberal Democrats believe that climate change and air pollution threaten the future of the planet, and that in the UK and internationally we should be investing in and supporting renewable energy, however we do not support this particular proposal as we consider that there are on balance a greater number of identifiable concerns as compared to the potential benefits which may be produced by this project.		Noted.

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	Therefore, we object to and oppose the proposal to construct and operate a solar photovoltaic electricity generating and storage facility at Cleve Hill, Graveney, nr. Faversham, Kent. Our objection to this proposal is made, in summary and not exclusively, on the following grounds:		Noted.

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	2. The size and location of the proposed site for this facility: The planned project site is located near the village of Graveney, about 2 km North-East of Faversham and 5 km West of Whitstable on the North Kent coast. The project is described in the application as covering an area of approximately 890 acres (365 hectares). Descriptions of the size of the project site have recently increased in information provided in the most recent phase of the consultation to 1000 acres. It is clear from the site plan that the project site covers an area of land larger than the village of Graveney and the town of Faversham combined. The size of the proposed facility and its close proximity to towns and villages are to our knowledge, unprecedented in the UK. The facility will, if constructed, therefore dwarf the communities which border it, and the risk of the potential negative effects on those communities is	Yes	The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. As a result, the proportion of the developable area of the site with solar PV modules has decreased from phase one Section 47 consultation to the final Application from 56.5% to 45.5%. The Applicant has also worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development

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				enlarged as is the extent to which they will be felt by the people who live nearby. The scale of the project will also we believe risk greater magnification of potential negative effects in respect of wildlife populations.		will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_537	Helen Whately	11/07/2018	4.45 pm	Overall, I remain very concerned about the sheer scale of the proposal. Whilst I understand that you have taken steps to pare back parts of the site, one simply cannot escape the fact that this is a vast area of landscape that will be lost.	Yes	Since PEIR stage the Applicant has sought to further reduce the area covered by solar panels. This has resulted in a total decrease from phase one Section 47 consultation to the final Application from 56.5% to 45.5%.
CH_email_537	Helen Whately	11/07/2018	4.45 pm	The main concerns I would like you to consider are as follows: • Size and location of the site – Despite paring back the size of the site, the sheer scale of the proposal remains huge. The marshes are a special, tranquil and beautiful landscape that should be protected for future generations to enjoy. Is this the right location for such an ambitious project?		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_537	Helen Whately	11/07/2018	4.45 pm	I find it very difficult to believe that this development can be done sympathetically, in a way that is not detrimental to wildlife or the local community. I would urge you to think again about your proposal.		This is the opinion of the respondent. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_595	Faversham Town Council Town Clerk	13/07/2018	12.56pm	Among other things, the FTC has strong concerns as to the size, location and visibility of the proposed Solar Farm from the surrounding areas. The PEIR touches on many aspects but none of these are covered in any great detail, leading one to believe that at this stage lip service only is being given to many of the very important aspects of the existing legislation and guidelines laid down by Government, Kent County and Swale Borough Councils. these must be fully addressed and information divulged to these authorities and the General Public before any decision is made to go forward with any formal Planning Application.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_534	All Saints Church	11/07/2018	3.19 pm	The size of the proposed solar farm, the same as the nearby town of Faversham, means that the village of Graveney would be dominated by an industrial site viewed not only from surrounding areas on the mainland but also by the Isle of Sheppey. The nearby marshes border a unique and unspoilt stretch of the Thames Estuary and are a haven for wildlife some of which is protected by the 1981 Wildlife and Countryside Act, making it, amongst other things, illegal to disturb wild birds, their nests, their eggs or their young. The Act also lists rare species which have extra protection and the marshes are home to many of those species. It is not only a special area for birds; it is also an important area for other species including great crested newts and water voles.	Yes.	The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. As a result, the proportion of the developable area of the site with solar PV modules has decreased from phase one Section 47 consultation to the final Application from 56.5% to 45.5%. The Applicant has also worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development

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						will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_534	All Saints Church	11/07/2018	3.19 pm	I urge the Inspectorate to refuse this application		Objection noted.
CH_email_536	Seasalter Chalet Owners Association	11/07/2018	3.49 pm	I am the Chairman of the Seasalter Chalet Owners Association, which represents a group of 27 chalets situated at Graveney Beach, Seasalter. On behalf of my members I wish to object to your plans to develop a solar park at Cleve Hill. The chalet owners have enjoyed the facilities of the Graveney Marshes for many generations and feel the proposed development will industrialise what is essentially a unique rural and estuary landscape. The scale of the proposal is out of all proportion to the benefits obtained and we feel there are other brown field sites which would be more appropriate and would not cause such an environmental impact.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_536	Seasalter Chalet Owners Association	11/07/2018	3.49 pm	When the current Cleve Hill Electricity Sub Station was in the development stage, we voiced the opinion that this was the tip of the iceberg and would lead to further development on the site. We were assured this would not be the case and that no further building would take place in the future; we now know this to be absolutely disingenuous. We now find that even your proposed substation and battery array is almost 4 times larger than the existing substation without even taking into consideration the area occupied by the actual solar panels. We understand the battery installation will be the largest in the world and, given that you have recently stated that the output of the site will be increased, we would imagine this area will again be enlarged from its current 8.5 hectares. I should be grateful if you would advise me if it is Hive's intention to further increase the size of this area. Given the predictions of the noise pollution of the batteries would be over 100 decibels we are		Information including the Rochdale Envelope parameters and energy storage facility are clearly set out in Environmental Statement Chapter 5: Development Description (document reference 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have the same magnitude effects, or effects of lesser magnitude than those included in the Environmental Statement (document reference 6.1).

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				concerned that even more units would make the noise levels intolerable.		

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CH_email_536	Seasalter Chalet Owners Association	11/07/2018	3.49 pm	I would like it known that all 27 chalet owners within our Association are against development consent being granted and will use all our legitimate powers to object. Yours sincerely,		Objection noted.
6. Legislative and Planning Policy Context						
CH_Freepost_485	Member of public	01/07/2018	10.30am	Compulsory Acquisition powers – In your meeting with the planning Inspectorate on 30 April you advised the order would seek compulsory acquisition powers over approximately 10 plots. Does this include Warm House?		The Applicant explained how the compulsory acquisition powers worked in relation to the DCO application at a face-to-face meeting on 4 July 2018. It was explained there that the powers would only apply to land within the DCO boundary.

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CH_email_560	Member of public	12/07/2018	5.41 pm	1 Government policy The government's UK Solar PV Strategy (www.gov.uk/government/publications/uk-solar-pv-strategy-part-1-roadmap-to-a-brighter-future) states that proposers must ensure that their proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity, and provide opportunities for local communities to influence decisions that affect them. This is also the view of the Planning Practice Guidance on Renewable & Low Carbon Energy.		No response required.
CH_email_560	Member of public	12/07/2018	5.41 pm	The Landscape Institute has Guidelines for Landscape & Visual Impact Assessment (GLVIA) and this shows that Graveney Marshes are a very sensitive location.		No response required.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Contravening Planning Protections The generation capacity of the proposal has been chosen to enable it to be considered by the Infrastructure Planning commission (IPC). The key aspects of the proposed site appear to be the availability and proximity to the national grid connection, but the damage caused by the proposal on the proposed site would far exceed the extra costs of grid connections elsewhere.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
CH_email_560	Member of public	12/07/2018	5.41 pm	At the meeting at CPRE Kent 22/3/2018 (see Annex, below), in response to questioning development in or near designated areas, the Applicant's representatives (Hugh Brennan & Emily Marshall), said that "as this was a Nationally Significant Infrastructure Project (NSIP), things were regarded differently.		No response required.

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CH_email_560	Member of public	12/07/2018	5.41 pm	This also appears to explain the Applicant's comment at the IPC Meeting on 30/4/2018. The Meeting Note, 'Any other business', says that the Applicant has been discussing the possibility of disallowing legislation relating to the EA. This suggests that the proposal could conflict with such legislation and therefore infringe the protections intended to be provided by the legislation. A key Planning protection for designated sites is that not only are they protected from development on the site itself but also from developments nearby which could affect them. Hence Graveney Marshes are protected against the proposed development because it would also adversely affect the neighbouring protected sites.	No	The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable.
7. Landscape and Visual Impact Assessment						

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CH_call_471	Member of public	20/06/2018	4.20 pm	He has picked up some literature and a feedback form from a local information point in Sheppey. Wanted to know where the site was exactly, and why these documents were being hosted in Sheppey. It was explained that this was to allow people who lived and/or worked in Sheppey to remain informed about the project. His interpretation of the solar park was that it would not be visible from Sheppey and he is aware that the types of solar panels will be different to the traditional style of solar panels.	No	Please see Volume 3 of the Environmental Statement (document reference 6.1) and Chapter 7 (6.1.7) for the LVIA assessment and viewpoints from Sheppey.

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CH_email_413	Member of public	05/06/2018	05.18am	There are some important points to note. 1. None of the properties in Residential Cluster 8 have been mentioned in the detailed assessment sheets, for example Vine Cottage, 1 New Houses, Sparrow Court, and the Old Vicarage even though Figure A7 5.9 shows a photo image which covers the views which are currently enjoyed by each of these properties. Please can you address asap and also provide me with the RVAA report relating to Sparrow Court. 2. The green outline of Residential Cluster 8 does not encompass the full extent of the land which forms part of Sparrow Court and there is no photo image of the proposed development site from the garden or paddock areas which extend right up to the solar park's boundary line for around 240 meters. Please can you address asap		The residential amenity assessment for this property is contained with the Residential Visual Amenity Assessment Technical Appendix A7.5 of the ES (DCO document reference 6.4.7.5).

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				his as the proposed development would be of major impact 3. There is also no photo image showing Cleve Hill from Coney Banks or any detailed assessment sheet despite the proximity of this property to the proposed development site Please can you address this asap.		

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CH_email_451	Member of public	15/06/2018	10.27am	Please can you send me all photographs of the site you presented at yesterday's meeting in their unedited state ASAP. I'm talking, colour perspective, light, dark etc. Just as the photographer took them. I also would like to have copies of ALL your mock up solar images too. A spokesperson confirmed that you have more photographs taken at different times of the day and various times of the year that you have chosen not to share with us. These are being used for the application I was told and we need to see all imagery used in the application process not carefully selected ones. I would like copies of all your images that you are presenting as part of the application that includes photographs, mock ups, drawings etc. The photographs you provided		The visualisations within the ES have been prepared in accordance with Landscape Institute's 'Photography and photomontage in landscape and visual impact assessment Advice Note 01/11'. The imagery is prepared using 50 mm single frame photographs captured on a full frame sensor digital SLR camera. The imagery is then stitched together using a cylindrical projection to form the panoramic images used within the ES. Due to the extents of the site and the locations of the agreed viewpoints, panoramic images are the most suitable way to display the photomontages and provide sufficient context of the surrounding landscape. The methodology for photography and visualisation is found in Technical Appendix 7.1 (DCO document reference 6.4.7.1).

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				were not clear enough and had been chosen specifically so the panels blended with the landscape. This is not how it will look in reality and you have also not represented the scale (height) of the panels clearly enough in the images or the perspective. Fish eye lens images are distorted and not good enough either. I look forward to receiving them.		

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CH_email_488	Member of public	29/06/2018	7.40 am	I object to the plans for the solar farm on Graveney Marshes. I'm currently walking the Kent Coastal path, starting at the border with Sussex and have just reached Conyer. To my surprise I'm finding the path beside the creeks to be even more beautiful than the path by the sea. The stretches by the creeks, and especially at Graveney, are hauntingly beautiful, isolated and unspoilt. There is a wide variety of wild flowers and bird life. The solar farm will change the area irrevocably.	No	Comment noted.
CH_email_492	Member of public	29/06/2018	12.24pm	Yes, that is fine. Can you also confirm whether, as I asked months ago and more recently at the public exhibition, will there will be photos taken from the middle of the site. i.e. half way along the public footpath that cuts through the middle of the site, to produce accurate visualisations of being between two 'fields' of 4 m high panels? Thank you	Yes	The Applicant has undertaken an additional photomontage, included as viewpoint 22 of the LVIA presented in Volume 3 of the Environmental Statement (6.1) with the assessment in 6.1.7.

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CH_email_529	Member of public	10/07/2018	4.19 pm	I do not support the proposals for the Cleve Hill solar farm due to the landscape and visual impact of the proposals, on the experience of the area from permissive footpaths and rights of way and its relationship to the nature conservation areas that surround it. It's too big a single mass of solar. Any solar development will have to show how it is designed to have no impact on nature, including the connections between natural areas and management of the site, including cleaning the panels. The option for using bird deterrents of any kind must be excluded with oversight by the local wildlife trusts. Please keep me updated on the project and further consultations.	No	Comment noted
CH_email_582	Member of public	13/07/2018	9.09 am	I would strongly object to this site going ahead. It's an area of outstanding natural beauty and the loss of such would be a travesty.	No	Comment noted

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CH_email_583	Member of public	13/07/2018	9.28 am	I am responding to the consultation on the proposed solar development at Cleve Hill. I generally welcome the development of renewable energy and recognise it is essential to tackle climate change. However, I have objections to the development as it is currently proposed. It is too large and is likely to have an adverse impact on wildlife, especially birds. The proposed site is in an open landscape and the development will have a major impact on the landscape. These impacts will be especially apparent from the Saxon Shore Way where the elevated route of the path, on top of the sea wall means that the solar panels will dominate landward views, My main concerns about the impact on birds are that the proposed mitigation area is too small and partly in the wrong location and that the development	Yes	In consultation with the Habitat Management Steering Group, the Applicant has increased the Arable Reversion Habitat Management Area from 41ha to 56 ha, which is due to using Field J for the AR HMA. The Applicant has also created a separation distance of 63m from the solar PV modules to the Saxon Shore Way.

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				encroaches too close to the Delph ditch. I am not convinced by the calculations presented that the proposed area will be large enough and much of it is too far from the estuary and unlikely to be used. I suggest that extending the mitigation area to include compartments J, H and F would provide an area more likely to be used by geese and also reduce the landscape impact. The ditch to the south of sea wall is an important area for breeding and migrating birds as evidenced by ringing there. The close proximity of the panels to the reeds is likely to diminish its importance as birds often seen moving between arable crops and reed bed. If the panels were located 50 metres south of the ditch this would provide opportunity for further habitat enhancement included some limited scrub planting. This would also lessen the visual landscape impact when seen from the Saxon Shore Way.		

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CH_email_418	Member of public	06/06/2018	9.56 am	Views – With the increased elevation of these panels can you please comment on the height and materials you intend to use to secure the site? I was advised at the first consultation that these would be 2 metre steel – clearly this would now seem inappropriate and our question is how do you intend to screen this development on the north elevation? Can I also comment that your photographs and descriptions of the marsh are very negative? Your perception is that this land is worthless and that there is nothing to be lost. Can you please refrain from describing something as unique as the marsh in this manner?		The deer fencing proposed is 2m high with security camera height is 3m high. These are reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) along with the dimensions of all equipment associated with the Development. Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7) acknowledges that there is a loss to arable farm land and assesses the landscape and visual impacts associated with the Development.
CH_Freepost_479	Member of public	22/06/2018	12.34pm	Your consultation questionnaire is disingenuous. Yes, I have seen a ground mounted solar development before. No, I do not want to recommend and local species to screen the industrial complex. How different from the local farmer who has quietly planted numerous native hedges and trees.		This is the opinion of the respondent.

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CH_Freepost_485	Member of public	29/06/2018	10.30am	Residential Visual amenity assessment – On page 20 of this document you conclude that "views form the properties would experience change in their views, but through mitigation many adverse effects have been addressed and therefore the solar development is not considered to create an unpleasant or unattractive presence upon the living conditions at this property". We have MAJOR CONCERNS with this document and the way in which this conclusion has been reached:		This is the opinion of the respondent.

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CH_Freepost_485	Member of public	01/07/2018	10.30am	In light of the above statement, for the detailed visual amenity assessment they have stated the closest window (selected based on worst case visibility) as the kitchen. This is obviously a view that is severely impacted by the development but the spare double bedroom has the same view but from the second story, surely this is therefore the worst case based on visibility? The assessment also states that the study is of low sensitivity, however, this is a room which is used daily as an office plus as an additional spare room for guests, how can this be low? The spare double bedroom (which you have stated is a single when it is fact a double) has medium sensitivity, even though this room is not used on a daily basis it is still the worst affected, it is still the worst affected, it is also a room where the door is left open and therefor the views are seen from the landing and are views which `I look at every day as I get up and pass between rooms upstairs. As a passing through space alone this		There is no published guidance on Residential Visual Amenity Assessment. The Landscape Institute has draft guidance for consultation but it has not yet been formally published. The methodology used to undertake the assessment on properties within the RVAA for the ES is presented in Technical Appendix A7.5 (DCO document reference 6.4.7.5).

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				has just as much impact as the lounge which is graded as high sensitivity.		

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CH_Freepost_485	Member of public	02/07/2018	10.30am	The main worry with this document is that the detailed visual amenity assessment mentioned above is used to provide a judgment which goes on to say “Embedded mitigation has moved the development footprint away from the property by 84m. Further mitigation would create a strong visual screen to the development reducing the effects upon the property. In light of this major effects would be reduced within a period of 10 years post construction, particularly for the ground rooms and garden.”		Assessments are found in RVAA Technical Appendix A7.5 (DCO document reference 6.4.7.5). Mitigation proposals are set out in the Landscape and Biodiversity Management Plan Technical Appendix A5.2 (DCO document reference 6.4.5.2).
CH_Freepost_485	Member of public	03/07/2018	10.30am	Therefore, on our view, a biased and incorrect assessment concludes that after 2 years (2 years construction and 10 years post construction) the major effects would be reduced for the ground floor and gardens (what about the second floor)?! Why do we have to wait 12 years for effects to be reduced! With a projected lifespan of 40 years this is over a quarter of the lifespan of the development.		Assessments are found in RVAA Technical Appendix A7.5 (DCO document reference 6.4.7.5). The planting takes time to fully mature and won't provide instant screening to the Development. Mitigation proposals are set out in the Landscape and Biodiversity Management Plan Technical Appendix A5.2 (DCO document reference 6.4.5.2).

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CH_Freepost_485	Member of public	27/06/2018	10.30am	We feel that the assessment should conclude as MAJOR effects (not Major/Moderate) and therefore DOES 'Create and unpleasant or unattractive presence upon the living conditions at this property'.		The assessment for all property groups and individual properties has used the methodology set out in Residential Visual Amenity Assessment Technical Appendix A7.5 of the ES (DCO document reference 6.4.7.5).
CH_Freepost_485	Member of public	28/06/2018	10.30am	We would also draw your attention to the last paragraph of point 8 in background on page 1 of this document which states: "However, when turbines are present in such number, size and proximity that they represent an unpleasantly overwhelming and unavoidable presence in main views from a house or garden, there is every likelihood that the property concerned would come to be widely regarded as an unattractive (rather than simply less attractive, but not necessarily uninhabitable) place in which to live."		There is no published guidance on Residential Visual Amenity Assessment. The Landscape Institute has draft guidance for consultation but it has not yet been formally published. The text refers to an appeal decision (albeit in relation to wind turbines) to inform the methodology of the RVAA. It is acknowledged that this Development is a solar PV facility rather than a wind farm. The Residential Visual Amenity Assessment of the ES can be found Technical Appendix A7.5 (DCO document reference 6.4.7.5).

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CH_Freepost_485	Member of public	29/06/2018	10.30am	Surely 988, 960 solar panels on 3016 tables 28m long by 24m wide and up to 4,5m in height with a minimum distance of 84m from the property WILL MAKE warm house and unattractive place to live!		Panel heights range from heights of 3-3.9 m across the Development site. The residential amenity assessment for this property is contained with the Residential Visual Amenity Assessment Technical Appendix A7.5 of the ES (DCO document reference 6.4.7.5).
CH_Freepost_485	Member of public	30/06/2018	10.30am	Finally, the panoramic images produced as part of this document give a misleading overview of the visual impact, as seen on the following page. SEE IMAGES ATTACHED		The viewpoints and visualisations are produced using methodology set out in Technical Appendix 7.1 of the ES (DCO document reference 6.4.7.1).
CH_Freepost_485	Member of public	01/07/2018	10.30am	The scale of these images and panoramic views they show reduce the impact of what you are looking at. To be so narrow that 3 full width images landscape on A4 (which is the largest printer we have) only takes up half the page is not represented of what the eyes see. It is the equivalent of looking through a letter box. Once again images have been displayed or produced in a way to hide the real impact of this development. With regard to the year one image we		The visualisations are designed to be viewed at the paper size that is shown in the detailed information in the bottom left hand corner of the viewpoint or visualisation sheets to represent the development at the correct viewing distance. The CAP sites hosted full size versions for viewing during Section 42 consultation. The viewpoints and visualisations are found in Volume 3 (DCO document reference 6.3).

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				note that no screening is even yet in place!		
CH_Freepost_485	Member of public	02/07/2018	10.30am	With all the photo montages of this entire side of the development no other infrastructure is shown (invertors, transformers, cabling, haul road) why is this?		All visualisations include the other infrastructure associated with the development. In some instances, this won't be seen due to heights of panels and distances from of these from the viewpoint. Visualisations are contained within Volume 3 (DCO document reference 6.3).

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CH_Freepost_485	Member of public	03/07/2018	10.30am	However, the panels above are completely different to the ones produced, there will be a very little light available and the amount of water run-off from the panels will be substantially more as the size and spacing of the panels is vastly different, it will be much more like the image below shown on page 5 – 10 of the same documents as an example of the panels used. SEE IMAGE ATTACHED		The design of the Development is set out in ES Chapter 5: Development Description. It is acknowledged that the arrangement of solar PV modules will differ from most other UK solar PV sites deployed to date, however, the individual solar PV modules (panels) proposed are of the same approximate dimensions as most other solar PV modules (approximately 2 m x 1 m).
CH_Freepost_485	Member of public	29/06/2018	10.30am	In the same regards we feel that MATURE screening should be put in place as a first priority. When you see large building sites cities etc, screening is the first thing to go up! We would like to bring your attention to the year one Photomontage you provided in the visual amenity assessment shown again below: SEE ATTACHED IMAGE		The mitigation proposals and maintenance are set out in the Landscape and Biodiversity Management Plan in Technical Appendix A5.2 (document reference number 6.4.5.2).
CH_Freepost_485	Member of public	30/06/2018	10.30am	At this point, construction is finished and there is still no screening in place. Once again this highlights the lack of compassion to wildlife and local residents alike!		The mitigation proposals and maintenance are set out in the Landscape and Biodiversity Management Plan in Technical Appendix A5.2 (document reference number 6.4.5.2).

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CH_Freepost_485	Member of public	03/07/2018	10.30am	Screening – Should the development go ahead you have so far proposed setting the panels back from the house by 84m and screening the development with hedging and in front of this a wild flower meadow. Who is responsible for the upkeep of the screening and meadow, will this be regularly maintained, and will there be a point of contact should this not be kept to a set standard?	Yes	The panel design has set back panels from properties and provided mitigation planting between the properties and the Development. The site operator would be responsible for the maintenance of the planting proposals. The mitigation proposals and maintenance are set out in the Landscape and Biodiversity Management Plan in Technical Appendix A5.2 (DCO document reference 6.4.5.2)
CH_Freepost_485	Member of public	27/06/2018	10.30am	In addition to the screening we note there will be a security lighting around the park, are there any plans in place to prevent the sheep setting these off or will the screening (when it is in place after 12 years) just block these distracting lights out?	No	Visible lighting, which will only switch on when activated by sensors for security purposes, will be deployed around the electrical compound and at the transformers. The lighting will likely be fixed to the plant itself rather than being stand alone. No areas of the Development are proposed to be permanently lit.

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CH_email_513	Member of public	05/07/2018	6.01 pm	2. The proposed location is on an area that is vitally important for its landscape beauty, which has various designations including: a. Area of High Landscape Value b. Eastern Fruit Belt Character Area c. Graveney Marshes Landscape Character Area No amount of 'mitigation' can protect this from being destroyed by your proposals.		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7). It is reported in the assessment that the site is within Graveney Marshes AHLV and that there are effects on users of the Saxon Shore Way and other PRoW. These are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and supporting appendices Environmental Statement, Technical Appendices 7.1-7.7 (document reference number 6.4.7.1-7).

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CH_email_513	Member of public	05/07/2018	6.01 pm	3. The visual impact from the proposed development cannot be mitigated against. The area is known and used by locals and visitors for its natural rough beauty. Changing this into a sea of industrial solar panels will ruin this view for everyone and impact not only local people who currently enjoy walking along the Saxon Shore Way, but also local businesses who will undoubtedly see reduced numbers of tourists visiting the area.		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7). There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
CH_email_520	Member of public	09/07/2018	12.13pm	4. The land is best viewed from above, from the A299 at Wraik Hill, Whitstable and from the Isle of Sheppey (a bird's eye view!) From those positions it is easy to imagine the blight that would be put on the area by the scale of development.	No	Viewpoint 18 represents views from Wraik Hill. Viewpoint 16 represents a view from Whitstable Harbour. Viewpoints 14, 15 and 17 represent views from the Isle of Sheppey. These viewpoints are shown in Volume 3 (DCO document reference 6.3.1).

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CH_email_552	Member of public	12/07/2018	3.39 pm	2.The panoramic visualisations (do you mean "photographs"?) are very difficult to compare, as the sequence (and in most cases, the viewpoints) in the "1 year" and "10 year" views do not match the "Now" sequence. It is important that consultees are able to compare like with like. The projected "visualisation" of the proposed arrays of solar panels give the impression of a pleasantly distant blueish haze, as if of less visual impact than would be the case in reality. To pinpoint locations, a grid-reference would have been helpful for each view.	No	There are 22no. Viewpoints and 10. no visualisations which are presented in the Environmental Statement, these are shown in Volume 3 (document references 6.3.1-6.3.10). For each of the visualisations there is an existing viewpoint for each visualisation which is then shown at year 1, 5 and 10. All photomontages use the same photograph as the viewpoint photograph. The methodology used to take the photographs and visualisation production is located in Technical Appendix 7.1 (DCO document reference 6.4.7.1) Grid references are shown on each of the viewpoints and visualisation figures.

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CH_email_552	Member of public	12/07/2018	3.39 pm	3. The viewpoints chosen for the panoramic "visualisations" appear very selective, mostly from points where there would be least visual impact from the solar array. Notably absent was any view from the sea bank alongside The Swale, near, for example, Castle Coot/Horse Sand, looking due south across the proposed array - a view which would show the most severe visual impact of the proposed scheme. The four-mile stretch of the Saxon Shore Way between Faversham and The Sportsman, Seasalter, is one of the finest coastal lowland walks in Kent. It is also one of very few stretches of undeveloped coast and hinterland in the county - that huge amenity value, both to residents of the Faversham/Whitstable/villages locality, and to visitors to what is a highly popular holiday area, will be lost if your scheme goes ahead. 3 miles of that stretch of footpath would be bounded to landward by visually intrusive raised solar panels stretching south for a mile -		The Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), Table 7.1 includes a completed second column and when consultee comments were made. Consultation on viewpoints was undertaken at scoping and PEIR. A table has been added in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) which lists viewpoints, their reason for selection and their distance from site. These viewpoint photographs are found in the Environmental Statement, Volume 3: Visualisations, Viewpoints (document reference number 6.3.1). The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).

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				effectively an industrial site - were the proposals to be approved.		

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CH_email_556	Member of public	12/07/2018	4.10 pm	2. The visual impact of the proposal on the wider landscape We note that some screening mitigation is now proposed for nearby properties. It was helpful that at the exhibition at the Guildhall, Faversham, we were able to view the visual display that demonstrated how the proposal's intrusion on the landscape, from certain vantage points, gradually lessened over a period of 10 years. However, these vantage points are all relatively close to the proposed site of the solar farm/power station and we are not aware that the impact of the proposal on the wider landscape, when viewed from the higher ground lying only a few miles from Graveney marshes, has been assessed. Panoramic views over The Swale can be seen from various locations such as the A2 Boughton Bypass, London-bound, just after the Gate Service Station; the A299 Thanet Way, London-bound, alongside the Estuary View Business Park and		There are 22no. Viewpoints which represent various receptors within varying distances from the Development, which are represented both at summer and winter views. Viewpoint 18 represents views from Wraik Hill. All viewpoints are located in Volume 3 of the ES (DCO document reference 6.3). There are 10no. viewpoints represented as photomontage visualisations produced for the ES which are located in Volume 3 of the ES (DCO document reference 6.3).

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				the Wraik Hill and Foxes Bottom Local Nature Reserve (the excellent views being mentioned on many websites such as Visit Canterbury and Explore Kent). Another location where a beautiful panoramic view can be seen is Dawes Road in the village of Boughton and this viewpoint is referred to in the walking guide, "The Peasant's Last Revolt' (Section D4). (This particular walking guide is part of a series of Faversham Food Trails produced by the Faversham Enterprise Partnership working in collaboration with Faversham Area Tourism Association.)		

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CH_email_560	Member of public	12/07/2018	5.41 pm	The Proposal would be an Industrial complex in un-spoilt countryside, and would be over-bearing and out-of-scale. It would also completely change the character of the area. Hence it would have severely adverse visual impact particularly on the landscape and locality. It would also have adverse effects on the character and appearance of the Conservation Area and local heritage assets.		This is the opinion of the respondent. The visual effects of the Development are assessed and supported by viewpoint visualisations in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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CH_email_618	Member of public	13/07/2018	3.58 pm	9. I believe that the visualisations provided in your consultation are very misleading as they show only a distorted panoramic view subject to “compression” and they do not in any way show the extent of the full visual impact of these panels on the views of the landscape. You have not provided any visualisations from a “normal” perspective I feel very strongly that this is disingenuous and designed to disguise and considerably understate the visual impact. I would strenuously urge you to consider in your submissions to the Secretary of State more balanced and even-handed evidence relating to the visual impact of your proposals.	No	The visualisations within the ES have been prepared in accordance with Landscape Institute’s ‘Photography and photomontage in landscape and visual impact assessment Advice Note 01/11’. The imagery is prepared using 50 mm single frame photographs captured on a full frame sensor digital SLR camera. The imagery is then stitched together using a cylindrical projection to form the panoramic images used within the ES. Due to the extents of the site and the locations of the agreed viewpoints, panoramic images are the most suitable way to display the photomontages and provide sufficient context of the surrounding landscape. The methodology for photography and visualisation is found in Technical Appendix 7.1 (DCO document reference 6.4.7.1).

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CH_email_618	Member of public	13/07/2018	3.58 pm	11. The size of the site and the multiple points from which the panels and other site infrastructure will be visible will create an industrialized and developed landscape resulting in incalculable loss of amenity and I agree with the submission of the Faversham Society to your consultation that this will result in "a loss of inestimable value to visitors and to local people, not just in the immediate future but for generations."		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) reports on the baseline of the site and the landscape and visual effects of the Development. Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers recreation effects associated with the Development.

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	3. The likely visual impact and the deterioration of the character of the landscape upon which the solar park would be built, and the landscape which surrounds the site: As is noted in the PEIR and NTS the proposed facility site is within the Eastern Swale Marshes Character Area, partially within the Eastern Fruit Belt Character Area, and predominantly within Graveney Marshes Landscape Character Area. It is bordered by the Saxon Shore Way, has a public right of way (PRoW ZR485) running through it and it is also close to and visible from the National Cycle Network Route 1. Furthermore, the site has a small but significant number of residential properties in very close proximity.		The impact on all of the features listed are reported in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) reports on the baseline of the site and the landscape and visual effects of the Development. Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers recreation effects associated with the Development.

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	We do not agree with the hypotheses in the PEIR and NTS in relation to the perceived limits to and mitigation of, potential effects on the landscape and the visual effect of the facility. We consider the probable effect on the landscape character and visual amenity of the site and its surroundings for some distance to be severely negative and we do not agree that the landscaping mitigation which has been described would materially minimise the negative effect. The main public use of the land within the site plan is the raised Saxon Shore way next to it and the PRoW running through it. Given the low level of the land within the site plan and the proposed height of the solar panels (up to 4m high), screening with vegetation and positioning of the panels (East – West orientation) will make little or no difference when travelling through it or around it. It is our view that this facility would fundamentally and detrimentally change the appearance of this	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13). There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual Impact

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				locality from the moment its construction begins until it is fully decommissioned (approximately 25 years).		Assessment (document reference number 6.1.7).

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CH_email_537	Helen Whately	11/07/2018	4.45 pm	• Views from the Saxon Shore Way – The panels are expected to reach 4m in some places, and will stretch to right up to the edge of the Saxon Shore Way. This will inevitably impact on the enjoyment of this unique landscape.		Across the boundary of the site and Saxon shore way there will be a minimum of 63 metres separation between solar panels and the Saxon Shore Way. In places this separation is as much as 100 metres. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).

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CH_email_537	Helen Whately	11/07/2018	4.45 pm	• Ineffective screening – The plans to screen panels with vegetation will take at least ten years to take hold, and I'm concerned that the properties and footpaths nearest to the site will still be impacted negatively.	No	The mitigation proposals have been designed to respond to existing landscape character which are set out in Landscape and Biodiversity Management Plan (DCO document reference 6.4.5.2) whilst also screening the Development. It is acknowledged in ES Chapter 7: Landscape and Visual Impact Assessment (DCO document reference 6.1.7) on the impacts of the development from properties and properties which considers effects both at year 1, 5 and 10. Further consideration of impacts on residential properties within 1 km of the Development are reported in Residential Visual Amenity Assessment (DCO document reference 6.4.7.5). Planting will take time to establish and will not provide instant screening. The design of the Development has considered views from both residential properties and footpaths and has set back panels from PRoW and residential properties to limit proximity to these receptors.

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CH_email_595	Faversham Town Council Town Clerk	13/07/2018	12.56pm	The Preliminary Environmental Information Pack (PEIR) does not give any indication of a visual representation of the site from high points to the south nor from the Isle of Sheppey. It will be extremely visible from these points and will impose a very harsh industrial aspect onto what is currently open marshland. It was felt that this could be detrimental to visitor numbers into what is currently an inviting hinterland to the Town of Faversham, which itself relies heavily on tourism for much of its revenue. There is mention of mitigation planting softening the views of the site from local viewpoints but these would have absolutely no effect on the views from the higher points mentioned above.		A range of viewpoints have been selected to represent a number of visual receptors and from varying distances from the site and these are reported and assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), along with the landscape effects associated with the development. The viewpoint images and visualisations are located in Environmental Statement, Volume 3: Visualisations, Viewpoints (document reference number 6.3.1). The height of the sea wall ranges from approximate heights of 5.5m to 6.29m and therefore provides significant screening reducing intervisibility in the wider landscape. Views from Isle of Sheppey, Harty are discussed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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CH_email_524	Open Spaces Society	09/07/2018	2.58 pm	Proposed Cleve Hill Solar Array in the parish of Graveney My reply to your second consultation is on behalf of the Open Spaces Society` 1) The visual intrusion will be enormous. It will be close to the Saxon Shore Way and the soon to be created Coastal path around England.	Yes	Across the boundary of the site and Saxon shore way there will be a minimum of 63 metres separation between solar panels and the Saxon Shore Way. In places this separation is as much as 100 metres. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) reports on the baseline of the site and the landscape and visual effects of the Development. Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers recreation effects associated with the Development.
CH_email_524	Open Spaces Society	09/07/2018	2.58 pm	4) Land adjacent will not be enhanced from a beauty point of view.	No	The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).
CH_email_524	Open Spaces Society	09/07/2018	2.58 pm	7) I have no objection to off shore Wind Farms, these have less impact on the visual enjoyment in the countryside.		Noted.

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CH_email_419	Member of public	06/06/2018	10.05am	Consultation re Proposed Solar Park at Cleve Hill I am not able to attend any of the consultation events scheduled next month, but would like to raise the following points. Firstly I am staggered and outraged at the prospect of the panels reaching a height of 4 metres. Throughout the first consultation event nearly every question was answered with 'don't know' but here you are, clearly knowing. You state that you are listening to the community but this surely proves you have no interest in the concerns of the local community. How do you intend to screen these panels? What materials will you be using to secure the site?		The Development has been designed to withstand a 1:1000-year flooding event, by raising all electrical infrastructure off the ground. The panel tip heights range between 3m to 3.9m above ground level to allow for the varying potential extreme flood levels across the site. The Environmental Statement Chapter 5: Development Description (document reference number 6.1.5) contains more information on heights of the panels. The Applicant has assessed the visual impact of the Development including the solar panels as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
8. Ecology						

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CH_Freepost_485	Member of public	03/07/2018	10.30am	Habitat creation and wildlife –Site reinstatement and habitat creation (PIER Volume 1 – Chapters, page 5-23) – You state that 'following construction, a programme of landscaping and habitat creation will commence.' With construction lasting two years what happens to the wildlife while this takes place? What are they supposed to do for these two years?		Land of value to wildlife will be retained and where required, mitigation has been proposed to ensure that there are net gains for wildlife, as detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). Mitigation for disturbance to wildlife is considered within Environmental Statement, Chapter 8: Ecology, Section 8.9 (document reference number 6.1.8). Construction would not occur across the whole site at one time, and would be phased. Given the size of the site, this will leave large areas undisturbed at any one time.

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CH_Freepost_485	Member of public	27/06/2018	10.30am	Our concern for the wildlife is not only that you will be taking their natural habitat away for two years so they will need to go elsewhere but once the habitat areas are then built the wildlife will have found somewhere else to go and our fear is that a large number of native spaces may not return to the area.		Land of value to wildlife will be retained and where required, mitigation has been proposed to ensure that there are net gains for wildlife, as detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). Mitigation for disturbance to wildlife is considered within Environmental Statement, Chapter 8: Ecology, Section 8.9 (document reference number 6.1.8). Construction would not occur across the whole site at one time, and would be phased. Given the size of the site, this will leave large areas undisturbed at any one time.

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CH_Freepost_485	Member of public	28/06/2018	10.30am	Why are the habitat creation areas not built and established first to mitigate as much disruption as possible?		Land of value to wildlife will be retained and where required, mitigation has been proposed to ensure that there are net gains for wildlife, as detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). Mitigation for disturbance to wildlife is considered within Environmental Statement, Chapter 8: Ecology, Section 8.9 (document reference number 6.1.8). Construction would not occur across the whole site at one time, and would be phased. Given the size of the site, this will leave large areas undisturbed at any one time.
CH_Freepost_485	Member of public	02/07/2018	10.30am	Vegetation growth (PIER Volume 1 – chapters, page 10-42) – 'Land under the PV arrays would be allowed to naturally vegetate following seeding with a wildflower or grass mix and be grazed by livestock. As vegetation becomes established under the PV arrays there is likely to be a decreased in surfaced water runoff rates.'		No response required.

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CH_Freepost_485	Member of public	03/07/2018	10.30am	In the above statement you also say land under PV arrays would be allowed to naturally vegetate – how will this occur when as previously stated 'tables will run continuously without breaks. How will the plants and flowers grow without light?		There will be a break between each solar panel table of approximately 2.5metres. Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.

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CH_email_513	Member of public	05/07/2018	6.01 pm	5. Although you consider that the farmland does not provide any particular wildlife benefits, it is home to numerous species of animals and insects that are food for raptors and other birds. Additionally, the crops grown and their environment provide food for birds, insects and reptiles which will be removed if your proposal goes ahead. There are also impacts on insects that lay eggs in water (e.g. mayflies, stoneflies) who mistake solar panels for water bodies (due to reflection of polarised light). Laying their eggs on the panels reduces their reproductive success and this 'ecological trap' could have wider impacts on rare or endangered aquatic invertebrates or birds, who rely on these insects for food. Additionally, this will create a loss of habitat for rare arable weeds, invertebrates etc.		The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_541	Member of public	11/07/2018	10.21pm	2. Habitat and Wildlife This development will drive away local wildlife and rare species which are found in these special and designated areas. Whilst you state that you will create new specific spaces for the wildlife, the scale of the development will inevitably have a detrimental effect on the wildlife in the area. Your documents state that the creation of the habitat areas will commence following construction. Construction is expected to take two years and what will the wildlife do during this time? They will leave the area and probably not return. Your site now encompasses a Site of Special Scientific Interest, which is a special place where wildlife should be protected, not driven away.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_552	Member of public	12/07/2018	3.39 pm	Clarifications required on land use across the site Chapter 13.159 repeats the well-worn suggestion that the land on the solar array sites could be used for grazing sheep. That would be highly unlikely to happen. Observations on existing solar parks, confirmed by some research, show that the only useful grass growth is in the narrow strips between arrays and beneath the lower edges of the panels, where rainwater is shed and where the shading effect of the panels is lowest. Immediately beneath the panels, shading is greatest, moisture from precipitation is non-existent and effective desertification of the ground surface takes place - grass is thin, certainly too thin to graze sheep on any large scale, dry-ground weeds proliferate and the sub-surface ecosystem is destroyed. That might be acceptable on a small-scale solar scheme, but in my view, it is not acceptable on the scale envisaged by your proposal.	No	There will be extensive open strips of grazing land suitable for grazing livestock that will be available between the strings and to the margins of the solar panel layout. These grazing areas will be available on a rotational basis for livestock. Further information is provided within the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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CH_email_552	Member of public	12/07/2018	3.39 pm	Replanting with more shade- and drought-tolerant grasses has been tried in experiments, with mixed success. How do you propose addressing this problem? Will you re-sow the whole acreage with drought-resistant grass before installing the arrays? And how will you control weed growth that is too coarse for sheep to graze on, around, and especially under, the solar panels, once they are in place? Or are you going to shrug your collective shoulders and say, "That's the farmer's problem, not ours."		The areas of the site proposed for solar panels are currently used for arable farming, in which it would be expected that the ground is bare earth, or effectively bare earth (i.e., seeded or seedlings only) for at least c. 30-40% of the time. With the Development, a level of vegetation will exist on a permanent basis across the site. Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3) sets out the likely vegetation under the panels. Between and around the panels, grass and wildflower mix will be seeded and maintained, as set out in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). The vegetation will assist with preventing run-off and soil erosion, and increasing transpiration, relative to a bare-earth arable scenario.

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CH_email_560	Member of public	12/07/2018	5.41 pm	2 Totally unacceptable impact on ecosystem The primary Objection is that this scheme would devastate the ecosystem in the site area and those areas to which wildlife currently using the site travels.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_560	Member of public	12/07/2018	5.41 pm	There is now a lot of data, both governmental and non-government, (State of Nature etc. For insects see: www.theguardian.com/environment/2018/jun/17/where-have-insects-gone-climate-change-population-decline?utm_source=sfmc&utm_medium=email&utm_campaign=transformerjune18), showing how all ecosystems are suffering from human intrusion and that ever more species are being killed off precisely because of schemes such as this proposal.		The Applicant recognises the importance of all ecosystems and has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_560	Member of public	12/07/2018	5.41 pm	As Chris Packham says, it is an apocalypse. If endangered species are lost, they cannot be replaced, and this includes all parts of the ecosystem, but especially the biome of the marshes. The existing biodiversity cannot be maintained if scheme goes ahead - just putting opaque panels above land immediately changes the micro-environment. It is claimed that the panels can be removed but re-establishing the biome would be impossible.		The Applicant recognises the importance of all ecosystems and has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_560	Member of public	12/07/2018	5.41 pm	As several Red list species use the area, such as Lapwing, any development must be refused. Similarly, Bats are clearly using the site and surrounding area (8.5.2.7 page 8-17) and it is very unusual to have Nine species in the area. Bats have badly suffered from human activities so proposed changes would have significant adverse impacts on them. The proposals would disturb and intrude into the area used by them.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha as described in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and therefore the predicted capacity of the extended AR HMA to support plovers and lapwings has been reduced to be similar to mixed arable habitat, which has been agreed with Natural England. The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) concludes that the Development will not adversely affect the integrity of the SPA. The site will continue to provide these benefits for species

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						and additional benefits through 'embedded mitigation' to provide either no net loss or net gains in habitat of value to invertebrates, reptiles, bats, water voles, which would not otherwise be available in the absence of the Development. Embedded mitigation is detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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CH_email_560	Member of public	12/07/2018	5.41 pm	The Applicant may try to help individual species, such as bees, but Ecosystem Management is more efficient than trying to manage individual species, so the ecosystem needs to be preserved and not damaged. (https://en.wikipedia.org/wiki/Ecosystem_management).	No	Habitat net gains proposed for invertebrates are described in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8).
CH_email_560	Member of public	12/07/2018	5.41 pm	There would be changes in type of existing vegetation and loss of existing carbon sequestration by such vegetation. The Government's new Environment Strategy aims to leave the environment in a better state than it is now. This large scheme fails that test.		This is the opinion of the respondent. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the

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						Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_560	Member of public	12/07/2018	5.41 pm	In contrast to the destruction of Graveney Marshes by the proposed solar power station, there are huge benefits from protecting nature. As a Deutsche Bank economist, Pavan Sukhdev says “We have evaluated 1,100 studies across the world and find that investing in protected areas produce a benefit to cost ratio between 25-to-one and 100-to one.” (http://news.bbc.co.uk/1/hi/sci/tech/8357723.stm)	No	This is the opinion of the respondent. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_560	Member of public	12/07/2018	5.41 pm	Notes: An ecosystem is a community made up of living organisms and non-living components such as air, water, and mineral soil. (Tansley (1934); Molles (1999), p. 482; Chapin (2002), p. 380; Schulze et al (2005); p. 400; Gurevitch (2006), p. 522; Smith & Smith 2012, p. G-5 Biomes are distinct biological communities that have formed in response to a shared physical climate ("The world's biomes. www.ucmp.berkeley.edu, Cain, Michael; Bowman, William; Hacker, Sally (2014). Ecology (Third ed.). Massachusetts: Sinauer. p.\~ 51. ISBN9780878939084)		No response required

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CH_email_560	Member of public	12/07/2018	5.41 pm	9 Other aspects It is the combination of everything in the wider area that is so important and the surrounding habitat and species are important as well as those on the actual site. Hence the PEIR insufficient in assessing all the impacts.	No	This is the opinion of the respondent. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_570	Member of public	12/07/2018	8.53 pm	All these species have their place and just because I haven't mentioned all of them, whose home this is, does not mean they are not important. Every species is as important as we humans…they all do their job in creating a balanced biodiversity and each animal deserves us humans to speak up for them as they have no voice.... When will 'we' humans truly consider and respect that ALL animals have a right to a home and safety. Something that us humans expect and generally take for granted. At this point I would ask you to value nature and to value the people living in the area and value the people who need open spaces. But particularly the people whose lives will be utterly affected by this proposal. Those living right next to this farm/park. And of course, the animals whose lives will be destroyed. Kent is The Garden of England,		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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				but this is a description that won't be worthy of Kent should 'projects' like this go ahead. Tourism and money brought into the area will undoubtedly be affected, as will house prices… (I am not a home owner). This area is not considered SSSI, but I defy anyone not to see its beauty. Just because an area isn't considered valuable- in this way does not make it valueless…		

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CH_email_618	Member of public	13/07/2018	3.58 pm	Effect on Wildlife 13. One of the important aspects of Graveney Marshes is the habitat it provides for birds and other wildlife including scare species such as marsh harriers. You will no doubt receive submissions detailing the potential detrimental effects of your proposals on the wildlife of the area from the relevant organisations. I have read the response of the Kent Wildlife Trust to your consultation and the inadequate mitigation proposed and I am extremely concerned by what they have to say in particular that “the proposals will result in significant impacts on wildlife and are unacceptable.”	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2). The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in

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						Field Y/Z and extension of the AR HMA to c. 56 ha, as described in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and therefore the predicted capacity of the extended AR HMA to support plovers and lapwings has been reduced to be similar to mixed arable habitat, which has been agreed with Natural England. The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) concludes that the Development will not adversely affect the integrity of the SPA. The site will continue to provide these benefits for species and additional benefits through 'embedded mitigation' to provide either no net loss or net gains in habitat of value to invertebrates, reptiles, bats, water voles, which would not otherwise be available in the absence of the Development. Embedded mitigation is detailed

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						within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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CH_email_626	Member of public	13/07/2018	5.44 pm	I have five initial concerns: 1. Habitat loss: due to inadequate protection of existing gullies and waterways on the site.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_626	Member of public	13/07/2018	5.44 pm	I will take each of these points in turn. 1. Habitat loss The site itself is an area teeming with wildlife and biodiversity. Saltwater gullies run throughout the site and existing agricultural land providing habitats for all manner of flora and fauna as identified by Cleve Hill Solar Park's consultancy Arcus' Environmental Impact Assessment: Scoping Report of December 2017, which identified among other creatures, Great Crested Newts within 100m of the proposed site.	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_626	Member of public	13/07/2018	5.44 pm	I am concerned that the solar PV arrays which are expected to be taller than standard arrays due to flooding risk will overshadow these gullies and waterways leading to habitat loss. I do not believe sufficient space has been allocated in the proposed plans between the arrays and the gullies to maximise the chance that the existing habitat is retained.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. There will be approximately 2.5 metres between every solar panel table. The separation between panels and ditches has been increased to a minimum of 15 metres across the site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_626	Member of public	13/07/2018	5.44 pm	3. Lack of evidence In relation to points 1. and 2. above. Cleve Hill Solar Farm's proposals do not mobilise sufficient evidence to quantify the impact a solar PV farm of this scale will have on wildlife and biodiversity both on the site and in and across the surrounding protected zones. A cursory glance at Google Scholar makes clear that literature on the impact of solar PV is both limited and unrelated to the scale of the proposed project. In its consultation Cleve Hill Solar suggests solar PV array sites have a negligible or even a positive impact on the surrounding area's biodiversity and wildlife as it creates an uninterrupted space. This is the confirmed position for much smaller sites, but there is very little literature on the impact of large-scale solar PV arrays in areas such as the proposed site in Graveney.		The Applicant explained at community consultation events the standards to which all Environmental Impact Assessments undertaken by the Applicant are kept. Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference 6.1). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	5. The views of local environmental and conservation experts: We note, respect and endorse the views and concerns of the Kent Wildlife Trust in respect of the Cleve Hill Solar Park proposal. The Kent Wildlife Trust is responsible for the management of 65 nature reserves around the county, as well as local wildlife sites and roadside nature reserves including the South Swale and Oare Marshes nature reserves which immediately surround the project site. Kent Wildlife Trust has experience in advising on wildlife enhancements for solar energy projects and has outlined public ally what we consider to be their expert concerns that the proposed East-West orientation and density of the solar panels will be likely to increase both direct and indirect negative impacts and significantly reduce the opportunities for wildlife compared to other possible arrangements.	No	The Applicant has worked closely with Kent Wildlife Trust to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2). Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays

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						due to reduced wind speeds, lower evaporation and reduced transpiration.

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CH_email_537	Helen Whately	11/07/2018	4.45 pm	• Flora and fauna – The marshes are home to a huge variety of birds, mammals and other creatures, who rely on the salt marshes and mudflats environment. The nature of the panels, orientated east-west and densely packed will let little sunlight o the earth below and I am unclear as to what wildlife this will effectively support.	No	All of the Development infrastructure is proposed for the land currently taken up by arable fields. Furthermore, the Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2). Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document

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						reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.

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CH_email_595	Faversham Town Council Town Clerk	13/07/2018	12.56pm	The North Kent Coastal strip is an important habitat for many endangered species of bumblebees and there is currently a project in place covering 130 miles of this coast to enhance and connect areas of this land, creating 'bee roads' to ensure that their diversity is encouraged. The Solar Park would create a huge break in the swathe of natural wildflower species that is so important to the wellbeing of the bees.	Yes	All of the Development infrastructure is proposed for the land currently taken up by arable fields. Furthermore, the Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. This includes the improvement of conditions on the site for pollinators such as bees. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2). Environmental Statement, Technical Appendices:

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						Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.

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CH_email_524	Open Spaces Society	09/07/2018	2.58 pm	2) The impact on the wildlife will be enormous.	No	This is not the conclusion reached in the Environmental Statement (document reference number 6). The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_536	Seasalter Chalet Owners Association	11/07/2018	3.49 pm	Having read all the literature you have published, we believe you will not be able to maintain the existing level of biodiversity and wildlife population and will ruin the existing natural habitat of many species. Given the orientation of the panels, the views currently enjoyed from the Saxon Shore Way across open farm land will be replaced by what will, in effect, be a sea of plastic stretching for miles.	No	This is not the conclusion reached in the Environmental Statement (document reference number 6). The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_560	Member of public	12/07/2018	5.41 pm	In addition, the landscaping proposals aiming to hide the view of panels would be just as damaging by changing the biome as installing panels. So continuing with farming use would be the less damaging and more beneficial for wildlife.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_469	Member of public	20/06/2018	1.21 pm	As a local resident, I have received your community consultation leaflets, regarding the development of Cleve Hill Solar Farm. I would like to provide you with some feedback, which you have indicated that you would like to hear. Having read your May 2018 community newsletter, the aspects which I support and which I strongly feel should be followed are: • The proposed community orchard • Designing the site to benefit bees • Improving biodiversity • Liaising with RSPB and Kent Wildlife Trust Alongside the proposed community orchard, might I suggest planting native trees and wildflowers as extensively as possible throughout the site, which I feel confident would prove to be an extremely efficient and cost effective method to help make the project more environmentally	Yes	Thank you for your comments. Unfortunately owing to strong objection from the community, the community orchard has not been progressed. However, the Applicant proposes a lowland meadow in its place. This feature is part of the Landscape and Biodiversity Management Plan as set out in document 6.4.5.2. This includes 3.64km of native hedgerow planting in addition to scrub areas and native tree planting. In the plan the Applicant includes embedded mitigation designed to improve biodiversity from the baseline. The Applicant has consulted on this and on the AR HMA with RSPB, KWT and Natural England.

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				friendly and surely increase the popularity of Cleve Hill Solar Park with local residents. Thank you for the opportunity to provide you with my feedback.		

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CH_email_527	Member of public	10/07/2018	12.42pm	I am responding to the most recent consultation regarding plans for the Cleve Hill Solar Park development proposal. I am a local resident living in Whitstable who visits the area on a regular basis to walk and bird watch. Overall, I am not in favour of the development. I recognise the need for more green energy, I just do not think this is an appropriate location for such a large development. However, I am a pragmatist and I expect planning permission to be given and so I want the best outcome for wildlife possible. I have two major concerns. The first is that the development will have a detrimental impact on local wildlife. I recognise the enhancement for wildlife made from the initial plan but think these should go further. Specifically, I am concerned that the additional land set aside for Brent Geese is insufficient for their needs. Brent do feed around the site but they	No	Thank you for your comments. Regarding local ecology, please see our complete ecological assessment in Chapter 8 of the Environmental Statement (document reference 6.1.8) and ornithological assessment (6.1.9). The Applicant has consulted on the AR HMA with the HMSG and has increased the AR HMA area from 41ha to 56 ha. Please also see the Landscape and Biodiversity Management Plan (document reference 6.4.5.2) which sets out management of the land surrounding and under the solar PV modules. Please see the LVIA study in Chapter 7 of the Environmental Statement (document reference 6.1.7) which assess the views from the Saxon Shore Way. The Applicant has also undertaken a non-motorised users' assessment, which has counted the frequency of walkers using the PRoWs as shown in Chapter 14 (document reference 6.1.14). Thank you for the idea of local information

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				also use the area for roosting when disturbed from the Swale. The location of the additional area to be set aside at the east end of the site puts it within that that is most heavily used by dog and other walkers and so most liable to disturbance. It is not that I don't think this is the correct site for this additional set aside, but that it should be made bigger. This would also negate my concern that the Brent will be reluctant to use the AR HMA as currently planned as the open nature of the landscape that they prefer for roosting will be lost by the development of the solar farm. While there are other areas of the Swale that the Brent can and do use, the part of the estuary that they prefer for feeding in the early part of the winter when they first arrive, and therefore the adjacent fields used for roosting at this time, is the southern part of the estuary adjacent to the solar farm site. Further I am not convinced by the argument that birds typical of the		boards, which is an idea that we welcome and will consider at the point of constructing the project should it be developed. [MONITORING]

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				current open agricultural setting will use the solar farm or boundary areas for nesting. Specifically, mention is made of birds using areas under the panels. I have seen this argued before but practically very little grows under solar panels and that space is basically dead for anything other than the few plants that can cope with a combination of low light and low rain fall. This can easily be seen at the solar farm development between Chestfield and Herne Bay. If you are serious about encouraging species such as Yellow Wagtail, Skylark and Redshank, all of which are mentioned in the information pack provided at the consultation, then additional land should be set aside for further AR HMAs. The ideal locations for these would be to the west opposite the Oare Marshes reserve and centrally adjacent to Castle Coote thereby benefitting from and enhancing those areas. My other concern is to do with secondary disturbance to birds in		

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				the Swale. Despite your best efforts at screening the solar panels they will be unattractive as viewed from the Saxon Shore Way. They simply will be and people who enjoy the area for walking and walking their dogs are likely to try to avoid the view. Mitigation planting will make little difference as your aim is to create grazing meadow in the buffer zone between the path and the development and grazing meadow by its very nature is made up of low vegetation. My concern is that, at the moment walkers and dog walkers are split between those that use the sea wall Saxon Shore path and those that walk along the tide line, but that the proportion walking along the tide line below the sea wall will increase as people actively try to avoid the view of the solar farm. Birds on the estuary are already subject to multiple disturbances, an increase in people walking along the tide line because of the presence of the solar farm will only increase that disturbance and put additional		

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				pressure onto this RAMSAR site. I am not sure what can be done about this, but at the very least an education programme with information boards encouraging people to stick to the sea wall path should be funded. Finally within the information pack provided there are admissions that the solar park may have adverse effects on some species, but hoped for positive effects on others. If you want to keep the local community on side it would be useful if an annual report demonstrating both positive and negative effects on wildlife was produced and published, i.e. continue monitoring the wildlife on site both during the build phase and beyond, and where negative impacts are observed come up with and publish plans to reverse those. Yours sincerely		

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CH_email_555	Member of public	12/07/2018	4.08 pm	Please make a note that [redacted] who live in beautiful Graveney, (that we liken to a nature reserve) are strongly objecting to your plans to build a solar farm monstrosity along with huge battery. Nothing can survive under these panels and we would much rather keep all the wildlife we already have, encourage more rather than lose any. Places like this are good for our planet, we are protesting and protecting for future generations to come. We dislike your unethical intentions, your greed, your plan to industrialise this beautiful area.	No	Comment noted

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CH_email_622	Member of public	13/07/2018	5.00 pm	I am writing to you to object to the development of Cleve Hill Solar Farm and the apparent lack of understanding of how it will affect the local ecology and landscape. Although I am aware that there are some small scale mitigation measures proposed in my opinion these utterly fail to understand that the value of the area to wildlife and as a landscape is that it is part of a greater open wild space and that by creating an industrial zone surrounded by trees as a screen there will be a complete change in the nature of the landscape as well as impacting the surrounding nature reserves and other areas important to wildlife. Some commentators have implied that the wildlife value of the site itself is minimal. This is possibly true if taken in isolation, although I have personally witnessed declining farmland birds such as Skylark, Grey Partridge and Lapwing using the site in recent years, but this ignores the fact that	No	Please see our complete ecological assessment in Chapter 8 of the Environmental Statement (document reference 6.1.8) and ornithological assessment (6.1.9). A buffer zone of a minimum of 63m with some areas being 100m has been designed between the solar PV modules and Saxon Shore Way. The Applicant has increased the buffer distances between the panels and ditches from 5m to 15m across most of the site.

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				the ecology of the area is reliant on maintaining an open landscape with a variety of foraging habitats free from the disturbing influence of enclosure. In particular the site's immediate proximity to South Swale Nature Reserve is almost certain to have a massive impact on roosting shorebirds that shun sites that have an element of enclosure. With this in mind, although I totally oppose the development, if it should go ahead, in my opinion, the proposed area of solar panels should be greatly reduced and should avoid going close to the Saxon shore way and the foreshore areas which are vital to the wildlife of the area to avoid creating the threatening presence of structures which enclose a bird's ability to spot approaching predators and consequently their probability of using the site at all. Further to this I would call upon the developers to consider creating a buffer zone between the area of solar panels and areas of historical		

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				public access so that there is not blanket coverage right up to the boundaries of the site. This would serve to reduce the impact on the landscape and the wildlife by ensuring that the area industrialized does not about right onto wildlife areas and zones enjoyed by people wishing to walk in an historic landscape. To this end I would suggest that a wide buffer area between solar panels and the flood defences of grassland would ensure that wildlife using the farmland habitat would have a refuge and at the same time create hunting zones for raptors and owls and serve as a wildlife corridor from one protected area to another. I urge that these considerations to wildlife and landscape should be implemented in a reduced development proposal although I continue to hold the opinion that one of the southeast's largest wild spaces of high wildlife value is no place for such a large development and that the benefit of renewable		

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				energy should not be used to create a smokescreen over the destruction of biodiversity.		

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9. Ornithology						
CH_email_481	Member of public	25/06/2018	10.31pm	Good evening, I would like to ask you to clarify your recent mitigation proposals with respect to the recent EU ruling that mitigation is no longer part of submissions in EIA or PIER reports with your recent Cleve Hill Solar Park proposal. I look forward to your reply.	No	The Applicant included extensive mitigation which is not impacted by any changes to EU law.

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CH_email_508	Member of public	03/07/2018	7.12 pm	Firstly, I would be grateful if you could confirm receipt of this email by sending a brief reply. Secondly, following your 2nd consultation event in Seasalter I wanted to provide some feedback on your proposals. To start my feedback I just wanted to state that I was disappointed not to have been contacted initially as an 'interested party.' I have an interest in a property next to the Sportsman Pub on the eastern end of your proposed site. The proposal would share a boundary with us and yet we have received no formal notifications. * I am extremely concerned about your proposal on several fronts. The site abuts a RAMSAR area which supports huge numbers of over wintering Brent geese. These, together with other rare birds such as Golden Plover and Lapwing, roost and graze on the arable site when the tide is in. Providing a mitigation zone of a		The Applicant contacted the respondent seeking further information relating to her property on 5 July 2018. The Arable Reversion Arable Reversion Habitat Management Area proposed at the east end of the site is now approximately 56 ha in size. ES Chapter 9: Ornithology clearly explains the rationale for how this area has been calculated to mitigate for the loss of the arable habitat. The effects on a range of ornithological receptors are set out in ES Chapter 9: Ornithology. The EA's proposals for managed realignment are addressed throughout the ES, and in particular in Chapter 10: Hydrology, Hydrogeology, Flood Risk and Ground Conditions. The landscape and visual effects of the Development are assessed in Chapter 7: LVIA of the ES. Technical Appendix A5.3 of the ES

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				few hectares at the east end of the site will not be sufficient to support the birds. * The arable fields host an increasing population of breeding skylarks and yellow wagtails; these locally significant populations will suffer huge disturbance and may be displaced. * Graveney and Nagden Marshes have been designated by the Environment agency as an area for managed retreat and are likely to flood. * Your proposals are at odds with the Government's 25 year plan for a Green Future. * The industrialisation of this area of low lying coast is completely at odds with the areas designation of being of "High Landscape Value" * The East West layout of the tables of PV panels will result in very low light levels beneath the panels - nothing will grow there.		is a Microclimate and Vegetation Study which sets out what vegetation is likely to establish and grow beneath the panels. Chapter 14: Access and Traffic of the ES addresses the effects of increased traffic levels during construction.

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				* Your proposals include an area of SSSI and the South Swale Nature Reserve. These are already managed for wildlife but will suffer great disturbance from construction and operation. * The increase in heavy traffic during construction will render the narrow Seasalter Road, which has few pedestrian walkways, very unsafe for other road users, cyclists, riders and pedestrians. All your consultations so far have referred to 75 lorries per day but no mention has been made of the return journeys. 150 lorries per day over a 10-hour working day is 15 lorries an hour - one every 4 minutes on a road with no walkways and limited width with at least 4 pinch points or blind bends! * The Saxon Shore Way long distance footpath runs along the northern and western edges of the proposed site. This beautiful footpath will have its character irreversibly altered.		

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				* The height of the solar panels will raise them above the sea wall making them visible from sea as well as land. * The proposed battery storage is very alarming. Not only is this a huge array of batteries but your proposals are very vague. No information is given about the fire risk. The large number of lorry container sized transformers will make a loud noise, 100 dcb, in this tranquil site. Finally, I have two questions for you. Why have you not considered other brownfield sites, for instance the decommissioned power station on the isle of grain which can be readily connected to the National Grid or Manston Airfield, another brownfield site? Can you also inform me as to what you intend to do about windblown salt build up on the surface of the panels. As I write the three-day strong NE wind has rendered my		

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				windows opaque. This would reduce the efficiency of the panels by a large margin. Do you intend to have a water washing scheme in which case how much water is this likely to use? I think this proposal is a monstrous one; done in the name of private profits and greed under a blanket of greenwash. I sincerely hope that the Secretary of State sees sense and turns this proposal down and prevents the total industrialisation of an unspoilt, empty, awe inspiring section of our coastline.		

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CH_email_523	Member of public	09/07/2018	2.24 pm	I attach details of the 306 birds we ringed or retrapped on the South Swale reserve during 2017. These were mostly caught between the sea wall and down to and including the dyke running parallel to the sea wall. These comprised breeding birds, including African migrants, and birds using the area as a corridor on migration. We only operated on this site for a few weeks in summer, but the list gives an indication of the importance of the site for birds. I also attach our Year Totals, showing 13,500 birds ringed on this valuable breeding and migration site from 1990-2017. I hope the Solar Farm, if it has to be here at all, will start much further back than the 60m specified in the May 2018 document. 260m at the very least would be	No	The Applicant has undertaken bird surveys from 2014-2018. The results of the assessment are presented in Chapter 9 of the Environmental Statement (document reference 6.1.9). In consultation with the HMSG, the Applicant has increased the Arable Reversion Habitat Management Area for birds from 41ha to 56 ha. The Applicant has maintained a minimum buffer distance of 63m from the Saxon Shore Way, in some areas of the site this is as wide as 100m.

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				needed to give the birds a chance to survive.		

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CH_email_531	Member of public	10/07/2018	10.56pm	I am finding it impossible to use your consultation reply form. It asks questions that would not reflect my opinions regarding this specific development and are irrelevant to my views. I find it difficult to believe that anyone can be unaware of the need for conservation these days, so I can only assume it is being deliberately ignored. The Graveney Marshes are unique. They provide a wonderful habitat for birds, water dwellers and plants. It has to be looked after and cherished and that starts underground. The entire food chain is required for it to survive. I have absolutely no idea what a community orchard has to do with it at all. It is not connected in any way with the area you are trying to destroy. How patronising can it get! Anyone who has any interest at all in being green would know that times have changed with regard to	No	These are the views of the respondent. Please see the Applicant's Needs Statement (document reference 7.3).

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				this type of wonton destruction for financial gain. So much land is already being built on and that is the place and time to incorporate solar panels etc. How would it be possible to trust anyone who thinks their bank balance is more important than the protection of these habitats? The arrogance of anyone who thinks they have a right to destroy it all for monetary gain is shocking and shameful. Until people learn to share natural resources with all inhabitants, however small, there is little hope for humanity! The marshes are a place of great beauty and pleasure for so many people. For anyone with an ounce of empathy for the creatures and plants relying on its unique resources it is essential and irreplaceable. How could anyone feel proud of this destruction. The creatures		

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				concerned may not have money or a voice but that does not make them unimportant. It does however show the lack of understanding of current thinking. This planet does not only belong to people. The ability to respect the needs of others (human or animal) is the true measure of humanity. In short, whilst I realise that solar energy is important, the Cleve Hill site is totally inappropriate. It is a recognise site of great importance for the natural world and much valued by so many people. Some things cannot be given a monetary value as they are so special. Graveney Marshes are unique and amazing for so many reasons, please do not destroy them just to make money.		

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CH_email_549	Member of public	12/07/2018	12.18pm	As a person who has walked over and around this area for forty years, I wish to register my opposition to your proposed development. I am all in favour of green energy but not on this site. I completely disagree with your analysis of the impact on wildlife, particularly birdlife. The impact will be very significant to all species that currently make use of the site and the surrounding area. Whilst it must be better to have a mitigation area rather than more solar panels, it will not remotely compensate for the loss of farmland as habitat for wildlife. You say the mitigation area will be managed for wildlife but do not say who will manage it or how it will be managed. I understand such promises can easily be rescinded. In this crowded corner of Kent, the site is a rare example of peaceful and beautiful landscape which the solar park will completely destroy.	No	Thank you for your comments. Please see the final Environmental Statement (document reference 6.1) for the complete sets of surveys and studies for the site. Please see the Landscape and Biodiversity Management Plan (document reference 6.4.5.2) which sets out how the Applicant will seek to manage landscape and habitats. This plan has been submitted as part of the application and will form part of the commitment for the Development. The Applicant has reduced the scale of the Development to 45.5% of the developable arable area and has presented two energy storage scenarios as presented in Chapter 5 of the Environmental Statement (6.1.5). The Applicant has undertaken a noise assessment as presented in Chapter 12 (document reference 6.1.12). The Applicant has sought to reduce traffic volumes since PEIR and includes a Construction Traffic Management Plan with the application, which sets out a range of mitigation for reducing traffic

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				It would be vandalism on the largest scale. The scale of the park, the type of panel and arrangement thereof and the enormous battery compound are all totally unsuitable for this site. The impact of the park will be devastating for local people and especially residents nearby. The impact would be visual and more sinisterly, audible as well as potentially dangerous. The impact of the building of the Park on the lives of those living by the road in Graveney would be utterly intolerable. The Company proposes to maintain sea defences. This is not the job of the Company. It would set a dangerous precedent and should not be taken out of the hands of the Environment Agency. The PEIR is monstrously verbose, specious, full of inaccuracies,		impact (document reference 6.4.14.1). The Applicant has reached a position with the Environment Agency in Appendix 26 of the Consultation Report (document reference 5.1.1). The Environment Agency is not obligated to manage sea defences. The Applicant would be obligated to maintain the sea defences as the EA does if it got planning approval. The Applicant provided a non-technical summary of the PEIR for those wanting a more digestible format. The Environmental Statement will also have a non-technical summary.

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				notable for its omissions and virtually impossible for the layman to read. Given the proximity of numerous nature reserves and protected areas, the above-mentioned impacts and the risk of inundation from the sea, this proposal appears to be completely insane. I sincerely hope that the Secretary of State will deny permission for this utterly grotesque proposal.		

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CH_email_520	Member of public	09/07/2018	12.13pm	2. This special landscape, the nearby salt-marshes having formed part of the monastic lands of Canterbury, remains of great importance as it runs alongside the sea and estuary of the Swale. Monkshill Road, close to the centre of the site, attests to this history. Currently the marshes of the Swale Estuary are important sanctuaries for migrating birds and are the homeland of many rare species. Over-wintering geese need grazing, a colony of herons needs protection and these are just two examples. Two weeks ago, I was privileged to witness a Marsh Harrier making a feeding flight, as is typical, low over the marsh on the inside of the sea wall. Birds of prey rely on small mammals, small mammals rely on unhindered grassland: the better the covering of grass the higher the number of wood-mice, voles and shrews. Quite independently of the disruption to flight by the sight and sound of solar panels, beautiful, rare species would be unable to find sufficient food and	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of c.56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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				resting areas. All Saints' Church has a colony of bats which we have been at pains to protect during building work. Imagine the impact on their sonar communication system of the noise of buzzing solar panels.		

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CH_email_418	Member of public	06/06/2018	9.56 am	Ecology and Bird Life – Again without site of before and after map showing the increased area available to migrating birds it is hard to comment on your statement.		The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_419	Member of public	06/06/2018	10.05am	With regard to the various bird surveys you refer to – were these independent? What times of the day were the surveys undertaken? What times of the year where they undertaken? Please provide copies of these surveys.		The surveyors are highly skilled ornithologists with many hundreds of hours of flight activity survey experience. Details on duration, timings and hours of these surveys are provided in The Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1); this now includes additional details regarding the timing and weather conditions during each survey.

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CH_email_513	Member of public	05/07/2018	6.01 pm	4. The proposed location is a key area for wildlife, particularly birds, and is recognised as an important overwintering location for many red list and schedule 1 species. The construction of your solar park will destroy the habitat, feeding, nesting and breeding grounds for these and many other birds that currently rely on them and will cause irreparable damage to both the habitat and bird populations. There is no mitigation you can provide that will prevent this devastating impact. Additionally, the security fencing you intend to include forms a barrier, restricting the movement of wild mammals and amphibians, and presenting a collision risk for some bird species. In view of the number of birds which inhabit the proposed and surrounding area, this could be catastrophic for the red listed and schedule 1 species.	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. The Environmental Statement,

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						Chapter 5: Development Description (document reference number 6.1.5) sets out the type of fencing which will be used by the Development. The Applicant has proposed to use mammal-friendly deer-fencing which will include mammal gates every 50 metres to prevent any loss to connectivity.

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CH_email_513	Member of public	05/07/2018	6.01 pm	7. The proposed site is adjacent to three designated areas – the Swale SSSI, SPA and Ramsar Wetland sites. These have been designated for a reason and should be protected. Just because your proposed site does not lie directly in one of these sites should not mean that you can destroy it and, potentially, have a devastating impact on the fauna and flora of the designated sites.	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_Freepost_519	Member of public	06/07/2018	10.00am	Cleve hill solar park – concerns and views Strongly object on the above proposed solar park and Graveney marshes as follows: 1. The loss of Graveney Marshes will have a detrimental impact on wildlife and the Natural habitat of bird nesting and breeding habitat. Total disregard for Nature and wildlife; not protecting our rural environment for future generations.	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_520	Member of public	09/07/2018	12.13pm	3. Anyone who has owned a house to which swifts or swallows return every year to the same site will recognise that birds have inbuilt flight and nesting patterns. We have already learned to our cost how our interference with wildlife leads to the loss of species and it is incumbent upon us not to rush to meet the demands of man at the expense of the natural world. Solar Farms not only absorb green spaces but are not themselves entirely green since they contain polluting heavy metals, such as cadmium, storing up problems for the future when they degrade.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support Brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Environmental Statement, The

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						Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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CH_email_556	Member of public	12/07/2018	4.10 pm	3. The proximity of the proposal to sensitive environmental sites. We are still concerned that this proposal is in an area surrounded by 3 designated protected areas - a national Special Protection Area, a European Site of Special Scientific Interest and a Ramsar Convention Site of international importance. Much of the targeted site itself lies within the Natural England-designated Greater Thames Estuary Natural Area and Character Area, while almost all of it is noted as an Area of Greatest Habitat Opportunity (enhancement) and as a Biodiversity Opportunity Area. Further, the Cleve Hill site adjoins two Kent Wildlife Trust reserves – Oare Marshes and South Swale – while the Royal Society for the Protection of Birds manages large chunks of the nearby Seasalter Levels.	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_556	Member of public	12/07/2018	4.10 pm	This very special landscape is enhanced by an incredible array of birdlife, particularly wildfowl and waders, while numbers of marsh harriers – a bird of prey on the brink of extinction in this country not so very long ago – are high. This therefore is an area where key bird species over-winter, feed and breed. The second phase of the London Array Project was curtailed because of bird fatalities and so the threat to birds, when their habitat is changed, is a real one.		The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_570	Member of public	12/07/2018	8.53 pm	Just being amongst animals and birds; such as the Lapwing, one of my absolute favourites - Barn Owls...a magical sight - The Marsh Harriers... I remember the first time I saw one...I felt like I was on the Plaines of Africa, such a rare sight for the south east, incredible wing span, soaring low to the ground in search of a meal - Short-eyed Owls...an owl who is found in open country. A beautiful bird, and again a rare sighting. Hares and water voles. The list go on .... BUT probably my favourites - the Brent Geese. They choose to spend their winter with us...this is a privilege. The familiar honking call they make to one another is, for me reassuring. They will struggle to differentiate between sea and these solar panels- stretching as far as the eye can see.	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_625	Member of public	13/07/2018	5.38 pm	I live close to this site and have walked the footpaths from Seasalter to Faversham for the last 30 years. I have seen puffins, marsh harriers, shore larks..., and I would like to go on seeing them.		Noted. The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_626	Member of public	13/07/2018	5.44 pm	2. Impact on birds: due to the scale of the site and proximity to protected zones.	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_626	Member of public	13/07/2018	5.44 pm	Birds nesting in these gullies – whether migratory or otherwise – do not distinguish between protected and non-protected zones and accordingly nest and feed throughout site.		The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_626	Member of public	13/07/2018	5.44 pm	2. Impact on birds: Given the scale of the site and the scope for glare from the arrays, the impact on local and migratory birds visiting and nesting in the surrounding protected areas is a serious concern. Whilst the RSPB is broadly in favour of solar PV arrays it makes an explicit exception when it comes to solar PV parks near to protected areas. In its May 2017 policy statement, the charity states "Concerns are most likely when located in or close to protected areas" (Link here). As I am sure the developers are aware and as Kent Wildlife Trust in its response to the Phase 2 consultation makes clear, the proposed site runs directly alongside protected areas as well as Special Protection Areas and Sites of Special Scientific Interest (SSSI) which have statutory protections under Article 4 of the EU Birds Directive 1979.	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_626	Member of public	13/07/2018	5.44 pm	Given the combination statutory protections and the RSPB's policy position it is clear that Cleve Hill Solar Farm must consider the impact it will have upon birds surrounding the site. I am not convinced that the current proposals have given sufficient regard to this matter. I note that the Kent Wildlife trust described this situation in the following terms: "The proposals set out in this consultation will result in significant impacts on wildlife and are unacceptable." (Kent Wildlife Trust's response to CHSP Phase 2 consultation link).	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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CH_email_640	Member of public	13/07/2018	11.50pm	I should like to confine my comments to the local issues that will potentially affect me as a local resident and the impact on some of the key bird species that currently use the site.		No response required

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CH_email_640	Member of public	13/07/2018	11.50pm	Ornithology. Wintering birds Brent Geese I know from my local knowledge and it is clear from the survey results that the percentage of the SPA's Brent Geese using the development site varies from year to year. The normal pattern of usage is that the early returning Brent Geese in late Sept and October feed initially on the intertidal area of the shore between Faversham Creek and Whitstable where they feed primarily on eel grass Zostera sp and intertidal green algae. They are joined by further arrivals in Nov/Dec. Once the inter-tidal food source is depleted the Brent Geese move onto grazing marsh and arable land adjacent to the Swale and some birds move off to other estuaries and harbours in southern England and beyond e.g the coast in north western France. To date, the usage of the proposed development site has varied, influenced by the cropping regime and the state of growth of potential		No response required.

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				forage crops. However, in most years there is some usage of the site by Brent Geese at some stage of the winter and in some years the core area has supported 100% of the Brent Geese within the SPA.		

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CH_email_640	Member of public	13/07/2018	11.50pm	In my opinion the AR HMA area proposed is insufficient to offset the loss of the wider area available to Brent Geese under the recent cropping regime. This has been admitted in the report. “The AR HMA may not be able to replace entirely the loss of foraging provision for Brent geese” 41 hectares have been identified as a Arable Reversion Habitat Management Area that will be intensively managed for Brent Geese and other wet grassland bird species, such as Lapwing and Golden Plover. This is adjacent to SSSI grazing marsh for which there is a statutory requirement for it to be kept in favourable condition. It cannot therefore, contribute to mitigation for the impacts of the solar park. This area of land is referred to differently in Chapters within the report. Sometimes it is referred to separately and in other Chapters as part of the AR HMA. This is somewhat confusing when discussing mitigation.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support Brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Environmental Statement, The

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						Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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CH_email_640	Member of public	13/07/2018	11.50pm	Lapwing and Golden Plover Like the Brent Geese the number of lapwing and golden plover using the proposed development site varies from year to year. The conversion from arable to grazing marsh should benefit both species but initially the density of the invertebrate soil fauna of the arable conversion is likely to be lower than on the adjacent grazing marsh. It may be some years before the forage available to plovers per hectare on the AR HMA is sufficient to compensate for loss of forage over the wider area. It is unlikely that the AR HMA will provide adequate mitigation for Golden Plover and Lapwing. This would have an adverse impact on the SPA.		The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support Brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Environmental Statement, The

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						Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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CH_email_640	Member of public	13/07/2018	11.50pm	Breeding Birds Marsh Harrier. Marsh Harriers have bred within the arable crops within the proposed development site and in the reedbeds of the seawall borrowed from where they forage over the adjacent farmland As stated in the Ornithology Chapter "the core survey area and adjacent terrestrial habitats form an important foraging area for marsh harriers throughout the year" The forage flights take place over a considerable area of the proposed development site, as identified by the flight line studies and my personal experience of the area. I note that corridors have been identified in the plan to provide forage sites for Marsh Harriers but I am concerned that the width of these may not be adequate. There is uncertainty regarding the impact of solar panels on breeding Marsh Harriers and their foraging behaviour. The effect of the boundary fences on foraging behaviour is also unknown. Will	Yes	Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased from a minimum of 5 m to a minimum of 15 m, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). In the majority of the site where solar panels are located, the offset between the edge of the arrays and the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. This is expected to result in no net negative effects on marsh harrier and could result in positive effects as a result of an increased extent of suitable foraging habitat. The Environmental Statement, The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) concludes

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				Marsh Harriers fly over such a vast array of panels to access the foraging areas or are they expected to access the forage areas from the borrowed along the sea wall? Marsh Harriers may nest again within the core site, if disturbance is minimal once the site is operational and there are sufficient reed dominant ditches to provide the necessary cover and nesting material for them.		that the Development will not adversely affect the integrity of the SPA.

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CH_email_640	Member of public	13/07/2018	11.50pm	However, I note in the Report that the developers have been talking to Kent County Council about the creation of permissive access to create a number of new circular routes and the potential for additional permissions e.g. cycling along these access routes. This will increase disturbance to the ditch network across the site and in my opinion will be detrimental to any nesting attempts by Marsh Harriers that are very sensitive to disturbance in the early stages of the nesting cycle. New permissive pathways may also have a negative impact on ground nesting birds within the access corridors and on water voles within the ditch system. The probable impact of the development is the loss of nesting and foraging area of great importance to Marsh Harriers in the core breeding area of North Kent. The AR HMA cannot mitigate this loss.	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially

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						drawing walkers away from the SPA whilst also promoting walking in the area.

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CH_email_640	Member of public	13/07/2018	11.50pm	Yellow Wagtail and Skylark Yellow Wagtail and Skylark nest at low densities across the whole proposed development site and will lose the majority of their nesting sites. The AR HMA will provide some mitigation for these species but Skylarks which use the arable stubble post-harvest will lose the majority of their forage habitat outside of the breeding season. At present, the proposal is for the solar panels to extend to within a few metres of the borrowdyke along the northern and western boundaries of the proposed development site. If a significant buffer zone of c 250 metres width was established along the length of the borrowdyke, this would provide a habitat management zone where management could be targeted towards enhancement for these ground nesting species. It would also provide habitat for small mammals and provide prey for both Barn Owl and Short-eared Owls that currently occur on the		Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) provides an assessment of the potential effects of the Development on all of these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements that will benefit some species.

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				site. The incorporation of shallow pools would also add to the biodiversity interest of the site. The establishment of such a zone would also reduce the requirement to manage the proposed AR HMA for a wide range of bird species which have different habitat preferences.		

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	4. The ecological impact and effects on wildlife habitat and populations most significantly rare and other birds: The proposed site is immediately adjacent to The Swale which is a Site of Special Scientific Interest, Special Protection Area and Ramsar site. The Swale Estuary is also a National Nature Reserve (and Marine Conservation Zone) and the site is bordered on the North and West, by both the South Swale Local Nature Reserve and the Oare Marshes Local Nature Reserve. The site is almost wholly enclosed by land which is designated as Wetland of International Importance (Ramsar sites). Although the land which would be used to accommodate the facility is not itself protected or designated as a Ramsar site, it is of a markedly similar character and quality to the surrounding Ramsar areas. It is also clear from the PEIR and NTS that the rare birds and other species which use the surrounding protected areas also	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of 57 acres. Increasing from 41 ha at PEIR stage. The Environmental Statement, Chapter 9: Ornithology (document reference 6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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				use the nearby land including the site itself as habitat. It is clear there will potentially be long term negative effects on Dark-bellied Brent Geese and Breeding Marsh Harriers. We consider that the PEIR and NTS make assumptions not currently supported by sufficient evidence in relation to the potential negative effects on Lapwing and Golden Plover, the Breeding Farmland Bird Community and Peregrines.		

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	We also believe that over reliance is placed on the suggested 40-hectare Arable Reversion Habitat Management Area north of the Cleve Hill substation in assuming that the potential negative effects on these species will be simply offset by establishing a small grassland area nearby and / or that such species will simply relocate to similar habitats elsewhere.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support Brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Environmental Statement, The

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						Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
10. Hydrology, Hydrogeology, Flood Risk and Ground Conditions						

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CH_email_418	Member of public	06/06/2018	9.56 am	What is there to say – these panels and the materials used to site them will destroy the soil and land conditions. How are you intending to improve this? As for your excitement at improving conditions for pollinators, well went for a walk recently and the bees were out, the wild flowers were out, the butterflies were about, the mosquitoes were about, the flies were about, the geese were feeding in the fields, the fields had been planted with crops and/or in the process of cultivation and the cattle were grazing. We do not need a picture of a bumble bee, a tree in blossom, a footpath sign or a water vole. We know what they look like and this is just patronising. You talk about improving all these things, yet you are in the process of destroying them in the first place. This is not improvement.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2). Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be

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						higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.

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CH_email_418	Member of public	06/06/2018	9.56 am	**Flood Protection –** As we understand this project has been in the making for over four years – at least that is what we were told at the first consultation. Surely this work should have been done at the outset. The fact that these panels are going to be elevated to ensure they are not compromised by floodwater means you have chosen the wrong site in the first place? Please refer to comment on non-government subsidy.		The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk.

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CH_email_419	Member of public	06/06/2018	10.05am	You talk a lot about improving soil, improving biodiversity etc. Can I suggest that the use of the word 'improving 'is being used incorrectly? You should surely be describing these actions as a means to redress the damage caused by your project to this unique habitat. As one fellow walker commented to me recently 'the beauty and tranquillity of this area speaks for itself'.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2). Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be

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						higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration. Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.

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CH_Freepost_485	Member of public	28/06/2018	10.30am	Flooding and run off rates – Runoff rates (PIER volume 1 – Chapters, page 10-39) You state 'The FRA identifies that the PV arrays have the potential to increase surface water runoff rates by approximately 37.6% compared to the baseline scenario.' 'As such, the area under the drip line should be seeded with a suitable grass/ flower mix, as shown in Plate 10.13, to prevent rilling (incisions in soil caused by concentrated water flow) and an increase in surface water run-off rates. And (PIER volume 1 – chapters, page 10-40) 'With the implementation of suitable planning (such as a wildflower or grass mix) the ground cover is unlikely to generate surface water runoff rates beyond the baseline scenario.'		No response required.

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CH_Freepost_485	Member of public	30/06/2018	10.30am	Once again, we see the 'unlikely' word used, what if the unlikely happens and surface water increases to a stage where water sits at the base and under the tables? Is this the real reason you have placed the transformer's on rafts and set the freeboard of all electrical infrastructures at 300mm rather than the 1 in 100-year flood? Is there and 'likely' chance of surface water approaching warm house?		These assessments were carried out on behalf of the Applicant. Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference number 6). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions. Theoretically the introduction of PV panels will increase the run off rates due to the presence of the impermeable PV modules that rainfall can directly fall on, however once rainfall has fallen off the PV panel any flow will be able to spread and flow along the ground

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						under the PV panels. Given the flat nature of the core Study Area it is likely that rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the panels were installed. Additionally, the area in which the Development is located is drained by a series of agricultural ditches, meaning that any ponding surface water is unlikely to be transferred to adjacent land.

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CH_Freepost_485	Member of public	01/07/2018	10.30am	From experience of this site over 42 years, when we have heavy rainfall water does sit on the arable land for quite some time before it drains away (sometimes days). With 644 acres of the land, (53% of the 1216 acre development site) which is over 1 square mile now covered with solar panels, surely this amount of water concentrated onto 572 acres is going to have more than a 'negligible' effect as your conclusion states (which I remind you the description of 'negligible' for this section is 'No increase in the probability of flooding onsite and offsite') – We hope you are going to issue the sheep with wellies and life jackets!		Theoretically the introduction of PV panels will increase the run off rates due to the presence of the impermeable PV modules that rainfall can directly fall on, however once rainfall has fallen off the PV panel any flow will be able to spread and flow along the ground under the PV panels. Given the flat nature of the core Study Area it is likely that rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the panels were installed. Additionally, the area in which the Development is located is drained by a series of agricultural ditches, meaning that any ponding surface water is unlikely to be transferred to adjacent land.

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CH_Freepost_485	Member of public	27/06/2018	10.30am	Maintenance of the sea defences - We are very concerned with the Cleve Hill Solar Park taking over maintenance of the sea defence.	No	This is the opinion of the respondent. The Applicant is only seeking the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance. The Environment Agency strategy for the area (currently under consultation) is for the ongoing maintenance of the existing flood defences for at least the next 20 years but through consultation, the EA has outlined that it would cease maintenance of the existing flood defences in the event that Cleve Hill Solar Park is constructed; and
CH_Freepost_485	Member of public	29/06/2018	10.30am	You obviously have an interest in maintaining these for the development area, but with redundancies in place for a 1 in 1000-year flood event including the bund, 300mm freeboard and floating transformers, should repairs become so expensive that they are uneconomical for you as a company what reassurances do, we have that defences will be kept to the same standard?		This is the view of the respondent. In addition to the Applicant there are also other infrastructure owners in the immediate area which also have an interest in the continuing function of the sea defences.

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CH_Freepost_485	Member of public	30/06/2018	10.30am	Sea defences and MEASS (PIER volume 1 – chapters, page 10-29) – You state 'As outlines in table 10.1, the EA present their scenarios regarding the Core Study Area in relation to the MEASS. In the absence of the development it is likely that the flood defences to the north of the core study area will be maintained for the next 20 years and then the EA may implement managed realignment of the defences with construction of the new setback embankments, whereby the land behind the defences would be allowed to flood. This scenario relies on the implementation of measures outlined in the MEASS, which has yet to be agreed as part of the next stage of the MEASS.'	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS. Under the MEASS the preferred option is to allow managed retreat after the decommissioning of the Development.

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CH_Freepost_485	Member of public	01/07/2018	10.30am	Once again the wording you have chosen is deceitful. The PREFFERED OPTION for his land as set out in MEASS from the environment agency, (a copy of which is detailed on the next page) is to maintain the current defences for 20 years, following which they would implement managed realignment of the defences with construction of new setback embankments mitigating the impact of coastal squeeze and returning the land to an intertidal habitat. Nowhere state what the EA's preferred option is.	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS. Under the MEASS the preferred option is to allow managed retreat after the decommissioning of the Development.

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CH_Freepost_485	Member of public	02/07/2018	10.30am	By Cleve Hill Solar Park taking over the maintenance of the defences this continues the impact of coastal squeeze which the EA are attempting to move away from. What happens to the defences once you have decommissioned the site and left?	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS. Under the MEASS the preferred option is to allow managed retreat after the decommissioning of the Development.

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CH_Freepost_485	Member of public	03/07/2018	10.30am	Our preferred option would thereby bi in with the EA's findings for benefit Area 6.2 – Cleve Hill below: SEE IMAGE ATTACHED		The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS. Under the MEASS the preferred option is to allow managed retreat after the decommissioning of the Development.

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CH_email_513	Member of public	05/07/2018	6.01 pm	6. The European Commission Science for Environmental Policy highlights microclimate impacts on solar parks with soil under the panels up to 5.2^{0}C cooler in spring and autumn, affecting many important plant–soil processes including productivity and decomposition. They also found that areas under panels were likely to be a source of carbon dioxide (CO2) whereas control and gap areas tended to be a CO2 sink. In view of the sheer size of the area you are proposing to develop this would have a further unacceptable and detrimental impact on the area.	No	Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.

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CH_email_513	Member of public	05/07/2018	6.01 pm	8. We are aware that you have been leasing the proposed site for a number of years and, during that time, have actively carried out drainage activities which has potentially reduced the classification of the land, meaning it now falls into the category which allows such proposals to be considered. Additionally, the land in question has been successfully farmed with at least one crop per year ever since I moved to Graveney in 1990. With growing populations in the UK, arable land is at a premium and should not be taken for this purpose.		The statement regarding the Applicant leasing the site for a number of years and carrying out drainage activities is not true. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.
CH_Freepost_519	Member of public	06/07/2018	10.00am	2. As flood marshes, they are designed to filter water away through natural drainage where will this be going when it has been polluted by discharge from batteries and the panels.		No discharge or pollution is anticipated from batteries or panels or any electrical infrastructure across the site. Batteries will be contained within a compound. An assessment of potential accidents and disasters relating to the Development are included in the Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17

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CH_Freepost_519	Member of public	06/07/2018	10.00am	3. Effect on the soil structure due to the high concentration of the support poles needed and the pounding of these into the marsh soil.		The current arable baseline results in a level of compaction, following construction there is expected to be improvement in soil structure.

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CH_email_520	Member of public	09/07/2018	12.13pm	5. The revised proposal suggests that the applicants would take on aspects of flood management. This, however, is a responsibility which properly lies with the Environment Agency and should not be used as persuasion to allow the development.		The Applicant is seeking to secure the existing level of protection which the Development site benefits from throughout the operational lifetime of the Development. The Applicant is not seeking to influence Kent's flood strategy. The Environment Agency's MEASS strategy sets out an anticipated approach to coastal flood risk management over the next 100 years. Without the presence of the solar park, the EA expects to cease maintenance of the existing defences sometime between 20 and 50 years in the future in order to facilitate a managed realignment of the existing defences on the site. With the presence of the solar park, the EA expects to cease maintenance of the defences earlier, on the basis that the maintenance will be carried out by the main beneficiaries of it (those who own assets which are protected by the coastal defences), as it is clearly in their interests to do so. The MEASS is expected to set out a "Plan B" scenario should the

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						Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future.

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CH_email_532	Member of public	11/07/2018	12.37pm	5. To say that flood defences will be constructed to ensure protection is to misunderstand flood protection. Nature will invariably generate an event beyond the return period design parameters. To reduce this risk will require flood protection not only along the frontage of the site but also at the end and rear of the site wherever there is lower ground, to prevent the flood protection being outflanked. Because North Kent power stations are already on vulnerable sites, such extreme flood defences have already been built. However, even they might be overtopped in extremis.		The Development has been designed to withstand a 1:1000-year flooding event, by raising all electrical infrastructure off the ground. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.

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CH_email_541	Member of public	11/07/2018	10.21pm	6. Flood risk to Faversham and other areas As we know, the Environment Agency has set out plans to cease maintaining the sea defences in their current form and returning the area to intertidal habitat. This is for the purpose of mitigating the impact of coastal squeeze. I have concerns over the sea defences being maintained by a private company, against the Environment Agency's preferred option, and effectively putting Faversham at risk of flooding in the future for the purposes of protecting your solar panels. It is not appropriate for private industry to take over such important jobs in deciding what should happen with sea defences as the effect goes way beyond your project and the immediate area.	No	The Site does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The EA currently have responsibility for the maintenance of the defences and have agreed that the operator of the Development should economically contribute to the future maintenance of the defences. Given that the existing defences provide a level of protection up to the 1:1000 year flood event, there is no requirement for the defences to be raised beyond their current height. The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the

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						following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm. As such, the Development is not in conflict with most recent version of the MEASS.

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CH_email_556	Member of public	12/07/2018	4.10 pm	4. Flooding risk We see no assessment in this proposal regarding the increase in flooding risk to Faversham as a result of the installation of a solar park/power station and the effect of building an earth bund, up to 4.8m in height, around its critical infrastructure.	No	The Site does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The EA currently have responsibility for the maintenance of the defences and have agreed that the operator of the Development should economically contribute to the future maintenance of the defences. The earth bund will protect the compound in the unlikely event of a breach in the existing flood wall to the north of the Site. Measures to control surface water run-off to greenfield rates within the compound area are outlined in Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1). Additionally, the outer facing slopes of the bund will be planted and vegetated, which is likely to limit the potential for rainwater to be transferred rapidly to the surrounding area, therefore

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						there will be no increase in surface water run-off rates from the compound.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Another example of misleading information relates to the Flood Risk and Modelling evidence. The figures appear to relate to depth of water around the site, but as the site is not perfectly flat these figures give a misleading impression. Hydrologists usually reference figures to Ordnance Datum – without that information the information is meaningless.		Flood modelling undertaken by the Applicant uses Ordnance Datum and uses flood depths as appropriate to inform the site design.

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CH_email_625	Member of public	13/07/2018	5.38 pm	From what I can see from reading the work of Dr Alona Armstrong at the Lancaster Environment Centre There is simply not enough information available at present to assess the impact on the local environment. Such a huge area of panels will impact on the people who live close to the park, wildlife and even possibly on climate (creation of micro climates). This is without even considering the visual impact in such a beautiful area.		The areas of the site proposed for solar panels are currently used for arable farming, in which it would be expected that the ground is bare earth, or effectively bare earth (i.e., seeded or seedlings only) for at least c. 30-40% of the time. With the Development, a level of vegetation will exist on a permanent basis across the site. Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3) sets out the likely vegetation under the panels. Between and around the panels, grass and wildflower mix will be seeded and maintained, as set out in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). The vegetation will assist with preventing run-off and soil erosion, and increasing transpiration, relative to a bare-earth arable scenario.

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	6. Flood risk: The site is in a flood zone (Flood Zone 3a). The project proposal, in seeking to address potential concerns about possible flooding dangers, appears to us to rely almost wholly on the existence of the pre-existing coastal sea defences. This does not take sufficient account of the need in our view, to ensure that coastal / flood defences are adequate to specifically protect a solar photovoltaic electricity generating and storage facility, not the arable land and freshwater grazing marsh which is being protected by those defences currently. Additional reliance is placed on proposed design measures for example raising the height of the solar arrays, however we remain of the view that whilst for example raising the height of the solar arrays may protect them to some degree of flood risk, this does not offer tolerable reassurance in relation to the proposed energy storage facility (and has the obvious	No	The Development has been designed to withstand a 1:1000-year flooding event, by raising all electrical infrastructure off the ground, and surrounding the electrical substation area with an earth bund. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk.

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				negative effect of making them more visible and harder to screen). We would highlight that the PEIR does acknowledge that the facility is potentially at risk of sea flooding.		

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CH_email_537	Helen Whately	11/07/2018	4.45 pm	• Flood defences – My understanding is that you are seeking to take control of flood defences so that you can maintain them to reduce flood risk onto the site. I am concerned that this conflicts with the potential long-term use of the site as an area of compensatory habitat for the delivery of the Medway Estuary and Swale Strategy.	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS.

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CH_email_595	Faversham Town Council Town Clerk	13/07/2018	12.56pm	Then there is the potential risk of flooding of the site and the proposed bunding to prevent this. The North Kent Coast is highly susceptible to serious flooding (as happened in 1953 and 2013). There is much land adjacent to Faversham that provides natural flood plains in such emergencies among these are Ham and Nagden Marshes to the North of the Town and Cleve and Graveney Marshes and Seasalter Levels to the Northeast. It is proposed that if this development were to proceed, then this resource would be lost as the developer proposes to bund the whole site to protect their development. This surely would increase the risk to the remainder of the low-lying land around the Town and along the coastal strip to the East and West of the proposed development. Much	No	The Site does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The EA currently have responsibility for the maintenance of the defences and have agreed that the operator of the Development should economically contribute to the future maintenance of the defences. The Development will not feature a bund around the whole site. Given that the existing defences provide a level of protection up to the 1:1000-year flood event, there is no requirement for the defences to be raised beyond their current height. Th

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				more consideration must be given to this aspect of the development.		

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CH_email_595	Faversham Town Council Town Clerk	13/07/2018	12.56pm	There has been much said about the land beneath the arrays being suitable for undergrowth promoting a habitat for small mammals providing a food source for birds of prey. Looking at the sketchy information contained within the PEIR, it would appear that there would be little space for light to permeate, surely then this will cause there to be a dark, desert like environment beneath which would inhibit vegetation growth. Even if there was to be some vegetation and wildlife, it would be highly unlikely that birds of prey would venture into the vast and gloomy environment to hunt, bearing in mind that these birds normally soar at great height prior to swooping down on their prey.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2). Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high

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						variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.

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CH_email_534	All Saints Church	11/07/2018	3.19 pm	The revised proposal suggests that the applicants would take on aspects of flood management. This, however, is a responsibility which properly lies with the Environment Agency and should not be used as persuasion to allow the development.	No	The Applicant is seeking to secure the existing level of protection which the Development site benefits from throughout the operational lifetime of the Development. The Applicant is not seeking to influence Kent's flood strategy. The Environment Agency's MEASS strategy sets out an anticipated approach to coastal flood risk management over the next 100 years. Without the presence of the solar park, the EA expects to cease maintenance of the existing defences sometime between 20 and 50 years in the future in order to facilitate a managed realignment of the existing defences on the site. With the presence of the solar park, the EA expects to cease maintenance of the defences earlier, on the basis that the maintenance will be carried out by the main beneficiaries of it (those who own assets which are protected by the coastal defences), as it is clearly in their interests to do so. The MEASS is expected to set out a "Plan B" scenario should the

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						Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future.

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CH_email_536	Seasalter Chalet Owners Association	11/07/2018	3.49 pm	As an Association we also have concerns regarding your strategy for preventing the site from flooding. It is understood you may need to place large boulders at the foot of the sea wall to prevent damage to the foot of the structure and would be interested to know if you have implemented a study to show how this may affect the sea defences between the Association properties and the start of the concrete sea wall. Your comments will be appreciated. In recent years flood water has overtopped the beach in this area and caused water to inundate the rear of our site and we are worried that any reinforcement further along the coast will have a detrimental effect.	No	The DCO application does not include any proposals to place large boulders at the sea wall. The Development Description defines the maintenance the Applicant may need to carry out. Any plans to undertake large scale flood defence works would be subject to a separate consent.

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CH_email_486	Member of public	27/06/2018	11.25pm	How much concrete is intended to be poured into the lush Graveney marshes? Which mode of transport has been earmarked for transporting concrete to the beautiful Graveney marshes?		Concrete will be used in the electrical compound and at the transformer locations across the solar park. Initial worst-case estimates are than approximately 40,000 m3 of concrete could be required, and this has been used to calculate the construction traffic volumes. A concrete batching plant is proposed onsite to reduce traffic movements associated with concrete deliveries. All construction materials will be brought to site by road.

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CH_email_511	Member of public	04/07/2018	4.12 pm	We have been contacted by a number of constituents with regard to concerns around flooding in Whitstable, as a result of the Cleve Hill Solar Park development. I would be grateful if you could provide us with some information on this, if possible. The main contact we have received, has raised the issue that the land at the moment is sacrificial and allowed to flood. Under the proposed development there will be increased sea defences meaning the land will no longer be allowed to flood in the same way which will have implications for the surrounding areas including Whitstable. Is this correct? I would also be grateful for sight of any flood risk assessments, flood risk maps or modelled floodplains that have been undertaken for this scheme.	Yes	The Applicant has consulted with the EA throughout the pre-application consultation in addition to the statutory s42 consultation as detailed in Chapter 5 of this Consultation Report. The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable. The majority of the Development is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme events. Only the electrical compound is designed to withstand a breach of the existing defences.

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						It is therefore clearly in the asset owner's interest to maintain the current standard of defences, to at least the same standard that the EA currently do. The Applicant therefore increased the Development site boundary to include the flood defences as shown in Figures 1-3, Chapter 1. This was consulted on in the PEIR. Subsequently a position between the EA and the Applicant has been reached as included in Appendix 26. Please also see the Applicant's complete Flood Risk Assessment in Chapter 10 of the Environmental Statement (document reference 6.1.10).

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11. Cultural Heritage and Archaeology						
CH_email_418	Member of public	06/06/2018	9.56 am	**Archaeology and Heritage –** Again is this an independent assessment or another one of your own?		These assessments were carried out on behalf of the Applicant. Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference number 6). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.

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CH_email_520	Member of public	09/07/2018	12.13pm	I am writing as a regular worshipper at All Saints' Church, Graveney, a Grade I listed building which has recently been put in good repair as a result of heroic efforts to raise over £200k, and which stands on the edge of the proposed Solar Farm. I wish to make the following comments:		No Comment Required
CH_email_560	Member of public	12/07/2018	5.41 pm	There are likely to be ancient salt works on the site, such as occur elsewhere locally.		

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	8. Archaeological impact: We are concerned that there will be a range of effects on for example the setting and significance of the WWII pillbox, the Church of All Saints in Graveney, Graveney Court Farm, Sparrow Court Farm, Sayes Court and the six medieval salterns East of the site as well as the archaeological evidence of its long use as agricultural land since at least the Middle Ages. We do not agree that the fact that these effects are technically temporary renders them minor effects. The lifespan of the facility appears likely to be in the region of 25 years which means they are substantially more than merely transient effects. In addition, we are also concerned that there remains considerable uncertainty about the extent and significance of the archaeological remains within the site area.		The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11).

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CH_email_534	All Saints Church	11/07/2018	3.19 pm	I am the vicar of All Saints' Church, Graveney, a Grade I listed building which is well used for Sunday services as well as events for the whole community and open days. The church was constructed in Norman times but it is mainly 14th century and is surrounded by a churchyard. It has recently undergone a major restoration project, a huge undertaking, but it means the building is now in good repair. The church and its surrounding area are cherished for their natural beauty, tranquillity and wildlife. The church is on a popular cycling and walking route and the church and churchyard draw many visitors. All Saints' Church is on the edge of the proposed Solar Farm. At the moment being surrounded by areas full of natural beauty contributes to people's well-being, looking out on a huge sea of solar panels will have a detrimental effect. The Coastal Path is an important draw for tourism in the area.	Yes	Following the Phase Two consultation, the Applicant removed solar panels from a further 4.4 ha of Field Y. This was in part due to concern raised with respect to Graveney Church. Field Y has now been removed in entirety from the Proposed Development. This will help to reduce encroachment above the former marsh, and help to allow the church to be seen in a rural context (in this direction). Other changes include a separation of panel block edge from the Proposed Development Boundary, with suggested screening to soften the edges of the Development. No other effect on heritage significance of Areas was found or considered likely to occur. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).

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				The height of the constructions, visually like rows and rows of sheds, would ruin the pleasure currently taken from looking over open fields, the marsh to one side, the sea to the other.		

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12. Noise and Vibration						
CH_Freepost_485	Member of public	29/06/2018	10.30am	· The fact that approx. 142,152 steel galvanised piles will be vibratory piled to a depth of between 1 and 2.5m is obviously of no importance. However, you do mention the equipment numbers, e.g. 3,016 tables. This obviously sounds a lot better from your point of view than 142,152 piles, which therefore once again disguises the scale and impact of the development.		The number of piles and details of the impact piling process are outlined in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
CH_Freepost_485	Member of public	30/06/2018	10.30am	Noise pollution – We currently live in a very isolated position and as you will be aware from the results of the noise monitoring you carried out at Warm House we have 'Very few noise sources at this location. Some birdsong and wind in trees audible.' For reference in the following section you have set the current representative dB level for Warm House as '39 day-time' and '31 night-time'.		Noise and vibration impacts have been assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12).
CH_Freepost_485	Member of public	01/07/2018	10.30am	Construction noise – This is one of our major concerns, particularly with regards	No	Noise and vibration impacts have been assessed in Environmental Statement, Chapter 12: Noise and

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						Vibration (document reference number 6.1.12).

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CH_Freepost_485	Member of public	02/07/2018	10.30am	To the vibratory pile driving of the 142,152-steel galvanised supporting structures to a depth of between 1 and 2.5m, the closest point of this work will be 85m from my home. In addition, we are also worried about the building and use of the Haul Road which will be 190m away from the closest point. SEE IMAGE ATTACHED	No	Construction will be undertaken block by block, most of which will be complete within 3 to 4 weeks. Piling operations will be avoided in blocks A - I during winter months to avoid potential impacts on birds. The assessment of piling operations includes both manoeuvring equipment, and active piling. As a conservative assumption, for the purpose of assessing piling impacts on human receptors, it is assumed that 4 pilers could operate at the same time for 50 % of the working day (i.e. actively piling for 6 hours per day). Core working hours are set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) while the timing of construction vehicle movements is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Core working hours are proposed

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						to be between 07.00 until 19.00, Monday to Friday and 07.00 until 13.00 on a Saturday (unless in exceptional circumstances where need arises to protect plant, personnel or the environment). In addition to this, a start-up and close down period for up to an hour before and after the core working hours is proposed. This does not include the operation of plant or machinery likely to cause a disturbance.

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CH_Freepost_485	Member of public	03/07/2018	10.30am	How has the vibratory plie driving noise levels calculated, 65dB is apparently the same level as a normal conversation, how can this be the same as vibratory pile driving?		The number of piles and details of the impact piling process are outlined in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). The noise assessment made in Chapter 12: Noise and Vibration (document reference number 6.1.12) considers noise emissions at the receptor rather than the source.

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CH_Freepost_485	Member of public	27/06/2018	10.30am	(PIER volume 1 – chapters 12-20) You state 'Construction will be undertaken during daytime periods only, i.e., 0700 – 1900 weekdays, and 0700 – 1300 weekends;' and (PIER volume 1 – chapters, page 12-23) 'It should be noted however, that piling operations have been assessed as having an 'on time' of 50% of a working day.' That is 6 hours per day!	No	Construction will be undertaken block by block, most of which will be complete within 3 to 4 weeks. Piling operations will be avoided in blocks A - I during winter months to avoid potential impacts on birds. The assessment of piling operations includes both manoeuvring equipment, and active piling. As a conservative assumption, for the purpose of assessing piling impacts on human receptors, it is assumed that 4 pilers could operate at the same time for 50 % of the working day (i.e. actively piling for 6 hours per day). Core working hours are set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) while the timing of construction vehicle movements is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Core working hours are proposed

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						to be between 07.00 until 19.00, Monday to Friday and 07.00 until 13.00 on a Saturday (unless in exceptional circumstances where need arises to protect plant, personnel or the environment). In addition to this, a start-up and close down period for up to an hour before and after the core working hours is proposed. This does not include the operation of plant or machinery likely to cause a disturbance.

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CH_Freepost_485	Member of public	28/06/2018	10.30am	(PIER volume 1 – chapters, page 12 – 23) You state 'As a detailed in Table 12.10, the predicted noise levels are below the BS 5228 daytime construction noise criteria of 65 dB LAeq at human receptors for hardstanding and track construction, installation of PV panels and the installation of the substation.' What about the installation of PV Panel Framework (e.g. piling)? This is above the BS 5228 criteria level and not mentioned!	No	Construction will be undertaken block by block, most of which will be complete within 3 to 4 weeks. Piling operations will be avoided in blocks A - I during winter months to avoid potential impacts on birds. The assessment of piling operations includes both manoeuvring equipment, and active piling. As a conservative assumption, for the purpose of assessing piling impacts on human receptors, it is assumed that 4 pilers could operate at the same time for 50 % of the working day (i.e. actively piling for 6 hours per day). Core working hours are set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) while the timing of construction vehicle movements is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Core working hours are proposed

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						to be between 07.00 until 19.00, Monday to Friday and 07.00 until 13.00 on a Saturday (unless in exceptional circumstances where need arises to protect plant, personnel or the environment). In addition to this, a start-up and close down period for up to an hour before and after the core working hours is proposed. This does not include the operation of plant or machinery likely to cause a disturbance.

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CH_Freepost_485	Member of public	29/06/2018	10.30am	Why has the traffic on the Haul Road been combined with the activity but the distance of this road been highlighted? In your assumptions used (PIER volume 1- chapters, page 12-22) you state 'A total of 35 vehicle movements per hour along the Haul road', that is more than one every 2 minutes only 190 metres away from Warm House!	No	Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) considers potential noise impacts of the Development.
CH_Freepost_485	Member of public	30/06/2018	10.30am	Wind and the weather affect the way sounds travels, especially considering this is a large flat wide-open area, how has that been factored into your decibel projections?		Noise predictions made throughout the Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) are undertaken according to ISO 9613, which assumes downwind propagation for all noise sources. As a worst case, it is assumed that all equipment associated with the Development could operate at the same time, at 100 % capacity, during both daytime and night-time periods.

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CH_Freepost_485	Member of public	01/07/2018	10.30am	(PIER volume 1 – chapters, page 12 -30) 'The development design and embedded mitigation measures are such that noise and vibration effects have been found to be not significant at the identified human receptors for all construction activities.' We strongly disagree with this finding.		This is the opinion of the respondent.
CH_Freepost_485	Member of public	02/07/2018	10.30am	Operational noise –As well as the construction noise which mat last up to 2 years, we are also concerned about the noise level once operational. Asked about this previously you have stated that it is only the inverters and transformers that will make noise and you will not hear these.		Noise during the operational phase of the development is assessed in Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100 % capacity, during both daytime and night-time periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be lower than the limits set out in Chapter 12: Noise and Vibration (document reference number 6.1.12).

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CH_Freepost_485	Member of public	03/07/2018	10.30am	Inverters (PIER volume 1 – chapters, page 12-26) – You state 'Approximately 3,750 string inverters are anticipated to be installed as part of the development, which will be distributed throughout the solar PV array. The candidate unit to be installed is the Huawei SUN2000, for which the manufacturers documentation provides a sound pressure level of 55dB (A) at 1m.' You have calculated the sound power level to 63dB(A). As previously mentioned on the last page 60-65 decibels is normal conversation level. How will we not be able to hear 3,750 inverters 'having a conversation' on our doorsteps?		The noise and vibration from transformers, inverters and the energy storage is undertaken in the Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.2 (document reference number 6.1.12). The predicted noise levels amount to a low effect at the nearest receptors.

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CH_Freepost_485	Member of public	27/06/2018	10.30am	Transformers - The above is also true of the transformers, you have advertised (PIER volume 1 – chapter, page 12 – 26) “The candidate transformer supplier has advised that these units have a sound power level of 84 dB(A). 84 dB is equivalent to somewhere between city traffic and a petrol lawnmower, with 74 of these across the site how will we not hear them?		The noise and vibration from transformers, inverters and the energy storage is undertaken in the Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.2 (document reference number 6.1.12). The predicted noise levels amount to a low effect at the nearest receptors.

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CH_Freepost_485	Member of public	29/06/2018	10.30am	Taking into account the above your conclusion of an overall assessment of the operational noise level for Warm House is 34dB (PIER volume 1 – chapters, page 12 – 26) 'During daytime periods the level of noise due to the operation of the development is predicted to be at least 5 dB below the prevailing background noise level. A rating level below 0 dB is considered to be below the LOAEL, and a such is of negligible magnitude.' How is it even possible that you predict noise levels to be below current levels when inverters and transformers are operational – the MUST be incorrect? Or is this only after 10 years when screening is in place during the summer months?		The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100 % capacity, during both daytime and night-time periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be lower than the limits set out in Chapter 12: Noise and Vibration (document reference number 6.1.12).

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CH_Freepost_485	Member of public	30/06/2018	10.30am	The most worrying point of all these tests is your final conclusion of noise pollution in table 12.17 below, how is 'NO SIGNIFICANT EFFECT ON HUMAN RECEPTORS' possible – this conclusion must come from incorrect, false or biased information! SEE IMAGE ATTACHED		This is the opinion of the respondent. Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference number 6). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.

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CH_email_541	Member of public	11/07/2018	10.21pm	5. Noise We are concerned about the noise levels both during construction and once operational. We question some of the predictions for noise in your materials. Vibratory pole driving and additional traffic on the roads during construction and the proposed 3,750 inverters and 74 transformers which will all make noise and yet you believe these will not have an adverse effect on noise. Your overall findings in table 12.17 state 'no significant effects' during either construction or operation are ridiculous and make us question all of your research. This is obviously based on poor research and can only be false.		Noise predictions made throughout the Environmental Statement (document reference number 6) are undertaken according to ISO 9613, which provides a prediction of noise levels likely to occur under conditions favourable to sound i.e. down-wind and under a moderate, ground-based temperature inversion. Predictions are therefore worst case. Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference number 6). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Inadequate regard has been given to the noise from the 3532 Invertors (Table 5.3) and 73 transformers. Although they may not be very noisy individually, together the noise would very intrusive, especially at times when all the panels are generating. We have a 2 kW PV invertor in our attic, and the noise is noticeable below, despite attic floorboards, 300 mm attic insulation and plasterboard ceiling, so clearly the much higher powers in the proposed system will be much noisier. In terms of Noise, the Environment Agency has been scathing about the competency of consultants who provide noise reports for proposals, with numerous consultants providing very poor-quality reports and dubious data to justify a proposal (Association of Noise Consultants, June, 2018, Noise Bulletin July 2018). It may be that the Applicant has used consultants who have avoided such incompetence and	No	The noise and vibration from transformers, inverters and the energy storage is undertaken in the Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.2 (document reference number 6.1.12). The predicted noise levels amount to a low effect at the nearest receptors. Noise predictions made throughout the Environmental Statement (document reference number 6) are undertaken according to ISO 9613, which provides a prediction of noise levels likely to occur under conditions favourable to sound i.e. down-wind and under a moderate, ground-based temperature inversion. Predictions are therefore worst case. Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference number 6). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary

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				deviousness, but the background noise levels (eg: Chart 12.1) are given using LA90 but the project noise levels (EG: Chart 12.10) are given using LAeq(day). Leq is the noise level averaged over the whole day of 16 hours, so is completely different from LA90, giving a very misleading impression of noise effects. This means that if the scheme is assessed and approved based on such information, then the Applicant or its advisors would be at risk of five years imprisonment for providing such misleading reports.		and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.

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13. Socioeconomics, Tourism, Recreation and Land Use						
CH_call_399	Member of public	01/06/2018	9.45 am	Hasn't received the consultation leaflet and feedback form yet, and would like these sending to her. Extremely opposed to the project and believes that CHSPL are vandals. Extremely concerned for wildlife and the loss of the current landscape. Would like it recorded that she does not see the point of the community orchard or the pathways through the site, because she doesn't want any of it.	Yes/ No	Comment noted. The community orchard has been removed from the Applicant's plans, where lowland meadow is proposed instead. Based on the majority opinion from the feedback received, the Applicant has included a permissive pathway to create a loop walk from Seasalter Road.

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CH_email_405	Member of public	01/06/2018	4.58 pm	Some more questions for you to answer We said we didn't want any panels along Cleve Hill as it would take away our sight line when driving in and out so, 1. Putting in a 'community' orchard will do what to our sight line? 2. How are people going to get to it? 3. Where do you think they'll park? Cleve Hill, from Graveney Hill Farm is a private road and we don't want traffic down here impeding our access to and from our homes	Yes	In response to the majority of feedback to the consultation, the Applicant has removed the community orchard from its proposals, where lowland meadow is proposed instead. The Applicant also proposes agricultural post and wire fencing at Cleve Hill for added security.

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CH_email_559	Member of public	12/07/2018	5.22 pm	I object strongly to this proposed solar 'park' in Graveney Marshes. It would damage wildlife, tourism, the local economy, the wider Kent economy, the flood defences for Faversham, the beauty of the area, etc.. It would bring in a large number of HGV size lorries to very small country roads, and on a National Cycle route! You have made no comment or provisions for any of these things. The damage to the local wildlife itself should be enough to stop this as you have no way of knowing how great the impact would be. You need to make a report of the breeding habits of the local schedule one bird and the red listed birds to have any credibility. You should have to get a licence to do anything like this in breeding season and on that basis alone this should not be allowed.	No	The Applicant has consulted on a Construction Traffic Management Plan (CTMP) as part of its PEIR and has consulted on this with KCC and at a bespoke workshop on 19 September with community representatives. This is included in the Environmental Statement (document reference 6.4.14.1). The Applicant has undertaken extensive ornithological and ecology surveys as presented in the Environmental Statement (document reference 6.1) and has consulted on this with statutory and local nature conservation bodies. Regarding the batteries, two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. Please see Chapter 5 of the Environmental Statement (document reference 6.1.5).

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				You have given no specifics on the size of the proposed batteries to store the electricity produced by this panels. It is an industrial site and business on a large scale. It would be right next to one of the most popular walks in the county and next to at least one nature reserve. The mention of a benefit to the local councils of £1mill is laughable given the size of most council's budgets. I object.		

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CH_email_624	Member of public	13/07/2018	5.14 pm	I also disagree with the proposed solar panels at Cleve Hill. Faversham residents are running out of spaces to walk locally in the countryside. We have already lost some of the tree for the new housing developments at Matthew homes brogdale Road and for the Perry Court development. Needless to say, the traffic will be more unbearable than it is at present. We need to preserve the wildlife for future generations. Instead of living in a concrete jungle. I whole heartily disagree with the development. No doubt this will fall on deaf ears just like the other objections. Regards	No	Comment noted. Please see the traffic and transport assessment presented in Chapter 14 of the Environmental Statement (6.1.14). The Applicant has consulted with statutory and local nature conservation bodies on the landscape and biodiversity management plan (document reference 6.4.5.2) regarding biodiversity and habitat improvements.
CH_email_418	Member of public	06/06/2018	9.56 am	Evolving Proposals – We note that there will be 60 metres from the footpaths at Saxon Shore Way to the start of the layout. Presumably this is not a concession but merely based on the topography and the ditches present in the marsh.	Yes	The minimum distance between the Development and the Saxon Shore Way is 63 metres. Visual effects are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and consider effects on the Saxon Shore Way and footpaths within and around the site.

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CH_email_418	Member of public	06/06/2018	9.56 am	During a recent walk I made a point of talking with other walkers and cyclists on the Saxon shore way. Without exception they were upset and dumfounded at your proposals. They were all non-resident to the area and sorry at the potential loss of the tranquil beauty of this UK government designated unique area.		Visual effects are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and consider effects on the Saxon Shore Way and footpaths within and around the site. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.

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CH_email_419	Member of public	06/06/2018	10.05am	Can you please provide a detailed map showing access paths, and exactly where the panels are to be erected.		The Applicant provided detailed information on proposals for new permissive pathways as part of the in the PEIR as part of the parallel s42, s47 and s48 consultation. At the Phase Two community consultation events there were specific fact sheets and exhibition displays which provided more information on amenity proposals. The application design for the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. More information on the public rights of way within and around the site and an assessment of them can be seen in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.

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CH_Freepost_485	Member of public	01/07/2018	10.30am	Local walking and tourism – Walking (PIER Volume 1 – chapters, page 13-25) on this page you state 'for walkers on the Saxon Shore Way, the view of the fields immediately will change significantly'. This is a popular walking area, not only for locals and tourists but also for a large number of bird watchers who walk past this part of the Saxon Shore Way to spot the many varied species which nest and feed in the area. With the delay in habitat creation and the significant visual impact of the site on the Saxon Shore Way we feel that this will have a major impact on the enjoyment of all people visiting the area.		It is reported in the assessment that the site is within Graveney Marshes AHLV and that there are effects on users of the Saxon Shore Way and other PRoW. These are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and supporting appendices Environmental Statement, Technical Appendices 7.1-7.7 (document reference number 6.4.7.1-7).

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CH_Freepost_485	Member of public	02/07/2018	10.30am	Tourism (PEIR Volume 1 – chapter 13-25) – You conclude that 'On balance, this is not enough evidence to suggest that there would be a significant adverse effect on the local tourism offer, or on the tourism economy. Therefore it is concluded that any changes to visitor numbers as a result of the Development would likely be very small, if they materialise at all.'		No response required.
CH_Freepost_485	Member of public	03/07/2018	10.30am	This is a very vague conclusion, as there is not sufficient evidence you conclude that the change to visitor numbers would likely be very small, if they materialise at all. Have you done any surveys or studies to see how many tourists come to this area to bird watch or use Saxon Shore Way?		There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
CH_email_520	Member of public	09/07/2018	12.13pm	6. The Coastal Path is an important draw for tourism in the area. The height of the constructions, visually like rows and rows of sheds, would ruin the pleasure currently taken from looking over open fields, the marsh to one side, the sea to the other.		There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.

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CH_email_520	Member of public	09/07/2018	12.13pm	7. There would be no economic gain whatsoever to Graveney and no local jobs created. In spite of claims that property values would not be affected, local residents have already experienced difficulty for, quite clearly, those looking for a home close to the sea in a special landscape do not want to look at acres of solar panels.	Yes	The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.64km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7), this assessment on

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						neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference 6.4.7.5).

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CH_email_532	Member of public	11/07/2018	12.37pm	7. There are many people much better equipped than me to supply detailed information about wild-life and the merits of grassland adjacent to the Swale Estuary, however, I have enjoyed walking and cycling along the local footpaths and bridleways and despite all the promises these will not remain as they presently are.		All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included

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						through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_541	Member of public	11/07/2018	10.21pm	4. Local Walking and Tourism You conclusion regarding tourism is unsubstantiated with little evidence shown as to how you arrived at that conclusion. We know that the marshes and the Saxon Shore Way attracts tourists and walkers to the area. It is also used by birdwatchers extremely regularly. The local council has been working hard to make the area attractive to tourists and the unspoilt landscapes are a draw for visitors. It is obvious that this will have an adverse effect on attracting walkers to this area and the other things they will then spend their money on across the local area whilst here.		There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.

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CH_email_618	Member of public	13/07/2018	3.58 pm	Loss of Amenity 7. I live in Faversham and know the Graveney Marshes area well. These marshes of North Kent are part of a beautiful landscape and a special place with wide vistas enjoyed by local people and visitors alike. Dickens recognised the special nature of this landscape and memorably described it in “Great Expectations”. 8. The proposed development will completely change this view of open farmland and wildlife marshland to a landscape with column after column of dark panels stretching into the distance from almost every point of view. The industrial landscape created by the panels will be completely visible from numerous viewpoints in the surrounding area.		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.

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CH_email_618	Member of public	13/07/2018	3.58 pm	10. It is important to stress that the visual impact will not just be apparent to those walking the Saxon Shore Way coast path adjoining the development but from many miles around. This is because the landscape is flat and being marshland contains few trees to mitigate its impact. Indeed, the scale of the project and the fact that the solar complex would be in low-lying land would, in any case, almost entirely obviate any serious attempt to lessen its visual impact. It is hard to think of a rural environment less suitable in terms of visual impact for a development of this nature.		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
CH_email_640	Member of public	13/07/2018	11.50pm	Likely impact of the development on the landscape, Amenity and Economic value of the site have been covered adequately in the submission from the Faversham Society and I am supportive of the issues that they have raised.		The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number

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						6.1.13) considers public right of way and the user experience.

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CH_email_640	Member of public	13/07/2018	11.50pm	Footpaths As someone who frequently walks the local footpaths, the whole nature of the landscape will be changed by the construction of 2 metre high deer fences, with associated security cameras, to contain the site and this will further intensify the atmosphere of industrialisation of the landscape. The footpath from Nagden to Castle Coote at the western end of the site will also bounded by security fencing and walkers will no longer have any view over the wild open landscape of the marshes owing to the close proximity of the solar panels. It will result in walkers having to pass through an uninteresting corridor, with views of panel supports and associated infrastructure ,to access the seawall, from where they will look over row upon row of solar panels extending from the seawall borrowdyke to the back of the marsh.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13). There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual Impact

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						Assessment (document reference number 6.1.7).

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	9. The lack of any substantial local benefit: The proposal claims that the facility will produce enough clean electricity to power 110,000 houses which is described as being as many as all of the homes in Faversham and Whitstable. This we consider to be disingenuous and an attempt to give members of the communities most affected by this proposal the incorrect impression that this project is for their benefit and that they will receive the electrical energy produced. The truth is that the power generated would be sold into the national grid, to be used wherever needed. The profit from the sale of the electricity goes to Wirsol who will operate the facility once constructed, not the local communities. The only possible benefit is the estimated £1 million p.a. likely to be paid in business rates during the lifetime of the facility, which we consider to be a poor value exchange in light of the concerns we have described in this	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Environmental Statement Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference 6.1.4) presents the alternative sites considered. Should the Development be built, CHSP will contribute a significant amount of renewable energy to power over 91,000 homes. This is at a time when a significant proportion of energy generation is being closed owing to the decommissioning of coal fired power stations. The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme

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				response. Ends		and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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CH_email_524	Open Spaces Society	09/07/2018	2.58 pm	5) The enjoyment of the area for walker's bird watchers and equestrians will be diminished.		This is the opinion of the respondent. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
CH_email_534	All Saints Church	11/07/2018	3.19 pm	There would be no economic gain to Graveney and no local jobs created. In spite of claims that property values would not be affected, local residents have already experienced difficulty for, quite clearly, those looking for a home close to the sea in a special landscape do not want to look at acres of solar panels.		This is the opinion of the respondent. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
14. Access and Traffic						

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CH_email_418	Member of public	06/06/2018	9.56 am	Access and Traffic – 42.2% of respondents have identified this as a major concern and yet you give it two lines in your newsletter. Please provide details of how you propose to deliver this project, including materials etc. What is your traffic management plan? You may wish to know that at the first consultation I asked Hugh Brennan if there were plans to install a new road link off the A299. He assured me that there was not and made a promise that there would not be one. If this has changed the whole integrity of this scheme is in question.	No	At the Phase Two community consultation events there were traffic specific fact sheets and exhibition displays which provided more detailed information on Access and Traffic, as provided in the PEIR. The Applicant also held a focussed transport workshop held with elected members on the 19 September 2018. Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). There are no plans for a new road link off the A299.

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CH_email_419	Member of public	06/06/2018	10.05am	You have provided no information on your traffic management plan for what is clearly incredibly poor access to a site needing large movements of HGVs. Please provide details of how you intend to access this site. Also the roads leading to site will be receiving high levels of traffic movement throughout the life of the project. Will your company be providing funds to ensure the upkeep and maintenance of the local road network?	Yes	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). The Applicant has also committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix

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						A14.1 (document reference number 6.4.14.1).

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CH_email_513	Member of public	05/07/2018	6.01 pm	9. The amount of construction traffic from your development will be unbearable for the village. I live on Seasalter Road and will be directly impacted by the lorries and other traffic that will be used. The roads are very narrow, with no footpaths along most of the lane, and are regularly used by cyclists and walkers from the village and local farms. Additionally, the village school is right on the road and has their sports field on the other side of the road. The road is not wide enough for two small trucks to pass each other so all local traffic will be impacted. Additionally, we believe the traffic will create an unacceptable level of risk to students, pedestrians and cyclists, both from increased pollution from the construction traffic and the increased risk of accidents.	Yes	This is assessed in the Environmental Statement, Chapter 16: Air Quality, section 16.4 (document reference number 6.1.16). Mitigation is proposed in respect of construction dust, in the Environmental Statement, Chapter 14: Access and Traffic, section 14.4.5.1 (document reference number 6.1.14) and in non-road mobile machinery in Environmental Statement, Chapter 16: Air Quality, section 16.4.5.3 (document reference number 6.1.16). A Construction Environmental Management Plan (CEMP) is provided in the Environmental Statement, Technical Appendix: Construction Environmental Management Plan (document reference number 6.4.10.2), which includes dust management measures. Some measures are detailed in the Environmental Statement, Chapter 16: Air Quality section 16.4.5.1 (construction and decommissioning dust) and 16.4.5.3 (non-road mobile machinery) (document reference

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						number 6.1.16). No measures are required for construction traffic emissions, given the negligible predicted impact. The Applicant has proposed a number of mitigation measures in relation to construction traffic movements that are detailed within the Construction Traffic Management Plan (document reference number 6.4.14.1).

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CH_email_520	Member of public	09/07/2018	12.13pm	The residents of Graveney will be subjected to heavy traffic during construction and at the same time will be encroached upon by housing developments, coming out from Faversham at the Love Lane junction and along the south side of Graveney Road. To add to this by absorbing its traditional, distinctive marshland landscape into an industrialised 1,000 acre site, further marred by noise and large battery storage buildings will mean the destruction of the way of life of a small rural community.	Yes	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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CH_email_541	Member of public	11/07/2018	10.21pm	3. Traffic in the Village The number of lorry movements at the peak of the construction amounts to a movement approximately every two minutes throughout the day. The information provided at the consultation only described the number of additional lorries but each will need to enter and leave the site, again misleading the public regarding the true number of movements through the village. Our village roads cannot sustain this. We are effectively two villages combined into one (Goodnestone and Graveney) and there are no pavements along the roads between the two villages and there is a school ([redacted]) and pub on the main road which are used by residents of both villages. Having spoken to your representatives at the meeting there is no provision to put in pavements linking the villages to make it safer for residents. This is the very least that should be	Yes	Since the Phase Two consultation, the Applicant has reduced the traffic numbers associated with the worst-case construction programme. This is now a peak of 80 HGV vehicles per day. Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed

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				done given the disruption and risk to public health.		within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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CH_email_640	Member of public	13/07/2018	11.50pm	Access and Traffic As a Graveney resident I am concerned about the amount of lorry traffic generated during the construction phase of the solar park. This will cause an unacceptable level of congestion on the local, narrow roads, especially Seasalter Road and Head Hill Road that are not suitable for the frequent traffic required to transport materials to and from the site. As a local resident I am aware that just one lorry on Head Hill road is sufficient to cause a minor tail back because of the lack of passing places. We know that when accidents occur on the nearby Thanet Way, A299 and traffic is diverted through Graveney that this causes severe congestion and often brings the local road network to a standstill.	Yes	Since the Phase Two consultation, the Applicant has reduced the traffic numbers associated with the worst-case construction programme. This is now a peak of 80 HGV vehicles per day. Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed

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						within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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CH_email_446	Member of public	14/06/2018	1.28 pm	My name is [redacted], I live in [redacted] located next to [redacted]. I have seen the proposals for the solar farm which would surround the majority of our house. I personally do not have many issues with plans to build a solar farm. However, my question is where would the main entrance site be? Would the route be Cleve Hill lane which meets a dirt track leading to the farm? This also leads to my property and neighbours. The current state of the track due to heavy farm machinery is really not in good condition, and I fear that more use with heavy lorry's etc would further damage the existing track. If the proposed plans went ahead, would there be a possibility that the track could be resurfaced to withstand the extra use? Look forward to hearing from you.	No	Access to the Development will be via the existing access road to the London Array Cleve Hill substation and therefore not via Cleve Hill Lane.
15. Climate Change						

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CH_email_513	Member of public	05/07/2018	6.01 pm	10. We understand the solar panels you will be installing have been produced in China. This, and the significant amount of cement/concrete and other materials you will need to install your proposed development, create a huge carbon footprint which significantly offsets any 'green' impacts of the renewable energy that will be generated.		The procurement process for the Development has not started. The Applicant has assessed the influences of the development on Climate Change in Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15). The sources of information used in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15), are referenced in the chapter. Aspects for which CO2 costs are not available are identified.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Carbon reduction The Applicant claims that this proposal is the only way to achieve the UK's reductions in carbon as required by the Climate Change Act. This ignores the fact that the electricity generation system has a very good record of carbon reductions. The Committee on Climate Change (CCC), Reducing UK emissions – 2018 Progress Report to Parliament, 28 June 2018, says: "Overall, UK emissions are down 43% compared to the 1990 baseline. However most of this is down to excellent progress in reducing emissions from electricity generation."		No response required

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CH_email_560	Member of public	12/07/2018	5.41 pm	The CCC data shows that the Power sector has managed to reduce 'Actual emissions' close to 'Achievable emissions' (02-Exhibits PR18), and their time-series data shows that between 1990 and 2017, emissions from Power decreased from 204 to 72, a 75% decrease, while that from Buildings only decreased 106 to 85, a 20% decrease, so the effort needs to be focused on buildings, not on power.		No response required
CH_email_560	Member of public	12/07/2018	5.41 pm	One of the Committee's key messages to Government is to "support the simple, low-cost options" such as improving insulation of buildings. This would provide reductions in emissions at a lower cost. The proposed solar power station on Graveney Marshes is not a 'simple low-cost option' and therefore conflicts with the CCC advice.		No response required

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CH_email_560	Member of public	12/07/2018	5.41 pm	A big example of taking the CCC' advice to decarbonize buildings, is the London Energy Efficiency Fund (LEEF), which so far has saved 21 GWh of energy, with the St George's Hospital power and heating system increasing energy efficiency and saving money for patient care, while also reducing carbon. Another £500 million has now been allocated to the successor fund, the Mayor's energy efficiency fund (MEEF) so big carbon reductions and demand on the Grid will continue (www.london.gov.uk/press-releases/mayoral/mayors-500m-energy-fund-9). These schemes take place in existing buildings and so benefit occupants as well as the building owner, rather all the benefit of the proposed solar power station going to the developer.		No response required

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CH_email_560	Member of public	12/07/2018	5.41 pm	The fear that the closure of coal power stations might need a 'dash for gas' has proven unfounded (Coal to Clean, May, 2018). In addition, 95% of the required renewables growth to replace coal is already contracted or under construction, with offshore wind providing most of the growth from 2017 to 2025. The analysis shows that replacement generators will rarely be required as they will operate with a load factor of just 3% by 2025. Gas use for electricity generation has already peaked and will continue declining.		No response required
CH_email_560	Member of public	12/07/2018	5.41 pm	So, this Proposal is NOT essential for the UK's Carbon targets.		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which

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						presents more detail in respect of the viability and benefits of the Development.
CH_email_560	Member of public	12/07/2018	5.41 pm	Solar PV in the UK has the lowest load factor of all renewables and the average UK PV load factor is 10.8%, but the Applicant quotes a factor14 of 10.7%. So, the locational justification for a solar power station on Graveney Marshes is very weak because it is only slightly better than UK average.		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_560	Member of public	12/07/2018	5.41 pm	In contrast wind's Load Factor is over 30% rising to over 40% for the best offshore sites (Renewables 2016-2018.pdf). Solar PV has peak production in Quarters 2 & 3 – when electricity demand is lowest. The provision of a 350 MWh battery (4.3 Table 4.1) will not make any difference to the seasonal performance because its capacity is one thousandth of annual production – in other words very small. Although this battery may be there for Enhanced Frequency Response payments, this is only likely to be of benefit for some 5 years or so, because of the increased storage available from other sources. It is notable that wind has half (21 GW) of all installed renewable capacity (42 GW), indicating that installers have seen this as being their preferred route for non-domestic renewable electricity.		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_560	Member of public	12/07/2018	5.41 pm	Comparing land use footprint, clearly wind is far lower than PV, but for the same avian and other reasons that Cliffe Airport was rejected, a wind power station on Graveney Marshes would also be rejected. This means that Graveney Marshes is an unsuitable site for renewable power. This means that Graveney Marshes is an unsuitable site for renewable power.		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
16. Air Quality						

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	7. The effects of construction and decommissioning on local communities and air quality: We are concerned by the information that the total construction programme is expected to last for a period of up to two years and that during the peak construction phase (expected to last for approximately four months) up to 75 HGVs and 48 LGVs could be required to access the site using a single access point, per day. The traffic effects during the decommissioning of the facility are stated to be likely to be the same (possibly somewhat lesser). In addition to the concerns about local communities having to endure the traffic effects during the construction and decommissioning phases, Faversham Liberal Democrats have prior concerns about pollution and air quality in the local area, and we have previously undertaken research which shows that in some local areas, most notably the A2 at Ospringe in Faversham, nitrogen	Yes	Since the Phase Two consultation, the Applicant has reduced the traffic numbers associated with the worst-case construction programme. This is now a peak of 80 HGV vehicles per day. Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed

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				dioxide levels are routinely exceeding legally binding air quality standards.		within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). This is assessed in the Environmental Statement, Chapter 16: Air Quality, section 16.4 (document reference number 6.1.16). Mitigation is proposed in respect of construction dust, in the Environmental Statement, Chapter 14: Access and Traffic, section 14.4.5.1 (document reference number 6.1.14) and in non-road mobile machinery in Environmental Statement, Chapter 16: Air Quality, section 16.4.5.3 (document reference number 6.1.16). A Construction Environmental Management Plan (CEMP) is provided in the Environmental Statement, Technical Appendix: Construction Environmental Management Plan (document reference number 6.4.10.2), which includes dust management measures. Some measures are detailed in the Environmental

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						Statement, Chapter 16: Air Quality section 16.4.5.1 (construction and decommissioning dust) and 16.4.5.3 (non-road mobile machinery) (document reference number 6.1.16). No measures are required for construction traffic emissions, given the negligible predicted impact.

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CH_email_526	Fav Lib Dems	10/07/2018	8.44 am	Notwithstanding the predictions made to the effect that there will be no exceedances of nitrogen dioxide levels at any identified receptor as a consequence of vehicle exhaust arising from the construction process, we remain concerned that industrial traffic associated with this project may exacerbate the already dangerously poor air quality in parts of Faversham and its surroundings.		This is assessed in the Environmental Statement, Chapter 16: Air Quality, section 16.4 (document reference number 6.1.16). Mitigation is proposed in respect of construction dust, in the Environmental Statement, Chapter 14: Access and Traffic, section 14.4.5.1 (document reference number 6.1.14) and in non-road mobile machinery in Environmental Statement, Chapter 16: Air Quality, section 16.4.5.3 (document reference number 6.1.16). A Construction Environmental Management Plan (CEMP) is provided in the Environmental Statement, Technical Appendix: Construction Environmental Management Plan (document reference number 6.4.10.2), which includes dust management measures. Some measures are detailed in the Environmental Statement, Chapter 16: Air Quality section 16.4.5.1 (construction and decommissioning dust) and 16.4.5.3 (non road mobile machinery) (document reference

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						number 6.1.16). No measures are required for construction traffic emissions, given the negligible predicted impact.
17. Miscellaneous Issues						

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CH_email_501	Member of public	02/07/2018	5.58 pm	Just a quick question. What fire precautions are in place for your Battery banks? Do they require fixed firefighting equipment? I'm Just interested to know. Kind regards		Fire detection and suppression equipment is likely to be deployed as part of the energy storage facility. The exact details will depend on the type of batteries installed. Control systems, cooling and battery management systems are the most effective way to prevent fire. The battery arrays will also be designed to have sufficient separation and ensure that if a fire does start, it can be contained and will not spread. ES Chapter 5: Development Description provides a summary of the types of measures likely to be implemented.

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CH_email_652	Member of public	17/07/2018	8.00 am	Hi, I've been a vociferous supporter of your Cleve Hill project in my local community in East Kent. The argument I'm currently coming up against is; you plan to sell the power generated off shore rather than it being used for the UK. I can find no direct confirmation or otherwise about this so can you please shed some light? I assume all power generated would need to enter our national grid first? Is that correct? Is it then up to the National Grid what they do with it? I know the UK is fairly high importer of electricity but also that we do export some. Any information you can give would be much appreciated.	No	The Development would connect into the National Grid network at the Cleve Hill substation where then it would be redistributed as part of the centralised grid system.

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CH_email_418	Member of public	06/06/2018	9.56 am	What we're doing – Please advise if the environmental studies have been undertaken by an independent company or by yourselves. Also please can you provide a copy.		Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference 6.1). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.
CH_email_418	Member of public	06/06/2018	9.56 am	DCO Submission – Timescale here seems a little short after 13 July. Please can you provide me with the necessary references and department that I need to write to at the DCO. Please advise if this letter will be forming part of your submission evidence.		The resolution of key issues with consultees has led the application submission to be delayed beyond August 2018.

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CH_email_419	Member of public	06/06/2018	10.05am	I see that battery storage remains an option but where on the site will the buildings be placed, what size will they be and what plans are in place to ensure there is no leakage?		Information including the Rochdale Envelope parameters and energy storage facility are clearly set out in Environmental Statement Chapter 5: Development Description (document reference 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have the same magnitude effects, or effects of lesser magnitude than those included in the Environmental Statement (document reference 6.1). No leeching is anticipated from any electrical infrastructure on the site. A Phase 1 Preliminary Site Assessment has been undertaken

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						as presented in the Environmental Statement, Technical Appendix 10.4 (document reference 6.4.10.4). This identifies potential contaminants of concern and provides recommendations for further investigations. Major Accidents and Disasters is covered in the Environmental Statement Chapter 17: Miscellaneous Issues, section 17.7 (document reference 6.1.17) and specifically the potential for the Development to cause major accidents or disasters is covered in section 17.7.2. No risk of major incidents is identified in any development phase

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CH_Freepost_485	Member of public	01/07/2018	10.30am	House prices and project changes – As discussed with you on several occasions and detailed again at the start of this letter our plans as a family was for my son and his wife to purchase some land from me and to build a house where the barns are currently. One of the main benefits of this was that by Keith and Angela buying land from me I would be able to pay off the small mortgage I have left on Warm House and this would also provide me with savings to supplement my small single pension income. Without this I will at some stage in the future need to sell the house as I will be unable to afford to keep living here.		The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.7km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7), this assessment on

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						neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference 6.4.7.5).

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CH_Freepost_485	Member of public	02/07/2018	10.30am	When [redacted] and [redacted] discussed this with you [Applicant, name redacted], you showed no compassion and just shrugged your shoulders and said 'we can't be held responsible for a timing issue". Once again showing a complete lack of empathy and compassion for the impact your companies have had.		The Applicant recognises that the long time period associated with the planning process for NSIPs can cause uncertainty for close neighbours and community members. The Applicant has kept all neighbours informed of the project's development via regular written communication and face-to-face meetings as outlined in Chapter 7 of this Consultation Report. The resolution of key issues with consultees has led to the application submission to be delayed beyond Q3 2018 which was stated in the SoCC.

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CH_Freepost_485	Member of public	03/07/2018	10.30am	The major issue we have with regards to not only the statement of “we can’t be held responsible for a timing issue’ but also the fact that it will be increasingly difficult to me to afford to keep living here is that I will now not be able to sell the property for anywhere near the value of what Warm House would have been worth before your proposal letter dropped through the door (surely a ‘timing issue’ of your making). This is even if I can find a buyer who will be willing to put up with the uncertainty of the proposal, the major 2-year building program including the vibratory pile driving of approximately 142, 152 galvanised steel piles and the visual impact (which would only be slightly mitigated after a period of 12 years).		Noise and vibration impacts have been assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12). The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference 6.4.7.5).

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CH_Freepost_485	Member of public	27/06/2018	10.30am	Your response on several occasion when asked about the impact of house prices is 'There's no evidence to suggest either wat that property prices are reduced by solar farms'. This is a nonsense statement, firstly and by your own admission there has never been a solar farm like this in the UK previously so there will be no comparable evidence, secondly, by looking at the property and the situation it sits in it is obvious there will be a substantial loss in value, not only due from when it is actually built but also from the uncertainty surrounding the development and the 2 years of construction noise and disruption. If you think there is no impact to property prices why have you moved the edge of the park back over 80m and then try to hide it with screening?		The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced3.64km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7), this assessment on

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						neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference 6.4.7.5).

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CH_Freepost_485	Member of public	28/06/2018	10.30am	Another point we would like to raise regarding house prices and the ability to sell a property is the scale process of the only property currently on the market which is immediately affected by the development (although nowhere near to the severalty of warm house) being Nagden house, sandbanks lane, Graveney, Faversham, Kent, ME13 9DP. This was on the market for £1,300,000 and had an offer accepted on this. This was discussed with you in February this year when talking about the effect on house prices and you advised that the prospective purchasers had spoken with you and had said that they were happy with the development. As you are aware, the buyers pulled out.		There are a number of factors which are involved in fluctuations of property prices. The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced3.64km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter

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						7: Landscape and Visual Impact Assessment (document reference 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference 6.4.7.5).

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CH_Freepost_485	Member of public	29/06/2018	10.30am	As an update on this property the price was reduced to £1,000,000, has not been sold and now has been taken off the market. Is this not evidence?		There are a number of factors which are involved in fluctuations of property prices. The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced3.64km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter

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						7: Landscape and Visual Impact Assessment (document reference 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference 6.4.7.5).

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CH_Freepost_485	Member of public	30/06/2018	10.30am	In our view it is therefore obvious that house prices and the ability to sell the house is severely affected by this proposal whether the planning permission is granted or not.		There are a number of factors which are involved in fluctuations of property prices. The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced3.64km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter

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						7: Landscape and Visual Impact Assessment (document reference 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference 6.4.7.5).

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CH_Freepost_485	Member of public	02/07/2018	10.30am	Compensation – As also discussed with you on several occasions it is your policy that compensation will not be paid, for all the points raised in this letter so far, we ask that you now reconsider your company's stance on this. It is not right and should not be allowed that a company can come in and have such a detrimental impact on people's lives, both mentally and finically without offering compensation in any way. This is not about our right to a view, his is about our right to a normal life!	No	As discussed in person with the individual. The Applicant has sought to mitigate the impacts of the Development through embedded design, and is not offering compensation. The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced3.64km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the

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						visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference 6.4.7.5).

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CH_Freepost_485	Member of public	28/06/2018	10.30am	Mental health – As I am sure you can understand from the details provided in the background at the start of this letter, the way in which Hive Energy UK, Wirsol Energy, Arcus Consultancy Services and Counter Context have handled this process has led to significant mental health effects in myself and my family, there range from depression, lack of sleep and on-going stress relating to the future, including financial worries and being powerless to move forward with our lives.	No	The Applicant recognises that the long time period associated with the planning process for NSIPs can cause uncertainty for close neighbours and community members. The Applicant has kept all neighbours informed of the project's development via regular written communication and face-to-face meetings as outlined in Chapter 7 of this Consultation Report. The resolution of key issues with consultees has led to the application submission to be delayed beyond Q3 2018 which was stated in the SoCC.

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CH_email_560	Member of public	12/07/2018	5.41 pm	The Applicants should also have regard to CPRE's "Future Energy Landscapes" (FEL) which concludes: "The FEL methodology has been tested and has shown that strong preferences about ownership, decision making control and distributive fairness underpin any acceptance of energy generation infrastructure in the landscape. The process of 'grounding in place' (which is a fundamental part of the Future Energy Landscapes methodology) results in energy plans that reflect local people's understanding of what will work in the place they call home. It cannot be shortcut, and it does not work at larger spatial geographies (such as whole local authorities) because people need to relate their energy plan to the realities of the community dynamics and landscapes where they live. This goes against the current direction of travel for government policy making on communities and energy, which is currently moving towards the district and supra district scale.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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				Such a move towards larger spatial geographies runs the risk of entrenching existing views that energy planning is 'done to' local communities and that meaningful consent is not an element in the decision-making process."		

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CH_email_560	Member of public	12/07/2018	5.41 pm	Energy saving programmes in the USA have proved to be three times cheaper than new supply. When scaled up to the size of power stations these savings really add up. So instead of the Applicant spending the money destroying Graveney Marshes, similar investment in Negawatts would achieve the same result with no objections and no requirements for a DCO or other bureaucracy. If the Applicant carried this out with the NHS, where there is a huge scope for energy saving, this would yield large health and social benefits as well as reducing carbon and enabling continuity of supplies. Alternatively, the Applicant could carry out similar work with Community Energy groups, which would also yield great social and community benefits	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_560	Member of public	12/07/2018	5.41 pm	The Applicant's proposals will not help to reduce the cost of electricity to consumers, which continues to rise in price. In contrast, consumer installations of renewable energy, such as PV, reduce the impact of such price increases, especially if diversion of excess generation goes to heating/hot water or electric vehicles (EVs). Indeed Domestic PV is still becoming cheaper – IKEA/Solar Century are offering 4 kW system for £4,405 inclusive, with potential savings of £427 meaning a yield of over 9%. (https://online.solarcentury.com/ikea/calculator-time-restricted-offer?cid=em|gb|solar|20180612174428077_3). So instead of ever-increasing electricity costs consumers would have ever increasing savings.		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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CH_email_560	Member of public	12/07/2018	5.41 pm	It is notable that during 2016 -17 there were 596 NETS events where transmission circuits were disconnected either automatically or by urgent manual switching, and this was more than in the previous year. Although the majority of these events had no impact on electricity users with only 29 resulting in loss of supplies to customers, but such losses are very serious for critical users. A Centrica survey (Mission Critical Power, June 2018, p41) shows that 81% of businesses have had at least one power failure in the past year. So, increasing numbers of businesses are investing in on-site backup which can both increase reliability but also reduce power quality issues. So Graveney Marshes is the wrong place for a power station - it is not close to such businesses, and the increasing availability of distributed power means much less need for supplies connected to the Grid, and hence no need for the Applicant's proposal.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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				In its summer outlook report, National Grid said: ”Peak transmission system demand for high summer (June-August) was forecast at 33.7 gigawatts (GW) and the summer minimum at 17 GW. The increase in distribution connected generation, for example wind and solar photovoltaic, has contributed to this downward trend in demand. Lower overall electricity demand, along with increased renewables generation, means there is less need for gas-fired electricity generation.” The lower gas use means lower carbon emissions too.		

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CH_email_560	Member of public	12/07/2018	5.41 pm	The National Grid also states (03_Summer Outlook_24Apr18) that it expects electricity demand on the transmission system to fall, which suggests that the transmission costs per MWh will increase, which provides additional incentive to generate locally rather than use the National Grid. Unfortunately the market structure is biased in favour of high cost supply: because customers pay per unit of electricity consumed, profits only increase if electricity use increases. Companies could make money by helping consumers to use less energy, but at present they compete to find the cheapest power supply. As the 'Reversing the current, A Manifesto for Putting Energy Users First' Report says: "When the user is at the centre, the old divide of demand and supply evaporates, replaced by a single question: How do I meet the needs of the user in the most cost-effective way? By focussing on the user, we have a genuine chance to cut emissions,		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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				make businesses and the public sector more efficient and competitive, and lift the vulnerable from fuel poverty." A huge benefit of distributed energy and consumption is that transmission losses are reduced. The UK's electricity transmission and distribution system are incredibly inefficient. The 'Less Waste More Growth' Report (www.lesswastemoregrowth.co.uk/report), shows that losses in the transmission and distribution system amount to 7.9% of the electrical output from power sources. In contrast, Germany has half such losses, at 3.9%. So minimising the transmission distances reduces the power losses. So the proposed solar power station just adds to the losses, and is in the wrong place for improving transmission and distribution efficiency, particularly as East Kent is relatively low demand area in contrast to Medway and London.		

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CH_email_560	Member of public	12/07/2018	5.41 pm	The Applicant also needs to detail the energy conservation measures which it promised would be funded as part of the scheme, and who will benefit from that.	No	The Applicant has not made any commitments in this regard.
CH_email_560	Member of public	12/07/2018	5.41 pm	There must also be a formal commitment to Post Implementation Management which must include regular monitoring and reporting, at least four times a year, for the life of the scheme.	No	This is outlined in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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CH_email_560	Member of public	12/07/2018	5.41 pm	Annex: Extract from Minutes of meeting concerning the proposed Cleve Hill Solar Farm held on Tuesday, March 22, 2018, \line at Queen\'81\'66s Head House, Charing} Present: Cleve Hill Solar Farm: Mike Bird (Arcus Consultancy Services Ltd), Hugh Brennan, Emily Marshall (Counter Context) CPRE Kent: Julie Davies (planner), David Mairs (PR & communications), Vicky Ellis (chair), Graham Warren} GREAT Lut Stewart (vice-chair)} HB said grassland could be retained on the site to allow grazing by sheep. Work was being done with Lancaster University concerning the amount of light reaching the grassland and how eco-culture could be maintained. Sheep would not be on site throughout the year because of potentially wet conditions. Two-thirds of the site would be covered by panels, said HB.		No response required.

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				VE asked how landscape damage could be justified in designated areas. HB said that as this was a nationally important infrastructure project, things were regarded differently. EM added that this needed to be worked out and the development justified in that context; there was a difference in national and local designations.		

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CH_email_570	Member of public	12/07/2018	8.53 pm	In fact, this area has been responsible for ... literally saving my sanity … having suffered for many years with depression and other serious mental health issues. I do believe its vastness, my love of nature and having the opportunity to be, sometimes, in total isolation, really aided my recovery.		No response required.
CH_email_570	Member of public	12/07/2018	8.53 pm	I have worked as a counsellor/therapist for 10 years and I therefore know, also from a professional view point, the importance of open spaces for mental health and wellbeing (putting my personal view to one side).		No response required.

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CH_email_626	Member of public	13/07/2018	5.44 pm	5. Financing: the project financial model should be disclosed so the Government can take an informed view on whether the scale of the project is appropriate.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. A Funding Statement will also be included with the application as part of the Compulsory Acquisition Information (document reference number 4.2).

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CH_email_626	Member of public	13/07/2018	5.44 pm	5. Financing The developers Hive Energy Limited and Wirsol must disclose their financial due diligence for the project so that the Government can make an informed decision. Otherwise it is impossible for the Government to tell whether the scale of the project is based on rational need or greed. Financial modelling is an extremely subjective art form and it may well be the case that the project could be scaled back to the benefit of the existing and future wildlife and biodiversity of the site and surrounding area if more competitive financing could be sourced or equity returns scaled back. Without this information the Government and the public is unable to adequately scrutinise and challenge the project's scale. We cannot allow biodiversity and wildlife to be placed at risk for the sake of profiteering, masquerading as a contribution to a cleaner-greener future. Yours sincerely,	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. A Funding Statement will also be included with the application as part of the Compulsory Acquisition Information (document reference number 4.2).

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Phase Two Feedback Forms

Phase Two Feedback Forms			
Ecology and bird life We have produced a land management programme in conjunction with Natural England, RSPB and Kent Wildlife Trust. Regarding local ecology and bird life in the area what are your main concerns for those species that are important to you should the park be developed?			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_014, PhaseTwo_FeedbackForm_056, PhaseTwo_FeedbackForm_105, PhaseTwo_FeedbackForm_108, PhaseTwo_FeedbackForm_132, PhaseTwo_FeedbackForm_231, PhaseTwo_FeedbackForm_066 PhaseTwo_FeedbackForm_084	Concern for adjacent protected areas: including SPA, SSSI, and RAMSAR sites.	No	The additional areas included in the Development since the PEIR, which comprise part of The Swale SPA/SSSI/Ramsar site, will not contain any new development structures; they are included to facilitate ongoing maintenance of the sea wall and to bring biodiversity benefits through more appropriate management of the freshwater grazing marsh in the east of the site. Chapter 9, Environmental Statement (document reference

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			6.1.9) and RIAA (document reference 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites.
PhaseTwo_FeedbackForm_162, PhaseTwo_FeedbackForm_193, PhaseTwo_FeedbackForm_062 PhaseTwo_FeedbackForm_111	Respondents expressed concern for birds mistaking solar panels for water, particularly migratory birds	No	Chapter 9, Environmental Statement (document reference 6.1.9) assesses the potential effect of collision to birds; Natural England guidance states that there is no scientific evidence of collision risk associated with solar PV arrays.
PhaseTwo_FeedbackForm_007, PhaseTwo_FeedbackForm_009, PhaseTwo_FeedbackForm_010, PhaseTwo_FeedbackForm_016, PhaseTwo_FeedbackForm_021, PhaseTwo_FeedbackForm_025, PhaseTwo_FeedbackForm_027, PhaseTwo_FeedbackForm_038, PhaseTwo_FeedbackForm_043, PhaseTwo_FeedbackForm_044, PhaseTwo_FeedbackForm_052 PhaseTwo_FeedbackForm_053 PhaseTwo_FeedbackForm_057, PhaseTwo_FeedbackForm_072 PhaseTwo_FeedbackForm_073 PhaseTwo_FeedbackForm_074	Respondents generally commented that all species and the ecosystem at the site are important. Flora and fauna specifically noted included: **Birds:** Brent geese, lapwing and golden plover, Avocet, Wigeon, Dunlin, Redshank, Shelduck, Teal, Little Egret, Grey Plover, Knot, Ruff, Black Tailed Godwit, Bar Tailed Godwit, Curlew, Short Eared Owls, Hobby and Peregrine Falcons. skylarks, dunnocks and yellow wagtails together	No	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effect's birds, including the qualifying interest features of the designated sites.

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PhaseTwo_FeedbackForm_085 PhaseTwo_FeedbackForm_092, PhaseTwo_FeedbackForm_096 PhaseTwo_FeedbackForm_099 PhaseTwo_FeedbackForm_110 PhaseTwo_FeedbackForm_112 PhaseTwo_FeedbackForm_113, PhaseTwo_FeedbackForm_119 PhaseTwo_FeedbackForm_120 PhaseTwo_FeedbackForm_121 PhaseTwo_FeedbackForm_122 PhaseTwo_FeedbackForm_127 PhaseTwo_FeedbackForm_128 PhaseTwo_FeedbackForm_148 PhaseTwo_FeedbackForm_155 PhaseTwo_FeedbackForm_159 PhaseTwo_FeedbackForm_160, PhaseTwo_FeedbackForm_165 PhaseTwo_FeedbackForm_166 PhaseTwo_FeedbackForm_169 PhaseTwo_FeedbackForm_175 PhaseTwo_FeedbackForm_176 PhaseTwo_FeedbackForm_178 PhaseTwo_FeedbackForm_180 PhaseTwo_FeedbackForm_186 PhaseTwo_FeedbackForm_188 PhaseTwo_FeedbackForm_191 PhaseTwo_FeedbackForm_192 PhaseTwo_FeedbackForm_196 PhaseTwo_FeedbackForm_199	with reed buntings, oystercatcher and lapwings nesting all over the site. Marsh Harriers **Bats:** oprano pipistrelles, common pipistrelles, noctules and Daubenton's bats Water voles, Hedgehogs Schedule 1 - hobby, marsh harrier, merlin, barn owl, peregrine, little fen, bearded tit, cettis, warbler, cirl bunting. RED LISTED: lapwing, cuckoo, skylark, yellow wagtail, yellow hammer, corw bunting, linnet. This is not acceptable. KRAG REPORT LISTED: great crested newt, viviparous lizard, smooth newt, snakes, palmate newt		

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PhaseTwo_FeedbackForm_203 PhaseTwo_FeedbackForm_208 PhaseTwo_FeedbackForm_214 PhaseTwo_FeedbackForm_230 PhaseTwo_FeedbackForm_234 PhaseTwo_FeedbackForm_235 PhaseTwo_FeedbackForm_236 PhaseTwo_FeedbackForm_244 PhaseTwo_FeedbackForm_247 PhaseTwo_FeedbackForm_267 PhaseTwo_FeedbackForm_046 PhaseTwo_FeedbackForm_005 PhaseTwo_FeedbackForm_011 PhaseTwo_FeedbackForm_012 PhaseTwo_FeedbackForm_133 PhaseTwo_FeedbackForm_171 PhaseTwo_FeedbackForm_179 PhaseTwo_FeedbackForm_210 PhaseTwo_FeedbackForm_225 PhaseTwo_FeedbackForm_273 PhaseTwo_FeedbackForm_001 PhaseTwo_FeedbackForm_004 PhaseTwo_FeedbackForm_008 PhaseTwo_FeedbackForm_035 PhaseTwo_FeedbackForm_047 PhaseTwo_FeedbackForm_049 PhaseTwo_FeedbackForm_061 PhaseTwo_FeedbackForm_067 PhaseTwo_FeedbackForm_068 PhaseTwo_FeedbackForm_069			

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PhaseTwo_FeedbackForm_070 PhaseTwo_FeedbackForm_081 PhaseTwo_FeedbackForm_095 PhaseTwo_FeedbackForm_104 PhaseTwo_FeedbackForm_115 PhaseTwo_FeedbackForm_129 PhaseTwo_FeedbackForm_150 PhaseTwo_FeedbackForm_223 PhaseTwo_FeedbackForm_238 PhaseTwo_FeedbackForm_264			
PhaseTwo_FeedbackForm_043 PhaseTwo_FeedbackForm_090 PhaseTwo_FeedbackForm_167 PhaseTwo_FeedbackForm_177 PhaseTwo_FeedbackForm_018, PhaseTwo_FeedbackForm_097	Respondents expressed concern that the Habitat Mitigation Area proposed is not sufficient.	Yes	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effect's birds, including the qualifying interest features of the designated sites. The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity improvements with

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			Natural England, RSPB and Kent Wildlife Trust. This has resulted in an agreed Arable Reversion Habitat Management Area ('AR HMA') for birds of 56 ha, which has increased from 41ha between PEIR and Application submission.
PhaseTwo_FeedbackForm_003 PhaseTwo_FeedbackForm_022 PhaseTwo_FeedbackForm_029 PhaseTwo_FeedbackForm_051 PhaseTwo_FeedbackForm_101 PhaseTwo_FeedbackForm_147 PhaseTwo_FeedbackForm_168 PhaseTwo_FeedbackForm_229	Respondents commented specifically that the loss of open farmland will have major impact on migratory and over-wintering bird species	No	Water birds and marsh harrier are given a large degree of attention in the assessment (Chapter 9, Environmental Statement (document reference 6.1.9)) because they are the species associated with the adjacent European designated site. The wintering and farmland bird communities are identified as Important Ecological Features and an assessment of the potential effects on these species has been provided.
PhaseTwo_FeedbackForm_002	The impact of noise on residents cannot be ignored but without a doubt will also affect foraging habitat for birds and other animals.		The Applicant has avoided potential noise impacts relating to the Development by designing out potential noise pollution upon receptors. This has been done by placing transformers away from the nearest receptors, and surrounding

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			the energy storage facility and substation compound with a 7m high bund. The Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) set out the predicted noise levels and outlines the mitigation proposals. Noise during the operational phase of the development is assessed in the Environmental Statement, Chapter 12: Noise and Vibration Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100% capacity, during both daytime and night-time periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be

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			lower than the limits set out in the Chapter.
PhaseTwo_FeedbackForm_006, PhaseTwo_FeedbackForm_093	Corridors that are wildlife friendly throughout	Yes	Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased from a minimum of 5 m to a minimum of 15 m, as described in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives). In the majority of the site where solar panels are located, the offset between the edge of the arrays and the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. This is expected to result in no net negative effects on marsh harrier and could result in positive effects as a result of an increased extent of suitable foraging habitat.

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PhaseTwo_FeedbackForm_017	I hope that hunting, shooting and fishing will NOT be allowed on the site. Land not used for solar panels etc should be planted with trees to absorb carbon from the atmosphere.	No	The Development will not be used for hunting, shooting or fishing. The Landscape Biodiversity Management Plan ('LBMP', document reference 6.4.5.2) details how land under and around the panels and in areas without panels will be managed.
PhaseTwo_FeedbackForm_019	Bird and other ecology being affected 1) by construction 2) permanently and people will have less opportunity to see birds in natural habitat. Saltmarsh is rare - you are destroying it	No	Chapter 9, Environmental Statement (document reference 6.1.9) and RIAA (document reference 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites.
PhaseTwo_FeedbackForm_023	Certain ground nesting ups may benefit e.g. skylark. sps may benefit from increase in population of small animals	No	Chapter 9, Environmental Statement (document reference 6.1.9) and RIAA (document reference 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds including ground nesting birds.
PhaseTwo_FeedbackForm_024	we can't walk our dogs in case of blench woods due to bird life. Why should you be able to disturb such an important life lone.	No	Comment noted.

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PhaseTwo_FeedbackForm_036	I would like every solar panel to have a sign in bird language telling the birds which way to fly to their new home	No	Please see Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) for details of the proposed solar park.
PhaseTwo_FeedbackForm_039	Biased format: I should be free to answer any way I like	No	The Applicant provided free form response sections on its feedback form for additional comments to be made. The Applicant also invited written responses to its communication channels advertised across its consultation literature and in notices.

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PhaseTwo_FeedbackForm_041	My main concern is that the impact on the overall viability of a large area of land important to wildlife will be compromised by having a large industrial area placed within it. Roosting and feeding shorebirds are extremely sensitive to disturbance and many species found in the area require a large area and variety of habitat to be able to flourish. In particular Skylark and Grey Partridge will be deprived of breeding habitat. Golden Plover, Lapwing will be deprived of feeding and roosting habitat. Marsh harrier and Peregrine will be deprived of hunting areas. By placing a development of this size in an area of great importance to ever-decreasing wildlife and suggesting that its impact is like dropping a turd on the nose of the Mona Lisa and saying "don't worry, 99% of the painting is still fine". This development would reduce the overall effectiveness of the	No	Chapter 9, Environmental Statement (document reference 6.1.9) and RIAA (document reference 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites.

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	wildlife conservation areas in this region.		

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PhaseTwo_FeedbackForm_050	there are several red list species living on the marshes where the development is proposed. Also the area is an important migratory feeding station for migratory geese and swans. there is evidence from the large solar farms in America that birds are injure by mistaking the panels for water		Chapter 9, Environmental Statement (document reference 6.1.9) and RIAA (document reference 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds Chapter 9, Environmental Statement (document reference 6.1.9) assesses the potential effect of collision to birds; Natural England guidance states that there is no scientific evidence of collision risk associated with solar PV arrays.
PhaseTwo_FeedbackForm_055	I am concerned that the mitigation proposed will not make up for the ecological impacts. In particular, I am worried about the effects of the development on Dark-bellied Brent Geese and the Marsh Harrier. As identified by Kent Wildlife Trust, it is likely that the proposals will adversely affect the Special Protection Area (SPA).	No	Chapter 9, Environmental Statement (document reference 6.1.9) and RIAA (document reference 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites. The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat

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			mitigation, land management and biodiversity improvements with Natural England, RSPB and Kent Wildlife Trust.
PhaseTwo_FeedbackForm_056	The proposed site is next to a SSS2 and nature reserve and will definitely impact on wildlife, especially birds.	No	Chapter 9, Environmental Statement (document reference 6.1.9) and RIAA (document reference 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites.
PhaseTwo_FeedbackForm_059	Too little thought has been given to the wider environment of which the proposed solar farm would be a part of. The RSPB has brought up plot lands and proposes to develop Sea Salter Levels. Some joined up thinking is needed here	No	The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity improvements with Natural England, RSPB and Kent Wildlife Trust.

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PhaseTwo_FeedbackForm_079	The birds of prey will leave, along with other important species		Chapter 9 (Ornithology) Environmental Statement (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) has been undertaken and submitted with the Application. A focus of the RIAA is the loss of functionally linked land for lapwing, golden plover, Brent goose and marsh harrier.
PhaseTwo_FeedbackForm_102	Notices from your consultation that you are putting deer proof fencing around the site. Haven't spoken to anyone who has seen deer on the marshes don't they prefer woods?		The Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) sets out the type of fencing which will be used by the Development. Reference to 'deer fencing' is due to the name of the particular type of fencing included in the Development.

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PhaseTwo_FeedbackForm_109	water vole, Brent goose, bumblebee and many more animals need our help to keep Faversham get better. The heat from millions of glass panels and 7660 battery unit will make a hotter area in Faversham.		The Environmental Statement, Technical Appendices: Micro-climate and Vegetation Study (document reference number 6.4.5.3) assesses the impact of the Development on local micro-climate.

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PhaseTwo_FeedbackForm_117	I wish you'd given us a textarea for this instead of just a one-line text input! I have four points to make. [1] I'm concerned that the birds currently actively using the fields themselves (I'm not a good birdwatcher, but birds are so abundant there that even I've seen marsh harriers, yellow wagtails, skylarks, peregrine falcons, yellowhammers, goldfinches, starlings, crows, kestrels and various kinds of pigeon and gull, as well as other birds I couldn't identify, and I know that that's far from a complete list) will lose their habitat outright. Several of those birds are schedule 1 (protected species) or red-listed (highest conservation priority). [2] I'm concerned that the birds using the adjacent nature reserve, sea wall and reedbeds (here I've seen linnets (also red-listed), stonechats, wheatears, meadow pipits and reed buntings, as well as more birds I can't identify, and heard	No	Chapter 9, Environmental Statement (document reference 6.1.9) and RIAA (document reference 5.2) assess the effects of the full extent of the Development and provide a complete assessment of the potential effects on birds, including the qualifying interest features of the designated sites. Noise impacts relating to the Development are assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12), Chapter 8 Ecology (document reference number 6.1.8) and Chapter 9 Ornithology (6.1.9). There will be noise controls placed upon the Development during construction to prevent any disturbance to adjacent nature reserves. The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the Breeding

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	reed and/or sedge warblers, and again I know people who are better at this than I am have seen much, much more) may also be using the fields and may in any case be disturbed or driven away by the noise and disruption of construction and/or by the subsequent industrial character of the area. [3] I have similar concerns for the large numbers of waders, ducks and geese using the creek and shoreline (here my personal sightings include avocets, lapwings, ringed, golden and grey plovers, curlews, black-tailed godwits, oystercatchers, redshank, turnstones, egrets, herons, shelducks, teal and doubtless more I've forgotten), plenty of which are also schedule 1 or red-listed: do they use the fields too? Will they stay during and after construction? [4] And I also have concerns for the many species of invertebrate one finds along the footpaths and		Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species. The site will continue to provide these benefits for species and additional benefits through 'embedded mitigation' to provide either no net loss or net gains in habitat of value to invertebrates, reptiles, bats, water voles, which would not otherwise be available in the absence of the Development. Embedded mitigation is detailed within the LBMP (document reference 5.2).

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	the sea wall. Here I don't have specifics, but a walk in spring or summer is accompanied by buzzing and fluttering of countless bees and butterflies, amongst others. They're there for a reason. Will the reason persist?		

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PhaseTwo_FeedbackForm_118	That they'll end up dead! Your PEIR only mentions herbicide once - saying the land will immediately benefit by not having a farmer spray herbicide. how will you prepare the land before installing the panels? How will you control the sycamore, elder, alder, buckthorn that will germinate and grow? And how will you control tallweeds such as giant hogweed, brambles etc? I can't believe that you can do that without herbicide...		The Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8), Chapter 9: Ornithology (document reference number 6.1.9) and Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) set out how the Development proposes to use fertiliser. There may be some herbicide use when seeking to achieve arable reversion. This is not expected to exceed the existing baseline.
PhaseTwo_FeedbackForm_125	Potential 2 degree Celsius temperature rise in area will affect flora and fauna phenology. Disruption to breeding areas and patterns eg marsh harrier, bearded tit, yellow wag tail, little tern, great crested newt.		The Environmental Statement, Technical Appendices: Micro-climate and Vegetation Study (document reference number 6.4.5.3) assesses the impact of the Development on local micro-climate.
PhaseTwo_FeedbackForm_130	You've not yet told us any truths so how can we trust you?		These are the views of the respondents.
PhaseTwo_FeedbackForm_131	I do not think this massive site is suitable for a nature reserve.		None of the development infrastructure is will be placed on land listed as a nature reserve.

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PhaseTwo_FeedbackForm_135	Desertification of acres of the countryside, small token slithers or corners are not sufficient to replace what will be lost.		The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_138	Particular concerns are improvement of biodiversity and improving conditions for pollinators	Yes	Embedded mitigation to provide net gains in habitat of value to invertebrates is proposed. The retention of existing habitats of value to a range of protected and priority species is proposed, with limited habitat clearance of track and spine road crossings not impacting the favourable conservation status of wildlife at any trophic level. Habitat gains for protected and priority species are quantified within Chapter 8, Environmental Statement (document reference 6.1.8) detailed within LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_143	Building the site will be destructive and noisy that most wildlife will leave or be decimated.		Noise impacts relating to the Development are assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12), Chapter 8: Ecology (document reference number 6.1.8) and Chapter 9:

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			Ornithology (6.1.9). There will be noise controls placed upon the development's during construction to prevent any disturbance to adjacent nature reserves. This SPA is assessed as an ecological receptor within Chapter 12: Noise and Vibration. The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.
PhaseTwo_FeedbackForm_144	Loss of habitat for Marsh Harriers.	Yes	Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased from a minimum of 5 m to a minimum of 15 m, as described in Chapter 4, Environmental Statement (document reference 6.1.4). In the majority of the site where solar panels are located, the offset between the edge of the arrays and

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			the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. This is expected to result in no net negative effects on marsh harrier and could result in positive effects as a result of an increased extent of suitable foraging habitat. The RIAA (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
PhaseTwo_FeedbackForm_145	Development of this size may cause issues for migratory species confusing the panels for lakes, in addition the panels will create substantial amounts of shade, changing the types of flora that grow in the area, and thus affecting the biodiversity of the area. The development would also remove a natural corridor for wildlife between protected areas,		Chapter 9, Environmental Statement (document reference 6.1.9) assesses the potential effect of collision to birds; Natural England guidance states that there is no scientific evidence of collision risk associated with solar PV arrays. Please see the LBMP (document reference 6.4.5.2) for the landscape management plan and biodiversity improvements proposed.

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PhaseTwo_FeedbackForm_152	Building this on top of wildlife sanctuary is ludicrous and will have a massive negative impact on the wildlife and birds		These are the views of the respondent. Please see Chapter 8 (Ecology) and Chapter 9 (ornithology) of the Environmental Statement (document reference 6.1).
PhaseTwo_FeedbackForm_157	Please consider creating an additional nature area to offer space for different species and genetic diversity.	Yes	As part of the Development, the Applicant has increased its AR HMA from 41ha to 56 ha and, in response to comments from the HMSG, have included an area of 37ha of SSSI land to manage for biodiversity improvements.
PhaseTwo_FeedbackForm_158	Providing a mitigation area at one end of the site limits the availability of diverse coastline habitat over a large area. There should be a wider habitat margin on the other side of the dykes along the length of the estuary coastline - to benefit the range of species over the whole site!		A minimum buffer distance from the Saxon Shore Way of 63m has been maintained by the Developer, with this buffer increasing to 100m at the Faversham Creek end.
PhaseTwo_FeedbackForm_163	No to park		Noted.
PhaseTwo_FeedbackForm_172	Missing plant survey!!		Please see Chapter 8 (Ecology), Environmental Statement (document reference 6.1.8) for the complete assessment of all ecology for the Development.

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PhaseTwo_FeedbackForm_195	Is some of this bleak site still going to be accessible for wildlife?	Yes	The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_198	any buildings has impact better put the site elsewhere	No	Please see Chapter 4, Environmental Statement (document reference 6.1.4) for a full description of the site selection process.
PhaseTwo_FeedbackForm_201	Fully understand the need to invest in renewable energy which requires land to achieve. Would like to see set aside land in the project (more than just a token gesture) maybe consider offsetting through significant donation to appropriate wildlife trust to invest in protecting land somewhere locally	Yes	As part of the Development, the Applicant has increased its AR HMA from 41ha to 56 ha and, in response to comments from the HMSG, have included an area of 37ha of SSSI land to manage for biodiversity improvements.
PhaseTwo_FeedbackForm_209	Good		Noted.
PhaseTwo_FeedbackForm_211	My interest is in invertebrates specifically pollinating insects. Diversity of food sources.		Habitat net gains proposed for invertebrates are described in Chapter 8 of the Environmental Statement (document reference 6.1.8).

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PhaseTwo_FeedbackForm_212	My main concerns are for ecology and visual impact. The height (3-4 metres) and density of the panels are problematic. There will be no land available between the panels for any wildlife (plant or animal, including birds), making it a dead zone, covering many acres. I have seen many operational ground-mounted solar developments, but none of them look anything like what has been proposed.		The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_213	Use the Saxon Shoreline a lot. Ground nesting sites to be protected.		Noise impacts relating to the Development are assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12), Chapter 8: Ecology (document reference number 6.1.8) and Chapter 9: Ornithology (6.1.9). There will be noise controls placed upon the development's during construction to prevent any disturbance to adjacent nature reserves. This SPA is assessed as an ecological receptor within Chapter 12: Noise and Vibration.

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			The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.
PhaseTwo_FeedbackForm_220	'Deer fences' impact on connectivity. Can these be replaced by traditional hedges? Area 2. Needs a proper plan for grazing meadow habitat along with existing area to the west. Will this area sufficiently compensate for the land going under solar panels which was used at the time by Brent geese [ineligible] some farmland birds. What habitat plan is there under and around the panels? Sheep grazing and what?		The Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) sets out the type of fencing which will be used by the Development. The Applicant has proposed to use mammal-friendly deer-fencing which will include mammal gates every 50 metres to prevent any loss to connectivity.
PhaseTwo_FeedbackForm_221	Want to please neighbours etc and keep the birds etc.		Please see the Consultation Report (document reference 5.1) and Chapter 9 (ornithology), Environmental Statement (document reference 6.1.9).

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PhaseTwo_FeedbackForm_222	I was told in the late 70s that there was a SSSI preservation order, up to one mile from sea wall in land		Land to the east of the Development is designated land. In response to comments from the HMSG, the additional areas included in the Development since the PEIR, which comprise part of The Swale SPA/SSSI/Ramsar site, will not contain any new development structures; they are included to facilitate ongoing maintenance of the sea wall and to bring biodiversity benefits through more appropriate management of the freshwater grazing marsh in the east of the site.
PhaseTwo_FeedbackForm_226	I think wildlife adapts to their surroundings		These are the views of the respondent. Please see Chapter 8 (ecology), Environmental Statement (document reference 6.1.8).
PhaseTwo_FeedbackForm_228	I think it is important the wild life have plenty of space between the solar panels, which I am sure they will		The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_238	Total loss of habitat for endangered farmland birds		The wintering and farmland bird communities are identified as Important Ecological Features and an assessment of the potential effects on these species has been

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			provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9)
PhaseTwo_FeedbackForm_239	As the relevant bodies have been involved in the project can it be assumed that the species that inhabit the area have been taken care of?		The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity improvements with Natural England, RSPB and Kent Wildlife Trust. This has resulted in an agreed Arable Reversion Habitat Management Area ('AR HMA') for birds of 56 ha, which has increased from 41ha between scoping and Application submission.
PhaseTwo_FeedbackForm_240	The PV panels are too densely packed and will shade out a lot of plant species. Biodiversity would be much better if bigger gaps (i.e. more than 300mm) could let more light underneath.	Yes	The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2). There will be gaps of 2.5m between the solar panel strings and 'corridors' of connecting natural habitats in areas of the site that are

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			not currently represented by this habitat (i.e. monocrop or bare soil). During the peak botanical growth season and invertebrate activity period of spring/summer/autumn, sunlight will fall between the panels to provide habitat for invertebrate species occupying a range of ecosystem niches. When the sun is in the south, which happens at all times of year, it will land directly on the ground between the north-south lines of panels.
PhaseTwo_FeedbackForm_243	The park should not be developed regardless of the proposed 'land management programme' there is no evidence to suggest that land management will preserve the well-being of the wildlife that reside there.		The LBMP has been consulted on with the relevant prescribed consultees and HMSG and is included with the Application (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_246	Don't need		Please see the Applicant's Need Statement (document reference 7.3).
PhaseTwo_FeedbackForm_253	It is feared that migratory birds will desert the area and there will obviously be a large amount of animals that killed by the work of clearing such an enormous site.		Please see Chapter 9 (ornithology) and Chapter 8 (ecology) of the Environmental Statement (document reference 6.1).

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PhaseTwo_FeedbackForm_255	The development will cover far too big and area and will cover a large area within too short a space of time giving the exisiting wildlife and damaged marshland no time to recover and/or relocate. With local farmland being designated for housing these marshland areas are one if the few breathing spaces that will be left for both us and the wildlife. We have regularly completed the butterfly count in this area and the speed with which this development will occur and the vast area it covers will not give these species the opportunity to survive in its current numbers. Panels should not be laid east to west as this minimises spaces inbetween.	Yes	The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2). Embedded mitigation to provide net gains in habitat of value to invertebrates is proposed. The retention of existing habitats of value to a range of protected and priority species is proposed, with limited habitat clearance of track and spine road crossings not impacting the favourable conservation status of wildlife at any trophic level. Habitat gains for protected and priority species are quantified within the Chapter 8 of the Environmental Statement (document reference 6.1.8), and embedded mitigation detailed within the LBMP (document reference 6.5.5.2). There will be gaps of 2.5m between the solar panel strings and 'corridors' of connecting natural habitats.

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PhaseTwo_FeedbackForm_260	You will destroy the Marsh land of this area turning it all to mud where will the habitat be then.		The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_263	Renewable energy trumps misplaced local concerns about wildlife		Please see the Applicant's Need Statement (document reference 7.3).
PhaseTwo_FeedbackForm_264	Ever decreasing habitat which cannot be mitigated		The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_269	To maintain habitats as much as possible and improve diversity if possible.		The total area covered by solar PV modules has been reduced to 45.5%, with significant spaces amongst the panels for biodiversity gains as set out in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_272	Badger welfare		No badgers were recorded as present on the site. See Environmental Statement, Badger Survey (document reference number 6.4.8.3).

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Phase Two Feedback Forms			
Visual impact We have proposed using local native species in our plans to screen certain areas of the solar panels from view. Based on our proposals are there other local species you recommend?			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_016 PhaseTwo_FeedbackForm_152 PhaseTwo_FeedbackForm_159 PhaseTwo_FeedbackForm_246 PhaseTwo_FeedbackForm_115 PhaseTwo_FeedbackForm_131 PhaseTwo_FeedbackForm_155 PhaseTwo_FeedbackForm_178 PhaseTwo_FeedbackForm_193 PhaseTwo_FeedbackForm_214 PhaseTwo_FeedbackForm_225 PhaseTwo_FeedbackForm_235	Respondents expressed that they feel the visual impact of the development will be a blot on the landscape.		These are the respondent's views. Please see the complete LVIA, Chapter 7, Environmental Statement (document reference 6.1.7).
PhaseTwo_FeedbackForm_002 PhaseTwo_FeedbackForm_045 PhaseTwo_FeedbackForm_056 PhaseTwo_FeedbackForm_102 PhaseTwo_FeedbackForm_105 PhaseTwo_FeedbackForm_164 PhaseTwo_FeedbackForm_183	Respondents commented that the proposed height of the solar panels will result in a strong visual impact on the area.		These are the respondent's views. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7). The Development comprises of a range of panel heights which have a range of apex heights of between 3 and 3.9 metres.

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PhaseTwo_FeedbackForm_007 PhaseTwo_FeedbackForm_180 PhaseTwo_FeedbackForm_014 PhaseTwo_FeedbackForm_092 PhaseTwo_FeedbackForm_128 PhaseTwo_FeedbackForm_145 PhaseTwo_FeedbackForm_177 PhaseTwo_FeedbackForm_188 PhaseTwo_FeedbackForm_238 PhaseTwo_FeedbackForm_252 PhaseTwo_FeedbackForm_262 PhaseTwo_FeedbackForm_264	Respondents expressed concern about the scale of the site being too large, and suggested it should be reduced.	Yes	The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. As a result, the proportion of the developable area of the site with solar PV modules has decreased from phase one Section 47 consultation to the final Application from 56.5% to 45.5%.
PhaseTwo_FeedbackForm_001	Visual impact is important. The pleasure of walking in this area is the wide-open spaces which are free of buildings and development which make it very quiet and tranquil.		The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation

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			and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_004 PhaseTwo_FeedbackForm_005 PhaseTwo_FeedbackForm_005 PhaseTwo_FeedbackForm_008 PhaseTwo_FeedbackForm_010 PhaseTwo_FeedbackForm_011 PhaseTwo_FeedbackForm_012 PhaseTwo_FeedbackForm_018 PhaseTwo_FeedbackForm_019 PhaseTwo_FeedbackForm_021 PhaseTwo_FeedbackForm_022 PhaseTwo_FeedbackForm_024 PhaseTwo_FeedbackForm_038 PhaseTwo_FeedbackForm_046 PhaseTwo_FeedbackForm_047 PhaseTwo_FeedbackForm_062 PhaseTwo_FeedbackForm_064 PhaseTwo_FeedbackForm_073 PhaseTwo_FeedbackForm_074 PhaseTwo_FeedbackForm_084 PhaseTwo_FeedbackForm_095 PhaseTwo_FeedbackForm_104 PhaseTwo_FeedbackForm_117 PhaseTwo_FeedbackForm_122	There were several comments that the proposed screening cannot adequately deal with the visual impact of the scheme.		The visual impact is assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Through consultation, the Applicant has proposed a series of landscaping and screening. Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2. This includes a 3.64km of native screening planting.

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PhaseTwo_FeedbackForm_125 PhaseTwo_FeedbackForm_129 PhaseTwo_FeedbackForm_137 PhaseTwo_FeedbackForm_160 PhaseTwo_FeedbackForm_253 PhaseTwo_FeedbackForm_260 PhaseTwo_FeedbackForm_099 PhaseTwo_FeedbackForm_120 PhaseTwo_FeedbackForm_166 PhaseTwo_FeedbackForm_196 PhaseTwo_FeedbackForm_253			
PhaseTwo_FeedbackForm_017	If trees and shrubs grow well I do not care whether they are "native" I suggest Willow Alder and Sycamore be considered.		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development.
PhaseTwo_FeedbackForm_023	Drainage ditches are important areas for swipe and so on. With insects attracted to water based plant life.		Generally, the panels have been set away from aquatic habitats. The baseline arable fields extend to typically 2m from the ditches, and the increase of typically 13m of grassland either side of the main ditches represents a substantial increase in long-term habitat. design has been changed since PEIR to increase the separation between the majority of north-south ditches crossing the site,

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			and the panels from 5 - 8 m typically at PEIR, to typically 15m.
PhaseTwo_FeedbackForm_025	You cannot replace an established ecosystem.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_027	no		No response required.
PhaseTwo_FeedbackForm_035	It will take years to screen the view and, in the meantime, the local wildlife will die off		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to

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			mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_036	To make the panels more attractive, I would like all the posts to be painted bright green		The Applicant does not propose to paint any of the related infrastructure green. A description of the solar panels and mounting structures can be found in Environmental Statement Chapter 5: Development Description (document reference number 6.1.5).
PhaseTwo_FeedbackForm_039	Biased format: I should be free to answer any way I like		The Applicant provided free form response sections on its feedback form for additional comments to be made. The Applicant also invited written responses to its communication channels advertised

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			across its consultation literature and in notices.
PhaseTwo_FeedbackForm_041	Using trees to screen the site may reduce the visual impact of the development but completely fails to understand that the original landscape is one of an open area, not a wooded one. It also ignores the fact that the local ecology depends on an open environment. This is an area important to wading birds, farmland species and hunting raptors and owls, all of which require an open aspect and shun an enclosed environment. The point is that this is an open landscape and wildlife area, not a wooded one.		In terms of screening the development whilst retaining open views, the context of this is to provide low level screening to remove views of the development whilst retaining views of large skies and wider views to the Isle of Sheppey and the surrounding landscape when viewed from a range of viewpoints, whilst understanding that such viewpoints are representative and receptors experience the landscape in a dynamic way with areas of screening and openness in the current landscape experienced along the existing public rights of way for instance as well as wider views. Proposed planting also provides a context to more distant views creating a landscape setting for the development through creation of layers within the landscape.
PhaseTwo_FeedbackForm_042	Oak		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development. Oak is slow growing

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			and therefore is seen as less suitable to the Development.
PhaseTwo_FeedbackForm_044	Not putting the solar panels there in the first place.		Objection noted.
PhaseTwo_FeedbackForm_049	'certain areas' in unacceptable! No one wants to see ANY panels.		These are the respondent's views. Please see the complete LVIA, Chapter 7, Environmental Statement (document reference 6.1.7) and Consultation Report (document reference 5.1).
PhaseTwo_FeedbackForm_050	willow, reeds grasses		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development. This outlines how species outlined in the ditch habitats will be sensitively managed.
PhaseTwo_FeedbackForm_051	Marsh-native plants don't grow very tall...		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development. Screening planting has only been proposed where it is in keeping with the features of the area of the Development.

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PhaseTwo_FeedbackForm_059	Too big, in the wrong area. Not 'NIMBY' politics but development in Australia and brownfield sites and what is proposed here is not the same. Economies of scale are driving the scheme, not the wishes of the local people.	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_061	Why shield solar panels with hedgerows, presumably restricting the light?		Screening planting will be outside of the perimeter fence, roughly 10 metres from solar panels, therefore reducing the potential for shading. More information can be found in The Environmental Statement Chapter 5: Development Description (document reference number 6.1.5).
PhaseTwo_FeedbackForm_069	Visual impact will be terrible - panels far too high and too many of them. East west layout particularly intrusive.		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference 6.1.7).

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PhaseTwo_FeedbackForm_070	This isn't the right question - like many of your earlier questions I believe it is disingenuous. Residents objections will not be overcome by different 'screening plants.		The Applicant's question: We have proposed using local native species in our plans to screen certain areas of the solar panels from view. Based on our proposals are there other local species you recommend? was intended to seek views of the community on the Applicant's LBMP, where a final version is presented in the Application (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_072	There are no native plants of any height there. Have you not been there? The animals it attracts will not accept something different. Have you no knowledge of habitats at all?		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development.
PhaseTwo_FeedbackForm_079	The visual impact of this project will be incredibly large. This is a beautiful space I have grown up walking in, and has always been a peaceful place. This is the wrong place for a large-scale development of solar power.		These are the views of the respondent. Please see Chapter 7 LVIA, Environmental Statement (document reference 6.1.7) and Chapter 4, Environmental Statement (document reference 6.1.4) which describes the site selection process for the Development.
PhaseTwo_FeedbackForm_081	To me, prevention is better than cure. I would rather the proposed development was not built on this beautiful green coastline.		Noted. These are the views of the respondent.

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PhaseTwo_FeedbackForm_087	This statement doesn't make sense.		The Applicant's question: We have proposed using local native species in our plans to screen certain areas of the solar panels from view. Based on our proposals are there other local species you recommend? was intended to seek views of the community on the Applicant's Landscape and Biodiversity Management Plan, where a final version is presented in the Application (document reference number 6.4.5.2).
PhaseTwo_FeedbackForm_089	Use of native species will still create an artificially planted environment and spoil the current vista and natural environment		Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference 6.4.5.2),
PhaseTwo_FeedbackForm_093	Mixed hedges and poplars		Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference 6.4.5.2),
PhaseTwo_FeedbackForm_096	All native species		Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference 6.4.5.2),
PhaseTwo_FeedbackForm_101	The Cleeve Hill installation is very poorly screened at the moment for anyone using the coastal footpath.		The Applicant cannot comment on other development. The Environmental Statement, Chapter 7: Landscape and Visual Impact document reference 6.1.7) takes into

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			consideration the cumulative impacts of the developments.
PhaseTwo_FeedbackForm_108	who would want to walk through 1000 acres of panels? Yow will still see the panels from the Seasalter road and local properties, and ground.	Yes	The Applicant has reduced the overall area of solar PV modules from 56.5% of the developable area to 45.5% of the developable area and has removed solar PV modules at Cleve Hill to reduce views from Seasalter Road and the village of Graveney.
PhaseTwo_FeedbackForm_109	The picture in the Mail on Sunday 1/7/18 showed how bad a picture it would be. Assault and battery, your team showed pictures how it would be in 1-5 years		The Applicant advises consultees to view the final photomontages and LVIA as presented in Chapter 7, Environmental Statement (document reference 6.1.7 and associated technical appendices in volume 3, document reference 6.3)
PhaseTwo_FeedbackForm_111	My concern about visual impact concerns the scale of the development and its being sited in an attractive area. I would suggest that there are less attractive areas which would be better sites for such a development.		Please see Chapter 7 LVIA, Environmental Statement (document reference 6.1.7) and Chapter 4, Environmental Statement (document reference 6.1.4) which describes the site selection process for the Development.

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PhaseTwo_FeedbackForm_112	Who will hold you to account if you fail to deliver? Particularly in these times of local government cut backs. Why has a scale model not been produced if you are so confident that it will not be visually intrusive? The surround planting suggested will take years to mature. Who will care for these young trees etc until they have matured?		The Applicant has presented visualisations of the Development at Section 42 consultation and as part of the phase two Section 47 consultation. These are available to view in Chapter 7, Environmental Statement (document reference 6.1.7 and associated technical appendices in volume 3, document reference 6.3). The operator of the Development will be responsible for all landscaping as outlined in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_113	Blackthorn, Hawthorn, Wild Cherry		Please see the final Landscape and Biodiversity Management Plan (document reference 6.4.5.2). The Applicant has proposed 3.64km of native hedgerow planting across the Development site.
PhaseTwo_FeedbackForm_121	You are proposing to develop too close to the coast.		The Development will be of a minimum buffer distance of 63m to the Saxon Shore Way and in some parts of the site this is as wide of 100m.
PhaseTwo_FeedbackForm_130	You've not yet told us any truths so how can we trust you?		These are the views of the respondents.

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PhaseTwo_FeedbackForm_134	Why not put solar panels on all new builds, huge areas around Faversham and Canterbury are being turned into new houses so why not use the already used space E.G. roof tops to harvest the suns solar energy and not another green site.		Please see Chapter 4, Environmental Statement (document reference 6.1.4) which describes the site selection process for the Development.
PhaseTwo_FeedbackForm_135	Local ecologists should advise on this.		The Applicant has consulted with Kent County Council, Swale Borough Council and Canterbury City Council as well as the consultees of the HMSG throughout the pre-application process as detailed in the Consultation Report (document reference 5.1).
PhaseTwo_FeedbackForm_143	It is a wetland area- trees will look out of place		Mitigation screening has been developed to provide screening where possible that is in keeping with the existing landscape characteristics and planting in that area. For example, not planting hedgerows or trees on the northern part of the development, along the Saxon Shore Way has been reflected in planting grasses and scrub type habitats. Mitigation proposed is illustrated and reported within the Landscape and Biodiversity

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			Management Plan (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_158	This is rather a patronising question and avoids asking for wider opinions/proposals regarding visual impact! Surely you have ecologists who should know what species are local and appropriate for this site. The visual impact is the scale and proximity of the panels to a much loved and rare piece of green coastline in Kent! Creating a wider margin between the Saxon Shore Way and panels will lessen the visual impact more appropriately! Neither is adding a few paths in between the panels an adequate solution!		The Applicant advises consultees to view the final photomontages and LVIA as presented in Chapter 7, Environmental Statement (document reference 6.1.7 and associated technical appendices in volume 3, document reference 6.3)
PhaseTwo_FeedbackForm_163	No to park		Objection noted.
PhaseTwo_FeedbackForm_165	Please consider rows of popular trees, as they are traditional to Kent and fast disappearing		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development.

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PhaseTwo_FeedbackForm_168	Your 10-year images are showing very slow growth Grey Alder mixed in would give more height in that time		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development.
PhaseTwo_FeedbackForm_169	Visual impact would be similar to that of commercial greenhouses and far less than other development possibilities		These are the views of the respondent. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_171	Species must be carefully selected to tolerate the conditions of the soil		Please see the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_175	Willow, Dos Rose, Bramble (may occur naturally), Hazel, Hawthorn and Blackthorn		The Applicant has included 3.64km of native hedgerow planting in its LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_176	Please consider above concerns		Noted.
PhaseTwo_FeedbackForm_189	The LVIA concentrates on visual and fails to recognise landscape and does not follow GLVIA 3		Visual effects of the Development are assessed and supported by viewpoint visualisations in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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PhaseTwo_FeedbackForm_191	The visual impact displays are dishonest. They do not show the huge battery complex or the access roads or the intrusive fencing and CCTV etc.		All visualisations include the other infrastructure associated with the development. In some instances, this won't be seen due to heights of panels and distances from of these from the viewpoint. Visualisations are contained within Volume (DCO document reference 6.3).
PhaseTwo_FeedbackForm_195	his solar farm is an area full of electricity pylons and poor quality agricultural land, What's the big deal?		These are the views of the respondent. The existing landscape features including the existing electricity pylons have been considered in the LVIA, Chapter 7, Environmental Statement (document reference 6.1.7) for the final assessment.
PhaseTwo_FeedbackForm_198	these panels are tall and the battery big, deer fences tall-it will be seen obtrusive and ugly-cannot deny this.		These are the views of the respondent. Please see the Applicant's Project Description (document reference 6.1.5) detailing the proposals for the energy storage and 2m high deer fencing. Please see the LVIA, Chapter 7, Environmental Statement (document reference 6.1.7) for the final assessment.
PhaseTwo_FeedbackForm_199	footpath and housing have to be totally screened from the panels		The Applicant has sought to screen neighbouring properties using a

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			variety of mitigation including panel removal, set back and screening as set out in the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_208	It should no be done 'on the cheap'		Please see the LVIA, Chapter 7, Environmental Statement (document reference 6.1.7) for the final assessment and the LBMP (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_209	Good		
PhaseTwo_FeedbackForm_210	Local to the immediate area and local provenance.		Noted. The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development.
PhaseTwo_FeedbackForm_211	Good nutritious pollen sources e.g. white clover		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development. The Applicant has consulted with the Bumblebee Conservation Trust regarding improving the site to benefit pollinators such as bees. As a result, species which are valuable to the shrill carder bee have also been included in the species list.
PhaseTwo_FeedbackForm_219	No		Noted.

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PhaseTwo_FeedbackForm_222	The impact will certainly sort out the local wildlife and many more		Comment not understood.
PhaseTwo_FeedbackForm_226	Good		Noted.
PhaseTwo_FeedbackForm_228	Not sure		Noted.
PhaseTwo_FeedbackForm_230	Links to loss of wildlife and birds especially. Better to have panels on every building before putting them on fields.		These are the views of the respondent. The Applicant has assessed this in the Environmental Statement, Chapter 8: Ecology (document reference 6.1.8) and Chapter 9: Ornithology (document reference number 6.1.9). The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_231	This will detract from the bleak natural beauty and peacefulness of the area		Mitigation screening has been developed to provide screening where possible that is in keeping with the existing landscape characteristics and planting in that area. For example,

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			not planting hedgerows or trees on the northern part of the development, along the Saxon Shore Way has been reflected in planting grasses and scrub type habitats.
PhaseTwo_FeedbackForm_232	Plant more trees on the site to screen it off. Plant wild flowers around the site	Yes	The Applicant has included 6.34km of native hedgerow planting and has included areas of lowland meadow. The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development.
PhaseTwo_FeedbackForm_239	No.		Noted.
PhaseTwo_FeedbackForm_240	A mixture of native British hedging and taller screening (Italian Poplar) which is traditional to Kent landscape as windbreaks around fruit farms.		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development. Poplar trees are not proposed to be used.
PhaseTwo_FeedbackForm_243	Don't erect the hideous structures that show no evidence that these structures are 'eco-friendly' as suggested. There has been little evidence to suggest how environmentally friendly these structures are.		The Applicant has assessed the influences of the development on Climate Change in Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15). The sources of information used in the Environmental Statement, Chapter 15: Climate Change

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			(document reference number 6.1.15), are referenced in the chapter. Aspects for which CO2 costs are not available are identified.
PhaseTwo_FeedbackForm_244	Lowlands are not protected in national law as uplands are: there are no marshes as AONBs, or National Parks. This huge and extensive tidal marsh farmland has a massively important impact in the landscape. Screening the edges is utterly insufficient. We need the sense of space and distance. The way the light reflects off the estuary and the sea are subtle and beautiful. Putting these square miles of panels in will have a dreadful impact over a huge area and damage the spiritual and recreational uses of thousands of people. It is just too big. Too big.		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land. None of the Development infrastructure is proposed to be on marshland.
PhaseTwo_FeedbackForm_247	Totally the wrong area for such and expansive development.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection,

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			Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_255	Public rights of way and access will no longer benefit from views of marshland added to which the inevitable fencing and security measures that will be needed to protect the infrastructure will be an eyesore.		Mitigation screening has been developed to provide screening where possible that is in keeping with the existing landscape characteristics and planting in that area. For example, not planting hedgerows or trees on the northern part of the development, along the Saxon Shore Way has been reflected in planting grasses and scrub type habitats.
PhaseTwo_FeedbackForm_269	Coppice some woodland for nightingales		The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development.

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Phase Two Feedback Forms			
Traffic access and construction Based on your previous experience from developments in the local area, what lessons could we take away?			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_009 PhaseTwo_FeedbackForm_024 PhaseTwo_FeedbackForm_061 PhaseTwo_FeedbackForm_180 PhaseTwo_FeedbackForm_192 PhaseTwo_FeedbackForm_208 PhaseTwo_FeedbackForm_228	Respondents stated that Faversham and the surrounding area already struggles from traffic and congestion and will struggle to accommodate the impact of this development.	No	The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. Predicted traffic volumes are discussed within Chapter 14, Environmental Statement (document reference 6.1.14). The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_005 PhaseTwo_FeedbackForm_008 PhaseTwo_FeedbackForm_010	Respondents expressed that this traffic will cause disruption to local residents, visitors, businesses and agriculture.		The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).

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PhaseTwo_FeedbackForm_018 PhaseTwo_FeedbackForm_052 PhaseTwo_FeedbackForm_073 PhaseTwo_FeedbackForm_115 PhaseTwo_FeedbackForm_142 PhaseTwo_FeedbackForm_143 PhaseTwo_FeedbackForm_160 PhaseTwo_FeedbackForm_163 PhaseTwo_FeedbackForm_178 PhaseTwo_FeedbackForm_188 PhaseTwo_FeedbackForm_207 PhaseTwo_FeedbackForm_222 PhaseTwo_FeedbackForm_243 PhaseTwo_FeedbackForm_246 PhaseTwo_FeedbackForm_247 PhaseTwo_FeedbackForm_265 PhaseTwo_FeedbackForm_267	Several respondents expressed that their preferred solution was for the project not to go ahead.		Noted. The Applicant has sought to consult on information regarding traffic and transport for the Development, inviting comments from the community on how impacts can be mitigated including hours or times to avoid and what the construction schedule could look like.
PhaseTwo_FeedbackForm_035 PhaseTwo_FeedbackForm_046 PhaseTwo_FeedbackForm_062 PhaseTwo_FeedbackForm_069 PhaseTwo_FeedbackForm_092 PhaseTwo_FeedbackForm_100 PhaseTwo_FeedbackForm_104 PhaseTwo_FeedbackForm_119 PhaseTwo_FeedbackForm_196 PhaseTwo_FeedbackForm_266	Respondents stated that the current infrastructure is unsuitable, inadequate and insufficient for the heavy traffic that will be required.	Yes	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).

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PhaseTwo_FeedbackForm_195 PhaseTwo_FeedbackForm_273 PhaseTwo_FeedbackForm_050 PhaseTwo_FeedbackForm_166	Respondents stated that construction should be sensitively managed to minimise disruption to local residents. People should be kept informed and notified.	Yes	The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. Predicted traffic volumes are discussed within Chapter 14, Environmental Statement (document reference 6.1.14). The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1). This includes communication throughout the construction of the Development should it go ahead.
PhaseTwo_FeedbackForm_095 PhaseTwo_FeedbackForm_108 PhaseTwo_FeedbackForm_152 PhaseTwo_FeedbackForm_155 PhaseTwo_FeedbackForm_177 PhaseTwo_FeedbackForm_230 PhaseTwo_FeedbackForm_272	Respondents expressed that they believe the roads in the area are too narrow to accommodate construction traffic.	No	The Applicant has undertaken a traffic assessment for the Development in consultation with Kent County Council, who are responsible for the local roads and paths network. This assessment is presented in Chapter 14, Environmental Statement (document reference 6.1.14)
PhaseTwo_FeedbackForm_056 PhaseTwo_FeedbackForm_066 PhaseTwo_FeedbackForm_105 PhaseTwo_FeedbackForm_159	Respondents expressed support for transport via sea-based transport, such as barges.		Alternative access routes and methods are assessed in Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4), and Chapter 14: Access and Traffic (document reference number 6.1.14).

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PhaseTwo_FeedbackForm_102	85 lorries a day plus minibuses is a blight on our local community, who not develop mansion airport for your solar farm.		The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. Chapter 4, Environmental Statement (document reference 6.1.4) describes the site selection process for the Development.
PhaseTwo_FeedbackForm_021	80 plus lorries a day!! going through a tiny hamlet.		Please see Chapter 14, Environmental Statement (6.1.14).
PhaseTwo_FeedbackForm_129	80+ lorries a day!! What can you be thinking?		Please see Chapter 14, Environmental Statement (6.1.14).
PhaseTwo_FeedbackForm_038	A much smaller development in a less sensitive area	No	Chapter 4, Environmental Statement (document reference 6.1.4) describes the site selection process for the Development.
PhaseTwo_FeedbackForm_025	Access and local roads are unsuitable for this development.		The Applicant has undertaken a traffic assessment for the Development in consultation with Kent County Council, who are responsible for the local roads and paths network. This assessment is presented in Chapter 14, Environmental Statement (document reference 6.1.14).

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PhaseTwo_FeedbackForm_170	Access will need to use the roads that national cycle route I (NCRI) is routed vice. There is a need to minimise conflict between the L/HGVs and cyclists. It would be an advantage to route via the Saxon Shore Way and Wester most permissive path on your plans to improve that route. The surface will need to be reasonable but not necessarily bound	No	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion, including interaction with cyclists, during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_003	All goods should be moved in the smallest vehicles possible and the use of articulated vehicles should be at an absolute minimum if approved access routes are closed all deliveries should cease till, they are open again.		The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. As a result of this the average LGV trips increased to 45 (two way). The average HGV numbers reduced to 80 (two-way). Construction traffic is assessed in Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14)
PhaseTwo_FeedbackForm_011	Also detrimental to wildlife.		The Construction Environment Management Plan, Environmental Statement, Technical Appendices (document reference number 6.4.10.2) will be implemented during construction including the

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			Breeding Bird Protection Plan to ensure the avoidance of disturbance to Schedule 1 species.
PhaseTwo_FeedbackForm_234	At certain times of day, the Brenley Roundabout and the A2 are heavily congested and will be more so with the new developments that are happening. Your construction traffic should not use these access points.		Predicted traffic generation from the proposed development and vehicle routing is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). The environmental effects of the construction traffic have been assessed in the context of both local roads and the strategic road network and no significant residual environmental impacts are predicted. In addition, a Construction Traffic Management Plan, available in Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1), has been produced to support the DCO application which sets out a number of mitigation measures.
PhaseTwo_FeedbackForm_004	Based on projected HGV movements can cause severe connections. Road surfaces will be damaged. Plans will be needed to create environs for vehicles and pedestrians.		The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1). The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the

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			Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_022	Be honest. Protect properties that are vulnerable. Protect my health - mentally and well-being.	Yes	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_039	Biased format: I should be free to answer any way I like		The Applicant provided free form response sections on its feedback form for additional comments to be made. The Applicant also invited written responses to its communication channels advertised across its consultation literature and in notices.
PhaseTwo_FeedbackForm_081	Despite promises and bribes, the developers in my experience do not understand the impact of these massive construction sites. Promises of screening from view are wholly underestimated and poorly executed. The site and structure will be fully visible, permanently.		The Applicant denies any claim of creating bribes. Throughout the pre-application consultation process the Applicant has consulted with residents, neighbours and the community as set out in the Consultation Report (document reference 5.1). The full landscaping plans are set out in the LBMP (document reference 6.4.5.2).

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PhaseTwo_FeedbackForm_047	Do not build this type of development in a coastal / rural setting. The impact would be profound.		These are the views of the respondent. A full Environmental Impact Assessment has been undertaken for the Development as presented in the Environmental Statement (document reference 6.1).
PhaseTwo_FeedbackForm_235	Do not disturb the verges, do not use people's driveways to turn your vehicles, do not think you own the road and expect other travellers to move out of the way of your vehicles, do not speed through the village, do not operate outside of agreed hours		The Applicant has set out a series of policies and mitigation measures to ensure impacts from traffic are reduced during the construction of the Development, should it be built (see document reference 6.4.14.1).
PhaseTwo_FeedbackForm_019	Do not do it! HGVs for 12-18 months is unacceptable for local and recreational users. You cannot mitigate the disruption for Graveney and Seasalter residents.		The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1). There will be no construction traffic going through Seasalter.
PhaseTwo_FeedbackForm_204	During the construction phase you need to minimise disruption of the Graveney Road	Yes	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).

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PhaseTwo_FeedbackForm_135	Engaging with the immediate community on a more personal level. Offering real and concrete community and wildlife improvements to lesson impact.		The Applicant has engaged with the community throughout the pre-application consultation process as detailed in the Consultation Report (document reference 5.1) including hosting a specific transport and traffic workshop in response to phase two comments on 19 September.
PhaseTwo_FeedbackForm_226	Have consideration for other road users		Noted.
PhaseTwo_FeedbackForm_125	Have the haulers a plan to mitigate traffic disruption and vibration damage to building?	Yes	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1). By undertaking a patch and repair process before the construction, the Applicant aims to reduce vibration from traffic.
PhaseTwo_FeedbackForm_120	Head hill and Seasalter roads are narrow country lanes with homes and a primary school. We are already assaulted by large lorries and the noise and pollution and road damage they bring. You will make that worse.		The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1). A Construction Environmental Management Plan (CEMP) is provided in the Environmental Statement, Technical Appendix: Construction Environmental Management Plan (document reference number 6.4.10.2), which includes dust management measures. Some measures are

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			detailed in the Environmental Statement, Chapter 16: Air Quality section 16.4.5.1 (construction and decommissioning dust) and 16.4.5.3 (non road mobile machinery) (document reference number 6.1.16). No measures are required for construction traffic emissions, given the negligible predicted impact. Noise impact is assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12).
PhaseTwo_FeedbackForm_171	HGV drivers must adhere to the recommended routes. Must avoid A2990 and Church Lane Seasalter		Access to the site is proposed via the A299, via the village of Graveney. It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted.
PhaseTwo_FeedbackForm_127	Hopefully this will not go ahead but how and where will traffic go? One direction goes into Whitstable the other is small country roads.		Access to the site is proposed via the A299, via the village of Graveney. It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted.

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PhaseTwo_FeedbackForm_049	Horrendous disruption for local residents, damage to roads that are unsuitable for constant heavy vehicles.		These the views of the respondent. The Applicant has consulted with Kent County Council highways on the traffic and access proposals.
PhaseTwo_FeedbackForm_109	How many lorries, cars and vans would it take to build the solar panels. 989,000 solar panels a long country lane which is a cycle route from Faversham to Whitstable is too narrow for lorries to pass.		An assessment of the impact up on the National Cycle Route network is included in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).
PhaseTwo_FeedbackForm_269	I lived near Eton rowing trench when it was under construction. The lorries were very frequent and noisy. My family rides bikes along the local lanes and I worry about similar large vehicles. More quiet smaller vehicles might be better for us than fewer very large ones.		The Applicant consulted on traffic volumes at phase two s47 consultation and in the PEIR. The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the PEIR. As a result of this the average LGV trips increased to 45 (two way). The average HGV numbers reduced to 80 (two-way). Construction traffic is assessed in Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseTwo_FeedbackForm_051	I think your plans on this matter are good.		Noted. Please see the final CTMP (document reference document reference 6.4.14.1).
PhaseTwo_FeedbackForm_169	Keeping construction traffic to a minimum, avoiding peak times and unsocial hours		Noted. Please see the final CTMP (document reference document reference 6.4.14.1).

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PhaseTwo_FeedbackForm_007	Large vehicles along this road will be dangerous to all - especially school children.		The Applicant will be avoiding peak school times. It is proposed that the project will not accept HGV deliveries to site or let HGVs leave the site between the hours of 08.30 to 09.30 and 15.00 to 16.00 to avoid Graveney Primary School start/finish times. Please see the final CTMP (document reference document reference 6.4.14.1).
PhaseTwo_FeedbackForm_023	Local access is via narrow lanes. The impact on road, long term effects might be considerable.		Please see Chapter 14, Environmental Statement (document reference 6.1.14). (Please see the final CTMP (document reference document reference 6.4.14.1).
PhaseTwo_FeedbackForm_133	Local access is via narrow lanes/roads. The impact on road surfaces long term might be (). Local area road safety aspects will be a major concern given farm mechanics and bus route movements and additional traffic with substantial new houses by 2020 in Faversham.		Please see Chapter 14, Environmental Statement (document reference 6.1.14). (Please see the final CTMP (document reference document reference 6.4.14.1).

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PhaseTwo_FeedbackForm_255	Make it smaller, phased development over a longer time frame, restricted construction times to prevent noise nuisance to residents and blocking up country lanes in peak times, keep security measures to a minimum to make site more accessible and more aesthetic		The Applicant provides details of the construction plan in Development Description, Chapter 5, Environmental Statement (document reference 6.1.5) – which considers phasing of the construction of the solar PV modules and energy storage.
PhaseTwo_FeedbackForm_209	Make the road better	Yes	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_113	Making sure roads are maintained and made good after construction. Keep noise and speed and pollution of vehicles to a minimum	Yes	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_128	Many houses suffered damage by London array. We are tiny village with a road built for a horse and cart. Not huge lorries.		The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).

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PhaseTwo_FeedbackForm_002	My clients were assured that there wouldn't be access from Cleve Hill. This is already occurring and causing distress.		The Applicant confirms that all access will be via the existing access for the Cleve Hill substation as set out in Chapter 5, Environmental Statement (6.1.5).
PhaseTwo_FeedbackForm_137	No in case in traffic is [ineligible] in this area.		Comment not understood.
PhaseTwo_FeedbackForm_122	No increase in traffic is feasible in this area		Noted.
PhaseTwo_FeedbackForm_014	Not taken into account traffic volumes already at M2/A2 Junction - Brenley roundabout!		It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_068	Not to over develop the site		Noted.
PhaseTwo_FeedbackForm_044	Not to ruin the beautiful area for your profit - solar panels belong on house rooves.		Noted.

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PhaseTwo_FeedbackForm_260	Our roads are crumbling away there is just no way forward in this area we are small and not designed for construction without ripping up the whole area _ look at sheerness for an example		These are the views of the respondents. The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_157	Please make sure you build a permanent road between graveness and grins path / graveney church	No	No additional permanent roads will be included at this location.
PhaseTwo_FeedbackForm_186	Prevent vehicles bringing mud into roads.	Yes	Wheel washing and other mitigation will be implemented as part of the CTMP (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_074	put it in a brownfield site as that is already covered in concrete and land won't be ruined		Please see Chapter 4, Environmental Statement (document reference 6.1.4) for a description of the site selection process.
PhaseTwo_FeedbackForm_167	Site access from the main arterial routes is limited and not in a good state of repair, it will only get worse and from this increase in HGV traffic		The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).

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PhaseTwo_FeedbackForm_101	Small scale solar projects such as the one at Abbeyfields are acceptable: they can be accommodated visually and the installation was not very disruptive. It is the scale of this particular development which is problematic for people and wildlife.		These are the respondent's views.
PhaseTwo_FeedbackForm_099	Solar as a land batch is insufficient and inappropriate		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_210	Speed limits enforced 20/25mph. Travel in convoy with escort.	Yes	Such measures are included in the final CTMP (document reference document reference 6.4.14.1).
PhaseTwo_FeedbackForm_215	State/safety of roads and pavements. Frequency and Reliability of Buses		The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference number 6.4.14.1).

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PhaseTwo_FeedbackForm_096	Stay away from Graveney Marshes and alike! Use suitable locations i.e. Kingsnorth power station has recently been decommissioned.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_175	Steps must be taken to ensure all drivers know which route to take to avoid getting stuck in narrow country lanes and causing damage to property and hedgerows and trees etc.	Yes	Such measures are included in the final CTMP (document reference document reference 6.4.14.1).
PhaseTwo_FeedbackForm_041	That one development leads to another. In other words that this is likely to be the beginning of the piece by piece destruction of the whole area.		These are the respondent's views.
PhaseTwo_FeedbackForm_012	That the pollution and lengthy disruption is NOT worth it. The benefits so not compensate.		This is assessed in the Environmental Statement, Chapter 16: Air Quality, section 16.4 (document reference number 6.1.16). Mitigation is proposed in respect of construction dust, in the Environmental Statement, Chapter 14: Access and Traffic, section 14.4.5.1 (document reference number 6.1.14) and in non-road mobile machinery in Environmental Statement, Chapter 16: Air Quality, section 16.4.5.3 (document reference number 6.1.16).

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			Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_145	The A2 is at capacity, there are high levels of air pollution and congestion. the current road infrastructure would struggle to cope with the traffic movements, perhaps if the developer could fund the building of the Ospringe Bypass prior to work commencing?		Information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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PhaseTwo_FeedbackForm_206	The development will cause traffic congestion - transport at night	No	Information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). It was not considered appropriate to transport goods at night.
PhaseTwo_FeedbackForm_176	The need for extreme sensitivity when planning traffic movements is essential. Your traffic and access leaflet is very misleading with preference to vehicle size. The minibus is shown as being 2/3 of the size of a 38 tonner?		Information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).

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			It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_198	the piling of the metal supports will cause ground tremor- I have experienced this at another site that was built.		Noise and vibration impacts have been assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12).

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PhaseTwo_FeedbackForm_244	The roads in North Kent are still pretty well medieval, contorted in their pathways and narrow. That is both in the rural access roads and nearby communities - Graveney, Seasalter, Faversham, Margate, Whitstable. This is proposed as a colossal industrial installation and we neither have nor want sufficient roads. The importance of this area is its unspoiled medieval character, irreplaceable.	No	A description of the predicted increases in road traffic during construction of the proposed development along Head Hill Road and Seasalter Road are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Chapter 14: Access and Traffic (document reference number 6.1.14) also assesses the environmental impacts of construction traffic on sensitive receptors and no significant residual environmental effects are predicted. This includes effects associated with fear and intimidation, and highway safety. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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PhaseTwo_FeedbackForm_043	The roads leading to the site, particularly through Graveney, are not wide enough to accommodate the HGVs needed. There is a school directly on the route - air pollution, noise and risk of accident will be increased. It is appalling for local residents to have to suffer this proposed intrusion.	No	A description of the predicted increases in road traffic during construction of the proposed development along Head Hill Road and Seasalter Road are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Chapter 14: Access and Traffic (document reference number 6.1.14) also assesses the environmental impacts of construction traffic on sensitive receptors and no significant residual environmental effects are predicted. This includes effects associated with fear and intimidation, and highway safety. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_089	There are already many accidents on that road and more traffic will only worsen the situation. It is known as a calm and peaceful place and more traffic will spoil that and the immediate environment (air pollution, animals etc)		A description of the predicted increases in road traffic during construction of the proposed development along Head Hill Road and Seasalter Road are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).

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			Chapter 14: Access and Traffic (document reference number 6.1.14) also assesses the environmental impacts of construction traffic on sensitive receptors and no significant residual environmental effects are predicted. This includes effects associated with fear and intimidation, and highway safety. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_238	There will be huge numbers of traffic movements during construction works in particular. It is difficult to imagine that this will not have a major impact on resident's health and comfort.		A description of the predicted increases in road traffic during construction of the proposed development along Head Hill Road and Seasalter Road are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Chapter 14: Access and Traffic (document reference number 6.1.14) also assesses the environmental impacts of construction traffic on sensitive receptors and no significant residual environmental effects are predicted. This includes effects associated with fear and intimidation, and highway safety.

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			Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_031	This is in the wrong place. Choose a brownfield sight such as the old Kingsnorth power station site		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_064	Total traffic chaos will ensure		This is the opinion of the respondent. A description of the predicted increases in road traffic during construction of the proposed development along Head Hill Road and Seasalter Road are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Chapter 14: Access and Traffic (document reference number 6.1.14) also assesses the environmental impacts of construction traffic on sensitive receptors and no significant residual environmental effects are predicted. This includes

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			effects associated with fear and intimidation, and highway safety. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_214	Traffic is a nightmare in and around Faversham. This will cause chaos.		This is the opinion of the respondent. A description of the predicted increases in road traffic during construction of the proposed development along Head Hill Road and Seasalter Road are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Chapter 14: Access and Traffic (document reference number 6.1.14) also assesses the environmental impacts of construction traffic on sensitive receptors and no significant residual environmental effects are predicted. This includes effects associated with fear and intimidation, and highway safety. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within Environmental Statement, Technical Appendices:

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			Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_217	We suffered from traffic noise during the Cleve hill power station build. The village can't sustain so much traffic especially when the Thanet Way has problems and the traffic is diverted. Also if any large vehicles use sandbanks pedestrians would truly have problems.		The Applicant has welcomed feedback and experiences from the construction of the London Array substation construction. This has included feedback from community and prescribed consultees, and feedback received from a focussed transport workshop held with elected members on the 19 September 2018. A number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_072	Whatever the project it has to be on an appropriate site. This is not appropriate.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_221	Will not know and then after?!		No response required.
PhaseTwo_FeedbackForm_036	You should use helicopters to keep the problems off the road	No	Alternative access routes and methods are assessed in Environmental Statement Chapter 4 -

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			Site Selection, Design Evolution and Consideration of Alternatives (document reference number 6.1.4), and Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseTwo_FeedbackForm_032	You would be able to learn a lot but the pound signs in front of your eyes blur your vision.		No response required.
PhaseTwo_FeedbackForm_130	You've not yet told us any truths so how can we trust you?		These are the views of the respondents.

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Phase Two Feedback Forms			
Archaeology and local heritage			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_003 PhaseTwo_FeedbackForm_215 PhaseTwo_FeedbackForm_168	Respondents stated that the Graveney Boat was found near to the site.		The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11). The Graveney Boat is not sited on the Development site but on the neighbouring Graveney Marshes 870m east to the site. Please see Chapter 11, Environmental Statement (document reference 6.1.11).

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PhaseTwo_FeedbackForm_136 PhaseTwo_FeedbackForm_152 PhaseTwo_FeedbackForm_159	Respondents stated that the development would have a negative impact upon the Saxon Shore Way which has local historic value.		The Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) reports on the baseline of the site and the landscape and visual effects of the Development. Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers recreation effects associated with the Development.
PhaseTwo_. FeedbackForm_004 PhaseTwo_FeedbackForm_010 PhaseTwo_FeedbackForm_011 PhaseTwo_FeedbackForm_018 PhaseTwo_FeedbackForm_025 PhaseTwo_FeedbackForm_027 PhaseTwo_FeedbackForm_032 PhaseTwo_FeedbackForm_052 PhaseTwo_FeedbackForm_072 PhaseTwo_FeedbackForm_081 PhaseTwo_FeedbackForm_092 PhaseTwo_FeedbackForm_096 PhaseTwo_FeedbackForm_115 PhaseTwo_FeedbackForm_120 PhaseTwo_FeedbackForm_128 PhaseTwo_FeedbackForm_162 PhaseTwo_FeedbackForm_163 PhaseTwo_FeedbackForm_167 PhaseTwo_FeedbackForm_178	Respondents stated that the local heritage should be preserved and that the site should be left alone.		The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11).

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PhaseTwo_FeedbackForm_199 PhaseTwo_FeedbackForm_214 PhaseTwo_FeedbackForm_226 PhaseTwo_FeedbackForm_228 PhaseTwo_FeedbackForm_235 PhaseTwo_FeedbackForm_260			
PhaseTwo_FeedbackForm_005	Graded listed buildings will be affected. Local heritage is the beauty and tranquillity that would be destroyed, it will affect all our lives.		The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11). Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.
PhaseTwo_FeedbackForm_007	Maintenance of the heritage buildings in surrounding areas need to be taken care of. Any new archaeology should also.	No	As part of the Environmental Impact Assessment undertaken for the Development, the Applicant has assessed the cultural heritage and archaeology for the Development site area as presented in Chapter 11 of the PEIR and subsequently in Chapter 11 of the Environmental Statement (document reference number 6.1.11).
PhaseTwo_FeedbackForm_008	By local heritage I take it you refer to the beauty of the area and people's access to it - this would be totally destroyed and listed buildings badly affected.		This is the opinion of the respondent. As part of the Environmental Impact Assessment undertaken for the Development, the Applicant has assessed the cultural heritage and archaeology for the Development site area as presented in Chapter 11 of the PEIR and subsequently in Chapter 11 of the Environmental Statement (document reference number 6.1.11).

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PhaseTwo_FeedbackForm_012	This scheme rides roughshod over our local heritage. It completely re designates an area of fabulous beauty and natural calm for an oversized electricity station.		This is the opinion of the respondent. As part of the Environmental Impact Assessment undertaken for the Development, the Applicant has assessed the cultural heritage and archaeology for the Development site area as presented in Chapter 11 of the PEIR and subsequently in Chapter 11 of the Environmental Statement (document reference number 6.1.11).
PhaseTwo_FeedbackForm_014	Local history - birth place of Faversham golf club		Noted. As part of the Environmental Impact Assessment undertaken for the Development, the Applicant has assessed the cultural heritage and archaeology for the Development site area as presented in Chapter 11 of the PEIR and subsequently in Chapter 11 of the Environmental Statement (document reference number 6.1.11).
PhaseTwo_FeedbackForm_022	The Graveney boat was discovered in Graveney Marshes. Historic church which attracts tourists for its architecture, age and stained glass.		The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11). The Graveney Boat is not sited on the Development site but on the neighbouring Graveney Marshes 870m east to the site. Please see Chapter 11, Environmental Statement (document reference 6.1.11).
PhaseTwo_FeedbackForm_039	Why is the box so small? Limits people's answers!		The Applicant provided free form response sections on its feedback form for additional comments to be made. The Applicant also invited written responses to its

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			communication channels advertised across its consultation literature and in notices.
PhaseTwo_FeedbackForm_043	This is an ancient landscape. The Saxon Shoreway runs along it. Having walked through solar panel covered fields, they are intimidating and intrusive. This part of the ancient Saxon Shoreway would be lost.		It is reported in the Environmental Statement, Chapter 7 (document reference number 6.1.7) that the site is within Graveney Marshes AHLV and that there are effects on users of the Saxon Shore Way and other public rights of way. These are reported in document reference number 6.1.7 and supporting appendices Environmental Statement, Technical Appendices 7.1-7.7 (document reference number 6.4.7.1-7). The Applicant has established a minimum buffer distance between the solar panels and Saxon Shore Way of 63m. The Applicant removed panels from the sloping land north of Nagden to reduce visibility from Nagden and from the Saxon Shore Way on both sides of Faversham Creek.
PhaseTwo_FeedbackForm_046	Flood plain to protect rest of coast and nearby Faversham, what knowledge do you have of maintaining this? Local heritage are not just the church and graded houses, but community OPEN SPACES!!!		The Development does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11). Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number

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			6.1.7) considers the existing open nature and characteristics of the site.
PhaseTwo_FeedbackForm_049	The flood plan protects Faversham and the coast. Potential disaster if not maintained. This magnificent open space IS local heritage and MUST REMAIN!	No	The Development does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11). Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.
PhaseTwo_FeedbackForm_050	Hugely important in this area as historically the area has archaeology from Neolithic times forwards		Noted. An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical

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			Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseTwo_FeedbackForm_051	I can't think of any archaeology organisation that could do a full-site, pre-development dig. Are you wouldn't be building down, eh? The solar plant would obviate access to the full extent of marsh-land that locals grand parents remember.		An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4). All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_062	The construction of the site would destroy all heritage assets within the perimeter, and render access impossible.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.

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PhaseTwo_FeedbackForm_069	We don't know what is there. Surveys so far are insufficient. Anything found will be noted and destroyed.	Yes	An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseTwo_FeedbackForm_090	This space belongs to everyone at present. When fenced off no one will be able to view this beautiful area. It will only belong to the developers. It will be seen from a huge area. Not a pleasant site.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_101	Graveney marshes are a precious wild place that need to be preserved with minimal disruption.		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.
PhaseTwo_FeedbackForm_108	Destroying the Saxon shore way walk with fabulous wild views, part of the local heritage and for regular visitors who walk, like us. Devastating.	Yes	A minimum buffer distance from the Saxon Shore Way of 63m has been maintained by the Developer, with this buffer increasing to 100m at the Faversham Creek end. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document

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			reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_109	Faversham is a cinque port which has many interest places to see and visit		Noted.
PhaseTwo_FeedbackForm_113	Give archaeologists plenty of time to dig and provide funding to preserve findings?	Yes	An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseTwo_FeedbackForm_117	I forgot about this when I was filling out the form at the first consultation event last year, but isn't this where the Graveney Boat was found?		The Graveney Boat is not sited on the Development site but on the neighbouring Graveney Marshes 870m east to the site. Please see Chapter 11, Environmental Statement (document reference 6.1.11).
PhaseTwo_FeedbackForm_121	You are proposing to develop too close to the coast.		The Development will be of a minimum buffer distance of 63m to the Saxon Shore Way and in some parts of the site this is as wide of 100m.
PhaseTwo_FeedbackForm_125	Saxon Shore Way will become an eye sore, flood plain will be dissipated leading to		The Development does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding.

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	potential flooding of Faversham		The Applicant has established a minimum buffer distance between the solar panels and Saxon Shore Way of 63m. The Applicant removed panels from the sloping land north of Nagden to reduce visibility from Nagden and from the Saxon Shore Way on both sides of Faversham Creek.
PhaseTwo_FeedbackForm_135	Investment into historic buildings in the parish such as the church.	No	Field Y has now been removed in entirety from the Proposed Development. This will help to reduce encroachment above the former marsh, and help to allow the church to be seen in a rural context (in this direction). Other changes include a separation of panel block edge from the Proposed Development Boundary, with suggested screening to soften the edges of the Development.
PhaseTwo_FeedbackForm_136	The Saxon Shore Way is local historical value, part of its appeal is that the landscape is relatively untouched.		A minimum buffer distance from the Saxon Shore Way of 63m has been maintained by the Developer, with this buffer increasing to 100m at the Faversham Creek end. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_145	The area hasn't been investigated for its historical importance, it is close to the roman shore line, and likely contains artefacts that require investigation.	Yes	An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).

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PhaseTwo_FeedbackForm_152	Will ruin the Saxon shore walk as footpaths will be shut off	Yes	All PRoWs which run through and around the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_157	I am the museum development officer for Kent and Medway. Please consult with local museums and contact [redacted]		Noted. An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseTwo_FeedbackForm_159	The Saxon shore path will be subject to alteration and significant reconstruction if water levels necessitate improvements to the sea wall. This will of course be detrimental to its current state.		All PRoWs which run through and around the site will be preserved by the Development. The Applicant has established a minimum buffer distance between the solar panels and Saxon Shore Way of 63m. The Applicant removed panels from the sloping land north of Nagden to reduce visibility from Nagden and from the Saxon Shore Way on both sides of Faversham Creek.
PhaseTwo_FeedbackForm_160	The Kent [ineligible] are a well-known, with level feature of this part of SE England. Goodbye to these natural parts of our heritage.		This is the opinion of the respondent. The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11).

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			Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.
PhaseTwo_FeedbackForm_166	we have less and less marshland, meadow land etc in this country. Its part of the flesh and blood of the area. No matter that you Facilitate land for sleep/birds etc you are changing the nature of the vast area.		Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.
PhaseTwo_FeedbackForm_168	The Graveney bout!		The Graveney Boat is not sited on the Development site but on the neighbouring Graveney Marshes 870m east to the site. Please see Chapter 11, Environmental Statement (document reference 6.1.11).
PhaseTwo_FeedbackForm_177	The creek into Faversham has long historical interest		Visual effects of the Development are assessed and supported by viewpoint visualisations in Chapter 7, Environmental Statement (document reference number 6.1.7).
PhaseTwo_FeedbackForm_179	This stretch of the north Kent coast has been in continuous human occupation for over 50,000 years. We need to understand their presence at Cleve		An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).

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PhaseTwo_FeedbackForm_180	Will an archaeological survey be carried out prior to the site being developed? Will the public have access to this document? Will the developers adhere to any recommendations made in the report?	Yes	An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseTwo_FeedbackForm_192	Whatever you do is likely to affect local heritage. Suggest the good local archaeological group are allied to conduct a FULL site survey so any valuable material is not lost.	Yes	An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseTwo_FeedbackForm_198	Pristine local land, part of the estuary's long history and instantly recognisable and loved by locals.		The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11). Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.
PhaseTwo_FeedbackForm_206	The site will expose artefacts that will need to be conserved	Yes	An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately

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			dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).
PhaseTwo_FeedbackForm_215	Bronze age boat remains in marshes		An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4). The Graveney Boat is not sited on the Development site but on the neighbouring Graveney Marshes 870m east to the site. Please see Chapter 11, Environmental Statement (document reference 6.1.11).
PhaseTwo_FeedbackForm_230	What is on this land? Significant finds made in past in area and made more works need to be done	Yes	An outline WSI will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting). See Environmental Statement, Technical Appendices: Outline Written Scheme of Investigation (document reference number 6.4.11.4).

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PhaseTwo_FeedbackForm_244	It should be more widely known that this estuary landscape is the setting for the great early English poem Beowulf, as published 20 years ago by the Faversham Society (paper 64). This is the oldest work in the English language and it is clear from place-name evidence that the action is centred on the Isle of Harty (just across the water from the proposed power station). This site is pretty well unchanged in appearance from the 5th or 6th centuries, bar changes in sea level up and down. The solar power station will be intrusive and damaging to a precious, unique, unprotected landscape. This is a site of cultural significance equivalent to Stonehenge. This fact alone ought to be enough to make people stop and	No	The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11).

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	think about the damage that is proposed.		
PhaseTwo_FeedbackForm_247	Rich in local heritage and walkers who enjoy the natural aspects and wildlife.		The Applicant has assessed the impact of the Development on cultural heritage and archaeology in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11).

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Phase Two Written Responses			
Tourism			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_027 PhaseTwo_FeedbackForm_032 PhaseTwo_FeedbackForm_052 PhaseTwo_FeedbackForm_056 PhaseTwo_FeedbackForm_059 PhaseTwo_FeedbackForm_064 PhaseTwo_FeedbackForm_072 PhaseTwo_FeedbackForm_115 PhaseTwo_FeedbackForm_122 PhaseTwo_FeedbackForm_128 PhaseTwo_FeedbackForm_162 PhaseTwo_FeedbackForm_163 PhaseTwo_FeedbackForm_226 PhaseTwo_FeedbackForm_019 PhaseTwo_FeedbackForm_008 PhaseTwo_FeedbackForm_022 PhaseTwo_FeedbackForm_024 PhaseTwo_FeedbackForm_046 PhaseTwo_FeedbackForm_050 PhaseTwo_FeedbackForm_062	Respondents expressed a general objection to the project and its potential loss of tourism including: Cyclists, ramblers, bird watchers, businesses, historians, artists, writers, runners.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).

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PhaseTwo_FeedbackForm_069 PhaseTwo_FeedbackForm_092 PhaseTwo_FeedbackForm_093 PhaseTwo_FeedbackForm_095 PhaseTwo_FeedbackForm_105 PhaseTwo_FeedbackForm_108 PhaseTwo_FeedbackForm_119 PhaseTwo_FeedbackForm_125 PhaseTwo_FeedbackForm_137 PhaseTwo_FeedbackForm_159 PhaseTwo_FeedbackForm_177 PhaseTwo_FeedbackForm_178 PhaseTwo_FeedbackForm_180 PhaseTwo_FeedbackForm_214 PhaseTwo_FeedbackForm_222 PhaseTwo_FeedbackForm_228 PhaseTwo_FeedbackForm_267			
PhaseTwo_FeedbackForm_025 PhaseTwo_FeedbackForm_196 PhaseTwo_FeedbackForm_213 PhaseTwo_FeedbackForm_231 PhaseTwo_FeedbackForm_014	Respondents stated that they believe tourism will be impacted due to the loss of the current landscape in the area.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).

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PhaseTwo_FeedbackForm_096 PhaseTwo_FeedbackForm_215	Respondents expressed that they believe the development will result in a loss of tourism in the area because of an impact on local wildlife. This particularly concerns any potential reduction in ornithological interest in the area.	No	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_089 PhaseTwo_FeedbackForm_145 PhaseTwo_FeedbackForm_234 PhaseTwo_FeedbackForm_011 PhaseTwo_FeedbackForm_012	Respondents expressed that they believe the development will result in a loss of tourism in the area because of a loss of popularity with walkers.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation

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			and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseTwo_FeedbackForm_004 PhaseTwo_FeedbackForm_005 PhaseTwo_FeedbackForm_061 PhaseTwo_FeedbackForm_117 PhaseTwo_FeedbackForm_152 PhaseTwo_FeedbackForm_164 PhaseTwo_FeedbackForm_235 PhaseTwo_FeedbackForm_240 PhaseTwo_FeedbackForm_255	Respondents stated that the open landscape is a key attraction, and the project will destroy this and the Saxon Shore Way.	Yes	The Applicant has established a minimum buffer distance between the solar panels and Saxon Shore Way of 63m. The Applicant removed panels from the sloping land north of Nagden to reduce visibility from Nagden and from the Saxon Shore Way on both sides of Faversham Creek.
PhaseTwo_FeedbackForm_204 PhaseTwo_FeedbackForm_223	Some respondents stated that there should be a visitor centre created once the project is operational.	No	Noted.
PhaseTwo_FeedbackForm_007	Such a wonderful area to walk and drive to Seasalter. Heavy traffic will damage an already precarious route for cyclists.		An assessment of the impact up on the National Cycle Route network is included in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).
PhaseTwo_FeedbackForm_010	Can't see the attraction to tourists of visiting a solar power station devoid of what wildlife was there before and attractive to the area - see visual impact above!		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_018	No additional construction traffic to prevent access to villages - towns - so no solar power station here in Graveney	No	Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
PhaseTwo_FeedbackForm_039	Why is the box so small? Limits people's answers!		The Applicant provided free form response sections on its feedback form for additional comments to be made. The Applicant also invited written responses to its communication channels advertised across its consultation literature and in notices.
PhaseTwo_FeedbackForm_045	We own a holiday caravan park and this will put off a lot of people wanting to stay surrounded by this.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.

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PhaseTwo_FeedbackForm_049	If this space is carpeted in panels, then - what tourism? What kind of tourists visit a massive solar panel sight for R&R and a lovely view?		The Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figures 1-3, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_051	I guess some people go on-tour to see impressive engineering works, and they'd stay / eat in Faversham. But it will enhance nothing of the	No	This is the opinion of the respondent. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact

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	experience of walkers or sailors.		Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_081	Despite promises that the nearby Cleve Hill Wind farm transformer station would be fully screened, the whole site remains totally visible from every angle.		The Applicant cannot comment on other development. The Environmental Statement, Chapter 7: Landscape and Visual Impact document reference 6.1.7) takes into consideration the cumulative impacts of the developments.
PhaseTwo_FeedbackForm_090	Will tourists come to view this? I think not! Hire a boat to view this? Come from the city for peace and green fields. No more in this area. Is this the view that a tourist would want? Oh no! Surely not.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_101	The economic future of Faversham is closely tied to tourism. What evidence is there that this huge development is not going to have anything other than a negative impact?		There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
PhaseTwo_FeedbackForm_109	People come from other areas to Faversham to see Faversham 300 years of history and bird life boating, walking and cycling		Noted. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number

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			6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_121	You are proposing to develop too close to the coast.	Yes	The Development will be of a minimum buffer distance of 63m to the Saxon Shore Way and in some parts of the site this is as wide of 100m.
PhaseTwo_FeedbackForm_127	Traffic is already a huge problem in this area. No additional traffic should be encouraged the area's infrastructure cannot cope.	Yes	Since the Phase Two consultation, the Applicant has reduced the traffic numbers associated with the worst-case construction programme. This is now a peak of 80 HGV vehicles per day. Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted.

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			Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
PhaseTwo_FeedbackForm_135	Environmental / learning centre, hides etc...	No	Noted.
PhaseTwo_FeedbackForm_166	This is so massive and such an eyesore everyone that I think it will negate the reason for even keeping footpath open. Why will people want to come here with this impacting so hugely on the whole atmosphere, views etc in this area.		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseTwo_FeedbackForm_169	Whilst access for walking, riding and cycling would be welcomed, care must be taken to protect wildlife.		The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional

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			permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseTwo_FeedbackForm_176	This is not a big tourist area except to migrating birds. This makes it unique and special as such	Yes	The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of c.56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference number

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			6.1.9) and The Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
PhaseTwo_FeedbackForm_192	The local authority is trying to promote tourism to Faversham. There must be concerns that a huge solar park will turn off tourism and discourage visitors.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
PhaseTwo_FeedbackForm_195	It'll give people something to look at, There's nothing much out there.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_198	who would stay near the sportsman in Faversham now? I wouldn't pick to		This is the opinion of the respondent. Since the Phase Two consultation period, the Development has moved the solar PV infrastructure further away from the Sportsman in order to increase the size of the Arable Reversion Habitat Management Area.
PhaseTwo_FeedbackForm_203	This area is heavily reliant on tourism. A massive solar park can't in any way attract people to the area.		There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some

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			local expenditure benefits associated with construction workforce.
PhaseTwo_FeedbackForm_206	Schools will need information to teach students		Noted.
PhaseTwo_FeedbackForm_210	The landscape, access, sense of place is particularly important. The solar farm at this scale will fundamentally change this. Access to the area is along the sea wall, looks down the solar farm.		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.

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PhaseTwo_FeedbackForm_244	The Swale and its marshes are not - thank goodness - promoted as a centre of intense tourism but have a hugely important role in local and green tourism, providing quiet walks, birdwatching, fishing, sailing, photography and general inexpensive recreation. For most of these activities, for the tens of thousands of local people who use the area for these purposes, it is the landscape - the quiet, unspoiled, open, undeveloped land - which is the major attraction. You would, with one oh-so-easy decision, destroy forever a precious silent treasure which sustains thousands of households with calmness, joy, release, pleasure, art, access to nature, views which are more or less unchanged for the last two thousand years....		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.
PhaseTwo_FeedbackForm_247	People come from miles around to enjoy the peace and tranquillity which will change		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number

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	forever once this ugly and profit lead development takes place		6.1.7) considers the existing open nature and characteristics of the site.
PhaseTwo_FeedbackForm_273	Tourism should not be a priority of the solar farm.		Noted.

Phase Two Feedback Forms			
Recreation and local amenity			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_041 PhaseTwo_FeedbackForm_043 PhaseTwo_FeedbackForm_046 PhaseTwo_FeedbackForm_049 PhaseTwo_FeedbackForm_074 PhaseTwo_FeedbackForm_101 PhaseTwo_FeedbackForm_122 PhaseTwo_FeedbackForm_136 PhaseTwo_FeedbackForm_137 PhaseTwo_FeedbackForm_152 PhaseTwo_FeedbackForm_159 PhaseTwo_FeedbackForm_166 PhaseTwo_FeedbackForm_198 PhaseTwo_FeedbackForm_210 PhaseTwo_FeedbackForm_225 PhaseTwo_FeedbackForm_262	Respondents stated that the development would change the way the amenity is experienced/felt due to losing the tranquillity of the amenity currently.	No	The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.

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PhaseTwo_FeedbackForm_267 PhaseTwo_FeedbackForm_024 PhaseTwo_FeedbackForm_119 PhaseTwo_FeedbackForm_125 PhaseTwo_FeedbackForm_131			
PhaseTwo_FeedbackForm_010 PhaseTwo_FeedbackForm_018 PhaseTwo_FeedbackForm_025 PhaseTwo_FeedbackForm_027 PhaseTwo_FeedbackForm_032 PhaseTwo_FeedbackForm_051 PhaseTwo_FeedbackForm_064 PhaseTwo_FeedbackForm_068 PhaseTwo_FeedbackForm_072 PhaseTwo_FeedbackForm_092 PhaseTwo_FeedbackForm_096 PhaseTwo_FeedbackForm_115 PhaseTwo_FeedbackForm_162 PhaseTwo_FeedbackForm_163 PhaseTwo_FeedbackForm_178 PhaseTwo_FeedbackForm_191	Respondents stated a general objection to the development and its impact on recreation and local amenity.	No	Noted. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_005 PhaseTwo_FeedbackForm_007 PhaseTwo_FeedbackForm_012 PhaseTwo_FeedbackForm_038 PhaseTwo_FeedbackForm_052 PhaseTwo_FeedbackForm_090 PhaseTwo_FeedbackForm_100 PhaseTwo_FeedbackForm_145	Respondents stated that the development will mean they will have their recreational amenity spoilt/ lost.	No	This is the opinion of the respondents. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13:

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PhaseTwo_FeedbackForm_167 PhaseTwo_FeedbackForm_214 PhaseTwo_FeedbackForm_235 PhaseTwo_FeedbackForm_247			Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_019 PhaseTwo_FeedbackForm_150 PhaseTwo_FeedbackForm_183	Respondents stated that the amenity will be affected by the visual impact.	No	This is the opinion of the respondents. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_050 PhaseTwo_FeedbackForm_112 PhaseTwo_FeedbackForm_231	Respondents stated that the recreational amenity is used by people who visit the area for its wildlife.		Noted.
PhaseTwo_FeedbackForm_188 PhaseTwo_FeedbackForm_056 PhaseTwo_FeedbackForm_105	Respondents stated that they were concerned about the impact which the development would have upon the Saxon Shore Way for: walkers/ runners/ cyclists and those who love wildlife.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site.

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			No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_059 PhaseTwo_FeedbackForm_062 PhaseTwo_FeedbackForm_084 PhaseTwo_FeedbackForm_142 PhaseTwo_FeedbackForm_168 PhaseTwo_FeedbackForm_229 PhaseTwo_FeedbackForm_238 PhaseTwo_FeedbackForm_240	Respondents stated that people would not want to use the Saxon Shore Way because of the visual impact of the development.	No	It is reported in the Environmental Statement, Chapter 7 (document reference number 6.1.7) that the site is within Graveney Marshes AHLV and that there are effects on users of the Saxon Shore Way and other public rights of way. These are reported in document reference number 6.1.7 and supporting appendices Environmental Statement, Technical Appendices 7.1-7.7 (document reference number 6.4.7.1-7). The Applicant has established a minimum buffer distance between the solar panels and Saxon Shore Way of 63m. The Applicant removed panels from the sloping land north of Nagden to reduce visibility from Nagden and from the Saxon Shore Way on both sides of Faversham Creek.

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PhaseTwo_FeedbackForm_093 PhaseTwo_FeedbackForm_186 PhaseTwo_FeedbackForm_195 PhaseTwo_FeedbackForm_204 PhaseTwo_FeedbackForm_232	Respondents stated that they wish to see footpath network maintained around the site.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_002	You advised that a community orchard along Cleve hill but it is not clear as to how this will sight lines when driving, how it will be accessed and additionally		In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site.
PhaseTwo_FeedbackForm_004	Local amenity will be lost if the scheme proceeds, and it is naive for the developers to think that a community orchard can compensate for this.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site.
PhaseTwo_FeedbackForm_008	Local access to walkers, bird watchers etc would be severely curtailed and I suspect in many areas restricted altogether.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.

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PhaseTwo_FeedbackForm_009	The local area is very popular with residents and visitors because it provides very varied sites for people to explore. - history, architecture, the creek etc etc		Noted.
PhaseTwo_FeedbackForm_014	Lovely place to walk and ramble		Noted.
PhaseTwo_FeedbackForm_017	Continued and increased access for walkers is desirable.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_022	Difficulties face by mobile library used by local residents and Graveney School. England coastal path??		Noted.
PhaseTwo_FeedbackForm_023	Not an area for recreation. yes to footpaths to Saxon shore line. No to increasing facility for horses, bikes and motorised vehicles.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.

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			Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseTwo_FeedbackForm_039	Why is the box so small? Limits people's answers!		The Applicant provided free form response sections on its feedback form for additional comments to be made. The Applicant also invited written responses to its communication channels advertised across its consultation literature and in notices.
PhaseTwo_FeedbackForm_069	Would be destroyed. Area will be desert. No nature left.		This is the opinion of the respondent. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site.

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			No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_081	The whole are is enjoyed by walkers, holiday-makers, boating enthusiasts, holiday-makers and other tourists as well as by thousands visitors and locals who enjoy this peaceful and tranquil area for its outstanding beauty. A million solar panels along the whole coastline is just plan wrong. This development is unsightly, unwanted and unnecessary.		This is the opinion of the respondent. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_087	That just because Graveney is a small community it doesn't mean they should be bulldozed into accepting this		This is not the case. The number of receptors does not, typically, affect the significance of effects, instead the sensitivity of receptors combines with the magnitude of effect. A significant effect may be identified

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	obliteration of a local amenity.		that applies to a single receptor, in which case this would be stated. Certain relevant guidance does refer to the number of receptors, in which case this is followed, but that guidance is not specific to this Environmental Statement (document reference number 6.1).
PhaseTwo_FeedbackForm_091	There are currently lots of headlands to walk around as well as the footpaths. Perhaps more routes through the park could be provided to allow the area to be used for recreation as well.	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_108	I believe this marshland has been a source of comfort, fun and companionship for locals to enjoy for many years. This would be totally lost if this park were built.		This is the opinion of the respondent. None of the Development infrastructure will be on marshland. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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PhaseTwo_FeedbackForm_109	Boating, fishing, walking, local swimming pool		Noted. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseTwo_FeedbackForm_113	Good that you are considering reducing the numbers of panels in certain areas and screening and also extending existing permissive pathways, cycleways and bridgeways.		Noted.

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PhaseTwo_FeedbackForm_117	This is a beautiful, peaceful place with several public footpaths and permissive paths across and around it, used regularly by local residents in search of green space, fresh air, the calming qualities of the natural world, or just somewhere nice to go for a run or walk their dogs. While the paths themselves are not under threat, the transformation of the character of the area will still result in a loss of amenity. There is a world of difference between a walk across fields alive with larksong and a walk across an industrial landscape with the buzzing of transformers.		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseTwo_FeedbackForm_121	You are proposing to develop too close to the coast.		The Development will be of a minimum buffer distance of 63m to the Saxon Shore Way and in some parts of the site this is as wide of 100m.
PhaseTwo_FeedbackForm_128	All footpaths should be presented. Who wants to walk through a path surrounded by 12 foot panels.	Yes	There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c.

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			35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). In response to feedback from the phase two community consultation the Applicant has produced an additional photomontage from inside the PRoW on the site.
PhaseTwo_FeedbackForm_133	Not an area for recreation. Yes to footpaths to Saxon shoreline- No to increasing facility for horses, bikes, motorised vehicles by widening and extending bridleways. Open to abuse from day 1.	Yes	In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose

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			promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseTwo_FeedbackForm_135	Access and amenity areas for local people, community gardens, allotments, inclusion of school for educational resources.	Yes	Noted. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_147	This is a beautiful walking area with walkways provided along the dikes. The presence of a great field of collectors will ruin the pleasure.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_160	Man people enjoy these marshes for recreation and relaxation. Their beauty will be minimised if the public areas are adequately and sensitively screened.		None of the Development infrastructure is proposed to be on marshland. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the

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			Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.
PhaseTwo_FeedbackForm_169	Whilst access for walking, riding and cycling would be welcomed, care must be taken to protect wildlife.	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.

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PhaseTwo_FeedbackForm_177	None of the business rates generated will come to my local authority (Canterbury city council) or directly to the residents of Graveney through their parish council.		The Applicant does not have any control over the business rates mechanism.
PhaseTwo_FeedbackForm_192	Walkers etc should be encourages and not find access restricted on the site but I am dubious about too much concreted paths and amenity. The site is NOT a public park and does not need too much development which will compromise wildlife.	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers

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			away from the SPA whilst also promoting walking in the area.
PhaseTwo_FeedbackForm_200	I have used the farm track marked 'possible permissive pathway', from Nagden to the sea wall since 1970 - this route is established!		Noted.
PhaseTwo_FeedbackForm_211	I cannot see this will materially detract.		Noted.
PhaseTwo_FeedbackForm_215	Footpaths - Clear and Safe to walk. Provision of clean and accessible public toilets		Noted.
PhaseTwo_FeedbackForm_220	Extra paths good, particularly if they are made into traditional lanes with hedge and not faced in with unusually high metal 'deer fences'	Yes	There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the

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			baseline in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_228	Local recreation is important too		The Applicant agrees with this statement. The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_230	Will destroy pathways and access to the sea across open farmland. Who wants to walk between rows of solar panels?		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13). There would be substantial horizontal separation between the path and the solar

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			panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_234	The marshes are accessible to virtually any walker or dog. Your proposal will limit this access and enjoyment.		This is the opinion of the respondent. All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.

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PhaseTwo_FeedbackForm_244	See my remarks about tourism. Your categories here assume that tourism is an industry, whereas our experience is that local people enjoy the Graveney and Faversham marshes as a local accessible free resource. I also think that we have no real knowledge about the projected life of this installation, or what will be done when it becomes outmoded or inefficient. In Denmark there are thousands of redundant wind turbines littering the countryside – too expensive to take down. There are so many places where solar installations should and could be place – along motorways and railways, on factory roofs, on the roofs of houses. Why do we have to have these flat panels? Why not the rotating cylinders, or spherical gatherers? How long is this technology going to last? It seems to me you		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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	guys have looked with your banking eyes and not considered the real costs.. the legacy. The local planning authorities have a hopeless record in insisting on sustainable development… insulation for new buildings, solar roofs, community transport, heat pumps, the list is pitiful. Obviously we cannot go on consuming more and more power – we need more – but your solution here is to dump this HUGE ugly destructive and short-term juggernaut onto a fragile, beautiful, precious, unprotected area without considering the damage you are doing. This proposal is NOT the answer. The flooding risk alone should make you stop and think.		

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PhaseTwo_FeedbackForm_255	We walk freely through and around this area, it is a breathing space in an increasingly built up area, being surrounded by panels of such height, covering such a wide area, as well as other structures required including fencing will take this away.		This is the opinion of the respondent. All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_273	I think the orchard is a fine idea, please promote this idea	Yes	Noted. Feedback on the proposals for the Community Orchard are included in Chapter 10 of this Consultation Report. As a result, the Applicant has removed this proposal from the Development.

Phase Two Written Responses			
Other, please specify			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**

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PhaseTwo_FeedbackForm_024 PhaseTwo_FeedbackForm_122 PhaseTwo_FeedbackForm_137	Where will we walk our dogs?		All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_006 PhaseTwo_FeedbackForm_007 PhaseTwo_FeedbackForm_038 PhaseTwo_FeedbackForm_061 PhaseTwo_FeedbackForm_079 PhaseTwo_FeedbackForm_088 PhaseTwo_FeedbackForm_101 PhaseTwo_FeedbackForm_112 PhaseTwo_FeedbackForm_145 PhaseTwo_FeedbackForm_160 PhaseTwo_FeedbackForm_166 PhaseTwo_FeedbackForm_205 PhaseTwo_FeedbackForm_207	Respondents stated that the site is too big and out of scale for the location.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_046 PhaseTwo_FeedbackForm_049 PhaseTwo_FeedbackForm_165	Respondents stated that they believe solar panels should be placed on roofs, industrial sites or brownfield sites.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference

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			number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_010 PhaseTwo_FeedbackForm_011 PhaseTwo_FeedbackForm_025 PhaseTwo_FeedbackForm_027 PhaseTwo_FeedbackForm_081 PhaseTwo_FeedbackForm_115 PhaseTwo_FeedbackForm_222 PhaseTwo_FeedbackForm_244	Respondents voiced a general objection to the project.		Objection noted.
PhaseTwo_FeedbackForm_125 PhaseTwo_FeedbackForm_069	Noise pollution from transformers, distribution units, battery storage facilities and construction of the solar park.	no	The Applicant has avoided potential noise impacts relating to the Development by designing out potential noise pollution upon receptors. This has been done by placing transformers away from the nearest receptors, and surrounding the energy storage facility and substation compound with bund. The Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) set out the predicted noise levels and outlines the mitigation proposals.

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			Noise during the operational phase of the development is assessed in the Environmental Statement, Chapter 12: Noise and Vibration Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100% capacity, during both daytime and night-time periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be lower than the limits set out in the Chapter.
PhaseTwo_FeedbackForm_123 PhaseTwo_FeedbackForm_139	Impact on value of housing in area	No	The Applicant recognises concerns from surrounding properties regarding impacts on house prices. The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at

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			Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.7km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference number 6.4.7.5).
PhaseTwo_FeedbackForm_017 PhaseTwo_FeedbackForm_241	Respondents stated that growing food is also important.		Noted. Environmental Statement, Volume 4: Technical Appendices (document reference number 6.4) contains an Agricultural Land Classification survey (document reference number 6.4.13.1). This concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.

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PhaseTwo_FeedbackForm_005	Noise pollution from the transformers and inverters, dust creation, flood plain supporting the coastal flooding scheme, type of coverage of panels will change CO2 levels, microclimate will be affected by diverse change in temperature under panels. You will ruin my life here if this is built.		All of these potential impacts are assessed in the Environmental Statement (document reference number 6).
PhaseTwo_FeedbackForm_008	The high levels of noise pollution both during the construction and later in the general running of the site will be totally unacceptable.	Yes	This is the opinion of the respondent. The Applicant has avoided potential noise impacts relating to the Development by designing out potential noise pollution upon receptors. This has been done by placing transformers away from the nearest receptors, and surrounding the energy storage facility and substation compound with a bund. The Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) set out the predicted noise levels and outlines the mitigation proposals. Noise during the operational phase of the development is assessed in the

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			Environmental Statement, Chapter 12: Noise and Vibration Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100% capacity, during both daytime and night-time periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be lower than the limits set out in the Chapter.
PhaseTwo_FeedbackForm_012	Flood defences. The area of land in question will protect our area from the impending sea level rise that will be one of the results of global climate change.		The Development does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body

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			responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseTwo_FeedbackForm_014	A place where people have scattered loved ones ashes!		Noted.
PhaseTwo_FeedbackForm_019	Floods. You have not considered the whole area just your site. Extending your boundary means you would be responsible for flood maintenance. I do not believe you have the expertise to take this over from the environmental agency. They are impartial and consider the whole area INCLUDING Faversham. You cannot be entrusted with the flood protection of this whole area!!		On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. It would be interest of the Development to ensure that the site infrastructure would be protected from flooding.
PhaseTwo_FeedbackForm_020	Complete loss of a unique environment.		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.

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PhaseTwo_FeedbackForm_022	Construction will be a major concern. The roads will not survive nor my sanity. My house will not survive the constant vibration and onslaught from a project of this scale. Hardly your concern when its value is probably TUPPENCE now.		The assessment of construction noise and vibration is contained within Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.1 (document reference number 6.1.12). Both Chapter 12: Noise and Vibration (document reference number 6.1.12) and Chapter 14: Access and Traffic (document reference number 6.1.14) identify that no significant residual environmental impacts from construction traffic are predicted. Furthermore, the Applicant has proposed a number of mitigation measures in relation to construction traffic movements that are detailed within the Construction Traffic Management Plan (document reference number 6.4.14.1). Contained in this, the Applicant has proposed to carry out a road condition assessment prior to construction in order to ensure the road is in good condition at the start and end of construction.
PhaseTwo_FeedbackForm_039	Why is the box so small? Limits people's answers!		The Applicant provided free form response sections on its feedback form for additional comments to be made. The Applicant also invited written responses to its communication channels advertised

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			across its consultation literature and in notices.
PhaseTwo_FeedbackForm_042	Visual detriment		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_048	The key concern re amenity and visual impact is that of overall landscape amenity not the details of close up which is of course important too. At present the landscape amenity belongs to all of us. This proposal utterly removes it and replaces it with blackness. The proposal also privatises the Seawall and SSI making them subservient to the commercial interests of the Power Station sponsors.		The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13). The SSSI land incorporated in the revised red line boundary is already under private ownership and would be subject to the same restrictions regarding land management as it currently is.
PhaseTwo_FeedbackForm_050	am important wellbeing site too		Noted.

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PhaseTwo_FeedbackForm_051	I'm interested in Cleve Hill's impact on and benefits for Faversham. As it's on the scale of national provision, no £'s for Faversham. Then: with no town to be built out on its east, south and west sides, having C.Hill filling the north side feels like a final attack on town's integrity - it's too big. I admire your mitigations in response to the first consultation - but the best mitigation will be to not build Cleve Hill		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_062	See above on public safety. I am also concerned about increased flood risk if the sea defenses are no longer maintained by a publicly accountable agency.	No	On 30 April 2018, to give the Applicant the ability to undertake maintenance works on the flood defences throughout the lifetime of the Development in the event that the Environment Agency ('EA') ceases to undertake maintenance, the Applicant changed the DCO application boundary to include the existing flood defences. It is in the interest of the Development to ensure that the site infrastructure would be protected from flooding.

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PhaseTwo_FeedbackForm_072	This area is perfect as it is. It is calming peaceful, bleak in some weathers and totally uplifting for all who use it. There is nowhere else like it. It makes people feel free and at peace. Invaluable I would say.		Noted. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site.
PhaseTwo_FeedbackForm_090	I will not wish to walk in this area any more at. So why would anyone else chose to walk there after construction. A total loss for the whole community. An outstandingly beautiful area obliterated for good		This is the opinion of the respondent. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.
PhaseTwo_FeedbackForm_093	Land to return to agriculture or nature reserve post solar farm.		The Applicant has outlined how the Development would be decommissioned in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
PhaseTwo_FeedbackForm_106	I paint local landscapes.		Noted.

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PhaseTwo_FeedbackForm_108	This is a floodplain as part of the flood management infrastructure for Kent coast. It is a serious issue that places like Faversham could be affected should you takeover the sea wall to only protect your site.		The Development does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding.
PhaseTwo_FeedbackForm_109	Faversham is like Rye in Sussex, small town by the sea with a creek. If you got the go ahead there would be no large places in Kent by the sea for wildlife and people.		This is the opinion of the respondent. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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PhaseTwo_FeedbackForm_117	As mentioned above - I'm also concerned about noise pollution. Additionally, I'm puzzled that an area earmarked in the local plan for return to salt marsh habitat should be seen as a suitable place for any kind of construction (isn't it a flood plain?) and wonder whether the solar installation will compromise the land's ability to soak up floodwater, which would presumably increase the risk to Faversham. Finally, construction - there are no roads through the site (one of its greatest charms is how remote it is) and it gets very, very soft and muddy underfoot in the winter. You'll be taking heavy construction vehicles over roads that aren't really built for them and then, presumably, on over temporary surfaces...? I would expect this to be somewhat damaging in and of itself.	Yes	The Applicant has avoided potential noise impacts relating to the Development by designing out potential noise pollution upon receptors. This has been done by placing transformers away from the nearest receptors, and surrounding the energy storage facility and substation compound with a bund. The Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) set out the predicted noise levels and outlines the mitigation proposals. The Development does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a

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			number of factors to be considered and overcome for the strategy to be implementable.
PhaseTwo_FeedbackForm_121	You are proposing to develop too close to the coast.	Yes	The Development will be of a minimum buffer distance of 63m to the Saxon Shore Way and in some parts of the site this is as wide of 100m.

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PhaseTwo_FeedbackForm_124	build nuclear plants, cheaper and more cost effective all round as if a solar farm is about to save the planet. PS if so good why is our electricity the highest price in the EU (total crap)		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_127	Consultation and info only from 13/6 to 16/6 couldn't make any of these should be more.	No	As well as holding events in the community between Wednesday 13 June and Saturday 16 June, the Applicant also made all consultation materials available to download from the project website.
PhaseTwo_FeedbackForm_128	Your proposed screening trees will not grow unless constantly attended and watered for the next 10 years.	No	Screening and mitigation proposals are presented in the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2) This includes a 3.64km of native screening planting. As part of the Environmental Statement, the Applicant has also produced photomontages at the 5-year period.

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PhaseTwo_FeedbackForm_133	I am assuring the development is "fair ()" Readily understand the concerns of those locals to Graveney/ Cleve on the despise of the landscape and proposed development.		The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_136	Surely profit if your main concern and Green site acre cheap to convert however is this the best option for everyone or is it fore mostly about the money?		This question is not relevant to the planning application.

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PhaseTwo_FeedbackForm_144	This type of project should be in post-industrial type locations.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_155	I think proximity to existing key driving force behind to try and put solar farm elsewhere, where it might not impact birds and wildlife as much.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseTwo_FeedbackForm_159	Alternative sites. I am unaware of alternative Baron field sites that where first considered. We will loose hundred as acres of agricultural land also. Other solutions need to be concidered		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_163	No to park		Objection noted.
PhaseTwo_FeedbackForm_164	This exhibition was totally biased and cynical. Nowhere on the exhibition panels do you state the overall area. "53% of site covered" - conveniantly clouds the space between the panels which can not be seen anyway. The photographs in the report (Page 6) is of much lower panels, they are not 4m high as in the proposals. "components of a typical solar farm" shows ground level panels.	No	The visualisations within the ES have been prepared in accordance with Landscape Institute's 'Photography and photomontage in landscape and visual impact assessment Advice Note 01/11'. The imagery is prepared using 50 mm single frame photographs captured on a full frame sensor digital SLR camera. The imagery is then stitched together using a cylindrical projection to form the panoramic images used within the ES. Due to the extents of the site and the locations of the agreed viewpoints, panoramic images are the most suitable way to display the photomontages and provide sufficient context of the surrounding landscape. The methodology for photography and

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			visualisation are found in Technical Appendix 7.1 (DCO document reference 6.4.7.1). The applicant also stated that there will be 2.5 metres of separation between each solar panel table.
PhaseTwo_FeedbackForm_170	Generation / sustainable power. I have PVs on my own roof, drive an electric vehicle, have battery storage at home, and have invested in community power schemes. I strongly support renewable generation and believe that your use of batteries is a plus.		Noted.
PhaseTwo_FeedbackForm_172	Plant life		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site.

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			No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_177	The use of a greenfield site is unnecessary when there are decommissioned coal power generation sites in Kent and elsewhere in the country. There are other ways of generating solar power than using farmland.eg on all new houses.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_181	The inclusion of a community orchard needs to be carefully research, who will look after it.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site.

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PhaseTwo_FeedbackForm_183	The paths through the site are fenced to 2m - it will look like a concentration camp. Oppressive and menacing.	No	This is the opinion of the respondent. The deer fencing proposed is 2m high with security camera height is 3m high. These are reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) along with the dimensions of all equipment associated with the Development. The Applicant has assessed the visual impact of the Development as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_190	sensible land use		Noted.
PhaseTwo_FeedbackForm_193	Under the panels, will it become Barron and brown?		Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.
PhaseTwo_FeedbackForm_196	What about flooding?		The Development has been designed to withstand a 1:1000-year flooding event, by raising all electrical infrastructure off the ground.

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			The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.
PhaseTwo_FeedbackForm_204	Battery technology is vital		Noted.
PhaseTwo_FeedbackForm_210	Local objections do not mean a lack of willingness to accept renewable energy. It is the scale of whitewash with regard to environmental mitigation that is being offered.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_214	Who even owns this land?? How is a private company allowed to propose such a devastating plan for our beautiful, special countryside.		This is not relevant for the planning application.

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PhaseTwo_FeedbackForm_228	Just keep everything as normal as possible I guess, but maybe a change is good		Noted.
PhaseTwo_FeedbackForm_232	Reduced electricity rates for local residents to compensate for ongoing inconvenience/ E.g. increased traffic, noise and visual impact		Noted.
PhaseTwo_FeedbackForm_234	The position of the panels proposed is too close to existing housing and will impact on the residents quality of life	Yes	The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.7km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), this assessment on neighbouring properties is supported by the Technical

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			Appendices, Residential Visual Amenity Assessment (document reference number 6.4.7.5).
PhaseTwo_FeedbackForm_240	The small community at Nagden should have a bigger buffer zone between the houses and the solar panels. Zone M of the papers should be halved, taking away the southern half. Zone R should be excluded completely.	No	The Applicant has consulted with the surrounding properties and have confirmed that there is no current evidence to suggest that property prices are impacted by solar developments. In response to comments regarding views from neighbouring properties, the Applicant has removed panels from Cleve Hill at Field Y and Z. The Applicant also set-back panels from Warm House by 66m and Nagden by 68m, and introduced 3.7km of native hedge row screening to mitigate the potential visual impact of the development. The Applicant has assessed the visual impact upon neighbouring properties as part of the Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment (document reference number 6.1.7), this assessment on neighbouring properties is supported by the Technical Appendices, Residential Visual Amenity Assessment (document reference number 6.4.7.5).

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PhaseTwo_FeedbackForm_247	I totally object to this ridiculous project. Precious natural and wildlife habitat is being snatched from under the noses of local residents so that fat cats can make extortionate profit. This land belongs to the people of this community and not there to be taken away Not only our community who enjoy this richly diverse land but who feel a sense of protection and responsibility for the habitats who populate it		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_265	Stop hiding behind terminology. These are not "Solar parks" or "Solar farms" they are SOLAR POWER STATIONS		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_269	The wind farm at recluver has a visitors centre. This may have helped local people to feel proud of renewable energy. Maybe we could have information boards?	No	Noted.

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Further Comments			
Were your questions answered satisfactorily by our team?			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_002	There were a number of unknowns especially on how the visual impacts may be minimised/alleviated or removed; maintenance of proposed community orchard.		Noted.
PhaseTwo_FeedbackForm_004	Little derailed information available on some important elements of the proposed scheme, particularly regarding management plans and the impact of floods in the area.	No	The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable.

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PhaseTwo_FeedbackForm_005	Mitigation is not sufficient, answers to questions extremely vague and misleading	Yes	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference number 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effects birds, including the qualifying interest features of the designated sites. The Applicant established a Habitat Management Steering Group ('HMSG') with local representation from Kent Wildlife Trust in order to discuss appropriate habitat mitigation, land management and biodiversity improvements with Natural England, RSPB and Kent Wildlife Trust. This has resulted in an agreed Arable Reversion Habitat Management Area ('AR HMA') for birds of 56 ha, which has increased from 41ha between PEIR and Application submission.

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PhaseTwo_FeedbackForm_006	As last time, your team answered questions fully and with enthusiasm for the project but we were not always happy with the answers		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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PhaseTwo_FeedbackForm_010	Just a hollow PR exercise.		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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PhaseTwo_FeedbackForm_012	Why are our community going through you and not an independent body?		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
PhaseTwo_FeedbackForm_013	No mention of the solar panel already there		Comment unclear
PhaseTwo_FeedbackForm_014	They couldn't answer all the questions - some		Noted.

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	answers were very vague!		
PhaseTwo_FeedbackForm_018	Things are not represented factually - low they are lies		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_019	You are not considering local people and their concerns / needs - tinkering is not the answer - you HAVEN'T listened RE-SIZE. How we get our electricity is not the point. The point is how you obtain it - not about you making money at the expense of local damage. There are other places brownfield / industrial building etc to generate electricity - this is about reduced cost for you at the expense of local area and people.	Yes	In response to comments regarding views from surrounding properties and views of the site, the Applicant changed the Development design following phase one s47 consultation, as presented in the PEIR, in the following ways: the Applicant removed modules from south east of public right of way that crosses the south-eastern corner of the site to reduce visibility of the Development from Graveney including the Cleve Hill Road area and Sandbanks Road. The Applicant also removed modules from above the 12 m AOD contour on Graveney Hill to reduce the potential for modules to be visible above the crest of the hill, both from the areas described above, but also for the properties accessed from Cleve Hill Road, Crown Cottages and Graveney Hill Farm. The Applicant removed modules from the south west of the site to the north east of Nagden to reduce visibility from the properties at Nagden and for the users of the rights of way at Nagden. The Applicant removed panels from the sloping land north of Nagden to reduce visibility from Nagden and from the Saxon Shore Way on both sides of Faversham Creek. The Applicant removed modules from the land immediately north of Warm House on the southern boundary to reduce visibility from the property. See Chapter 1 of the Consultation Report (document reference number 5.1) and Chapter 7

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			of the Environmental Statement (document reference number 6.1.7). In total, the Applicant has reduced the area covered by panels in the developable area from phase one s47 consultation to what is presented in the final Environmental Statement (document reference number 6) from 56.5% to 45.5%.

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PhaseTwo_FeedbackForm_021	very biased		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_022	Answers were vague, particularly regarding the safety of my home		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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PhaseTwo_FeedbackForm_025	There has been no attempt to inform Whitstable, which is close and will be affected by this development.	No	The Applicant included Seasalter in its core consultation zone, as set out in Chapter 7 of this Consultation Report (document reference number 5.1). The core consultation zone for the Development was identified by: • using a zone of theoretical visibility to assess the areas in the 'vicinity' of the land which may experience a degree of visual impact form the Development ; • using natural and human geographical boundaries, for example using Junction 7 of the M2 as the most southerly point for the core consultation zone, and the most northerly point being the foot of Leysdown-on-Sea; • including areas of access options, which covered the Head Hill Road, Seasalter Road and Faversham Road the core consultation area, which included 12,800 local homes and businesses, the following consultation activities took place: • Direct mailings of consultation materials and newsletters • Two rounds of community consultation events • Displaying hard copy Development information available across 8 Community Access Points ('CAP sites') (listed in the SoCC and listed in Appendix 28) • Advertising across 35 local information points (listed in Appendix 28) • Holding ongoing near neighbour and

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			stakeholder meetings • Placing site notices • Displaying all consultation materials on the Development website • Providing consultation updates via Twitter Whitstable was included in the wider consultation area for the Development, as set out in Chapter 7 of this Consultation Report (document reference number 5.1). In the wider consultation area, the following consultation activities took place: • Advertising across media channels covering the core and wider consultation area • Engaging with the wider Kent media as well as regional and national media through press releases and radio, TV and interviews • Making hard copy Development information available at 8 CAP sites • Advertising across 35 local information points • Holding stakeholder meetings throughout the wider consultation area such as meetings with Canterbury Greenpeace Group, Canterbury Green Party, and with Rosie Duffield MP. • Using online and social media techniques: dedicated Development website and twitter account.

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PhaseTwo_FeedbackForm_039	I put questions about sea wall height to a representative who set about trying to find some information with which to answer them. After ten minutes it became clear he had no idea what he was talking about and he admitted he was a transport consultant. Not helpful to mislead in this way and have people who know very little about the development answering questions		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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PhaseTwo_FeedbackForm_045	Found to be very patronising!!		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
PhaseTwo_FeedbackForm_051	Polite, listening, informed people there		noted.

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PhaseTwo_FeedbackForm_056	No wish to engage with alternatives Eg. Sea-based solar panels	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) contains an assessment of the most suitable construction transport method, including consideration of sea-based transport.
PhaseTwo_FeedbackForm_059	The representative from the solar farm company did not answer my questions on the economic viability of the proposed plant vs environmental impact.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_066	We were told what you wanted us to know, and no what we needed to know		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_070	Staff were young and polite bit didn't really engage with the concerns I raised or respond to the issues.		This is the opinion of the respondent. The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.

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PhaseTwo_FeedbackForm_073	The people sent were smug, not interested in answering questions and actually argued between themselves about what the answers were. The main guy (greasy swept-back hair, bit of a tv villan) told us 'Don't get [redacted] started' when we wanted to ask him further questions about the wildlife. It was unprofessional and lacked the empathy we expected. It was too corporate and other than [redacted] who actually knows what he's talking about but can't say he thinks this is a catastrophe for the environment, the others were insincere and answered our questions like we were stupid and didn't know they had to be diplomatic and were hiding information. It		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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	was clear that this is a money making scheme and you've got the resources to employ people to bat away our concerns.		
PhaseTwo_FeedbackForm_084	We were not told that the panels would now be too close together for grass/sheep in between, or that they would be noisy.		There will be gaps between solar panel tables of 2.5 metres. Enhancements and land management plans are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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PhaseTwo_FeedbackForm_091	Didn't attend		Noted.
PhaseTwo_FeedbackForm_101	I wanted information about the potential health and social impact of a solar farm of this size I wanted information on the potential impact of a solar farm of this size on the migratory birds who use the adjoining wetlands		Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17) includes a Health Impact Assessment at Section 17.4
PhaseTwo_FeedbackForm_102	Very concerned about the amount of traffic on a narrow country lane.Over a railway bridge, past a primary school.	Yes	The Applicant has proposed a series of mitigation in the CTMP to reduce congestion during the construction phase of the Development, available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_105	No wish to engage with alternatives e.g. sea based solar panels	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) contains an assessment of the most suitable construction transport method, including consideration of sea-based transport.
PhaseTwo_FeedbackForm_106	Misleading graphics, too many words like "intended" so no real valve.		Across our literature the Applicant has been very clear which figures have been drawn for illustrative purposes and have clearly labelled and annotated these figures.

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PhaseTwo_FeedbackForm_109	Team was biased, the man said he would cover his back garden and his neighbors with solar panels		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_111	There was a lot to cover in a short time and further information was promised.		Noted.
PhaseTwo_FeedbackForm_112	We have yet to see a 3D plan either a scale model or computer generated that can be interrogated. I am not at all convinced by the answers given and the mechanism for holding the company to account in delivering its promises	No	As part of the parallel section 42, section 48 and section 47 consultation in May 2018, the Applicant produced photomontages of viewpoints at a current, 1 year and 10-year time period. All these photomontages were presented as part of the PEIR and were available to view online, in hard copy at the designated CAPsites, and in person at one of the community consultation events.

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PhaseTwo_FeedbackForm_117	I was too distressed to be able to take much in or remember the questions I wanted to ask (fortunately, I've been able to find answers since). The now/after 1 year/after 10 years images were effective, but I'd hoped also to see a mock-up of a solar panel - not mounted at its full height, obviously, but to help us get a feel for the scale of the individual units - or close-up photos of the existing large-scale east-west array near Delfzijl in the Netherlands, to show us the state of the ground underneath the panels (I've heard conflicting answers as to whether grass will be able to grow there), though maybe those were there and I missed them?		Noted.

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PhaseTwo_FeedbackForm_129	Very biased.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_130	None of our questions are being answered - all we get is an "I don't know"		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.
PhaseTwo_FeedbackForm_132	No wish to engage with alternatives E.g. Sea-Bas() Solar panels	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) contains an assessment of the most suitable construction transport method, including consideration of sea-based transport.
PhaseTwo_FeedbackForm_140	Misleading graphics, too many words like "intended" so no real value.		Across our literature the Applicant has been very clear which figures have been drawn for illustrative purposes and have clearly labelled and annotated these figures.
PhaseTwo_FeedbackForm_143	They were not! A visual you displayed was misrepresenting the space between the panels when I pointed it out, I was told it was only a cartoon! Not impressed		Across our literature the Applicant has been very clear which figures have been drawn for illustrative purposes and have clearly labelled and annotated these figures.
PhaseTwo_FeedbackForm_145	consultation events where held at times when I was working, thus was unable to attend		Noted.

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PhaseTwo_FeedbackForm_154	no wish to engage with alternatives e.g sea-based solar panels	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) contains an assessment of the most suitable construction transport method, including consideration of sea-based transport.
PhaseTwo_FeedbackForm_155	Fundamental differences in standpoint- I think there must be more suitable sites elsewhere.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_163	Don't intend going it should not be allowed, Faversham residents should stand together on this		Noted.
PhaseTwo_FeedbackForm_166	They cannot answer them satisfactorily because despite all benefits for us as a nation, it all has no benefit for me as a resident and will spoil much of the local area for us.		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_172	No plant survey has been conducted and as a forager I seek protection for sea beet.	No	See Environmental Statement, Phase 1 Habitat Survey (document reference number 6.4.8.1.2
PhaseTwo_FeedbackForm_176	Not enough accurate answers to technical questions about panel production, transport and generating efficiencies.		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.

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PhaseTwo_FeedbackForm_177	By using consultants, we had no direct contact with developer and they were unable to accept that comment made would have any effect on the development		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.

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PhaseTwo_FeedbackForm_178	Any questions on why sites like old power stations could not be used or any other reason why this site particularly was good other than commercial and best for money reasons could not be convincingly answered.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_183	but highly biased		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_187	But does not change our views		Noted

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PhaseTwo_FeedbackForm_188	For question above: disgraceful - PR event only. For this question: your team are trained to provide careful, manipulative responses For the question after: these questions are highly manipulative		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
PhaseTwo_FeedbackForm_191	Lots of "I don't know, but I could probably find out"		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.

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PhaseTwo_FeedbackForm_192	As I mentioned to one of your staff advisors on the scheme, what is planned and what happens to the ground are tow different things! She also did not know that power cuts are frequent in Faversham due to faults at the sub-station!		Noted.
PhaseTwo_FeedbackForm_198	No artist impression of site in scale with panels and battery this is because no one would like / approve of it.	No	As part of the parallel section 42, section 48 and section 47 consultation in May 2018, the Applicant produced photomontages of viewpoints at a current, 1 year and 10-year time period. All these photomontages were presented as part of the PEIR and were available to view online, in hard copy at the designated CAPsites, and in person at one of the community consultation events.
PhaseTwo_FeedbackForm_200	May 2018 community consultation leaflet was informative with clear mapping of proposals		Noted.
PhaseTwo_FeedbackForm_207	Smoke screen		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_210	Representatives did not have local knowledge and were not fully briefed to answer detail. Very disappointing and felt a bit like a tick box exercise to tell the truth.		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.
PhaseTwo_FeedbackForm_214	It would be a waste of time and you are just doing it to tick boxes. Lip service. Money talks. YES - Stop this now!		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat

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			enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
PhaseTwo_FeedbackForm_217	Mainly because any construction in the area doesn't affect your team so they have not any concerns for us locals		The Applicant ensure that at all events team members from across the relevant disciplines were on hand to explain the Development and answer questions from members of the local community attending the events.

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PhaseTwo_FeedbackForm_236	I am still not clear how much light there will be at ground level for plants to grow. This could not be answered by the team and no pictures were available. Also, I am not clear on the mechanism for allowing eg sheep to be grazed beneath the panels - will the lease enable you to sublet to a sheep farmer?	No	Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.
PhaseTwo_FeedbackForm_240	I asked questions about the size and density of the installation and about the noise emitted by the battery storage units. I received assurances but I cannot in all honesty say that I was convinced by the answers.		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_244	It seems like a done deal to me, rather than a genuinely open-minded consultation.		The Applicant and its professional team are confident that the consultation undertaken has gone beyond the statutory requirements to consult and engage with consultees. Over the past 11 months we have held 40 separate meetings with neighbours, residents and community groups as well as hosting 8 community consultation events to discuss and receive feedback to our proposals. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. This Development change is shown in Figure 1, Chapter 1 of this Consultation Report. As a result of these Development changes, 36% of the entire red line boundary site area is taken up by panels and 45.5% of the developable area (i.e. previously the agricultural land) will be panels. This provides a significant opportunity for the dual land use through sheep grazing, habitat enhancements and biodiversity improvements as summarised in Table 1, Chapter 1.
PhaseTwo_FeedbackForm_260	You seem determined to ruin our countryside to make money		This is the opinion of the respondent.
Have you seen an operational ground-mounted solar development before?			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**

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PhaseTwo_FeedbackForm_001	I have seen a ground mounted solar development when passing by on train or bus but these were smaller panels in a smaller area than proposed at Cleve Hill.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_003	The examples I have seen leave much more land between panels and allow light under to encourage plant growth and grazing	No	Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration.
PhaseTwo_FeedbackForm_004	The smaller scale developments seem to have been in harmony with the surrounding landscape. CHSP us a complete variance with here.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_005	Where is the question about battery storage?		The Applicant provided free form response sections on its feedback form for additional comments to be made. The Applicant also invited written responses to its communication channels

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			advertised across its consultation literature and in notices.
PhaseTwo_FeedbackForm_006	As before - smaller scale and entirely parallel, south facing panels (so not comparable)		Noted.
PhaseTwo_FeedbackForm_007	These proposed panels are much taller which will blight the local landscape.		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views.
PhaseTwo_FeedbackForm_009	yes but only when driving past.		Noted.
PhaseTwo_FeedbackForm_010	Nothing specific re battery storage.		Noted.
PhaseTwo_FeedbackForm_014	there are already a few in Faversham which we have not objected to.		Noted.
PhaseTwo_FeedbackForm_015	I would like to see one		Noted.

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PhaseTwo_FeedbackForm_018	A cute small one - low down - no impact on wildlife, plant life people, leisure, tourism, heritage...		Noted.
PhaseTwo_FeedbackForm_019	SMALL scale is ugly but acceptable.		This is the opinion of the respondent. The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_022	Alongside roads, away from residential areas is more appropriate.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_029	All solar developments in east Kent appear are smaller in area, and split between different		Noted.

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	fields, which is far less intrusive to the local widlife activity.		
PhaseTwo_FeedbackForm_037	Unsightly and bad for wildlife		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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PhaseTwo_FeedbackForm_039	This question is an outrageously biased and poor question. It is worded poorly, and leads the viewer to thinking that other small, low, and soft impact solar farms that they have seen are relevant to this project when the difference between the types of solar is fundamentally massive. You must not mislead people, and this question plus the one above are examples of setting bias in the most unconscionable way. YOU MUST DISREGARD THESE QUESTIONS AS THEY ARE NOT ABOUT THE PROPOSAL.		Noted. This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_041	The visual impact is appalling from a great distance and the impact on the ground upon which they are sited is one of total destruction. In my opinion this type of solar farm should not even be contemplated until all available roof space has been used for electricity generation.		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_043	Abbeyfields in Faversham. Highly intrusive to walk along.		Noted.
PhaseTwo_FeedbackForm_044	Don't try and undermine are opinion - we know what solar panels in a field look like.		Noted.
PhaseTwo_FeedbackForm_045	They totally destroy beautiful landscapes and areas of wildlife, birds etc.		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views.

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PhaseTwo_FeedbackForm_046	On brownfield sites, not on agricultural land, or near villages or SSSI's		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_047	But not in a sensitive coastal area, not opposed to smaller, discreet plans.		Noted.
PhaseTwo_FeedbackForm_049	Only brownfield sites, not near towns and villages or wildlife areas.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_051	Abbey Farm solar plant		Noted.

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PhaseTwo_FeedbackForm_056	They are a hideous eye-sore which are being increasingly placed in appropriate locations		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_057	Yes and it is not worth destroying nature to develop it there.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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PhaseTwo_FeedbackForm_058	it's not a question of the need for solar energy it's a question of the location. don't hide under a veil of wanting a good economy based on renewable energy if you've picked the cheapest site possible for your solar farm, because it's easier than establishing solar panels on brownfield sites that are already distracting the environment. There's no use trying to save the planet if there won't be any planet left to save because it will all be covered in industrial sheets- this whole project seems like a gimmick to trick people into opposing something they believe in, so that development will never have to take place. Yes, i've seen an operational ground-		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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	mounted solar development before, and yes I agree with it.		
PhaseTwo_FeedbackForm_059	It is the scale and impact of the proposed plant that is unacceptable: wrong location and devastating ecological impact.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseTwo_FeedbackForm_061	Ugly and uses agricultural land which we actually need to feed ourselves.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_066	Herne Bay , St Nicholas at Wade, Faversham		Noted.
PhaseTwo_FeedbackForm_072	Whilst not visiting them I have researched a lot since this inappropriate plan has appeared.		Noted.
PhaseTwo_FeedbackForm_073	But the ones I've seen in real life won't look like the one you are proposing as there are none in the UK. Yours is more suitable to desert and middle eastern landscapes, not the bucolic Kent coast.		Noted.
PhaseTwo_FeedbackForm_074	the question has too many buzz-words, this can confuse people taking the survey		Noted.

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PhaseTwo_FeedbackForm_081	In my experience, these are large-scale industrial developments and as-such are unsightly. Their positioning should reflect this by locating them on industrial wasteland not greenfield sites and especially not on the coastline.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_084	Not on this scale, or this type of design.	no	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_090	Spain		Noted.
PhaseTwo_FeedbackForm_094	lots		Noted.

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PhaseTwo_FeedbackForm_095	There are many in the area. All have destroyed the ecology within there foot print. Completely at odds with the impact studies put forward by the developers.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_102	This one is very much taller. Will blight the Seasalter, Graveney, Faversham marshes		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views.
PhaseTwo_FeedbackForm_105	They are a hideous eye saws in inappropriate locations		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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PhaseTwo_FeedbackForm_108	Salisbury, small scale, hidden from view, not effecting local community or an area of habitat importance.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_109	Coving up farmland and wildlife area is not the answer wind farms out at sea is a lot better answer all round only 11% power not a good return		Noted.
PhaseTwo_FeedbackForm_112	On farmland		Noted.

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PhaseTwo_FeedbackForm_117	I've seen conventional south-facing arrays, built on a small scale, from a train or car window. I've never walked along a footpath adjacent to such a development, as I would be doing (for hours! It takes me 3 hours to walk the Saxon Shore Way from Nagden Cottages to the Sportsman at Seasalter, stopping to enjoy the scenery and take photos, or two hours to walk the loop along the creek and back down the first - permissive - footpath back to the cottages; and it would take at least half that long even if there were nothing to photograph) if I continued to walk my current routes with a solar park in situ; and I've only seen photographs of east-	Yes	There will be a minimum buffer distance from the Saxon Shore Way of 63m has been maintained by the Developer, with this buffer increasing to 100m at the Faversham Creek end. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience.

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	west arrays. Your "How we get our electricity" questions feel like a trap. Of course renewable energy is good. That doesn't mean it's good to cover Graveney Marshes in solar panels.		
PhaseTwo_FeedbackForm_123	France		Noted.
PhaseTwo_FeedbackForm_124	Eye-sore		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views.

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PhaseTwo_FeedbackForm_125	On brownfield site and areas hidden from public view, NEVER in an area of such importance		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_128	They are hideous: not very effective and noisy.		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views, and Chapter 12: Noise and Vibration (document reference number 6.1.12) assess the noise and vibration impact.
PhaseTwo_FeedbackForm_130	But they are all in smaller packets which is much more in context with saving our countryside and open spaces		Noted.
PhaseTwo_FeedbackForm_132	They are a hideous Eye saw () in inappropriate locations		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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PhaseTwo_FeedbackForm_143	Hideous- fields are for wildlife, farming not out of date solar panels. What is wrong with the many redundant industrial sights?		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_153	Disagree with the word 'park' - it is a noisy power station.		Noted.
PhaseTwo_FeedbackForm_154	They are a hideous eye aw which increasingly are being places in inappropriate locations.		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_157	A physical "mock up" of area @4m high would be useful to see	No	Noted. As part of the parallel section 42, section 48 and section 47 consultation in May 2018, the Applicant produced photomontages of viewpoints at a current, 1 year and 10-year time period. All these photomontages were presented as part of the PEIR and were available to view online, in hard copy at the designated CAPsites, and in person at one of the community consultation events
PhaseTwo_FeedbackForm_163	You don't want to know		Noted.

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PhaseTwo_FeedbackForm_164	Most are virtually at ground level. Should select a site where this can be achieved.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_166	They are useful, but incredibly ugly. It would be much more sensible to subsidise or legislate for panel on all new builds, all industrial estates etc.		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_177	There is an established solar farm in the vicinity		Noted.
PhaseTwo_FeedbackForm_178	Really ugly, no thought about what it is doing to the land. Again, business over wildlife, people, the understanding of sense of loving this beautiful landscape totally ignored for techo and perceived needs that is		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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	not wanted. Just because it looks as spare land for it. Not wanted!		
PhaseTwo_FeedbackForm_182	Abroad -Germany-Spain-France		Noted.
PhaseTwo_FeedbackForm_183	But it was much lower and much smaller - this will be an eye sore on a grand scale		Noted.
PhaseTwo_FeedbackForm_188	The small-scale, acceptable one at Abbey Fields		Noted.
PhaseTwo_FeedbackForm_191	Faversham already has a small one		Noted.
PhaseTwo_FeedbackForm_192	Would like to see one		Noted.
PhaseTwo_FeedbackForm_195	I have seen the existing Cleve Hill development from a distance		The Development has not been built.

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PhaseTwo_FeedbackForm_196	Its ugly		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_198	ugly barren land fine in areas not already populated by wildlife and not on the edge of nature reserves.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_200	Already exists on abbey farm, off abbeyfields, near sewage plant at Faversham		Noted.
PhaseTwo_FeedbackForm_203	Looks unsightly. In my opinion, the UK should be reducing energy consumption, so we won't need to generate as much.		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_204	The fact that we can get the energy and graze the sheep is good		Noted.

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PhaseTwo_FeedbackForm_206	In Spain		Noted.
PhaseTwo_FeedbackForm_209	Will locals get cheap electric?	No	During the Phase Two community consultation, the Development consulted on proposals for additional permissive pathways around the site and a proposed community orchard. The analysis of the feedback received can be viewed in Chapter 10 of this Consultation Report (document reference number 5.1)
PhaseTwo_FeedbackForm_210	Many are sited alongside busy transport routes, industrial areas - areas that visually are not negatively affected by the addition of a solar farm.		Noted.
PhaseTwo_FeedbackForm_214	STOP!		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_217	It was alongside the M4 and I have to say it was an extreme eyesore, one which we could do without.		Noted.

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PhaseTwo_FeedbackForm_222	They are a total blot on the landscape, as ae the wind mills and we do not seem to benefit from it at all.		This is the opinion of the respondent. The Applicant has assessed this Development's effect on views in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_225	If similar to the one at Gedling, Nottinghamshire		Noted.
PhaseTwo_FeedbackForm_230	Ugly. Understand need for more energy but every building should have panels installed before ruining green field sites.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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PhaseTwo_FeedbackForm_236	only from the road on travelling passed farmland		Noted.
PhaseTwo_FeedbackForm_240	There is a small development nearby off Abbey Fields, Faversham		Noted.
We are proposing additional permissive routes through and around the site as shown in our consultation materials. How do you use the site and its adjacent areas?			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_002	My client walks through the site, cycles and walks the Saxon shore way	Yes	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.

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PhaseTwo_FeedbackForm_003	The existing EA access should be maintained and made into a public cycleway and top of the sea wall continued for cycle use.	No	Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseTwo_FeedbackForm_005	We would not want to use this site		Noted.
PhaseTwo_FeedbackForm_021	No development		Noted.
PhaseTwo_FeedbackForm_022	Enjoying the view.		Noted.
PhaseTwo_FeedbackForm_025	The area is perfect as it is .	No	All permissive pathways which run through or around the site will be unaffected by the Development.

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PhaseTwo_FeedbackForm_029	The site is so quiet at present which is great, but your proposals appear to require noisy cooling fans on the units.	No	The Applicant has avoided potential noise impacts relating to the Development by designing out potential noise pollution upon receptors. This has been done by placing transformers away from the nearest receptors, and surrounding the energy storage facility and substation compound with a 7m high bund. The Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) set out the predicted noise levels and outlines the mitigation proposals. Noise during the operational phase of the development is assessed in the Environmental Statement, Chapter 12: Noise and Vibration Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100% capacity, during both daytime and night-time periods.
PhaseTwo_FeedbackForm_038	The existing routes will be destroyed and industrialised in terms of views, noise in some places and viewing of wildlife		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_039	These are already permissive routes - and the threat about not keeping them in the PEIR (page 5-15) is awful		The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_041	If there is the idea to increase use of the area this completely fails to understand the problem that disturbance creates to roosting and feeding shorebirds. providing further access as a carrot to those who oppose this shows a total lack of understanding of the ecological needs of the wildlife of the area.	Yes	Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseTwo_FeedbackForm_046	Why? No one want to go there		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_049	I use it for walking and a NATURAL environment. I would		Noted.

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	not visit if the solar park were there.		
PhaseTwo_FeedbackForm_062	I don't think routes among rows of solar panels the height of a London bus would be attractive to recreational users, however many paths there were. Fencing to secure the site would further detract from the experience.	No	There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_066	Footpath maintenance		

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PhaseTwo_FeedbackForm_072	The joy of this place is its feeling of isolation. All this will be lost and destroyed. There will not be the bird song and the sound of waving reeds and grass. The skylarks will not be the only sound on a still day!	No	This is the opinion of the respondent. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_073	We use it to relax and escape into nature, this won't be possible if you build this solar farm here and it will destroy our ability to use this beautiful piece of countryside. It's not a matter of 'providing some more routes through' - it's a matter of you ruining a place where so many people	No	This is the opinion of the respondent.

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	take refuge from the business of their daily lives and feel at one with nature. Your choice to take this from us is offensive, unthinking and driven by your desire for money and profit. you should all be ashamed of yourselves.		
PhaseTwo_FeedbackForm_074	and running		Noted.
PhaseTwo_FeedbackForm_081	We do not need additional permissive routes, just leave the whole site area untouched. Please take your proposal to a more suitable location (on brownfield industrial land, away from the coast).		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_084	Mostly use the site for bird ringing		Noted.

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PhaseTwo_FeedbackForm_090	I would not use this site after construction at all. It would not be like walking or cycling through a forest. Why would I or anyone else go through this abomination		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_095	Sail on the Swale		Noted.
PhaseTwo_FeedbackForm_101	I run through this area 2/3 times a week		Noted.
PhaseTwo_FeedbackForm_108	I would not walk ride cycle this route just to look at solar panels		Noted.
PhaseTwo_FeedbackForm_109	Let Kent wildlife trust take it over.	No	The Applicant has worked closely with Kent Wildlife Trust in developing its land management plans, details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_110	Not to happen		Noted.

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PhaseTwo_FeedbackForm_111	There are sites which are not used for these activities which I believe would be better suited for the development in that they are not on arable land in an attractive area important for bird life.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_118	It will be ugly - why would I wish to go and see that?		This is the view of the respondent.
PhaseTwo_FeedbackForm_120	Why on earth would anyone want to walk through the site?????	No	The Applicant consulted on proposed new permissive pathways through the site during the Phase Two community consultation. As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_125	I walk for the views and peace and quiet		Noted.
PhaseTwo_FeedbackForm_128	I live here.		Noted.

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PhaseTwo_FeedbackForm_129	There should be no development.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_131	This site would be even worse if it stopped people from walking directly along the coast from Faversham to Seasalter.	No	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_152	We was told that footpaths would not be closed off at the abbey solar Park and guess what they was. it looks like some sort of prison camp		The Applicant cannot comment on other developments.
PhaseTwo_FeedbackForm_160	Pathways must be screened	No	There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental

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			Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_161	Don't build solar park		Objection noted.
PhaseTwo_FeedbackForm_166	its a beautiful, peaceful area.		Noted.
PhaseTwo_FeedbackForm_179	Heritage information panels	No	Noted.
PhaseTwo_FeedbackForm_183	Fenced paths not acceptable	No	There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual

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			Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_191	This is a sop. Why would anyone want to walk through the ugly site		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_193	Build on a brown field site		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_196	no matter which road you take it's not pleasant to see solar panels.		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_199	don't use the site		Objection noted.
PhaseTwo_FeedbackForm_200	Have used 'possible permissive pathway' from Nagden to sea wall since 1970!		Noted.
PhaseTwo_FeedbackForm_214	Stop this now		Objection noted.
PhaseTwo_FeedbackForm_215	Good - Please do so		Noted.
PhaseTwo_FeedbackForm_222	From the Saxon Shore I would look a blot on the landscape		This is the opinion of the respondent. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
PhaseTwo_FeedbackForm_232	Dog poo waste bins required		Noted.
PhaseTwo_FeedbackForm_234	I would prefer to walk across open land than an industrial site that		Objection noted.

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	will be created with the Solar Panels.		
PhaseTwo_FeedbackForm_244	Occasionally sail past it		Noted.
PhaseTwo_FeedbackForm_269	Very rarely though, I'd go more often if I could ride my bike.	No	Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
What would you like to see more of in the area of the site?			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_140	Peace and quiet		Noted.

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PhaseTwo_FeedbackForm_059	All of the above needs to be dependent on natures needs		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_129	All to be left as it is thank you.		Objection noted.
PhaseTwo_FeedbackForm_166	Although I think the reason for walking this area will largely lease to exit.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_235	Although they exist today so you would not be adding to this - you are just using this information as a means		This is the opinion of the respondent.

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	of trying to sell your proposal		
PhaseTwo_FeedbackForm_214	And no panels		Objection noted.
PhaseTwo_FeedbackForm_102	As I'd rather you sited it elsewhere	No	The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_178	But no solar farm		Objection noted.

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PhaseTwo_FeedbackForm_029	But who would want to walk through noisy industrial units with no views instead of quiet fields with birdsong?	No	The Applicant has avoided potential noise impacts relating to the Development by designing out potential noise pollution upon receptors. This has been done by placing transformers away from the nearest receptors, and surrounding the energy storage facility and substation compound with a 7m high bund. The Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) set out the predicted noise levels and outlines the mitigation proposals. Noise during the operational phase of the development is assessed in the Environmental Statement, Chapter 12: Noise and Vibration Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100% capacity, during both daytime and night-time periods.
PhaseTwo_FeedbackForm_079	Countryside and animals		Noted.
PhaseTwo_FeedbackForm_161	Don't build solar park		Objection noted.

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PhaseTwo_FeedbackForm_123	Don't want the site		Objection noted.
PhaseTwo_FeedbackForm_139	Don't want the site.		Objection noted.
PhaseTwo_FeedbackForm_106	Emptiness and quiet.		Noted.
PhaseTwo_FeedbackForm_164	empty space		Noted.
PhaseTwo_FeedbackForm_159	fields of crops, empty areas		Noted.
PhaseTwo_FeedbackForm_162	Fine as it is		Objection noted.
PhaseTwo_FeedbackForm_117	Generally speaking I'm all for new footpaths, but in this case it's hard to imagine that footpaths flanked by fences and tall solar panels will be enjoyable places to walk...	No	There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental

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			Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_179	Heritage information panels	No	Noted.
PhaseTwo_FeedbackForm_143	I do not want the area to change		Objection noted.
PhaseTwo_FeedbackForm_131	I do not want this site.		Objection noted.
PhaseTwo_FeedbackForm_267	I don't want to walk near a monstrosity at all. Why would anyone want a pathway through the huge ndustrial wasteland you'll create.		There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual

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			Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_111	I think this is the wrong location.		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_001	I welcome the additional footpaths across the site but as the views would be spoilt by solar panels will not be a pleasure to use, or a restful experience.		There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental

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			Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
PhaseTwo_FeedbackForm_072	I would like to see it staying exactly as it is. Perfect! There is room for the wildlife to thrive and for people to walk and enjoy it. We share here, we don't take away everything another species needs just because we think we are in some way more important than them.		Objection noted.
PhaseTwo_FeedbackForm_108	I would like to see marshes, not solar panels and batteries.		Objection noted.
PhaseTwo_FeedbackForm_081	I would like to see no development of this area. It is wonderful just		Objection noted.

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	the way it is - without solar panels.		
PhaseTwo_FeedbackForm_070	I would like to see plans for this solar park dropped.		Objection noted.
PhaseTwo_FeedbackForm_099	I wouldn't, just don't want to see solar farms		Objection noted.
PhaseTwo_FeedbackForm_211	Inclusion of more pollen and nectar rich sources for pollinating insects	Yes	The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development. The Applicant has consulted with the Bumblebee Conservation Trust regarding improving the site to benefit pollinators such as bees. As a result, species which are valuable to the shrill carder bee have also been included in the species list.
PhaseTwo_FeedbackForm_060	It is fine as it is		Objection noted.
PhaseTwo_FeedbackForm_087	It is perfect as it is.		Objection noted.
PhaseTwo_FeedbackForm_096	It’s perfect as it is		Objection noted.

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PhaseTwo_FeedbackForm_188	Just leave it as it is		Objection noted.
PhaseTwo_FeedbackForm_023	kept to absolute minimum, additional cycle paths	No	Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area
PhaseTwo_FeedbackForm_133	Kept to absolute minimum. Additional cycle parts and bridle paths strongly object to with () for abuse.	No	Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area
PhaseTwo_FeedbackForm_155	leave as is		Objection noted.

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PhaseTwo_FeedbackForm_247	Leave it alone and go somewhere else with this ridiculous land grab		Objection noted.
PhaseTwo_FeedbackForm_262	Leave it just as it is.		Objection noted.
PhaseTwo_FeedbackForm_095	Left completely alone		Objection noted.
PhaseTwo_FeedbackForm_019	Less panels! Too big!	Yes	The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. As a result, the proportion of the developable area of the site with solar PV modules has decreased from phase one Section 47 consultation to the final Application from 56.5% to 45.5%.
PhaseTwo_FeedbackForm_109	Lets have 989,000 trees planted instead		The Applicant is proposing to introduce 3.64 km of native hedgerow planting as part of the Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2).
PhaseTwo_FeedbackForm_010	Like to see NO solar panels!!!!		Objection noted.

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PhaseTwo_FeedbackForm_125	Marshland and a lack of solar panels		Noted.
PhaseTwo_FeedbackForm_130	More green Countryside would be good - NOT SOLAR PANELS		The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. As a result, the proportion of the developable area of the site with solar PV modules has decreased from phase one Section 47 consultation to the final Application from 56.5% to 45.5%.
PhaseTwo_FeedbackForm_073	more open space and less solar panels. in fact we'd like to see no solar panel and no battery storage		Objection noted.

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PhaseTwo_FeedbackForm_055	More uncovered space for wildlife. More through access for wildlife (nature corridors).	Yes	The Applicant has held a number of meetings and received detailed feedback from consultees regarding the size of the scheme and how this can be mitigated. In response the Applicant has made a number of Development design changes to reduce, remove or screen the solar panels. As a result the proportion of the developable area of the site with solar PV modules has decreased from phase one Section 47 consultation to the final Application from 56.5% to 45.5%. The Applicant has also worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_176	No need for more		Objection noted.

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PhaseTwo_FeedbackForm_210	No need for more - this is a 'remote' area - benefits from this so do not open up access any more.		Objection noted.
PhaseTwo_FeedbackForm_018	No panels		Objection noted.
PhaseTwo_FeedbackForm_128	No panels		Objection noted.
PhaseTwo_FeedbackForm_163	No panels		Objection noted.
PhaseTwo_FeedbackForm_027	no solar panels		Objection noted.
PhaseTwo_FeedbackForm_044	No solar panels		Objection noted.
PhaseTwo_FeedbackForm_043	NO SOLAR PANELS.		Objection noted.
PhaseTwo_FeedbackForm_011	no solar park		Objection noted.

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PhaseTwo_FeedbackForm_158	None of the above - the pathway that exists is good. You will be bring more people into a more reduced and pressured conservation area if you do any of the above so DON'T	No	As a result, in addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseTwo_FeedbackForm_244	None of these		Objection noted.
PhaseTwo_FeedbackForm_049	None of these if it means skirting around acres of panels		Objection noted.
PhaseTwo_FeedbackForm_041	None, things are just fine as they are.		Objection noted.

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PhaseTwo_FeedbackForm_183	Not fenced off		Noted. All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_110	not on prime marshlands		All of the Development infrastructure is proposed for arable land. Approximately 95% of this land is classified as Grade 3b, which is not best and most versatile agricultural land, i.e., it is of lower agricultural quality, as detailed in Agricultural Land Classification survey (document reference number 6.4.13.1).
PhaseTwo_FeedbackForm_193	Not on prime marshlands		All of the Development infrastructure is proposed for arable land. Approximately 95% of this land is classified as Grade 3b, which is not best and most versatile agricultural land, i.e., it is of lower agricultural quality, as detailed in Agricultural Land Classification survey (document reference number 6.4.13.1).
PhaseTwo_FeedbackForm_260	Nothing it's OK as it is		Objection noted.

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PhaseTwo_FeedbackForm_147	open areas for bird life	Yes	The Applicant has recognised the importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site. The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any indirect effect upon the adjacent sites. This has resulted in a Arable Reversion Habitat Management Area of c.56 ha. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and RIAA (document reference number 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
PhaseTwo_FeedbackForm_045	Open marshland.		All of the Development infrastructure is proposed for arable land. Approximately 95% of this land is classified as Grade 3b, which is not best and most versatile agricultural land, i.e., it is of lower agricultural quality, as detailed in Agricultural Land Classification survey (document reference number 6.4.13.1).
PhaseTwo_FeedbackForm_074	open space, wildlife and no solar panels		Objection noted.

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PhaseTwo_FeedbackForm_255	Open spaces!		Noted.
PhaseTwo_FeedbackForm_006	Pathways for wildlife		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_090	Pointless comment		Noted.
PhaseTwo_FeedbackForm_039	saltmarsh, wide open spaces, marsh harriers, nature, non-industrial things.		Noted.
PhaseTwo_FeedbackForm_038	See above. No one will use the paths for recreation or pleasure		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_205	Space		Noted.
PhaseTwo_FeedbackForm_025	The area is perfect as it is.		Objection noted.
PhaseTwo_FeedbackForm_269	The more access the better!	Yes	All PRoWs which run through the site will be preserved by the Development. In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_058	the paths are fine	No	Noted.
PhaseTwo_FeedbackForm_231	The site is fine as it is		Objection noted.
PhaseTwo_FeedbackForm_252	The site left as it is		Objection noted.
PhaseTwo_FeedbackForm_092	The site left as it is without the solar development		Objection noted.

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PhaseTwo_FeedbackForm_115	To remain as it is in all its natural beauty		Objection noted.
PhaseTwo_FeedbackForm_215	Walkers/Cyclists/Horses need to be separated for safety. Deaf/Blind disabled people may not realise bikes/horses are coming!	No	Noted. Substantial thought has also been given to a cycle way. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.
PhaseTwo_FeedbackForm_121	Walking through or around a solar farm is not that interesting, so focus on connectivity.	Yes	In addition to preserving all PRoWs which run through the site, the Development will create an additional permissive pathway on the east of the site running north to south and connecting the sea wall to Cleve Hill allowing a 'round' walk from Seasalter Road.
PhaseTwo_FeedbackForm_005	We would not want to use this site		Noted.
PhaseTwo_FeedbackForm_148	well nothing really. I like it as it is.		Objection noted.
PhaseTwo_FeedbackForm_177	Who wants to walk through thousands of solar panels		This is the opinion of the respondent.

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PhaseTwo_FeedbackForm_120	Why would anyone want to walk, ride, or cycle through or around a massive, ugly, noisy solar factory???		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_101	Why would I want to run or walk through or along a huge stretch of solar panels? Is that going to be good for my soul?		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_046	Why? No one wants to look at panels		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_264	Wildlife		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).

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PhaseTwo_FeedbackForm_002	Would rather leave the area as is. As mentioned, the proposed development is a blot on the countryside.		This is the opinion of the respondent.
PhaseTwo_FeedbackForm_265	Zero Development		Objection noted.
We are proposing the addition of a community orchard on site. A place where the community can contribute to, and harvest from, the land. Have you ever visited a community orchard?			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_050	a complete waste of time an environmental area would be better	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site. This area will now be managed as lowland meadow habitat.
PhaseTwo_FeedbackForm_095	A fop to the planners, does not mitigate the blight caused by such a development.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_019	A nice thing for local people but this is not orchard land it's saltmarsh	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_244	An orchard in a landscape filled with orchards, where fruit rots on the ground. What acreage do you propose to cover with panels? How big is your orchard? Why not put in an outdoor cinema? An adventure playground for people in wheelchairs? This proposal is insulting.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_211	But I did run 300 acres of fruit orchards.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_170	But not particularly important to me		noted.
PhaseTwo_FeedbackForm_179	Can we have more than 1?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_137	Daft appearant idea- don't () is.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_122	Daft appeasing idea - don't patronise us	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_024	Daft idea, don't patronise use	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_161	Don't build solar park		Objection noted.
PhaseTwo_FeedbackForm_004	Given its size and location, this adds no value to the community.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_166	good idea	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_165	Great idea, if you have to do it	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_159	Hardly relevant, almost placatory	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_195	Have a space to make fresh juice there or a solar powered music event.	No	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_051	Have you? For which community would the orchard be intended.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_167	How large is this in compensation to the site	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_025	How patronising!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_072	How patronising!!!!! We live in a farming community, orchards are not required. All we all need is the marshes to remain as they are. If you think you need to do this you are fully aware that you are totally industrialising the area. Have you no conscience?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_002	However, there is a lack of clarity on how it will be accessed, maintained and its impacts on sight lines.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_235	I am not interested in a community orchard and don't know what you are considering one. I simply want us to have the amenities we have today hence my opposition	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_062	I would be interested to know what contribution Cleve Hill would make to the maintenance of such an orchard, and how suitable land might be selected? It would be all too easy to designate a small piece of land unsuitable for power generation and its associated structures, and then leave it'to the community' to get on with the necessary input	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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	of time, expertise,mand money.		
PhaseTwo_FeedbackForm_143	If land is cheap because of poor soil as you say, how will apple trees grow?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_210	If this is near the village, and requested by the village - great idea.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_018	In an inappropriate place!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_056	Interestingly, the Dukes of Cornwall are proposing one for their ludicrously titled 'garden village' next to the M2!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_158	Is ther a management plan for this orchard - will there be long-term funding for a local	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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	organisation to run events and manage and maintain it? If not then it really is just gesture politics.		
PhaseTwo_FeedbackForm_247	Is This for real. Just leave the natural area alone. A community orchard or bribe cannot replace the real importance of this area	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_101	Is this supposed to be some form of redress? If so, it is laughable	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_081	It is all very well offering these incentives but they are tiny bribes to try and get the development approved. Please take this solar farm to an industrial brownfield area.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_087	It will not make up for the blight on the area.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_196	Just leave things as they are	Yes	In response to feedback received during the Phase Two community consultation. The

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			Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_043	Kent is covered in orchards. This proposal is patronising and laughable.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_209	Make the road better	Yes	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).
PhaseTwo_FeedbackForm_110	no	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_136	No man's orchard (Chactham Hatch)		noted.
PhaseTwo_FeedbackForm_039	No one knows what a community orchard is, and this is just a PR smokescreen	Yes	The Applicant has committed to undertaking a road condition survey before and after the construction of the Development, as detailed in the Construction Traffic Management Plan (CTMP), available in the Environmental Statement, technical appendix A14.1 (document reference 6.4.14.1).

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PhaseTwo_FeedbackForm_163	No panels		Objection noted.
PhaseTwo_FeedbackForm_041	Nobody ever visits it. A community orchard sounds like the type of politically correct bunkum that is thrown around to try and emotionally blackmail those who attempt to stand up for the rights of ever-dwindling wildlife by branding them people who care more about wildlife than people. This area of land is important to wildlife because of its open nature, orchards completely change that.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_200	often fall into disuse	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_127	One has put on one estate but failed as nobody cared for it.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_060	Ridiculous idea we are surrounded by orchards. This is Kent!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_205	Risible tiny enclave of sanity	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_142	Site totally unsuitable for an orchard.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_193	Solar panels on new built houses		Comment not relevant to this planning application.
PhaseTwo_FeedbackForm_045	Sooner visit open marshland. Have no interest in visiting a solar panel orchard.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_266	sounds marginal, a Prince Charles type of focus	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_262	The proposed size of the community orchard is ridiculously small.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_120	The site does not need an orchard, it needs to be left alone for wildlife. The site is just fine as it is.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_222	The site would be better left as farmland	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_010	There are so many orchards in the UK. Strange question!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_130	There is limited access and NO PARKING here	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_029	This is a red herring and a poor substitute to wide open spaces with wildlife to be seen!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_265	This is hogwash. the site is already one of natural beauty and agriculturally productive	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_007	This is just a small consolation for our loss	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_188	This is just a sop	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_140	This is nonsense! () to commit to () acres of () in the local area there by supporting local landscapes with stewardship as a minimum! For 40 years.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_106	This is nonsense! Offer to commit to 100 acres of enhances marshland in the local area there by supporting local landowners with stewardship as a minimum! for 40 years.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_164	this is pure tokenism	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_073	This isn't going to compensate us. All of these questions are completely misleading and don't allow us to really say what we want to. We don't want a	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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	community orchard we want our open peaceful marshes without your solar farm		
PhaseTwo_FeedbackForm_038	This will be an industrial site, totally unsuited for a community orchard. No one will use it. 'Lipstick on a pig' comes to mind.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_047	This will not compensate!!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_079	This would be nice but doesn't disguise the fact that this development is not done with local people in mind, but is for a large corporation.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_183	Tokenism	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_125	Total pointless PR exercise	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_169	Very keen on this proposal	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_049	Visited community orchards in URBAN areas. Kent IS an orchard. Keep it that way!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_260	We are a rural area!! We don't need a community farm	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_129	We are surrounded by apple orchards, a pathetic attempt of mitigation.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_014	We are surrounded by orchards!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_108	we do not need any orchard, we need marshes	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_044	We have hundreds of acres of orchards already in Kent! Sorry but a little orchard doesn't change the fact	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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	your trashing a huge green area important for wildlife and people. To make yourselves a tidy profit.		
PhaseTwo_FeedbackForm_005	We would not want to use this site	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_267	What a daft idea to try and persuade people this will be good for them.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_128	Who do you think is going to look after it?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_066	Why do we need an orchard, we need all the proposed site to be untouched	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_046	Why? Orchards are plentiful in Kent!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_023	will the community value it or abuse it?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_133	Will the community value it- or abuse it?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_009	would it be difficult to manage?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_221	Would like to see it	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_090	Yes, I have. This is pie in the sky rubbish. Do you think this community is stupid in the extreme to swallow this talk	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_109	Your solar park would be the orchard	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
Would you be interested in visiting and supporting a community orchard at Cleve Hill Solar Park? Please indicate how often.			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**
PhaseTwo_FeedbackForm_220	3-4 times PA		Noted.

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PhaseTwo_FeedbackForm_069	A community orchard would be an insult to local people. The area would be ruined.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_191	A couple of dozen trees surrounded by power stations? No thanks	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_160	As often as I could		Noted.
PhaseTwo_FeedbackForm_238	A possibility		Noted.
PhaseTwo_FeedbackForm_193	All new factors must have solar		Noted.
PhaseTwo_FeedbackForm_104	Although the concept of a community orchard is a positive thing, it cannot in any way compensate for the loss of such a hugely beautiful and ecologically important landscape enjoyed by so many.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_178	At Cleve Hill, yes but not as Cleve Hill Solar Park. Just Cleve Hill. Note on next question: you are assuming the solar park will happen by the way you have set the questions. It's one sided so that means what people say will probably have no impact whatsoever/	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_087	because it's a poor substitute for the loss of a wonderful area.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_081	Cleve Hill Solar Farm would be a blot on the landscape and a blight on the land. Do you really think that one small community orchard will compensate for the loss of this massive stretch of coastline and surrounding land?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_032	completely out of character with the marshes / landscape	Yes	In response to feedback received during the Phase Two community consultation. The

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			Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_211	Does this have to be an orchard? Why not PYO Blackberry or raspberry for example.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site. This part of the site will now be managed as a lowland meadow habitat.
PhaseTwo_FeedbackForm_161	Don't build solar park		Objection noted.
PhaseTwo_FeedbackForm_199	don't have a car so can't get there		Noted.
PhaseTwo_FeedbackForm_155	don't know		Noted.
PhaseTwo_FeedbackForm_183	Don't patronize us!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_101	Faversham does not lack orchards or allotments. This is not a substitute for taking away the marshes. If you are advocates of community engagement	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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	then this should have been embedded in the project planning for Cleve Hill from the start.		
PhaseTwo_FeedbackForm_177	not convinced that the site has to be so large to make it economic. If it is not economic that surely is a reason for not building it		The Applicant has set out the reasons for the scale and location of the development in the Environmental Statement Chapter 4 - Site Selection, Design Evolution and Consideration of Alternatives (document reference 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
PhaseTwo_FeedbackForm_073	fuck off		Objection noted.
PhaseTwo_FeedbackForm_094	getting old		Noted.
PhaseTwo_FeedbackForm_128	Got enough to do now		Noted.
PhaseTwo_FeedbackForm_092	I don't see how this can adequately compensate the local community for the traffic, loss of views and amenities	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_012	I have to work so have no free time	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_010	I like apples if that helps.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_079	I live away now as I work as an environmental consultant in Bristol		Noted.
PhaseTwo_FeedbackForm_015	I regard this as a "bribe" enlist residents support for solar park.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_043	I work at Brogdale Farm. Home of the national fruit collection and 3500 varieties of fruit tree. This area is rich in orchards. Don't patronise us with this pathetic crumb.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_188	I'd rather visit the natural landscape	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_133	Interested in (); 10 years a guide at Brogdale	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_176	Interesting idea, if maintained properly	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_200	It's a 1 1/2 hour walk there!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_159	It's a bit of a sap	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_058	just build the orchard and relocate the solar panels		Objection noted.
PhaseTwo_FeedbackForm_047	Kent is awash with Orchards, we do not need one as a bribe to accept plans.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_066	Leave the whole site as it currently is		Objection noted.
PhaseTwo_FeedbackForm_136	Leave this area alone		Objection noted.

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PhaseTwo_FeedbackForm_134	Let's not fanny about with nature to make ourselves feel better.		Comment noted.
PhaseTwo_FeedbackForm_006	Live the other side of Faversham. For the next Q - put supportive and wrote reluctantly! Overall our climate change is too urgent to resist in spite of all the disadvantages of this project (and fury at the lack of governmental support which has made the huge size necessary).		Noted.
PhaseTwo_FeedbackForm_222	Make all the land orchards	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_255	Maybe		Noted.
PhaseTwo_FeedbackForm_187	more details before commitment	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_046	No	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_110	no	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_044	No - you're trying to detract from the main issue. Nice try.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_126	No park!		Objection noted.
PhaseTwo_FeedbackForm_049	No, no, no	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_210	Not in local area to me.		Noted.
PhaseTwo_FeedbackForm_072	Not needed. It isn't about trees, it's about these beautiful marshes and the insect's flowers and birds that rely on it and the people that need it too.	Yes	The Landscape and Biodiversity Management Plan (LBMP, document reference number 6.4.5.2), includes a species list which sets out the proposed species to be used for the Development. The Applicant has consulted with the Bumblebee Conservation Trust regarding improving the site to benefit pollinators such as

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			bees. As a result, species which are valuable to the shrill carder bee have also been included in the species list.
PhaseTwo_FeedbackForm_165	Not sure yet		Noted.
PhaseTwo_FeedbackForm_127	People don't have time. Too busy earning a living to survive.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_120	Please go and plant an orchard elsewhere	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_111	Possibly, if it happens.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_239	Possibly.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_125	Prefer to see the current views as they are now	Yes	In response to feedback received during the Phase Two community consultation. The

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			Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_009	Probably twice a year spring and autumn	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_056	Pure tokenism designed to favourably influence the planning authorities	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_117	Realistically, this is not something I would make use of - I live a good half-hour's walk from the closest edge of the site, and I don't think that's where you intend to put the orchard.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_039	Ridiculous. Who would look after it? Or does "supporting" it mean that you want the locals to do this?	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_158	See above comments - this needs to be properly funded in the long term - so that the community can enjoy it. Orchards need proper maintenance (and this should not be expected to be done for nothing whilst Cleve Hill are surely reaping profits from this solar farm) or it won't be worth visiting after a while! If people want to participate then that is fine but the expectation should not be that it is all voluntary! It hardly makes up for the loss of visible green space.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_192	See additional sheet numbered ONE!		
PhaseTwo_FeedbackForm_135	Slightly difficult question for people to answer as they won't know what this will involve or what they will be asked to do. E.g. are people going to	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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	have to buy and bring mowers or would Cleve Hill undertake basic maintenance?		
PhaseTwo_FeedbackForm_090	Such an orchard would never happen. The community is not so gullible as to think it would. Such a small sweetener!!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_164	Thank you but we already have our own orchards locally.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_001	The community orchard is a good idea for local residents but is not a facility I would be likely to use. I have never visited a community orchard.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_059	The orchard appears to be an afterthought and will not replace the biodiversity lost through the proposed scheme.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_064	This		Comment unclear.
PhaseTwo_FeedbackForm_019	This is a SOP! It is not the point - It doesn't mitigate habitat / visual and community loss.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_163	This won't benefit anyone in this town, unless all of Faversham is getting free elec - No to all		Objection noted.
PhaseTwo_FeedbackForm_138	Too far away from where people live. Would be interested if nearer housing.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_145	unsure		Noted.
PhaseTwo_FeedbackForm_070	Using a small amount of land for a community orchard will not mitigate the damage done by this proposal.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_243	We dont want a community orchard we want our beautiful countryside to be kept as it is!!!!	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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PhaseTwo_FeedbackForm_005	We would not want to use this site	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_045	Why would you?		Objection noted.
PhaseTwo_FeedbackForm_169	Willing to help with educational use of orchard		
PhaseTwo_FeedbackForm_230	Without understanding hoe this will work, it is impossible to say.	No	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_061	Would not be visiting area at all due to sheer scale and unsightliness of the project in an environmentally sensitive area.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_123	Would support if site didn't appear!		Objection noted.
PhaseTwo_FeedbackForm_139	Would support if site didn't appear!		Objection noted.
PhaseTwo_FeedbackForm_018	Wrong place - marshes do not have orchards - trees with fruit	Yes	In response to feedback received during the Phase Two community consultation. The

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			Applicant has not included proposals for a Community Orchard on site
PhaseTwo_FeedbackForm_109	You can have the orchard site, wildlife can have the solar area.		The Applicant has worked closely with statutory and non-statutory environmental groups to develop the design of the Development in order to mitigate any impact upon important ecological features and where possible to improve biodiversity on site. No significant ecological effects have been identified following the application of mitigation measures. In most cases, the Development will provide a net gain to biodiversity on Site. Enhancements are included through 'Embedded Mitigation', the details of which are included in the Landscape and Biodiversity Management Plant (document reference 6.4.5.2).
PhaseTwo_FeedbackForm_025	You have TOTALLY missed the point. This is an area of UNSPOILT country side.	Yes	In response to feedback received during the Phase Two community consultation. The Applicant has not included proposals for a Community Orchard on site

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Alternative Feedback Forms

Phase Two Alternative Feedback Forms			
ID	**Nature of Enquiry**	**Project Change?**	**Applicant Response**

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Alternative_FF_309 Alternative_FF_018 Alternative_FF_031 Alternative_FF_087 Alternative_FF_124 Alternative_FF_146 Alternative_FF_111 Alternative_FF_210 Alternative_FF_253 Alternative_FF_156 Alternative_FF_178 Alternative_FF_139 Alternative_FF_228 Alternative_FF_012 Alternative_FF_199 Alternative_FF_084 Alternative_FF_102 Alternative_FF_227 Alternative_FF_179 Alternative_FF_164 Alternative_FF_063 Alternative_FF_067 Alternative_FF_015 Alternative_FF_099 Alternative_FF_235 Alternative_FF_126 Alternative_FF_149 Alternative_FF_205 Alternative_FF_183 Alternative_FF_066			

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Further Consultation (13 July 2018 - Application)

Further Consultation (13 July 2018 - Application) Information Lines						
ID	Stakeholder	Date	Time	Nature of Enquiry	Project Change?	Applicant Response
2. EIA Process and Methodology						
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	"investigations will be carried out by accredited professionals…." These accredited professionals are recruited and paid for by CHSP and the view is that they are not impartial as has been evident from some of the impact assessments.	No	The Applicant has carried out a full Environmental Impact Assessment process as part of its Application, that adheres to the EIA regulations and associated legislation and guidance. The Applicant strongly disagrees with insinuation made by the respondent.
3. Consultation						

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	In respect of this Update leaflet, I set out below some of the observations and questions raised by a group of Villagers who I spoke to for their feedback. •Accessibility software has been in operation for many years now --- what is the reason for producing the leaflet in a format and style containing numerous barriers for those with dyslexia or a visual impairment?	No	The Applicant states clearly across its literature that alternative formats of all materials are available upon request from the Applicant. No such requests have been made.
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	•1 -- Introduction: -You state that you received over 700 pieces of feedback --- how many pieces of feedback did you actually receive? Why not state a precise figure?	No	The Applicant has been in the process of collating all feedback and has received 746 pieces of feedback to the phase two consultation, as reported in the consultation report.

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	One conclusion from the responses received is that only a very small percentage of respondents were positive about the proposals – was anyone in favour of the proposal?	No	The Applicant has received a mixture of responses to the Development as detailed in the Consultation Report (document reference 5.1) and where all responses can be viewed in Appendix 2 of document 5.1.1. The Applicant has set out how it has responded to all feedback.
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	• 2 --Our Proposals: -Circular arguments are used to underpin this case and the literature provided is therefore largely meaningless. For instance: "CHSP would deliver ..... secure." As many important pieces of information have been omitted, no-one in the group believed this statement	No	Please see the Applicant's Needs Statement (document 7.3) for a complete description of the need for the Development.

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	“Government……keep the lights on”. the response to this was that this is a very out-dated strap line designed to scaremonger and consequently no longer has any credible impact.	No	Please see the Applicant's Needs Statement (document 7.3) for a complete description of the need for the Development.
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	3 -- Our Phase 2 Consultation - “our detailed proposals” This is another circular statement and it is what CHSP believe –others do not share these views. Others believe that the proposals were not detailed – they reported that lots of information was missing, mispresented, over stated or understated and designed to mislead.	No	The Applicant disagrees that information was missing or misrepresented. The Applicant consulted in accordance with the SoCC and ran a parallel consultation process enabling the community to comment on a detailed PEIR and NTS.

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	“Throughout……. raised.” This is untrue as the only concession made so far results from a private deal with one householder. Most householders view their discussions with CHSP as unproductive because of the CHSP representatives’ disrespectful behaviour.	No	No private deals have been entered into. The Applicant has made design changes including the decision to not develop on 13.6ha of land on Cleve Hill, panel set back at Nagden and Warm House and 3,64km of hedgerow planting and a comprehensive screening plan as set out in document 6.4.5.2.

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CH_email_738	Lut Stewart, GREAT	25/09/2018	10.34am	In your leaflet regarding the phase 2 consultation there is a reference to the reduction of panels (plot Yes) in response to issues raised. You fail to disclose that this reduction is in fact an agreement that has been in place shortly after you announced the project --- there is in fact a householder with a written promise by HBrennan that there will be no panels on the top of Cleve Hill. Please explain how this arrangement came about and include an explanation as to why some individuals in the village were aware of the proposals BEFORE they were formally announced.	No	To clarify, after the phase one consultation the Applicant removed 9.2ha of solar PV modules from Cleve Hill, which included a portion of field Yes. In response to phase two comments and a response from Swale Borough Council, the Applicant removed all panels from field Yes resulting in a total area removed from development of 13.6ha. The Applicant has removed solar PV modules in response to consultation with stakeholders and no agreements have been entered.
4. Site Selection, Development Design and Consideration of Alternatives						

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	· Scale and Location: This is in the wrong place, ultimately it is up to CHSP to identify another suitable site. The fact that Cleve Hill gives cheap access to the National Grid is not a reason to propose a monstrous development here.	No	Please see a complete description of the site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4).
CH_email_737	Member of Public	22/09/2018	6.03pm	Go somewhere else....	No	Comment noted.

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CH_email_740	Lut Stewart, GREAT	07/10/2018	11.52am	Below is a published statement from HUGH Brennan setting out the guiding principles in identifying a suitable pace for a solar park. Why are none of these adhered to in the case of Cleve Hill Solar Park? Thanks, "Creating a solar park What we're looking for We work hard to make sure each of our sites reach their full potential and produce as much clean and renewable energy as possible. For this reason, we particularly look for suitable sites with strong levels of solar irradiation, which in England goes from Lancashire and Lincolnshire to Cornwall and Kent, and in Wales from Anglesey to the Severn Bridge. There are three main factors which we take into account when we consider a site: • Location		The Applicant has satisfied many of the criteria it seeks to adhere to in the siting of its solar sites. The Applicant has set out in document 7.3 a Needs Statement, explaining why the Development is a critical part of the UK's low carbon future. The Applicant has further set out its site selection and alternatives process in Chapter 4 of the Environmental Statement (document 6.1.4). The Applicant recognises that in the case of designated sites and flood risk, the Development has required the Applicant to seek mitigation in agreement with consultees to mitigate impacts to the surrounding designated sites and to reduce flood risk.

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				• Land characteristics • Legal issues In order to proceed with a site we would usually ask that the land is: • Well screened from visibility to people in the local area • Grade 2/3 or poorer – we don't use land that would be better suited for growing food and other crops • Not in or next to a designated protected area such as an Area of Outstanding Natural Beauty (AONB), Site of Specific Scientific Interest (SSSI), Ancient Woodland, National Park, World Heritage Site or Scheduled Ancient Monument • Well drained, with no flood risk • Not crossed by footpaths or rights of way – we want to preserve and encourage access to the countryside • South facing • Flat or gently sloping south – to minimise visibility for		

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				people in the area whilst maximising the energy generated • Between 30-200 acres (12-81) hectares in size • Under single ownership • Unobstructed by any pylons, towers or large trees which could shade the panels • Crossed by 33kv power lines and/or close to an 11-33kv electricity substation, both of which must have the capacity to carry the power generated by the solar park. After conducting detailed surveys to make sure a site is suitable, we will work with you to progress the project. This involves making a number of agreements which will allow: • Access to the land for the Distribution Network Operator. The operator must be legally allowed to access the land which is why landowners need to sign an Authorisation Letter. • An option to lease the land		

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				for 26 years. This is the period during which solar panels are at their most efficient and can produce the maximum amount of clean energy. In order to protect the funding for the park, our lease agreements have fixed terms and are not ordinarily able to be negotiated. This document is signed later in the development process of the site when the landowner has become familiar with the project. • A Heads of Terms Agreement to be put in place. • A 12-month Exclusivity Agreement to be made between the landowner and Hive Energy. What you can expect from us We really believe in choosing the right project for the right place. We're dedicated to ensuring that not only do our parks generate clean and renewable energy to power thousands of homes, but that our sites are compatible with		

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				local people and the environment. Should we take a project forward, we will work closely with you throughout the entire process, from initial environment and ecological studies to park installation and operation: • We consult local people and stakeholders to gauge their feedback and listen to their views on the project • We commission independent assessments to investigate whether the land quality, location and environmental factors meet strict planning requirements • We submit a thorough planning application to the local authority • We manage the installation of solar panels and their connection to the local grid • We maintain the panels throughout their lifetime • We dismantle the park at the end of its life		

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				Contact us If you want to find out more about how energy captured from the sun can bring a positive difference to your business, contact us now: Hugh Brennan Tel: 01794 324 343 Mob: 07926 523 187 Email: hugh.brennan@hiveenergy.co.uk"		

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CH_Freepost_748	Member of Public	11/09/2018	10.00am	This whole scheme sits are I believe nothing more or less than an environmental blight on this area, it should not be allowed to be built. For an alternative, why not build another Nuclear Power Station at Dungeness Kent, where the infrastructure is already in place.	No	These are the views of the respondent. Please see Chapter 4 for a complete description of the site selection and alternatives for the Development (document reference 6.1.4).
CH_Freepost_748	Member of Public	11/09/2018	10.00am	The power produced would be in excess of 3,000 megawatts, and generate continuous power, come rain or shine.	No	To confirm, the amount of electricity generated annually by the solar PV modules is expected to be approximately 303,000 MWh (303 GWh). This is based on a smaller installed capacity than the candidate design so is considered to be a conservative estimate.

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CH_Freepost_748	Member of Public	11/09/2018	10.00am	It would also provide many jobs for local people in the Shepway area, and further afield.	No	Please see a complete assessment of the socio-economic impacts of the Development in Chapter 13 of the Environmental Statement (document reference 6.1.13).
5. Development Description						
CH_email_685	Member of Public	30/07/2018	1.25pm	I am totally opposed to the proposed solar power plant at Cleve Hill as this is too big and will destroy wild life and plant life, the landscape, the Saxon Shore Way, leisure opportunities and heritage. There are better places to put this.	No	Comment noted. Please see the Applicant's Chapter 4 of the Environmental Statement explaining the site selection and alternatives process (document reference 6.1.4).

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CH_email_708	Member of Public	31/08/2018	10.17pm	I am intrigued to know how with the east/west orientation of the panels you will be able to accommodate 'grazing' sheep. It may paint a picture you wish people to believe but in reality, it cannot happen.	No	The Applicant has designed and consulted on a comprehensive landscape and biodiversity management plan (document reference 6.4.5.2) which has been consulted on with statutory and local nature conservation bodies. Wirsol has extensive experience in landscape management with sheep across there solar parks including at an east west layout in Delfzeijl, NL - which the Applicant has visited.
CH_email_709	Member of Public	02/09/2018	2.04pm	Position of Panels. Good afternoon. Could you tell me if you are planning to leave a coastal strip from the sea wall inland, and if so when will the panels start. i.e. 25 or 50 metres away. Thank you.	No	The Applicant has maintained a minimum buffer distance of 63m from the Saxon Shore Way. In some areas of the site, this stretches to 100m.

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CH_email_713	Member of Public	05/09/2018	1.36pm	I have several objections. 1. Site is far too large - bigger then Faversham. 2. Will affect the wildlife. 3. Huge visual impact in a hitherto unspoilt landscape. We have increasingly diminishing natural, wide open spaces. I do not think such a vast project is justifiable.	No	Comments noted. The Applicant has reduced the coverage of solar PV modules on the developable area from 56.5% to 45.5%. The Applicant has undertaken and consulted on extensive environmental surveys and studies as presented in the Environmental Statement (document reference 6.1). The Applicant has also undertaken a landscape and visual impact assessment (LVIA, document reference 6.1.7).
CH_email_714	Member of Public	05/09/2018	2.31pm	I live in Faversham with my wife. We are fully supportive of this project. Thanks for keeping us informed	No	Comments noted. The Applicant will continue to inform the consultation area during the Application submission and determination.

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CH_email_715	Member of Public	05/09/2018	4.00pm	I am in receipt of your latest leaflet. I am in support of this project as the land is virtually unused at present and is hardly attractive for visitors. It is not likely to upset wildlife as it is quiet and peaceful, especially as humans will stay clear. I was disappointed, however, to see the leaflet enclosed in plastic, A paper envelope would have been OK but a smear of glue along the right-hand edge would be better.	No	Comments noted. Thank you for your suggestion. The Applicant is researching more eco-friendly packaging. The current packaging is made from recycled plastic.

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CH_email_718	Member of Public	07/09/2018	11.16am	Thank you for this update. Unfortunately I was not able to attend the consultation events in June but have now viewed the materials on line. Very nice of you to give us a picture of an HGV and a mini bus, but completely unnecessary as I do know what they look like. What we need to know is the tonnage of the vehicles. You state that only 50% of the site will be covered with panels. So, pray tell me what you intend to place on the remaining 50%. And what of the dreaded battery storage? Sometimes mentioned, sometimes completely ignored. The graphics provided continue to be of a meaningless nature as they fail to give a proper indication of the impact of this development.	No	The Applicant displayed clear graphics distinguishing heavy goods vehicles from light goods vehicles. 45.5% of the developable area (i.e. arable land) will be solar PV modules. The Applicant has included 15m buffer distances between the drainage ditches and panels across most of the site, to maintain this habitat. The Applicant has included areas of lowland meadow and scrub and also 3.64km of hedgerow planting. In addition, the Applicant has included an area of 56 ha of Arable Reversion Habitat Management Area and in addition has scoped in an area of 35.1ha of freshwater grazing marsh for management as requested by Natural England, RSPB and Kent Wildlife Trust.

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				In a nutshell poor consultation. Thankyou		

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CH_email_719	Member of Public	10/09/2018	11.22am	Thing 1: do not try to pull the wool over anyone's eyes by calling your 'project' a Solar PARK. One might be tempted to ask where the children's' play area will be... Thing 2: your team is very professional, so [of course] you have an 'answer' to everything. Therefore we, the residents, have to jump through hoops set up by The Process, to no avail. I have meagre confidence in public consultations making any difference. Oh, and I care not a jot about deadlines for objections. I am objecting now - live with it, and act upon it. I live here. West Sussex and Hampshire are a little way off, so your officers are less likely to care. Thing 3: I have written the word 'answer' in Thing 2 above in inverted commas, as some of your answers are	No	The Applicant has accepted all late responses and responded to them in this Appendix of the Consultation Report (document reference 5.1.1). The Applicant has reduced the scale of the Development in response to consultation from 56.5% of the developable area to 45.5% of the developable area, making a total area removed from development of 13.6ha, increasing set back and screening across the site and removing Field J for habitat management.

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				not answers at all. e.g. August 2018 leaflet, Phase 2 update... page 3 [no page numbers though] I quote: "Respondents expressed their concerns about the size..." Your 'answer' makes no mention of any measures to make it smaller, a natural consequence to an objection over size. "Respondents...believe the proposed location for the site is unsuitable." Your 'answer' - "To date, no other sites have been identified..." A) So keep looking. B) That is NOT an answer. You [probably on purpose] misconstrue the word 'unsuitable' in the objection. It may be very convenient for you people technically, but it remains unsuitable; it is an expanse of natural, wild land. It will become a Solar Power Station. That would make it		

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				unsuitable to the area - and [I wonder if you can see this...] there is simply no argument against that. C) Saying that 'no other sites have been identified' is a bit like me saying, "where might I park my camper van [if I had one...]. Outside my house is unsightly and unsuitable. I know, what about outside Mr. Hogan's in Pulborough? Sorry - can't find anywhere else..." Thing 4: "residents expressed their concerns about the visual impact of the site [and] the height of the solar panels..." Your answer is actually quite promising in a way. ""Following our Phase 2 consultation, we have removed more panels at Cleve Hill..." That's the idea! Removal of panels! The obvious answer to mitigate all effects on visual impact is to remove the panels completely.		

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				Essentially: no-one wants you here. Go away.		

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	This is a solar park...., not by subsidies." This statement is viewed as absurd ---- the solar park is driven by financial gain as Mr Brennan readily asserts. This is an unsupported and unjustified statement.	No	Please see the Applicant's Needs Statement (document 7.3) for a complete description of the need for the Development.
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	CHSP is counting on the battery element to make more money --- selling energy from batteries is labelled as "battery subsidies" by the UK government --- why continue with claims that there will be no subsidies?	No	There are no subsidies for batteries or solar development from the UK Government.
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	Currently there are a range of solar innovations that are truly revolutionary and put this proposal in the shade.	No	Please see the Applicant's Needs Statement (document 7.3) for a complete description of the need for the Development.

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	-The statement that the panels will cover only about 50% of the site may be correct when taking into account that the site has been artificially enlarged ---at the end of the day there are still 1,000 000 panels. This kind of statement is clearly misleading and suggests that CHSP is trying to pull the wool over people's eyes.	No	The Applicant has calculated the percentage of panels using only the developable area i.e. the arable land and not the areas that have been scoped into the overall boundary. Of the developable area, the solar PV modules are 45.5%.
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	"site which is currently intensively farmed". It is revealing that this is one of the few reasons CHSP believes it can justify its choice of site --- even if it were true then this is not a reason to put 1, 000 000 solar panels on this farmland and completely obliterate it.	No	Please see a complete description of the site selection and alternatives in Chapter 4 of the Environmental Statement (document reference 6.1.4).

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	There continue to be CHSP statements about how solar panels have been removed but there is no evidence to support this --- how many and where have solar panels been reduced? In this respect it would be helpful to be able to identify plot Yes – no one knows where this. Can you please forward a map?	Yes	The Applicant has made design changes including the decision to not develop on 13.6ha of land on Cleve Hill, panel set back at Nagden and Warm House and 3,64km of hedgerow planting and a comprehensive screening plan as set out in document 6.4.5.2. The Applicant has issued a further newsletter to the distribution area making clear the changes that have been made.
CH_Freepost_748	Member of Public	11/09/2018	10.00am	HOW! You can now propose to cover a huge area here at Graveney Cleve Hill and Seasalter in Solar Panels I fail to understand.	No	Please see the Applicant's Needs Statement (document 7.3) for a complete description of the need for the Development.
7. Landscape And Visual Impact						

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	· Landscape and Visual Impact: As discussed before, the screening indicates that there is something to hide……10 inches of native sticks of hedgerow are not going to mitigate against this industrialised construction --- and how do CHSP propose to screen the hill?	Yes	The Applicant will not develop on 13.6 ha of land on Cleve Hill. The Applicant includes a complete LVIA in Chapter 7 of the Environmental Statement (document reference 6.1.7).
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	This is a valued landscape and additional shrub planting will not replicate marshland --- it would be detrimental to try to “add to the landscape character of the area” --- the village is very keen to keep the landscape as it has been for centuries……	No	This is the respondents view.

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CH_Freepost_748	Member of Public	11/09/2018	10.00am	Well sirs! I have always understood that the North Kent Marshes Area encompassing: Elmley Conyer, Uplees, Harty Fierry, Oare and graveney Seasalter is an area designated as an outstanding natural habitat, and NOT to be developed, but is left in its natural state, to be enjoyed now, and for future generations.	No	Comment noted.
8. Ecology						
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	"…. create a biodiversity gain." No net biodiversity gain will be created on the site – 94% + of respondents clearly view this as totally incorrect and another example of CHSP trying to erroneously justify the green credentials for the site.	No	The Applicant has consulted on the Landscape and Biodiversity Management Plan (document reference 6.4.5.2) with statutory and local nature conservation bodies and in consultation with leading research centres.

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	· Ecology and Birdlife: It is a very arrogant statement to say that "you understand the concerns raised…" The response to this is that CHSP themselves do not know what the consequences will be of this configuration as "this is a new type of panel layout" not previously used on this scale, nor on farmland with 3 designated nature reserves around it.	No	Through consultation the Applicant recognises the level of ornithological interest in the area. The Applicant has established a Habitat Management Steering Group with local nature conservation bodies, their local representatives and statutory consultees to discuss the habitat management for birds. The Applicant has consulted on the Landscape and Biodiversity Management Plan (document reference 6.4.5.2) with statutory and local nature conservation bodies and in consultation with leading research centres. The Applicant provides its ornithological assessment in Chapter 9 of the Environmental Statement (document reference 6.1.9).

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	It is not possible to get a net gain from the destruction, displacement and depletion of animal life. Kent Wildlife Trust, NE and the RSPB are firmly against the proposals and they report that they are not currently "working with CHSP". What is your response to this?	No	The Applicant has established a Habitat Management Steering Group with local nature conservation bodies, their local representatives and statutory consultees including RSPB to discuss the habitat management for birds. This is documented in the Applicant's Consultation Report (document reference 5.1).
10. Hydrology, Hydrogeology, Flood Risk and Ground Conditions						

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	• Flooding and Flood Protection: The views are very clear on this --- CHSP should not be involved in EA matters, as their concerns are purely about profit and nothing else.	No	The Applicant has consulted with the EA throughout the pre-application consultation in addition to the statutory s42 consultation as detailed in Chapter 5 of this Consultation Report. The EA's Medway Estuary and Swale Strategy (MEASS) strategy is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The MEASS proposals are strategic and not detailed as acknowledged by the EA. There are a number of factors to be considered and overcome for the strategy to be implementable. The majority of the Development is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme events. Only the electrical compound is designed to withstand a breach of the existing defences. It is therefore clearly in the asset owner's interest to maintain the

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						current standard of defences, to at least the same standard that the EA currently do. To note, the EA have no obligation to maintain sea defences.

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11. Cultural Heritage and Archaeology						
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	• Archaeology and Local Impact: More than 50% of respondents commented on the detrimental effect on our heritage. What is the reason that this is not mentioned?	No	The Applicant has assessed archaeology and cultural heritage as provided in the PEIR and Environmental Statement (document reference 6.1.11). The Applicant listed all comments raised to the consultation in the final Consultation Report (document reference 5.1).
13. Socioeconomics, Tourism, Recreation and Land Use						
CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	· Tourism, Recreation and Local Amenity: The "solutions" offered in this section do not address any of the issues raised. What are the reasons for making statements that do not respond to the concerns raised?	No	As stated in the document. In response to the consultation, the Applicant has scoped in an additional permissive pathway creating a round walk from Seasalter Road. The Applicant has also scoped out the community orchard in response to feedback.
14. Access and Traffic						

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CH_email_700	Lut Stewart, GREAT	22/08/2018	3.54pm	Thanks for your reply. The boxes have now been removed (late). This is the second time that traffic assessments have taken place without the knowledge of KCC and without notification of the villagers in Graveney. It is illegal to position boxes on property that does not belong to the CHSP organisation, even more so as it distracts the road users. It is very clear to me that as yet the CHSP organisation have not bothered to understood the traffic flow in Graveney. The "traffic expert" at the consultation event bore witness to this --- he did not have possess many facts about the traffic flow and was therefore unable to give any meaningful replies to questions. Why is this?	No	The Applicant has consulted with KCC Highways regarding the traffic assessments undertaken. The Applicant held a topic specific workshop with community representatives including members of GREAT on 19 September 2018. The Applicant's traffic consultant provided a presentation of the detailed breakdown of traffic numbers, which the Applicant had worked to bring down since PEIR. The Applicant also invited comments to the Construction Traffic Management Plan (CTMP, document reference 6.4.14.1) at the PEIR and at the presentation provided.

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CH_email_724	Lut Stewart, GREAT	13/09/2018	6.39am	• Traffic and Access: Villagers are very interested to hear what the proposals are in this regard.	Yes	The Applicant consulted with the community on the traffic and access assessment and construction management plan in its PEIR. In response to requests for understanding more about the traffic numbers the Applicant held a topic specific presentation on 19 September with representatives of the community, including the GREAT group. The Applicant presented a reduction in traffic movements from those originally presented in the PEIR and invited comments to the CTMP.

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CH_email_736	Lut Stewart, GREAT	20/09/2018	1.29pm	I was very disappointed that the alleged "feedback meeting" consisted of a couple of slides taken from the info sent in your leaflet---so nothing new. The transport consultation did cover some issues but not that much really --- Please copy this message from the villagers in its entirety in the responses to the consultation: Whilst it is recognised that the developers had attempted to mitigate against the harmful and damaging effects of the construction traffic, Graveney roads are not equipped for this onslaught of traffic. Should this development go ahead, there will be a destructive effect on the village as there will be traffic from 7 to 7 on weekdays and Saturdays and Bank	No	Thank you for your comments. The issues raised including: construction traffic, noise, dust, pollution and vibration have been assessed as part of the EIA as shown in the respective chapters of the Environmental Statement (document reference 6.1). The Applicant has sought to consult on the construction traffic management plan (document reference 6.4.14.1) to incorporate mitigation measures suggested by the community such as avoiding deliveries during school pick up and drop off times.

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				Holidays. Villagers will no longer be able to live their lives in peace because of the disruption and road congestion, blockages, noise, the dust, the pollution, the demolition the verges and the road surface (even though it is your intention to carry out road repairs work as and when) , the vibration, the damage to houses, the danger that this will cause to road users and the racket that will hinder the learning of the children of the 2 village schools. Thanks		

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17. Miscellaneous Issues						
CH_email_729	Member of Public	16/09/2018	3.28pm	can you produce solar panels coloured leaf green with a plastic leaf in each corner to help soften the outline?	No	The Applicant has not yet entered its procurement process for panels and to its knowledge does not believe that such panels as described exist on the market.

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Consultation Report

Appendix 3: Applicant Regard to Section 42 Consultation Responses

Section 42 Consultees

2. EIA Process and Methodology			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Graveney with Goodnestone Parish Council	1. Environmental Impact Assessment We note that the PEIR represents a "preliminary" Environmental Statement and that it will be refined further in the light of responses to the current consultation and further technical work. We trust that you will respond positively to the concerns raised by the parish council and the local community, as those most affected by the proposed development.	No	The PEIR was presented in the form of a draft Environmental Statement (ES), based on a preliminary design. This is updated by the ES submitted with the DCO application (document reference number 6), which takes account of consultation responses received since the PEIR.
Graveney with Goodnestone Parish Council	Whilst you state that you are following established EIA methodologies, we are concerned that this process can become overly mechanistic. The risk is that the method tends to drive the conclusions. This can lead to a false "objectivity" on what are often subjective judgements on what is important and what degree of impact arises from a proposed development.	No	Where there is either uncertainty in the conclusions of an assessment, or where there is subjectivity, this is stated in the Environmental Statement (document reference number 6). The authors are appropriately qualified professionals, and often methods involve the use of professional judgement, which is a necessary and integral part of forecasting effects and assessing their significance against criteria. The authors would expect that the majority of appropriately qualified and experienced professionals would come to the same conclusions.

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Graveney with Goodnestone Parish Council	For example, the matrix on pp 2-3 of the PEIR has an in-built bias against small communities, and areas of remote and isolated countryside such as the Swale Marshes. This is because it attaches considerable weight to "numbers of receptors" in contrast to the very different qualities associated this landscape - with its lonely tidal creeks, mud flats, marshlands and big skies- with relatively few people around.	No	This is not the case. The number of receptors does not, typically, affect the significance of effects, instead the sensitivity of receptors combines with the magnitude of effect. A significant effect may be identified that applies to a single receptor, in which case this would be stated. Certain relevant guidance does refer to the number of receptors, in which case this is followed, but that guidance is not specific to this Environmental Statement (document reference 6.1).
Graveney with Goodnestone Parish Council	The local community attaches great value to its distinctive local environment. It can be forgiven some cynicism when it sees repeated statements in the PEIR about "minor" or "negligible" impact from a large solar power development, of unparalleled size in the UK, which will wholly transform the character and appearance of a large area of much-valued local countryside.	No	The conclusions have been formed by the professional application of guidance. The guidance is typically English or British, and is used to ensure the same approach is applied consistently for all developments, as far as is practicable. It is acknowledged that the technical terms may appear dismissive to those without a relevant professional background, but that is not what is intended.
GREAT Graveney	1. Environmental Impact Assessment GREAT supports the premise that the PEIR will be adjusted in light of the responses received to the current consultation and further technical work. GREAT would ask that the DCO application reflects the concerns that the villagers have raised and does not remain fluid in respect of issues such as battery storage. The DCO application should only be presented when it is in	No	The PEIR was presented in the form of a draft Environmental Statement (ES), based on a preliminary design. This is updated by the ES submitted with the DCO application (document reference number 6.1), which takes account of consultation responses received since the PEIR.

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	a finished state, and following a full and fair public consultation.		
GREAT Graveney	It is stated that established EIA methodologies are used to inform the PEIR but these appear very formulaic and contain no evidence that is distinct from their conclusions. Not all assertions in the preliminary Environmental Statement are therefore reliable as there appears to be a desire to adopt a methodology that reaches a pre-determined conclusion.	No	The conclusions have been formed by the professional application of guidance. The guidance is typically English or British, and is used to ensure the same approach is applied consistently for all developments, as far as is practicable. The EIA process is iterative, in that the desire to avoid, where possible, or minimise environmental effects has led to changes in the design of the Development, as set out in the Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).
GREAT Graveney	The conclusions appear to be objective but they have been reached using subjective parameters. For example, the matrix on page 2-3 of the PEIR has an in-built bias against small communities, and areas of remote and isolated countryside such as the Swale Marshes. This is because it attaches considerable weight to “numbers of receptors” in contrast to the very different	No	This is not the case. The number of receptors does not, typically, affect the significance of effects, instead the sensitivity of receptors combines with the magnitude of effect. A significant effect may be identified that applies to a single receptor, in which case this would be stated. Certain relevant guidance does refer to the number of receptors, in which case this is

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	qualities associated with this landscape - with its lonely tidal creeks, mud flats, marshlands and big skies - with relatively few people around.		followed, but that guidance is not specific to this Environmental Statement (document reference number 6).
GREAT Graveney	In contrast, the local community attaches great value to its distinctive local environment. Therefore, the many statements about "minor" or "negligible" impact in the PEIR are seen to be subjective, especially when the size of the massive solar power station would change the countryside into an alien industrial zone. As a result, the impact of this is assessed as "major".	No	The conclusions have been formed by the professional application of guidance. The guidance is typically English or British, and is used to ensure the same approach is applied consistently for all developments, as far as is practicable. It is acknowledged that the technical terms may appear dismissive to those without a relevant professional background, but that is not what is intended.
GREAT Graveney	GREAT asks: • That the EIA assessments reflect the parameters of the community that would potentially be affected by this development.	No	The scope and approach of the EIA was set through the EIA Scoping process, which involved input from a wide range of consultees, following a procedure that is applied nationally. Relevant national guidance has been followed, generally, and, where not, this has been stated. The assessments reported in the Environmental Statement (document reference number 6) are location-specific.
Kent Wildlife Trust	Throughout our consideration of the proposals we have had regard to the core principle of ensuring no net loss of biodiversity *as a minimum*. While we appreciate the need to	No	The principles of sustainable development (e.g., the Brundtland definition) do not require no net loss of biodiversity. The Environmental Statement, Chapter 8: Ecology (document

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	attempt to quantify the scale of the impacts, a disregard of any impact, even if considered 'of low magnitude' would be an erosion of the principles of sustainable development.		reference number 6.1.8) and Chapter 9: Ornithology (document reference number 6.1.9) demonstrate a net gain in biodiversity from the Development.
Kent Wildlife Trust	We have also had regard to the principles of mitigation to offset the impacts not just in scale but in kind. An enhancement in the outcome for a one ecological receptor does not mitigate for a negative impact on another.	No	No response required
RSPB	The RSPB supports deployment of renewable energy projects, provided that harmful impacts on wildlife are avoided through appropriate siting and design. Renewable energy infrastructure can have a detrimental impact on wildlife if it is poorly located and/or designed, whether at sea or on land. The main potential impacts on birds include the risk of collision with structures, disturbance/displacement, barriers to movement of e.g. migrating birds or disruption to functional links, for example between feeding and breeding areas, habitat change with associated changes in food availability, and the cumulative and in combination effects of these impacts with those of other projects.	No	No response required
RSPB	We believe that Government has a duty to ensure renewable energy targets are met with minimal environmental impact. Our aim therefore is to ensure the delivery of the maximum	No	No response required

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	capacity of renewable energy for the minimum impact on the natural environment.		
Swale Borough Council	· EIA/Cumulatives	No	No response required
Swale Borough Council	EIA/Cumulatives	No	No response required
Swale Borough Council	In table 2.2 (item 12) the application at Brotherhood Woodyard (17/502338/FULL) was	No	Table 2.2 in the Environmental Statement (document reference number 6) has been updated since PEIR to reflect this
Swale Borough Council	permitted in May 2018 and this can be updated. Conversely (at item 20) the application at Bapchild was refused in April 2018.	Yes	Table 2.2 in the Environmental Statement (document reference number 6) has been updated since PEIR to reflect this
Swale Borough Council	Once the site has been developed, the main noise issue will come from the transmission and delivery of electricity from the farm. From previous experiences it is known that multiple transformers are likely to be needed, each of which can produce a significant noise level. Such noise will be exacerbated by the low existing background noise levels at this site and the flat terrain which is effective for noise propagation.	No	Noise effects are assessed in the Environmental Statement, Chapter 12 (document reference number 6.1.12).
Swale Borough Council	A noise assessment should be submitted, firstly of the existing background levels, to be compared with predictions or actual measurements of noise generating plant, once the facility is built. The impact of such levels	No	The noise assessment provided in the Environmental Statement, Chapter 12: Noise (document reference number 6.1.12) includes background noise measurements and predictions

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	should be predicted at the nearest residential properties, and any necessary noise mitigation be included.		of noise resulting from proposed plant, including mitigation measures where required.
The Faversham Society	46. Where are these effects factored into the environmental impact assessment?	No	The climate change assessment, in the Environmental Statement, Chapter 15: Climate Chapter (document reference number 6.1.15) includes factors that account for the transport of solar panels and batteries, albeit this is uncertain at this stage given the procurement contracts have not been placed.

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3 Consultation			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Ashford Borough Council	As a neighbouring authority to Swale, ABC is keen to be kept informed as to the progress of this application.	No	The Applicant kept ABC informed of the progress of the Development and consultation process through its ongoing s47 consultation materials as detailed in Chapter 7 of the Consultation Report (document reference number 5.1)

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Graveney with Goodnestone Parish Council	2. Consultation arrangements The Phase Two consultation has allowed a six week period for comments, based on publication of both a PEIR and an accompanying non-technical summary, and several local consultation events. However, we are concerned that the sheer volume of material published for comment (a four volume set of documents comprising many hundreds of pages, plus various additional supporting documents) make it extremely difficult for ordinary people in our parish to digest this information and to engage with it in a meaningful way with only six weeks available.	No	The Applicant recognised that some consultees would wish to read and comment on the detail within the PEIR, which is why it was provided in full at the community consultation events, at the Community Access Points and online on the project website. However, the Applicant also recognised that some consultees would not have the time or inclination to digest and comment on the full PEIR, and therefore its content was summarised in the non- technical summary of the PEIR, a number of topic-specific factsheets, and the large-format displays used at the community consultation events. As set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, “preliminary environmental information” means information which is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development). The consultation undertaken by the Applicant has discharged that duty.

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Graveney with Goodnestone Parish Council	We hope that when a DCO is formally submitted, you will voluntarily seek to go beyond any statutory consultation time requirements and make the available period for comment commensurate with the volume of material placed in the public arena. There needs to be adequate time and space for public understanding of this large and complex development proposal which will have a profound impact on this, and neighbouring, parishes.	No	Once the Application is submitted, the Planning Inspectorate sets out the examination procedure and timetable in accordance with Section 89 of the 2008 Act.
Graveney with Goodnestone Parish Council	We are concerned that some of the consultation documents – for example the visualisations of the development – are hard to download in an area with relatively slow internet speeds. We are also concerned that some "hard-to-reach groups" in the local community, such as those without access to cars or computers, will have found it hard to attend any of the consultation events or to access online information. We would like you to make specific arrangements to engage with such groups.	No	The Applicant has made available 8 CAP sites across the consultation area to ensure hard copies of the consultation documents are available to view. The Applicant also made available the consultation documents in hard copy form at both rounds of its community consultation events.
Graveney with Goodnestone Parish Council	There has also been concern in the parish that some of the material on display at the local consultation events has been misleading. As an example, a graphic of the solar arrays shows arrays approximately 2.5 metres apart, but the separating distance shown in the graphic is greater than the 3 to 4 metre height of the	No	Across the literature the Applicant has been very clear which figures have been drawn for illustrative purposes and have clearly labelled and annotated these figures.

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	arrays. The result is to exaggerate the gaps between arrays and to underplay the height of the installations.		
GREAT Graveney	After careful consideration of the proposals, GREAT's initial stance was one of broad objection. This position has not changed as a result of the consultation process. A contributory factor to the complete rejection of the proposed scheme has been a resistance by the developers to present and represent the full facts in the CHSP documentation and at consultations. Our position of complete opposition therefore remains.	No	The Applicant commenced early and open engagement with the community and undertook a series of consultation activities to engage as widely as possible with the community throughout the s47 consultation period as committed in the SoCC. The Applicant recognises that at the beginning of a consultation there can be some frustration in the community about the lack of answers to all questions regarding the Development whilst the Applicant seeks to develop the proposals iteratively in response to consultation. At stage two s47 consultation and s42 consultation the Applicant presented detailed PEIR and a PEIR NTS to s42 and s47 consultees. In order to provide this Development information to a widely as possible, the Applicant scoped in 'GREAT' as a s42 consultee as well as 20 other non-statutory community groups and stakeholders.

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GREAT Graveney	GREAT does not find it acceptable that at this late stage the documentation remains vague in a number of aspects, particularly the size and impact of the battery storage. We note that a number of variations are likely to be presented in the DCO application. GREAT continues to be most concerned that this is a significant part of the development which could be used in conjunction with non-renewable energy and that there has not been sufficient information for a fair consultation to have taken place.	Yes	The Applicant presented a candidate design of the Development in the PEIR. Through the comments received and a series of design iterations the Applicant has presented a Rochdale Envelope of the Development as presented in the final Environmental Statement (document reference number 6).

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GREAT Graveney	Full details about the battery facility should have been provided at the start of communications with the villagers to expand on the statement in the "Introducing Our Proposals and Consultation Programme" (Autumn 2017). It is stated (Heading 2) that "this project could showcase the UK as a global leader in battery technology". This statement would not have come about without the clear intention to have battery storage as a main component of the development. Not disseminating more information on this aspect is regarded as deliberately withholding important information about the proposed development and, in effect, treating the villagers in a manner that is not respectful.	No	The Applicant has maintained throughout the consultation on the Development that it is proposing to include energy storage technology in addition to the PV array in the Development Consent Order (DCO) application. The Applicant has previously commented to the community that whilst the type and final number of batteries for the project is unknown, a range of scenarios will be presented in the application for the project as has been presented in the Environmental Statement (document reference number 6). The Applicant has maintained in its consultation materials that energy storage technology is a key part of the Government's Industrial Strategy. The technology can be used in a number of ways in support of renewable energy generation including time shifting output and balancing frequency response. Energy storage technology will be part of the solution to help the grid shift from fossils fuels to renewable energy. By acting to smooth the supply of renewable energy to the grid, energy storage will play a key role in enabling an integrated low carbon energy supply. Energy storage technology forms an intrinsic part of the proposal for the Cleve Hill Solar Park and is an exciting part of the future of renewable energy generation.

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GREAT Graveney	Our comments reflect the questions, issues and concerns we have received from the vast majority of villagers following the Consultation Events and GREAT's website and awareness campaigns, including a GREAT-led Graveney Community Day.	No	Noted.
GREAT Graveney	Our response is set out in the same order as the chapters in the Preliminary Environmental Information Report (PEIR). This consists of a number of observations and questions seeking clarifications about the design, construction, destruction and impact of the proposal.	No	Noted.
GREAT Graveney	1. **Consultation Arrangements**		

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GREAT Graveney	The documentation for the Phase Two consultation is extensive and runs to over 2,300 pages. For the public, who are not experts or specialists, insufficient time has been provided to read and make comments. It should be noted that the material has been prepared by people who are experts and are able to work on this during normal working time, whereas the public are not experts and have to respond in their spare time. The time for responses does not bear any relation to the sheer volume of published material.	No	The Applicant recognised that some consultees would wish to read and comment on the detail within the PEIR, which is why it was provided in full at the community consultation events, at the Community Access Points and online on the project website. However, the Applicant also recognised that some consultees would not have the time or inclination to digest and comment on the full PEIR, and therefore its content was summarised in the non- technical summary of the PEIR - consisting of , a number of topic-specific factsheets, and the large-format displays used at the community consultation events. As set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, “preliminary environmental information” means information which is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development). The consultation undertaken by the Applicant has discharged that duty.

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GREAT Graveney	The accompanying non-technical summary is disappointing. Instead of providing a public-friendly and digestible summary, it uses technical language and lacks some of the important and relevant detail from the full PEIR. The document has very few images, lacking any useful diagrams or artist's impressions of what the development will be. GREAT asserts that this has been published to ensure that ordinary people are not in a real position to provide holistic comments and engage with the consultation in a meaningful way.	No	In addition to the non-technical summary provided, the Applicant provided a consultation leaflet with high level Development details, a number of non-technical fact sheets and a series of consultation boards to break down the Development information in a digestible format for all. These consultation documents were made available online on the Development website, at the consultation events, at the CAP sites and via post.
GREAT Graveney	In communicating information about the proposed development insufficient investment has been made to reach villagers that do not readily have access to IT. This is against the advice provided by the Planning Inspectorate in its advice notes. Not all consultation events reflected the needs of those with disabilities, or those that do not have access to transport, and have therefore excluded people from attending the events. Additionally, the short timeframe the consultation events were held over – just four events over four consecutive days in June, and some only during working hours – meant that a large number of interested people were unable to attend.	No	The Applicant has made all consultation documents made available online on the Development website, at the consultation events held and at the Development CAP sites. The Applicant has also met with numerous local stakeholders on several occasions to share project information and receive comments as detailed in Chapter 7 of the Consultation Report (document reference number 5.1).

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GREAT Graveney	It has also been noted that that the graphics and photos presented in the leaflets and at the consultation events are misleading because they do not represent the true dimensions and characteristics of the proposed facility, with the aim to portray the solar park in a more positive, agreeable light.	No	Across the literature the Applicant has been very clear which figures have been drawn for illustrative purposes and have clearly labelled and annotated these figures.
GREAT Graveney	GREAT asks: • That the consultation be re-run before any DCO application is made to ensure: o that the consultation time for the DCO application is in relation to the amount of materials presented, o that materials and events are accessible for all, o that materials are presented in a realistic and true fashion.	No	The Applicant agreed a multi-phased and iterative consultation process with the s43 local authorities for the Development as described and committed to in the SoCC. The Applicant held two rounds of consultation events, supported by several stakeholder meetings and interactions as detailed in Chapter 7 of the Consultation Report (document reference number 5.1). Once the Application is submitted it is the Planning Inspectorate who determines that examination timetable. All Application documents will be available to view on the Planning Inspectorate's website, on the Applicant's website and in hard copy at the 8 CAP sites.

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GREAT Graveney	As described and evidenced above numerous times, the consultation on this pre-application has been poor. In addition to providing confusing and misleading information, the organisation has been of a low quality and insensitive to the local community in terms of its ability to access, process and respond to the information.	No	The Applicant and its professional team are confident that the consultation undertaken to date has, as a minimum, complied with the SoCC and the requirements of the Act, but has actually gone further than those requirements to ensure an effective and meaningful consultation process. The Applicant has responded to the comments regarding to the consultation in this Consultation Report and how it has complied with the 2008 Act and relevant legislation and advice including how it has gone above and beyond these regulations. The Applicant includes in Appendix 26 a statement of common ground regarding consultation with the local authorities for the Development.

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GREAT Graveney	Cleve Hill Solar Park Ltd has, by its own admission (to the Faversham Society) set itself a "challenging" timescale in order to get the DCO application by Summer 2018. GREAT understands that the target for submission is the end of August 2018. Given that the (low quality and insufficient) 2nd phase consultation concludes in the middle of July it is difficult to see how enough time has been allowed to take the feedback properly on board. This is yet another example of how the overall consultation process has been, and is, inadequate.	Yes	The Applicant has complied a full and complete Application submitted to the Planning Inspectorate in October 2018. The Applicant updated the community through its Phase Two Community Project Update that the submission would be planned for October 2018 to be able to take into consideration the responses received at s42 consultation.
Kent County Council	KCC would welcome continued opportunity to engage throughout the progression of the DCO. If you require further information or clarification on any matter in this letter, then please do not hesitate to contact me.	No	The Applicant has met with Kent County Council on several occasions as part its monthly PPA meetings as well as meeting other teams across the Council. These meetings are detailed in Chapter 5 of the Consultation Report (document reference number 5.1).

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Kent Police	Should this application proceed, we would welcome the opportunity to meet with CHSPL at Kent Police Headquarters, to discuss CPTED and security in greater detail as any development may have a knock on effect for the future services and duties of the Community Safety Unit (CSU) and local policing.	No	Noted. The Applicant will maintain dialogue with KCC to ensure a meeting with Kent Police Headquarters is arranged should the Development be granted planning consent.
Kent Wildlife Trust	This letter constitutes Kent Wildlife Trust's formal response to the Phase 2 consultation on the Cleve Hill Solar Park (CHSP). We acknowledge and applaud the level of engagement the CHSP team has undertaken with the Trust prior to this stage through the Habitat Management Steering Group, and expect it to continue to enable the issues below to be discussed in more detail.	No	Noted with thanks.
Kent Wildlife Trust	Owing to the number and size of the documents and limited resources we have not been able to scrutinise them all to the level we would have liked. We may have missed further issues we would have raised here, or missed sections that addressed some of our concerns. The issues raised here are necessarily 'headline' issues.	No	Noted.

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Kent Wildlife Trust	We are aware that the responses to this stage of public consultation will be used to further refine the plans prior to submission of the application, and we intend to maintain a dialog during this period to discuss the concerns raised in this response and any further issues identified, with an aim to get the best possible outcome for wildlife should the application be approved.	No	Following the close of s42 consultation, the Applicant met with the HMSG on 21 August 2018.
Natural England	Based on the information provided, there are a number of areas where Natural England recommends further clarity is provided in relation to potential impacts to designated nature conservation sites and the associated mitigation measures that may be required. These are set out in detail in Annex 1 attached to this letter. The key points are summarised as follows:	No	Noted.
Natural England	Natural England welcomes the fact that you have set up the Habitat Management Steering Group. This has been a helpful forum for discussing mitigation and enhancement alongside other stakeholders. We look forward to continuing to work with you to resolve the questions set out in this letter.	No	Noted.

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RSPB	As mentioned in the previous consultation the RSPB is grateful for having been involved in this project since its early stages while looking forward to continuing further discussions to ensure our concerns are addressed.	No	Noted.
RSPB	We trust our comments are of use, and look forward to continuing to engage constructively with Cleve Hill Solar Park. Please note that the RSPB reserves the right to add to and/or amend its position in light of any new information and/or analysis submitted by the Applicant.	No	Noted.
Swale Borough Council	Thank you for your letter of 31 May 2018 and the Preliminary Environmental Information Report (PEIR) relating to the above proposed NSIP development. The Preliminary Environmental Information Report has been reviewed by Swale Borough Council (the Council) officers and consultants working on our behalf across the following subject areas;	No	No response required.
Swale Borough Council	Before commenting on the PEIR as a whole I have a few comments about the non-technical summary (NTS);	No	
Swale Borough Council	· The font is too small and faint	No	Noted.

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Swale Borough Council	· A glossary of abbreviations would be useful	Yes	Noted. The Applicant has provided a Glossary in the Consultation Report (document reference number 5.1) and the Environmental Statement (document reference number 6).
Swale Borough Council	· Summarising from the full PEIR has lost some of the meaning and is confusing – for example on page 25 “These factors are considered to be a material, but non-fundamental change to the UK’s emissions of climate-changing gases and is therefore a moderate, positive environmental effect that is significant”	No	Noted. The Applicant has corrected any mistakes in the final Environmental Statement (document reference 6.1).
Swale Borough Council	I should also add that I have received a copy of a letter to you from Mrs Pryke of Warm House (and her relatives) dated 25 June 2018 and that Mrs Pryke’s criticisms of your display material at recent public consultation events as set out in all but the last paragraph on page 3 of her letter are supported by the Council.	No	Noted. The Applicant has responded to the response in question from Warm House (see Appendix 27 of the Consultation Report, document reference 5.1.1). Across the literature the Applicant has been very clear which figures have been drawn for illustrative purposes and have clearly labelled and annotated these figures.
Swale Friends of the Earth	We welcome the detailed engagement so far carried out by the developer in relation to Cleve Hill Solar Park. We have found information provision to be adequate and that there has been the opportunity to ask questions and receive detailed responses.We look forward to engaging with you further.	No	Noted with thanks.

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The Faversham Society	There are three parts to our response. A. A list of our major current concerns B. A background document giving more grounds for our concerns C. A list of outstanding questions which we would like to see answered	No	
The Faversham Society	36. Are the companies confident that they have managed to consult with all sections and groups in the population affected?	No	The Applicant agreed a multi-phased and iterative consultation process with the s43 local authorities for the Development as described and committed to in the SoCC. As agreed with the local authorities as part of the SoCC, the Applicant defined a core consultation zone which covered an area of 12,800 local properties and businesses. The Applicant also expanded the consultation zone to include a wider consultation area, ensuring wider outreach of the Development publicity and information outreach. The Applicant has set out the range of consultation activities it undertook in accordance with the SoCC and s47 requirements in Chapter 7 of the Consultation Report (document reference number 5.1.). Included within this Chapter, Table 9 lists the additional community groups, hard to reach groups and other local stakeholders it actively sought to engage with.

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The Faversham Society	37. What efforts have been made to reach the hard to reach groups and consult them?	No	Please see the response above and Chapter 7 of the Consultation Report (document reference number 5.1.)

4 Site Selection, Development Design and Consideration of Alternatives			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Canterbury City Council	Chapter 6 sets out how alternatives have been considered as per the recommendations in Section 4.4 of the EN-1, which states that applicants are obliged to include in their ES information about the main alternatives they have studied, and whilst paragraph 7 refers to an extensive site search exercise having been carried out with a large number of sites identified and the reasons for selecting the site at Cleve Hill, a list of these sites does not appear to have been provided along with the reasons why they were discounted.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered.

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CPRE Kent	6. Agriculture At a time when local authorities are being forced to implement Local Plans with significantly elevated housing targets as the result of the changes to the NPPF (particularly across the already-stressed South East, and even more particularly in Kent), we contend that it is more important than ever that every effort is made to preserve productive agricultural land for food production. Future uncertainties over climate change, global demographics and population change only serve to underline the importance of maintaining this resource. Renewable energy ought to be embedded in the built environment, where it will be used locally reducing transmission losses, rather than taking up productive agricultural land for no better reason than its proximity to a National Grid connector.	No	The Environmental Statement contains an Agricultural Land Classification Survey in Environmental Statement, Technical Appendices: Soil and Agricultural Report (document reference number 6.4.13.1) which concludes that 95% of the agricultural land within the Development site is of Grade 3b or lower quality, and is therefore not best and most versatile agricultural land.
Faversham Footpath Groups	9. We understand that the developers consider that, for financial reasons, the solar farm needs to be of this unprecedented size in order for it to be viable, given the Government's decision to withdraw subsidies. But the corollary of this, in our view, is that it would cause unprecedented, unacceptable, damage to the landscape, especially in an area where its visual impact cannot be significantly lessened. We therefore urge the Secretary of State to refuse the application.	No	The Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the impact of the Development on landscape and visual resources.

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Graveney with Goodnestone Parish Council	3. Site identification We are concerned that the PEIR provides no clear justification for a solar power generating facility of this huge size (which is far in excess of anything previously seen in the UK), but then uses that extreme size to make the argument that "the only suitable site available is Cleve Hill", since it will provide the required connection capacity to the National Grid. This is a circular argument.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered. The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.
Graveney with Goodnestone Parish Council	We ask that CHSP explain the justification for a development of this size and provide more information on why Cleve Hill was chosen, including the site selection criteria adopted and the alternative sites which have been examined and rejected. For example, have large decommissioned power station sites – such as Kingsnorth, near Rochester – been examined?	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered. The decommissioned Kingsnorth Power Station site is approximately 25 km from Cleve Hill Substation and a 400-kV connection of that distance would not be economically viable.

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Graveney with Goodnestone Parish Council	We would also like more information on why a solar farm (or a number of farms) of smaller capacity – presumably with a much wider choice of locational options and a much less intense local environmental impact – cannot be considered.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered. The DCO application is also supported by a Needs Statement (document reference 7.3) which presents more detail in respect of the viability and benefits of the Development.
Graveney with Goodnestone Parish Council	The information supplied in the PEIR suggests that the choice of this site was largely driven by the current presence of spare connection capacity to the National Grid provided by the London Array sub-station at Cleve Hill (which has not yet been used for a second phase of offshore wind energy development out in the Thames estuary) and the adjacent 400 kV overhead line from Kemsley to Canterbury. These facilities already detract from the intrinsic character and beauty of the Swale marshes and should not be used as a justification for further intrusive development.	No	An assessment of the Landscape and Visual Impact of the Development on the existing baseline landscape and visual baseline environment is included in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). The assessment makes clear where existing development influences baseline landscape character, as does the landscape character assessment referred to in the chapter.
GREAT Graveney	1. **Site Identification**	No	No comment required.

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GREAT Graveney	The PEIR states that "the only suitable site available is Cleve Hill", since it will provide the required connection capacity to the National Grid**.** This basis provides no independent ground or evidence for the conclusion that the only site available is Cleve Hill.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered.
GREAT Graveney	The information supplied in the PEIR suggests that the choice of this site was largely driven by the spare connection capacity to the National Grid provided by the London Array sub-station at Cleve Hill. This is not a reason to add to further contamination of the marshes.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered.
GREAT Graveney	The project's name is highly misleading. The project has chosen to call itself "Cleve Hill" when in reality it is not on Cleve Hill, but is instead sited on Nagden Marshes, Graveney Marshes and Cleve Marshes. This is clear from the maps provided by the developer.	No	No comment required.
GREAT Graveney	GREAT asks:	No	No comment required.
GREAT Graveney	· Has a solar farm of a smaller capacity been considered?	Yes	The iterative design process has sought to continually appraise the limits of the project in response to consultation responses. At each stage of consultation, the Development design has reduced in scale with smaller areas of the Development site made available for development.

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GREAT Graveney	· The Hive developer reported that a site on Canvey Island was suitable for a solar farm – what are the reasons that this is not being pursued?	No	Please see Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) for a detailed description of the site selection for the Development.
GREAT Graveney	· What other sites were identified and what were the reasons for their rejection?	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered.
GREAT Graveney	GREAT demands:	No	No comment required.
GREAT Graveney	· That the developers drop the misleading name 'Cleve Hill' and instead use a more accurate and honest name that includes the word "marshes". We suggest 'Cleve Marshes Power Station'.	No	The name Cleve Hill was chosen due to the Development's connection to the existing Cleve Hill substation which is a readily identifiable and well-known feature in the area. Although the area referred to as Cleve Marshes on mapping was once marshes, it is now intensively farmed arable land so referring to the Development as Cleve Marshes could also be considered misleading. To alter the name of the project at this stage is considered to be confusing and counterproductive.
Kent Wildlife Trust	Alternatives	No	No comment required.

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Kent Wildlife Trust	While it can be argued there is a need for additional renewable energy generation, it does not necessarily follow that there is a need for a development of the scale, and at the location, proposed.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) sets out the reasons for the scale and location of the Development.
Kent Wildlife Trust	In Section 4 it is stated that "*A large number of sites had been identified by a team of project developers via direct approaches and a network of land agents across the country*" though these do not appear to be provided in the supporting appendices.	No	The Applicant continually appraise opportunities to develop or acquire sites all over the UK and this quote is a reference to this ongoing process. These sites are commercially sensitive and therefore a list will not be provided, however, information is available on Hive and Wirsol's operational and development sites in Chapter 1: Introduction (document reference number 6.1.1) which represents the other outcomes of their ongoing site selection exercises.
Kent Wildlife Trust	While we understand that the spare capacity at the Cleve Hill substation presents an opportunity, and is a principle driver in the selection of the development site (Section 4.2), this does not negate the need for full and proper consideration of alternatives. In the context of national renewable energy generation, we would expect a full and proper consideration of alternatives to include not just alternative locations, but alternative patterns of generation, i.e. multiple, smaller, decentralised generation.		Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered. The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development.

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Kent Wildlife Trust	While it may not be in your interests to undertake this work, we will be pushing the Planning Inspector(s) and Secretary of State to have regard to this. Indeed, we consider it essential to meeting the requirements of the Habitats Regulations to rule out alternatives to meeting the need.		Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) presents the alternative sites considered.
Kent Wildlife Trust	Kent Wildlife Trust believes that the best use of the development site would be to accommodate managed realignment. This would benefit both the environment through habitat creation and local communities through the provision of recreation and ecotourism opportunities, and potentially reduction in local flood risk. It is the best location within The Swale SPA for such an undertaking, and this is reflected in proposals within the Environment Agency's Medway Estuary and Swale Strategy. The solar park proposals are incompatible with this.		The Applicant has undertaken extensive consultation with the Environment Agency regarding its proposal for managed realignment at the Cleve Hill site. The MEASS currently includes a proposal for managed realignment in Epoch 2 - between 2038 and 2068. The EA proposes that should the solar park go ahead, the EA will cease to maintain the flood defences that currently protect the site, and the proposals for managed realignment can be proposed in the longer term, within Epoch 3 from 2068 to 2118. The managed realignment proposals at Cleve Hill remain subject to a high degree of uncertainty over at least the next 20 years with or without the presence of the Development. As the managed realignment could still be delivered within the MEASS strategy period of 100 years, and the EA has set out alternative proposals should the solar park go ahead, the Applicant does not consider that the solar park proposals should be considered to be incompatible with the MEASS.

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Ramblers	PV arrays should be installed as close to the point of use as possible, with particular use made of roofs on homes and large public and commercial buildings. When there is a need for large scale solar PV arrays ("solar farms") these should be sensitively situated so they do not damage valued landscapes.	No	No comment required.
Swale Green Party	· A more appropriate scheme for this site would be to exploit the spare capacity available in the existing London Array sub-station at Cleve Hill to build the second phase of the London Array offshore wide farm that was cancelled. Development in the efficiency of offshore wind turbines may make this scheme more viable than it was when phase one of the London Array was built.	No	The Applicant cannot comment on other developments.

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Swale Green Party	· Resources being put into this plan could be better directed such that energy gains were obtained by other means. Thus, if grants were made available to house-holders to better insulate their premises this would not only reduce the need for further energy generation but it would also provide a wide array of additional employment opportunities, fuel poverty would be reduced, homes would be far more comfortable, and occupants' health would be improved whilst CO2 emissions would decline. Solar panels should be compulsory on all new builds. Nearly 2000 homes have recently been given planning permission around Faversham. Under current plans none of the houses to be built will be fitted with solar panels. On-shore wind turbines are now the cheapest way to generate electricity, and would generate more energy during the winter, when electricity demand is higher, than would solar panels.	No	A diverse range of electricity generation is required to meet the UK's energy needs throughout the year. Please see the Applicants Needs Statement as presented in document 7.3.
Swale Green Party	The proposed site is unsuitable.	No	The reasons why the developer chose the site and considers it to be a suitable location are set out in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).

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Swale Green Party	· Since solar panels take up space and capture sunlight, clearly there will be a loss of food production, and the options for any future food production must be extremely limited.	No	Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) contains an assessment of the land use impacts of the Development.
Swale Green Party	Inadequate consideration of alternative sites.	No	Please see Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives.
Swale Green Party	· The developers have not considered any alternative site. Therefore, there is no analysis of why Graveney Marshes has been selected in preference to the available alternatives. This approach is unjustifiable and would not be permitted for any other form of development (for example, housing development).	No	Please see Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).
Swale Green Party	The most suitable site for an industrial development such as the one proposed, would be on a brown-field site, rather than in an environmentally-sensitive greenfield site in the countryside. There are more suitable sites available in Kent that already have the appropriate access to the National Grid. For example, the site of Kingsnorth coal-fired power station on Hoo Peninsular which was demolished this earlier this year. Another	No	Please see Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives. None of the alternatives proposed present viable sites to connect to the available capacity at Cleve Hill Substation.

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	suitable location is available on the Isle of Grain on the site of a former oil-fired power station (demolished in 2015) and the site of a former oil refinery. The former Richborough power station provides an example in Kent of the site of a redundant power station being used for low-carbon power generation. An international example is provided by the 1 GW solar farm being constructed on the site of the former nuclear power station at Chernobyl, Ukraine.		
The Faversham Society	14 Alternatives Sites	No	No comment required.
The Faversham Society	There are numerous alternative brownfield sites – even in this corner of the country. Kingsnorth and the Hoo Peninsular are obvious candidates. The Faversham Society needs clarification about why the Cleve Hill site has been chosen above others. If – as has widely been rumoured – it is attractive to developers solely because of the spare capacity on an existing and underused national grid connection, we do not believe that this is sufficient justification for the devastation which such a large - albeit solar - power station will create.	No	Please see Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). None of the alternatives proposed present viable sites to connect to the available capacity at Cleve Hill Substation.

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The Faversham Society	We also understand that although there can be economies of scale with other forms of energy production, this is not the case for solar energy since solar technology (panels and batteries) can be scaled incrementally, having numbers of smaller sites would deliver much the same returns. We would like to see the differences in long-term viability between a far less intrusive multi-site model and the single site devastation that is being proposed for Cleve Hill and the surrounding marshes.	No	There are economies of scale that are expected to result in the Development supplying the grid with some of the cheapest renewable electricity that it is possible to generate in the UK. Economies of scale is the reason that unsubsidised ground-mounted solar PV schemes are currently only commercially viable at large scale. The Development site is protected by coastal flood defences that are currently modelled to protect the majority of the site during a 1 in 1000 year flood event. Assessments of the impacts of the Development on ecology and ornithology are included as Chapter 8: Ecology (document reference number 6.1.8), Chapter 9: Ornithology (document reference number 6.1.9). Views from the Saxon Shore Way are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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The Faversham Society			There are economies of scale that are expected to result in the Development supplying the grid with some of the cheapest renewable electricity that it is possible to generate in the UK. Economies of scale is the reason that unsubsidised ground-mounted solar PV schemes are currently only commercially viable at large scale. The Development site is protected by coastal flood defences that are currently modelled to protect the majority of the site during a 1 in 1000 year flood event. Assessments of the impacts of the Development on ecology and ornithology are included as Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9). Views from the Saxon Shore Way are assessed in Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7.

5 Development Description
Section 42 Applicant Regard to Consultee Responses

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Respondent	Comment	Project change?	Applicant Response
Ashford Borough Council	Ashford Borough Council (ABC) appreciates the invitation to comment on the application for a Development Consent Order (DCO) relating to the proposed Cleve Hill Solar Park at Graveney within the Borough of Swale. We appreciate the significant magnitude of the proposal, which would result in a renewable energy-producing facility with a generating capacity in excess of 50MW, and would constitute a Nationally Significant Infrastructure Project (NSIP).	No	No comment required.
Ashford Borough Council	Given that the application site is some 6.5km from the Borough boundary, and considering the local topography, hydrological flows and other functional relationships, the Council considers that there are unlikely to be significant environmental impacts on Ashford Borough as a result of the proposal and has no comments to make at this time.	No	No comment required.
Canterbury City Council	General Points It would be useful to show on all the plans submitted the administrative boundary between Canterbury City Council and Swale Borough Council.	No	Where appropriate, the council boundary has been added to plans. Ordnance Survey 1:25,000 and 1:50,000 scale base maps show the council boundary clearly marked.

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CPRE Kent	Introduction and Summary As part of CPRE's Kent's campaigning our Environment Committee (comprising expertise in ecology, hydrogeology, renewable energy, sheperdry and flood risk) have reviewed the Cleve Hill Solar proposal and documented this response to the consultation. Currently we have identified concerns in the areas listed below and detailed in the following paragraphs; further areas may be added after scrutiny of the detailed DCO application. · Damage to landscape including tranquillity and dark skies · Inadequate assessment of flood risk and potential conflict with the Environment Agency's 'managed retreat/ strategy · Impacts on soil microclimate and hydrology · Ecological impacts · Damage to heritage assets by construction traffic · Loss of agricultural land · Threats to animal welfare	No	The Environmental Statement (document reference number 6), contains Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1), Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10), Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13), Chapter 8: Ecology (document reference number 6.1.8), and Chapter 14: Access and Traffic (document reference number 6.1.14), which address the concerns raised.
Dover District Council	Thank you for consulting Dover District Council on the Cleve Hill Solar Park Regulation 11 of the EIA Regulation notification. Having looked at the location plan and considered the distance that the Solar Park is	No	No comment required.

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	located from Dover District, I confirm that we have no comment to make.		
Energetics UK	Based on the information provided, I can confirm that Energetics does not have any plant within the area(s) specified in your request.	No	No comment required.
ESP Utilities	Thank you for your recent plant enquiry at (Cleve Hill Solar Park). I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works. ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry. Important Notice Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espipelines.com	No	No comment required.

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Graveney with Goodnestone Parish Council	4. Development design We note that the development design has evolved from an initial south-facing layout (as is traditional with UK solar farms) to an east-west facing layout, with solar panels at a shallower angle and on smaller "tables". There is considerable concern locally that the proposed new orientation will allow panels to be installed much closer together. (PEIR pp 5-8, paragraph 38, states that "the tables will run continuously without breaks".) Therefore, this new layout is likely to increase the impacts across much of the site and significantly reduce the opportunities for wildlife compared to 'traditional' designs. These increased impacts will include the effect on the local landscape, wildlife and flooding/drainage.	No	The east-west layout design presented in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) is the design that been assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), Chapter 8: Ecology (document reference number 6.1.8), Chapter 9: Ornithology (document reference number 6.1.9) and Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10).
Graveney with Goodnestone Parish Council	The impact of this more intense use of some parts of the site is partly offset by reducing the coverage of solar panels in several sensitive areas, for example in the vicinity of Nagden, Warm House, upslope parts of Graveney Hill, and alongside drainage ditches. We support changes which draw back solar panel coverage where it is in close proximity to existing dwellings, or in the most visible and sensitive parts of the landscape.	Yes	The design evolution of the Development is presented in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) and following further consultation at the PEIR stage, all solar panels have been removed from sloping topography in the south east of the development site to reduce visibility and increase separation from properties.

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Graveney with Goodnestone Parish Council	We are concerned about references to "future proofing" the development by allowing the developers a degree of flexibility – within agreed parameters – in the content, layout and design of the development, so that they can respond to technological changes between now and the time when any development permitted is procured and installed on site in, say, 2021/22. This is the so-called "Rochdale envelope". Our concern is that we could end up with something which is at variance with what local people think has been permitted in any DCO, and which has unforeseen local environmental impacts.	No	The Rochdale Envelope parameters are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) as Design Principles and Realistic Worst-Case Design Parameters for the purposes of assessment. The Rochdale Envelope approach is clear in its intent to produce an Environmental Statement (document reference number 6) that assesses the likely significant effects of a realistic worst-case design such that the effects of the as-built development are of the same, or no greater magnitude than those assessed in the Environmental Statement.
Graveney with Goodnestone Parish Council	We would like to understand more about the sort of things that might change and the sort of parameters within which change might be allowed. The parameters of any flexibility sought by the applicants should be the subject of sensitivity testing in terms of environmental impact, so that their potential impact can be understood before any decisions are made.	No	The Rochdale Envelope parameters are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) as Design Principles and Realistic Worst-Case Design Parameters for the purposes of assessment. The Rochdale Envelope approach is clear in its intent to produce an Environmental Statement (document reference number 6) that assesses the likely significant effects of a realistic worst-case design such that the effects of the as-built development are of the same, or no greater magnitude than those assessed in the Environmental Statement.

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Graveney with Goodnestone Parish Council	A particular concern here is the proposed battery storage facility, where this is very new technology and the extent, design and impact of this element of the CHSP proposals are far from clear. The PEIR says that this element of the proposals is "subject to a large degree of uncertainty" (pp 5-17) and it is not even clear whether they will be modules enclosed in shipping containers, or within a specially designed group of buildings. We would like genuine consultation on a specific proposal.	Yes	The Rochdale Envelope parameters for the energy storage facility are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have the same magnitude effects, or effects of lesser magnitude than those included in the ES.
GREAT Graveney	1. **Development Design**	No	No comment required.
GREAT Graveney	The development design has evolved from an initial south-facing layout (as is traditional with UK solar farms) to an east-west facing layout, with solar panels at a shallower angle and on smaller "tables". There is considerable concern locally that the proposed new orientation will allow panels to be installed much closer together (PEIR page 5-8, paragraph 38, states that "the tables will run continuously without breaks"). Therefore, this new layout is likely to increase the impacts across much of the site and significantly reduce the opportunities for wildlife compared to	No	The east-west layout design presented in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) is the design that been assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), Chapter 8: Ecology (document reference number 6.1.8), Chapter 9: Ornithology (document reference number 6.1.9) and Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10).

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	‘traditional’ designs. These increased impacts will include the effect on the local landscape, wildlife and flooding /drainage.		
GREAT Graveney	The impact of this more intense use of some parts of the site is partly offset by reducing the coverage of solar panels in several sensitive areas, for example in the vicinity of Nagden, Warm House, a part of Cleve Hill/Graveney Hill, and alongside drainage ditches.	Yes	The design evolution of the Development is presented in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) and following further consultation at the PEIR stage, all solar panels have been removed from sloping topography in the south east of the development site to reduce visibility and increase separation from properties.
GREAT Graveney	In many parts of the PEIR the developers have used references to other solar developments as evidence. It is clear that in almost all cases these references refer to a completely different kind of solar development (i.e. low, south facing, and small) and that therefore the comparisons are at best, weak, and at worst, misleading.	No	The comparisons with other solar sites are valid. It is recognised that the orientation of the panels and the scale of the Development are novel for the UK, however ground-mounted solar PV arrays are not uncommon in the UK and the Development shares its basic characteristics and likely significant effects with this common development type.
GREAT Graveney	GREAT asks:	No	No comment required.

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GREAT Graveney	· How will the developers ensure that those residents in closer proximity of the proposed development would not have to face an industrialised landscape?	No	Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) presents the landscaping scheme for the Development. A comprehensive planting scheme has been developed to reinforce existing screening, and to introduce new screening where none currently exists. This screening has focussed particularly on the southern boundary of the Development where the closest residential receptors are located.
GREAT Graveney	· Mitigation of Cleve Hill/Graveney Hill is not possible, would the developers therefore introduce set back of the whole hill?	Yes	All of the solar panels which were located on the sloping parts of the Development site around Cleve Hill and Graveney Hill (Fields Yes and Z in the PEIR) have been removed following consultation.
GREAT Graveney	· Have any agreements in relation to setback of solar panels been made with individual householders?	No	The Applicant has met with, or offered to meet with all of the residents of the closest households to the Development site. Responses at these meetings have informed the setbacks utilised in the final submission.
GREAT Graveney	· What further draw back of the solar panels would the developers make to ensure that the most visible and sensitive parts of the landscape are protected from an industrialised view?	Yes	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) sets out the iterative layout design process. At each stage of consultation, the areas where solar panels can be located have reduced and been set back from publicly accessible areas.

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GREAT Graveney	· We re-state that the DCO application should be presented in a finished state and not be so fluid to allow for variances should the development be allowed to go ahead, as this precludes possible environmental impacts to be identified at the earliest stage, before any decisions would be made.	No	The Rochdale Envelope parameters are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) as Design Principles and Realistic Worst-Case Design Parameters for the purposes of assessment. The Rochdale Envelope approach is clear in its intent to produce an Environmental Statement (document reference number 6) that assesses the likely significant effects of a realistic worst-case design such that the effects of the as-built development are of the same, or no greater magnitude than those assessed in the Environmental Statement.
GREAT Graveney	· What will the developers present – if not the full details -- when they have already been carrying out assessments on the proposed development site for several years?	No	The Rochdale Envelope parameters are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) as Design Principles and Realistic Worst-Case Design Parameters for the purposes of assessment. The Rochdale Envelope approach is clear in its intent to produce an Environmental Statement (document reference number 6) that assesses the likely significant effects of a realistic worst-case design such that the effects of the as-built development are of the same, or no greater magnitude than those assessed in the Environmental Statement.

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GREAT Graveney	· What other future changes would the developers present in the DCO application that they view to be acceptable?	No	The Rochdale Envelope parameters are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) as Design Principles and Realistic Worst-Case Design Parameters for the purposes of assessment. The Rochdale Envelope approach is clear in its intent to produce an Environmental Statement (document reference number 6) that assesses the likely significant effects of a realistic worst-case design such that the effects of the as-built development are of the same, or no greater magnitude than those assessed in the Environmental Statement.
GREAT Graveney	· What real experience do the developers have of a solar park with an east-west facing layout?	No	Wirsol, one of the CHSPL JV partners constructed and operates an east west array in the north of Holland on the south-eastern outskirts of the city of Delfzijl.

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GREAT Graveney	· What evidence has been drawn on that biodiversity increases in solar parks with an east-west facing layout?	No	The biodiversity increases predicted are not associated with the area beneath the arrays. Since the solar PV arrays will only cover less than half of the existing arable land, there is over half of the site where habitats can be created and many of these areas can be specifically managed for wildlife around ditches within the Development site, and large areas of outside of the fenced areas to promote habitats for pollinators, ground nesting birds, hedgerow nesting birds, bats (a bat roost in the WWII pillbox on the southern boundary) and a wider range of vegetation than can currently persist under the existing intensive arable regime onsite. Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) sets out the detail of the habitat gains as a result of the Development and assesses the biodiversity impacts of the Development as proposed in this context.
GREAT Graveney	· What real experience do the developers have of a solar park of this size?	No	Hive and Wirsol the CHSPL JV partners develop large scale ground-mounted solar parks globally and work with partners globally who are involved with the development of this scale and larger solar parks. Both JV partners have been

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			involved with some of the largest schemes in the UK to date of >40 MWp.
GREAT Graveney	GREAT demands:	No	No comment required.
GREAT Graveney	· That wherever a reference is made to previous or other solar projects it must be to a similar type of project – i.e. 3-4m high, 24m wide, east/west orientation. If this can't be done the developer should make it very clear what manner of comparison is being drawn or take out the reference altogether and state that this has never been done before and so no comparisons can be made.	No	All solar parks have variations in arrangement and scale and it is considered appropriate to make comparisons with other ground-mounted solar schemes as being the same type of development.

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GREAT Graveney	As outlined previously, the facts about the proposed battery storage facility have not been forthcoming and GREAT would like a full, clear and straightforward consultation on the battery storage component of the proposal.	Yes	he Rochdale Envelope parameters for the energy storage facility are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have the same magnitude effects, or effects of lesser magnitude than those included in the ES.
GREAT Graveney	· How will detergents be used to control any algae or other natural vegetation which may grow on the solar panels? How often will they be cleaned and what is the plan for disposal of any waste water produced by the operation?		Low mineral content or deionized water is typically used to clean solar panels rather than detergents. The cleaning schedule is not yet known, but as only water will be used, the drainage regime will be the same as for rainwater, as set out in Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10).

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GREAT Graveney	· The developers are keen to promote the addition of sheep on the proposed site, however the pictures in the May booklet do not appear to be in scale. Can more information be provided about the numbers and breed of sheep that will be grazed on the site? How long will they be grazed at the site during the year and where will they be moved to when not grazing here?		Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) sets out a summary of the likely grazing regime onsite. All of Wirsol's (CHSPL JV partner) UK sites are successfully grazed by sheep. BRE Guidance Agricultural Good Practice Guidance for Solar Farms was published in 2014, and the grazing regime proposed for Cleve Hill has been produced with reference to that document. It is understood from discussions locally that the Development site has been used for sheep grazing in the past.
GREAT Graveney	· The conditions of the proposed site do not provide the ideal environment for sheep and foot rot is a likely disease they will be afflicted by. How will the welfare of sheep be managed?		Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) sets out a summary of the likely grazing regime onsite. All of Wirsol's (CHSPL JV partner) UK sites are successfully grazed by sheep. BRE Guidance Agricultural Good Practice Guidance for Solar Farms was published in 2014, and the grazing regime proposed for Cleve Hill has been produced with reference to that document. It is understood from discussions locally that the Development site has been used for sheep grazing in the past. Shepherding onsite will be subject to the same agricultural regulations relating to disease

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			control, movement and identification as it would be if the solar park were not proposed.
Harlaxton Energy Networks Ltd.	Harlaxton Energy Networks Ltd. at this time has no assets in the area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this scheme	No	No comment required.
Health and Safety Executive	HSE's land use planning advice	No	No comment required.
Health and Safety Executive	Will the proposed development fall within any of HSE's consultation distances?	No	No comment required.
Health and Safety Executive	The red line site boundary is not currently within the consultation zones of any Major Hazard Installations or Major Accident Hazard Pipelines.	No	No comment required.

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Health and Safety Executive	Although there are currently no Major Hazard Installations or Major Accident Hazard Pipelines, should a Hazardous Substances Consent [The Planning (Hazardous Substances) Regulations 2015] be granted prior to the determination of the application, and / or HSE receives a notification under the Pipeline Safety Regulations 1996, then HSE reserves the right to revise its advice.	No	No comment required.
Kent Police	We have considered this application in regard to Crime Prevention Through Environmental Design (CPTED), in accordance with the National Planning Policy Framework (NPPF) and Department for Communities and Local Government (DCLG) Planning Practice Guidance – Crime Prevention and I would like the following comments and recommendations to be taken into consideration to ensure that CPTED is fully addressed.	No	No comment required.
Kent Police	Having reviewed the plans and documentation, we note Section 17.3.6 Security within the Cleve Hill Solar Park, Preliminary Environmental Information Report (PEIR) (Volume 1 – Chapters) dated May 2018. We also note Section 5.3.4.7 in relation to the specific proposals for fencing, security measures and lighting.	No	No comment required.
Kent Police	Fencing: The PEIR Volume 1 5.3.4.7 para 59 states that a fence will enclose the operational areas of the development, having spoken with your colleague on 17 July, we understand that	No	No comment required.

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	the site would be split into sections and each section would be individually fenced as indicated on the Proposed Development Layout plan (Figure 1.2) in the PEIR Volume II A – Figures.		
Kent Police	We understand that at it is likely to be a 'deer fence' of approximately 2m in height on treated wooden poles. Deer fencing offers little security value from a determined attack, however, we appreciate the rural nature of this large site and the installation of a full high spec security fence would probably not be ARC or in keeping with rural environment.	No	No comment required.
Kent Police	We appreciate that wildlife will need to access the enclosed areas, it is important that when installing the fence, any gaps under the fence are ideally no larger than 100mm, in order to deter/prevent valuable items (e.g. solar panels, copper cable) being passed under the fence as a result of a criminal attack. Wildlife access gates (e.g. badger/wildlife gates) should be considered, if not already part of the fencing plans.	Yes	Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) addresses fencing and security measures. The response received from Kent Police has informed this section.

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Kent Police	Additional natural planting can act as an additional defensive barrier to deter offenders. It is important that any gates are constructed to the same height and standard as the fencing. Gates should be constructed so that they do not provide easily accessible hand or foot hold to aid climbing. Gates should be fitted with appropriate security locks.	Yes	Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) addresses fencing and security measures. The response received from Kent Police has informed this section. Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) includes details of planting which will fulfil this purpose. The planting is proposed close to the most easily accessed parts of the Development site across the southern boundary.
Kent Police	Section 5.3.5 Electrical Compound of the PEIR Volume 1 states that “a security fence will encircle the electrical compound within the bund at ground level. We were unable to find details of the height and type of this fence. A metal security fence of 2m or higher is recommended as an added layer of security.	Yes	Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) addresses fencing and security measures. The response received from Kent Police has informed this section.
Kent Police	Regular fence patrols are recommended to ensure that any fencing has not been attacked or compromised. Any repairs should be carried out as a matter of urgency.	Yes	Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) addresses fencing and security measures. The response received from Kent Police has informed this section.

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Kent Police	Security Measures: The PEIR Volume 1 5.3.4.7 para 61 states that 240 CCTV cameras are proposed on 3m high steel or wooden poles. The height of the cameras is quite low and may offer opportunities for attack. However, as with the use of deer fencing, we appreciate the rural nature of the site and installing higher level columns may not be ARC. It is important that any CCTV systems conform to the ICO (Information Commissioners Office) guidance in regard to any General Data Protection Regulation (GDPR) 2018 and the new Data Protection Act 2018 (DPA 2018) requirements.	Yes	The Applicant will comply with these requirements and guidelines.
Kent Police	Lighting: The installation of sensored lighting for security purposes is noted as detailed in the PEIR Volume 1 5.3.4.7 para 63. Any lighting should be checked and maintained on a regular basis to ensure it is in full working order.	No	No comment required.
Kent Police	The following recommendations may be considered planning detail, however, from a general crime reduction and safety aspect, we recommend:	No	No comment required.
Kent Police	· Lone worker, emergency and staff safety procedures will need to be incorporated within operating and management processes, procedures and policy in line with any current legislation. The use of two way radios, mobile phones and other means to summon help (e.g. panic alarm) should be provided.	No	The Applicant will consider these recommendations during the pre-construction phase.

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Kent Police	All electrical compounds, inverter, substation, transformer, battery and control buildings/cabinets to be fully alarmed with 24 hour monitored systems and covered by CCTV. We note that CCTV is being proposed as detailed above.	No	The Applicant will consider these recommendations during the pre-construction phase.
Kent Police	· Appropriate security locks and devices should be installed on all equipment cabinets and associated buildings. Locking device screws/bolts should not be easily accessible when closed, to deter by-passing of the locks themselves by a determined offender. One way security clutch head security bolts/screws or similar can also be utilised to prevent easy removal.	No	The Applicant will consider these recommendations during the pre-construction phase.
Kent Police	· Hinge pins for equipment cabinets, associated buildings and gates should be hidden when closed and/or fitted with anti-lift devices.	No	The Applicant will consider these recommendations during the pre-construction phase.
Kent Police	· All photovoltaic (PV) solar panels should be individually security marked and all serial numbers recorded within a site inventory.	No	The Applicant will consider these recommendations during the pre-construction phase.
Kent Police	· PV's installed using one way security clutch head security bolts/screws or similar, as an added layer of security and in order to make removal more difficult for thieves.	No	The Applicant will consider these recommendations during the pre-construction phase.
Kent Police	· Where possible, the installation of individual alarms for each PV panel, with automatic reporting to the alarm company,	No	The Applicant will consider these recommendations during the pre-construction phase.

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	should the PV panel be tampered with or removed.		
Kent Police	· Copper cable; transformers; inverters; batteries; switch gear and any other equipment of high value should be security marked. This can be achieved by using unique identifiers, such as serial numbers on the insulation sheathing and / or with the use of forensic marking solutions. A full equipment inventory should be kept.	No	The Applicant will consider these recommendations during the pre-construction phase.
Kent Police	· Appropriate crime prevention/security signage warning of the use of CCTV and forensic marking solutions should be installed on the exterior face of the security fencing and any gates.	No	The Applicant will consider these recommendations during the pre-construction phase.
Kent Police	· Additional defensive planting of natural hedging can also be considered around the boundary as an added layer of security.	Yes	The scheme set out in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) is considered to address this requirement.
Kent Police	· As detailed above, the site operational areas should be fully enclosed within a minimum 2m fencing system. It is however, important that the gap between the base of any fencing and the ground is minimal, so that any equipment, such as the PV panels themselves or copper cable cannot be easily passed underneath by thieves.	No	The Applicant will consider these recommendations during the pre-construction phase.

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Kent Police	· Any public footpaths through the site of the arrays should be fenced to 2m on either side of the path.	No	Footpaths through the solar PV arrays are fenced to 2 m on either side of the path as shown in Environmental Statement, Figures, Figure 5.3 (document reference number 6.2).
Kent Police	· Given the large amounts of valuable equipment and copper cable likely to be on site during construction, it is essential that the main site and any smaller temporary compounds are secured with appropriate temporary alarms and CCTV systems, particularly if security guards are not to be employed during construction. Any tool containers, plant (e.g. excavators) and associated fuel bowsers/bunded fuel tanks should also be secured, alarmed and immobilised at the end of each working day.	No	The Applicant will consider these recommendations during the pre-construction phase.
Kent Police	If you have any queries regarding the above, please don't hesitate to contact us.	No	No comment required.
Kent Police	The information contained within this response is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and improving Community Safety with regards to this specific development/planning application.	No	No comment required.

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Kent Wildlife Trust	The proposals in front of us are of a scale and design not previous seen in the UK, still relatively novel internationally, and thus not fully understood with regard to their impacts upon flora and fauna. Owing to the sensitivity and importance of the nearby designated habitats, as well as the species therein and on the development site, it is necessary to adopt the precautionary principle. In the absence of evidence, and in the presence of uncertainty, it is prudent to consider the worst case scenario with regard to the impacts and efficacy of mitigation when presented with a range of possible outcomes.	No	The ecology and ornithology assessments contained within the Environmental Statement (document reference number 6) have been undertaken on the basis of a realistic worst case set of parameters and a precautionary approach to predicting likely significant effects is used, as is appropriate in an EIA. Whilst it is acknowledged that the total area of the Development is unprecedent in the UK as no other applications have been made for developments of greater than 50 MW, ground-mounted solar PV developments are common in the UK and their impacts are relatively well understood.
London Borough of Bexley	Following an assessment of the Preliminary Environmental Information Report (PEIR) which sets out the preliminary findings of the Environmental Impact Assessment (EIA) relating to the proposed Solar Park, I can confirm that the London Borough of Bexley has no comments to make.	No	No comment required.

Maritime and Coastguard Agency	It is likely that any works undertaken in the marine environment will require a Marine Licence from the Marine Management Organisation under the Marine and Coastal Access Act 2009. The following categories of activities, which may be required as part of the Cleve Hill Solar Park development, would likely require a marine licence where they are carried out in an area which is submerged at Mean High Water Spring tide: · Construction, alteration or improvement of works · Dredging · Deposits of any substance or object · Removal of any substance or object		Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently. • Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.

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Maritime and Coastguard Agency	· Construction, alteration or improvement of works		Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently. • Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.

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Maritime and Coastguard Agency	· Dredging		Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently. • Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.

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Maritime and Coastguard Agency	· Deposits of any substance or object		Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently. • Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.

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Maritime and Coastguard Agency	· Removal of any substance or object		Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently. • Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.

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Maritime and Coastguard Agency	The MCA is a statutory consultee to the MMO and we will consider the Marine Licence application from the safety of navigation and search and rescue perspective. It would be useful to see in the Environmental Statement details of expected marine infrastructure requirements, with consideration given to their impact on the safety of navigation for both commercial and recreational craft, and proposed risk mitigation methods.		Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) includes a summary of the works that are considered to constitute maintenance that will be included in the Development Consent Order (document reference 3). As the maintenance works will be the same as those that would be undertaken by the EA if the Development does not go ahead, the future baseline scenario will remain the same. In the event that more extensive works are required that fall outside the agreed definition of maintenance, separate consents will be obtained prior to works commencing.
Maritime and Coastguard Agency	Having considered the location, it is likely that any proposed works in the marine environment would fall within Peel Ports Medway's jurisdiction. Therefore they would need to be consulted in order to maintain the safety of navigation in their waters. We would also like to point the developers in the direction of the Port Marine Safety Code (PMSC), and its Guide to Good Practice, available at https://www.gov.uk/government/publications/port-marine-safety-code. They will need to liaise and consult with the Port Authority to develop a robust Safety Management System (SMS) for the project under this code.		Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently.

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			• Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.
Maritime and Coastguard Agency	We have no comments to make on the land-based infrastructure.	No	No comment required.
National Grid	This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG)	No	No comment required.
National Grid	I refer to your letter dated 31st May 2018 regarding the Proposed Development. Due to the close proximity of some of our assets, NGET wish to express their interest in further consultation while the impact on our assets is still being assessed.	No	The Applicant has continued to consult with NGET during the design evolution process, NGET agreed that the design of the Development is acceptable to NGET by letter on 10 October 2018.
National Grid	In respect of existing NGET infrastructure, this will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.	Yes	The Applicant has received the relevant information from NGET and has observed at least the recommended clearance distances from NGET assets as set out in Environmental Statement: Chapter 5, Development Description (document reference number 6.1.5).

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National Grid	Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGET's apparatus, we will require appropriate protection and further discussion on the impact to its apparatus and rights.	No	The Applicant will ensure that protective provisions are in place relating to NGET apparatus within the Development site boundary.
National Grid	National Grid infrastructure within / in close proximity to the order boundary Gas Transmission	No	No comment required.
National Grid	National Grid Gas has no gas transmission apparatus located within or in close proximity to the proposed order limits.	No	No comment required.
National Grid	**Electricity Transmission**	No	No comment required.
National Grid	National Grid Electricity Transmission has a high voltage electricity overhead transmission line within or in close proximity to the proposed order limits. The overhead line forms an essential part of the electricity transmission network in England and Wales. The details of the overhead line are shown below:	Yes	The ZV overhead line has been taken into consideration throughout the iterative design of the Development.
National Grid	ZV (400kV) overhead line route	No	No comment required.
National Grid	Specific Comments **– Electricity Infrastructure:**	No	No comment required.
National Grid	· **National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement** which provides full right of access to retain, maintain, repair and inspect our asset	Yes	The Development includes a 'spine road' which traverses the site parallel with the overhead line. This will provide better access for NGET to

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			undertake these activities than is currently available.
National Grid	· Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 **– 8 Technical Specification for "overhead line clearances Issue 3 (2004)**	Yes	The statutory clearances have been observed and the worst case clearances are shown in Environmental Statement, Technical Appendices A17.2. No permanent above ground structures other than fences are proposed to be built directly beneath the overhead lines.
National Grid	· If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	Yes	Safety clearances have been confirmed and will be maintained throughout the construction, operation and decommissioning of the Development.
National Grid	· The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.	No	No comment required.

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National Grid	· Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse **conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") d**rawings should be obtained using the contact details above.	Yes	The overhead line profile drawings have been provided by NGET and will be used to inform the construction phase.
National Grid	· If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	Yes	This advice has been observed in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
National Grid	· Drilling or excavation works should not be undertaken if they have the potential to disturb **or adversely affect the foundations or "pillars of support" of any existing** tower. These foundations always extend beyond the base area of the existing tower and foundation **("pillar of support") drawings can be obtained using the contact details above**.	Yes	The pillar of support drawings have been provided by NGET and have been used to inform the design of the Development, in particular the route of the spine road, as shown in Environmental Statement, Figures: Figure 5.3 - Site Layout (document reference number 6.2).
National Grid	· National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair	No	No underground cables have been identified that will be affected by the Development.

	and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.		
National Grid	· Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	No	No underground cables have been identified that will be affected by the Development.
National Grid	I hope the above information is useful. If you require any further information please do not hesitate to contact me.	No	No comment required.
Public Health England	Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals and preliminary environmental information report (PEIR) at this stage of the project.	No	No comment required.
Public Health England	We replied to earlier consultations as listed below and this response should be read in conjunction with that earlier correspondence.	No	No comment required.
Public Health England	Request for Scoping Opinion 43096	No	No comment required.

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Public Health England	We have considered the submitted documentation and can confirm that we are satisfied with the approach taken in preparing the environmental information report and the conclusions drawn.	No	No comment required.
Public Health England	We have no further comments other than it is noted that the EMF health impact assessment depends to a large extent on a particular cable example taken from a WHO report (Table 17.1). Please state whether the proposed cable has similar characteristics, such as number of circuits, maximum and typical current flow (kA), phase separation and depth of burial.	No	Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17) sets out more detail than was provided previously on both characteristics of the 400-kV connection which forms part of the Development, and the similarities with the example provided in the referenced WHO report.
Ramblers	We **do not support the Cleve Hill Solar Park proposal. I**t would replace a unique marshland landscape with the longest section of monotonous industrial development along the entire Kent section of the England Coast Path.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) presents an assessment of the landscape impacts of the Development.
Royal Mail	Thank you for your email, this proposal is assessed as a low risk to Royal Mail hence no s42 consultation response was submitted.	No	No comment required.
SGN	I write, on behalf of Southern Gas Networks PLC ("SGN"), in response to your letter, dated 31 May 2018 (a copy of which is enclosed for your ease of reference).	No	No comment required.
SGN	Background	No	No comment required.

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SGN	SGN understands that Cleve Hill Solar Park Limited ("the Company") proposes to construct a solar park in the vicinity of Faversham and Whitstable ("the Project"). SGN also understands that the Project has been classified, by the Planning Inspectorate, as a Nationally Significant Infrastructure Project which has required that the Company apply for a Development Consent Order ("the DCO") in respect of that land required for the Project. SGN notes that the area of land, that will form the subject of the DCO and which will be used for the Project, is that which is shown edged in black on the plan attached to this email.	No	No comment required.
SGN	SGN Gas Infrastructure	No	No comment required.
SGN	The Company should note that SGN is the company that is responsible for managing the network that distributes gas to homes and businesses across Scotland and the south of England. As such SGN is responsible for ensuring that the said network is protected and that any essential works, that take place near the same, are carried out safely and without causing any damage.	No	No comment required.

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SGN	SGN has reviewed the area of land, forming the subject of the DCO, and has determined that the same does not interact with its gas network. However, SGN wishes to highlight the existence of a low pressure gas main that is running under Seasalter Road, which in turn is situated on the boundary of that land forming the subject of the DCO. I refer you to the red coloured line, on the attached plan, in confirmation. *Note. The red coloured line denotes the approximate location of the said low pressure gas main and I draw your attention to the disclaimer on the plan.*	No	The location of the low-pressure gas main is acknowledged.
SGN	Requirements and Guidelines	No	No comment required.
SGN	SGN will require that the Company comply with a number of requirements, and guidelines, given that there is gas infrastructure situated in the vicinity of that land forming the subject of the DCO. These requirements, and guidelines, are set out below and have been designed to ensure that those works that take place near gas infrastructure are carried out safely and without causing damage to any gas infrastructure:	No	The Applicant will comply with these requirements and guidelines.
SGN	1. HSE publication HSG47 Avoiding Danger from Underground Services to check the position of the mains, pipes, services and other apparatus on site.	No	No comment required.
SGN	2. SGN's publication Dig safely measures to avoid injury and damage to gas pipes.	No	No comment required.

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SGN	SGN's website contains useful information and can be visited by using the following link: https://www.sgn.co.uk/Safety/Dig-Safely-2017-Contractors-And-Third-Parties/	No	No comment required.
SGN	I would be grateful if you would confirm that the Company will comply with these requirements and guidelines. If you should wish to raise any questions, in respect of the same, then please make contact with SGN's Plant Location Team plantlocation@sgn.co.uk or call 0800 912 1722.	No	The Applicant will comply with these requirements and guidelines.
South East Water	Just to advise our teams considered these documents and we had no issue or comment to make for the statutory consultation.	No	No comment required.
Southern Water	Further to your scoping document for the above site I have the following observations to make in respect of the proposed development:-	No	No comment required.
Southern Water	Southern Water's current sewerage records do not show any public sewers to be crossing the above site. However, due to changes in legislation that came in to force on 1st October 2011 regarding the future ownership of sewers it is possible that a sewer now deemed to be public could be crossing the above property.	No	No comment required.
Southern Water	Southern Water requires a formal application for a connection to the public foul sewerage and water main to be made by the applicant or developer.	No	A formal application will be made for a connection to the water main. Foul sewerage will be dealt with via a septic tank.

Southern Water	If you require any further information please do not hesitate to contact our office on 0330 303 0119.	No	No comment required.
Surrey County Council	Due to the location of the site, which is remote from the County, Surrey County Council have no further comments to make.	No	No comment required.
Swale Borough Council	Field Y	No	No comment required.
Swale Borough Council	I acknowledge that the first draft proposals included the possibility of solar panels across both Field Y and further east, both up to Cleve Land and beyond public footpath ZR488. The revised candidate design still indicates proposals to erect panels on the relatively steeply sloping southern side of Cleve Hill which will be visible from far greater distances than would panels erected on the flat low lying land that comprises the vast majority of the development site. These panels will be visible from as far as Harty Ferry on the Isle Of Sheppey (albeit in the context of clear views of the wider solar farm from this position) but also from the south and east.	Yes	The solar panels proposed on the sloping southern side of Cleve Hill referred to on plans as 'Field Y' have all been removed from the Development Design. Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) sets out the reasons for this change.

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Swale Borough Council	The diagram on page 5-9 of the PEIR makes clear the awkward and restless visual impact of panels arranged on sloping ground, which compares very unfavourable to the muted and more easily absorbed visual impact of panels running continuously across flat land. Field Y is such a small part of the overall proposal, but its negative visual impact will be out of all proportion to its benefits and I urge you to re-consider its inclusion in the scheme.	Yes	The solar panels proposed on the sloping southern side of Cleve Hill referred to on plans as 'Field Y' have all been removed from the Development Design. Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) sets out the reasons for this change.
Swale Borough Council	The Substation Location	No	No comment required.

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Swale Borough Council	The northern foot of Cleve Hill marks the first change from open flat land to that with any form of contour. Views westwards across the site from Seasalter Road north of Cleve Hill are not interrupted by anything of any great height. The high embankments around the proposed substation compound will significantly intrude into these views; creating a prominent and intrusive element in these long views. I have seen no analysis of why the substation compound could not be located to the south of the pylons, in fields P or Q; drawn back from the unobstructed views, and sheltered from view by Cleve Hill Itself.	No	The reasons why the electrical compound is considered to be in a suitable location are set out in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). In summary, the irregular shape of the fields, the distance from the NGET Cleve Hill Substation, and the introduction of views of the electrical compound from higher ground associated with All Saints Church, Graveney, and the conservation area it lies within all contributed to the selection of the preferred location shown in Environmental Statement, Figures: Figure 5.3 Site Layout (document reference number 6.3). The selected location also links the Development substation with the existing substation in the closest way possible, so that the two compounds are visible together rather than separately as would be the case if the electrical compound were located in fields P or Q.

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Swale Borough Council	I accept that this would require the substation to be slightly further from the National Grid switchgear, but I see no reason why a slightly longer connection would be impractical. The advantages of this in repositioning of the substation would be significant in landscape terms, better preserving the distinctive relationship between Cleve Hill and the flat marshland towards the coast. The substation would be seen between Cleve Hill and more developed areas to the south where it could be better assimilated, especially if its outline followed existing linear ground features and was less regular and artificial. I urge you to give significant further thought to this part of the proposals.	No	The reasons why the electrical compound is considered to be in a suitable location are set out in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). In summary, the irregular shape of the fields, the distance from the NGET Cleve Hill Substation, and the introduction of views of the electrical compound from higher ground associated with All Saints Church, Graveney, and the conservation area it lies within all contributed to the selection of the preferred location shown in Environmental Statement, Figures: Figure 5.3 Site Layout (document reference number 6.3). The selected location also links the Development substation with the existing substation in the closest way possible, so that the two compounds are visible together rather than separately as would be the case if the electrical compound were located in fields P or Q.
Swale Borough Council	I hope that these views are helpful and that you are able to respond positively to them	No	No comment required.

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Swale Friends of the Earth	With our focus on the need to cut carbon emissions to stay within the targets of the Paris Agreement, we are strong advocates of a shift from fossil fuels to clean renewable energy. The development of subsidy-free projects is also important to meet our climate change targets in a cost-effective way for the public and to grow the UK's green economy. We support the proposal to install a battery storage system as part of the development because the UK must move to a smarter, more flexible energy system to facilitate greater penetration of low carbon renewable energy technologies. We have no concerns over the design or siting of the battery storage system – its location next to the existing sub-station makes practical and economic sense and will have minimal environmental impact once operational.	No	No comment required.
Swale Friends of the Earth	We believe that the extent of the climate crisis means that the increased development of renewable energy projects has to be done urgently and at scale, but that they must be sited and designed sensitively in full consultation with local communities and expert organisations. We therefore support the development of large ground-mounted solar farms in Swale, ***as long as it can***	No	No comment required.

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Swale Green Party	The Green Party supports deployment of renewable energy. We recognise that international agreement for action to restrict global warming to under 2°C is a very considerable challenge. Renewable energy needs to be rapidly deployed at scale if we are to meet our international legal obligations. It is important in meeting this challenge that the right schemes are built in the right place. We do not believe that very large scale solar farms are the most appropriate deployment of renewable energy. There is no advantage to deploying solar at very large scale. An equivalent number of panels located on roofs (domestic, commercial and industrial) would provide a more efficient use of the energy generated. Furthermore, we do not believe that the Nagden, Cleve and Graveney Marshes provide an appropriate location. The site is prone to flood; surrounded by areas designated for their wildlife of international significance; and provides a much-loved amenity for local people. The development would substantially change the character of views from Saxon Shore Way, a long-distance footpath that runs along the edge of the site.	No	There are economies of scale that are expected to result in the Development supplying the grid with some of the cheapest renewable electricity that it is possible to generate in the UK. Economies of scale is the reason that unsubsidised ground-mounted solar PV schemes are currently only commercially viable at large scale. The Development site is protected by coastal flood defences that are currently modelled to protect the majority of the site during a 1 in 1000 year flood event. Assessments of the impacts of the Development on ecology and ornithology are included as Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9). Views from the Saxon Shore Way are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Swale Green Party	The reasons for our objection to the proposal are set out in more detail below. **Design of the solar farm is inadequate.**	No	Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) presents the parameters of the project design. Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) describes the iterative design process undertaken.
Swale Green Party	· The proposed solar farm has a load factor of less than 11%. This is, on average over a year the power generated is equivalent to only 11% of the peak output. In comparison off-shore wind has a load factor of more than 30%. The most recent offshore wind farms have a load factor approaching 50%. Therefore, the proposed solar farm is a very inefficient use of the site compared to alternative methods of renewable generation.	No	A diverse range of electricity generation is required to meet the UK's energy needs throughout the year.
The Faversham Society	A. Our major current concerns	No	No comment required.
The Faversham Society	The Faversham Society enthusiastically supports the development of all forms of renewable energy. We recognise the importance of using wind, solar and tidal technologies for power generation to reduce the use of carbon fuels and meet the UK commitments to reduce levels of greenhouse gasses. However, we have grave concerns about the negative environmental and amenity impact of the solar power station being	No	Please see Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).

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	proposed at Cleve Hill and across the surrounding marshes. There are alternative brownfield sites available, and distributed generation is both possible and more desirable.		
The Faversham Society	Our major concerns are listed here:	No	No comment required.

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The Faversham Society	1 Unprecedented Scale – What is being proposed on the outskirts of our	No	Please see Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. There are several examples of similar scale developments in operation and in development in Europe, such as Europe's current largest project of 300 MW at Cestas in France. Globally, there are now several solar PV facilities with in excess of 1 gigawatt of power capacity. Solar PV technology is reliable, has been deployed all over the world in a variety of different scenarios and climates and is a well-developed, well understood technology.

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The Faversham Society	town is an extremely large industrial development, as big if not now bigger, than Faversham itself. A development of this scale cannot fail to have a profound negative effect on the environment and reduce the economic and amenity value to those both living in and using the area. We will need to be convinced by the economic and environmental logic of building a single site at this scale. If the logic for constructing a plant of this size is so convincing why are there not similar developments anywhere else in Europe and beyond? Moreover, this is an experimental development. We understand that it is 15 times the size of the largest UK solar farm and we are told that neither the developer nor the builder has attempted a solar installation on this scale before.	No	Please see Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The Development Consent Order (document reference number 3) application is also supported by the Needs Statement (document reference number 7.3) which presents more detail in respect of the viability and benefits of the Development. There are several examples of similar scale developments in operation and in development in Europe, such as Europe's current largest project of 300 MW at Cestas in France. Globally, there are now several solar PV facilities with in excess of 1 gigawatt of power capacity. Solar PV technology is reliable, has been deployed all over the world in a variety of different scenarios and climates and is a well-developed, well understood technology.

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The Faversham Society	During the consultation process, there have been many changes to the proposal. Plans for the battery installation are still unclear.		The Rochdale Envelope parameters for the energy storage facility are clearly set out in ES Chapter 5 Development Description. Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have the same magnitude effects, or effects of lesser magnitude than those included in the ES.
The Faversham Society	We are disquieted that our marshes are being used for this experiment. We are also worried that if the Cleve Hill development is allowed on this far-eastern edge of our Borough, it will create a precedent that over time, will allow marshland to the west to be sacrificed until the whole of Swale's north Kent coastline becomes an industrialised zone.	No	The Development is proposed on arable land. Freshwater grazing marshes and other marsh habitats are designated internationally, nationally and locally to the west and to the east of the Development site as part of The Swale. It is very unlikely that a solar PV array would be permitted within these designated areas. There are several examples of similar scale developments in operation and in development in Europe, such as Europe's current largest project of 300 MW at Cestas in France. Globally, there are now several solar PV facilities with in excess of 1 gigawatt of power capacity. Solar PV technology is reliable, has been deployed all over the world in a variety of

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			different scenarios and climates and is a well-developed, well understood technology.
The Faversham Society	2. **Implications of Site Enlargement** – there has been a significant increase in the size of the proposed site during the consultation period. This has been achieved by developers including a Site of Special Scientific Interest and the seawall, the latter to enable the developer to negotiate with the Environment Agency in order to mitigate the risk of managed retreat on the operator's assets. (panels, batteries and other plant) This has enabled the developer to now claim that the panels will only cover 55% of the site (as if this in some way reduces their impact) and to include the extra land and the SSSI as part of their calculations concerning the benefit to	No	The 55% figure quoted was the percentage of the 387.6 ha of arable land that would be directly beneath solar panels and covered by the electrical compound. The area of land within the Development site boundary and the changes to the Development site boundary between Scoping and PEIR therefore had no impact on this calculation.

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	the environment that they suggest the power station will create. This raises serious issues regarding responsibilities and wider governance.		
The Faversham Society	13. **Identification and Mitigation of Long-Term Risks**	No	No comment required.
The Faversham Society	There are two questions about which the Society, local elected representatives and in time the wider public will need more assurance. Our first concern is the business assumptions on which the development is based. As we have seen recently with the Swansea Bay Tidal Lagoon scheme, huge and developments like the Cleve Hill Power Station are highly dependent on the demand for and the pricing of electricity over the long term. We believe the assumptions made by the developers about this should be made public. We want to know how sensitive those	No	Cleve Hill Solar Park Ltd has assumed that no public subsidy will be received for the solar electricity generated. Swansea Bay Tidal Lagoon was seeking a guaranteed payment for the electricity generated. A Funding Statement (document reference number 4.2) for the Development will be submitted with the Development Consents Order (document reference number 3) application

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	assumptions are to national and global shifts in the energy market over what timescale.		
The Faversham Society	We also want to know what account developers have made for the growing acceptance that the days of old national grid-based approaches to energy production and supply are numbered because they will be supplanted by the much more cost-effective and environmentally 'green', distributed generation,	No	The UK is still dependent on the National Grid, and whilst older centralised fossil-fuel are being commissioned, new electricity generation being commissioned includes very large-scale developments such as offshore wind farms, CCGT power stations as well as a diverse range of smaller scale, decentralised power generation. CHSP will be complementary to this diverse energy network, with the ability to contribute large amounts of electricity into the grid, and also the potential capacity through energy storage to facilitate the connection of more decentralised electricity generation by having the potential to provide balancing and frequency response services to the grid.

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The Faversham Society	This vulnerability to national and global events over the long term leads to our second major concern. If the site ceases to be economically viable – and most especially if the developer's company fails and goes into administration - who will be responsible for decommissioning the plant and restoring the marshes to their original condition? Without explicit reassurances and guarantees from developers and planning authorities, the risk of having a very large and redundant industrial plant covering such a large area would be unacceptable to the Faversham Society, to the public at large and most likely to their elected representatives.	No	Decommissioning will be the subject of Requirements in the DCO (the NSIP equivalent of Planning Conditions) which will ensure that the site owner at the cessation of the operational phase will be required to decommission the Development or be subject to enforcement and if necessary legal action.
The Faversham Society	We are concerned that there has been no information about the public health and security risks associated with the development. We understand it is proposed to construct the largest battery in the world covering ground equal to that of 15 football pitches. We would like to know about the environmental risks of fire and/or explosion and what arrangements will be made to mitigate the effects. It may surprise developers to learn that the people of Faversham and their elected representatives are particularly sensitive to the risk of large industrial explosions and the social, economic and environmental damage they wreak.	No	Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17) includes a Health Impact Assessment at Section 17.4. The risk of disasters and emergencies and the Development's resilience to such events is also covered in Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17).

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The Faversham Society	15 Losses and Benefits	No	No comment required.
The Faversham Society	As we have made clear, this unprecedentedly large solar power station will have a profound negative impact on the people that live in Faversham and the surrounding villages. Although it is these local people who will suffer the losses if this development goes ahead, it appears that as currently conceived, it provides no direct benefit for them either in the short or long term.	No	The Applicant has consulted extensively with local residents and encouraged respondents to suggest ideas and proposals for planning gain in the local area. The permissive accessways and the community orchard proposal set out in the PEIR were included as a direct response to consultation. At the phase 2 consultation, there was negative feedback, therefore the design has been refined to include one of the permissive accessways as a permissive footpath, and to remove the community orchard proposal. CHSPL will remain receptive to discussing ideas and proposals throughout the development, construction and operation of the Development.

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The Faversham Society	That lack of attention to what in other large development schemes would be known as 'planning gain', demonstrates the lack of regard or concern that developers and builders of the Cleve Hill solar power station have for the interests of the people of Faversham and the surrounding villages.	No	The Applicant has consulted extensively with local residents and encouraged respondents to suggest ideas and proposals for planning gain in the local area. The permissive accessways and the community orchard proposal set out in the PEIR were included as a direct response to consultation. At the phase 2 consultation, there was negative feedback, therefore the design has been refined to include one of the permissive accessways as a permissive footpath, and to remove the community orchard proposal. CHSPL will remain receptive to discussing ideas and proposals throughout the development, construction and operation of the Development.
The Faversham Society	B. Background Paper	No	No comment required.
The Faversham Society	Cleve Hill Solar Farm **– Consultation on pre-submission Development Control Order July 2018**	No	No comment required.
The Faversham Society	General	No	No comment required.

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The Faversham Society	This scheme is the pre-submission version of the Development Control Order and has been sent to Swale Borough Council as a consultee. Hence, all material can be viewed on both the Cleve Hill Solar Farm website and on the Swale Borough Council website under reference 18/503041. Swale Borough Council has no powers to determine the application because the scheme is for a Nationally Significant Infrastructure Project. This power falls to the Planning Inspectorate on behalf of the Secretary of State for DBEIS. Following the end of the current consultation on 13th July, the full documentation for the application together with any representations on this consultation and all consultation from the first consultation held last autumn will be submitted to the Planning Inspectorate.	No	No comment required.
The Faversham Society	The site has been increased in area compared with the original scheme. It now takes in part of the Site of Special Scientific Interest to the east of the site near to Seasalter Road and extends further towards the sea along the full length of the northern side to include the sea wall. This is so that the developers can negotiate directly with the Environment Agency about the management of the coastal defences in the longer term to avoid the Environment Agency removing or reducing the flood protection from this part of the	No	No comment required.

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	coast and so that they can have a larger area over which to provide mitigation from the loss of overwintering habitat on the site for birds. The two areas increasing the size of the site have enabled the developer to argue that the solar panels will only occupy 55% of the site area.		
The Faversham Society	The site	No	No comment required.
The Faversham Society	Construction	No	No comment required.
The Faversham Society	It is expected that the construction of the site would take place over a period of 18 months to two years starting from 2021. There are breeding birds on and in the immediate vicinity of the site and the developers have been advised by Natural England that they should not carry out construction during the breeding season from May to August. They were also advised that because of wintering birds to avoid visual or noise disturbance and use less disturbing methods of construction in winter. This represents substantial constraints to the period when works could take place.	No	Construction mitigation to avoid impacts on breeding and wintering birds are set out in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).

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The Faversham Society	The works that are proposed include digging 700 metres of a new drainage ditch, construction of a series of new culverts across the site across existing drainage ditches and alterations to existing culverts along the north and south edges of the site. It is also proposed to add a major track running from the site of the existing Cleve Hill sub-station to the seawall near Nagden and other tracks from east to west and from north to south within site to service the site. It is also proposed to build a new sub-station/site compound including battery storage of electricity close to the existing sub-station for the wind farm. There is also the installation of all the supporting frameworks for the solar panels and installation of the panels themselves.	No	No comment required.
The Faversham Society	Conclusion	No	No comment required.
The Faversham Society	For the above reasons, the Faversham Society considers that the Secretary of State should refuse the Development Consent Order for the development of the solar farm at Graveney, Nagden and Cleve Marshes and associated works.	No	No comment required.
The Faversham Society	C. Outstanding Questions	No	No comment required.

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The Faversham Society	23. What would make the current technology redundant?	No	The technology proposed to be deployed at the Development is not expected to become redundant. Electricity is expected to continue to be required for the duration of the operational phase. Solar panels do not require external inputs other than sunlight to generate electricity therefore the risk of redundancy is considered to be low. In the event that the Development becomes commercially unviable and operation ceases, the Development will be required to be decommissioned and removed to comply with DCO Requirements.
The Faversham Society	24. What will be the cost of decommissioning the plant?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	25. How do you intend to assure the public and government agencies that the developers will remain responsible for decommissioning the plant - even if the original companies involved become bankrupt?	No	Decommissioning will be the subject of Requirements in the Development Consent Oder (document reference number 6.3) (the NSIP equivalent of Planning Conditions) which will ensure that the site owner at the cessation of the operational phase will be required to decommission the Development or be subject to enforcement and if necessary legal action.

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The Faversham Society	26. What guarantees will you offer Swale and Kent Councils that they will not be left responsible for the costs of decommissioning and environmental restitution?	No	Decommissioning will be the subject of Requirements in the Development Consent Oder (document reference number 6.3) (the NSIP equivalent of Planning Conditions) which will ensure that the site owner at the cessation of the operational phase will be required to decommission the Development or be subject to enforcement and if necessary legal action.
The Faversham Society	27. How vulnerable will the SPS be to a shift from old national-grid based energy production and distribution to the fast emerging community distributed models?	No	The UK is still dependent on the National Grid, and whilst older centralised fossil-fuel are being commissioned, new electricity generation being commissioned includes very large-scale developments such as offshore wind farms, CCGT power stations as well as a diverse range of smaller scale, decentralised power generation. The Development will be complementary to this diverse energy network, with the ability to contribute large amounts of electricity into the grid, and also the potential capacity through energy storage to facilitate the connection of more decentralised electricity generation by having the potential to provide balancing and frequency response services to the grid.
Thurrock Council	Thurrock Council have no comments at this time.	No	No comment required.

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Trinity House Marine Navigation	We have considered the below application and this will have no impact on marine navigation. Therefore we would prefer to receive no further consultation on this matter.	No	No comment required.

6 Legislation and Planning Policy Context			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**

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Canterbury City Council	Appendix 1 Legislative and Planning Policy Context Chapter 6 primarily focuses on the importance Government places on the delivery of major renewable and low carbon energy infrastructure to meet its energy and climate change policy. However, the generic impacts of energy infrastructure are simply listed in paragraph 25, which suggests that they are of less importance - whilst they have been considered in more detail in other chapters, this chapter should be more balanced in setting out the legislative and policy framework that such projects will be assessed against. This is particularly important in this instance given that solar parks are not listed in paragraph 3.4.3 of the National Planning Policy Statement for Energy (EN-1) as one of the sources that future large-scale renewable energy generation is likely to come from. It would also benuseful to list against these impacts the relevant paragraphs from National Policy Statements (NPS), the NPPF, policies from the Development Plan and other documents referred to in Section 6.6.	No	The generic impacts of energy infrastructure are considered in detail throughout the Environmental Statement (document reference number 6), and in Section 3.4 Assessment of the Development of the Planning Statement (document reference number 7.2), together with assessment of the relevant local planning policies for each environmental topic.

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Canterbury City Council	After further consideration, there are some additional policies from the Canterbury District Local Pan (July 2017) that are considered to be relevant to the consideration of the project, as follows: · EMP12 - Agricultural Land; · T16 - Rural Lanes; · LB3 - Undeveloped Coast; · LB13 - River Corridors; and, · QL12 - Potentially Polluting Development.	No	The policies from Canterbury District Local Plan (July 2017) considered of relevance to the project have been added in Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6) and in the Planning Statement (document reference number 7.2). The policies have been assessed in Planning Statement (document reference number 7.2).
Canterbury City Council	A general overview of the policies from the Development Plan should also be included in this chapter along with their relevance to the consideration of the project as whilst they do not hold as much weight as the NPS, they still relate to and are important to the decision. In this case, greater weight could be given to the Development Plan given that solar parks are not listed in paragraph 3.4.3 of the National Planning Policy Statement for Energy (EN-1) or anywhere in National Planning Policy Statement for Renewable Energy Infrastructure (EN-3) as one of the sources that future large-scale renewable energy generation is likely to come from. Paragraph 34 refers to the a review of relevant policies being available in Section 6.5.9 but this appears to be missing from the chapter. Paragraph 39 should also clarify that the Development Plan is consistent with the NPPF	No	The missing section has been noted and amended. A detailed overview and assessment of the local planning policies applicable to the Development is set out in Section 3.4 of the Planning Statement (document reference number 7.2).

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	as the Canterbury District Local Plan was recently adopted in July 2017.		
Environment Agency	Section 6.3 of the PEIR, details relevant aspects of the National Planning Policy Framework to be considered. Paragraph 118 should be considered as this gives protection to compensatory sites.	No	This is noted. NPPF has been updated with its revised version (2018).
Graveney with Goodnestone Parish Council	5. Legislative and planning context a. National policy We accept that Government policy is to support the development of renewable energy sources, including solar power, to help to ensure that the country has a secure energy supply and to reduce greenhouse gas emissions.	No	No change required.

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Graveney with Goodnestone Parish Council	Current web based National Planning Practice Guidance (PPG) makes it clear that the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities. It states that cumulative impacts require particular attention, especially the increasing impact of wind turbines and large scale solar farms on landscape and local amenity as the number of turbines and solar arrays in an area increases, or the scale of individual proposals grows considerably bigger (as is the case here).	No	The cumulative impacts of the Development, specially the impacts on landscape and local amenity have been assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).
Graveney with Goodnestone Parish Council	The NPPG also sets out particular considerations that relate to large scale solar farms. They should preferably be on previously developed land, on non-agricultural land or on buildings. There is a need to justify any use of agricultural land. Large scale solar farms could have a damaging effect on landscape and a need to recognise that “this impact can be as great in a predominantly flat landscape as in hilly or mountainous areas” (NPPG-Para 007 Ref: ID-007-2014036).	No	The provisions of the NPPF have been considered in detail in Section 3.3.1 of the Planning Statement (document reference number 7.2). The agricultural land, and the landscape and visual considerations are discussed in Section 3.4 of the Planning Statement (document reference number 7.2). Site selection and the consideration of alternatives is presented in the Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).

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Graveney with Goodnestone Parish Council	The NPPG states that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset.	No	The assessment of effects on heritage assets is presented in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11).
Graveney with Goodnestone Parish Council	b. NPS Guidance on national infrastructure projects Developments of a certain size and type are deemed to be “national infrastructure”, which will not be subject to the usual process of a planning application to the local planning authority. Instead, such developments are subject to a Development Consent Order process determined by Ministers. This includes renewable energy development generating more than 50 MW, as in this case.	No	No change required.

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Graveney with Goodnestone Parish Council	Proposals which are referred to Ministers under the DCO regime must have regard to relevant National Policy Statements (NPS) on a range of national infrastructure matters. There is no national policy statement which provides specific policy in relation to solar PV and energy storage development.	No	Regard has been given to NPS-EN 1 and NPS-EN 3 in Section 3.3.1 of the Planning Statement (document reference number 7.2). Whilst there is no NPS that provides specific policy in relation to Solar PV, NPS-EN 1 sets out the overall national energy policy for delivering major energy infrastructure, and NPS-EN 3 provides national planning policy in respect of renewable energy infrastructure, such as the proposed Development.
Graveney with Goodnestone Parish Council	However, where a national policy statement does not exist for the development, the Secretary of State must have regard to any Local Impact Report and to any other matters which relate to and are important to the decision. This can include national planning and local planning documents, including national policy statements if they have relevant provisions relating to solar PV and energy storage development. In this case, this includes:	No	This is acknowledged. A Local Impact Report will be prepared following the submission of the Development Consent Order (document reference number 3). Other documents such as The National Planning Policy Framework has been considered in Section 3.3.1.4 of the Planning Statement (document reference number 7.2), whilst local planning policy is considered in Section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	NPS Reference: EN-1 Overarching NPS for Energy	No	NPS EN-1 has been taken regard of in section 3.3.1 of the Planning Statement (document reference number 7.2).

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Graveney with Goodnestone Parish Council	Parish Council Comment: The UK has ambitious targets to increase the diversity and security of energy supplies, including an increased role for renewable energy.	No	No change required.
Graveney with Goodnestone Parish Council	However, we note that adverse landscape and visual impacts, and proximity to European wildlife sites (SPA and SAC) are highlighted as significant constraints on development	No	The Landscape and Visual impacts are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), while European Wildlife Sites (SPA and SAC) are considered in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8).
Graveney with Goodnestone Parish Council	NPS Reference: EN-3 Renewable energy infrastructure	No	Reference to NPS EN-3 has been made in Section 3.3.1 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Parish Council Comment: This note did not anticipate solar power generation facilities of the scale now proposed by CHSP at Cleve Hill and we ask for clarification on the applicability of this NPS to the current proposals.	No	EN-3 has been considered and assessed in Section 3.3.1 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	NPS Reference: EN-5 Electricity networks	No	Reference to NPS EN-5 has been made in Section 3.3.1 of the Planning Statement (document reference number 7.2).

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Graveney with Goodnestone Parish Council	Parish Council Comment: We would like clarification on whether this NPS relating to overhead power cables of >132kV is also applicable to this case which involves a grid connection for a large solar power development, rather than new overhead lines, and if so, what elements of it. This clarification is a matter for the Planning Inspectorate rather than assertion by CHSP.	No	Reference to NPS EN-5 has been made in Section 3.3.1 of the Planning Statement (document reference number 7.2) where it has been interpreted.
Graveney with Goodnestone Parish Council	c. Local planning policies The Swale Local Plan 2017 (Bearing Fruit) was formally adopted in July 2017. It includes planning policies to guide the development of the area up to 2031. As a very recently adopted local plan, following extensive local consultation, we expect its policies to be afforded great weight in the consideration of any future DCO application. We also commend the extensive evidence gathering and analysis that underpinned the Local Plan, which were also informed by extensive engagement with the local community, local business and various specialist consultees.	No	The Swale Local Plan (2017) has been considered in detail in the Planning Statement, Section 3.4 (document reference number 7.2)
Graveney with Goodnestone Parish Council	Our comments on the relevant Local Plan Policies are set out below. In particular, we would like to draw attention to policies CP4 (which seems to have been overlooked) and DM30 (whose relevance we question) identified in the PEIR.	No	Policy CP 4 has been added to the list of relevant policies upon which the Development has been assessed. Policy DM 30 has been included and considered of relevance, as it relates to contributions to landscape and biodiversity.

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Graveney with Goodnestone Parish Council	SWALE LOCAL PLAN (2017): POLICIES RELEVANT TO THE PROPOSALS	No	No change required.
Graveney with Goodnestone Parish Council	Policy reference: ST1 Delivering Sustainable Development in Swale	No	Policy ST1 has been assessed in Section 3.4 of Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Parish Council Comments: We would like to have information on how the CHSP proposals will contribute to the sustainable development in Swale up to 2031, in the context of the various themes identified in this policy.	No	Policy ST1 has been assessed in Planning Statement, Section 3.4.1 (document reference number 7.2).
Graveney with Goodnestone Parish Council	Policy reference: ST7 The Faversham area and Kent Downs Strategy	No	No change required.
Graveney with Goodnestone Parish Council	Parish Council Comments: We note that the background to this policy states that to the north of Faversham “landscape capacity (to accommodate new development) is generally low, because of the open and sensitive nature of the marshland landscape and the high visibility” (para 4.3.10).	No	No change required.

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Graveney with Goodnestone Parish Council	The policy itself goes on to require new development to "value, serve and strengthen local landscape designations" (ST7 item 12), "where possible, achieve net gains for biodiversity" (ST7 item 15); and "protect and enhance the character, appearance and setting of the area's historic assets" (ST7 item 16).	No	No change required.
Graveney with Goodnestone Parish Council	We would like the Environmental Statement to explain how it will address these matters.	No	Policy ST 7 has been considered in in Section 3.4 of Planning Statement (document reference number 7.2)
Graveney with Goodnestone Parish Council	Policy reference: CP4 Requiring good design	No	This policy has been added to the list of relevant policies in Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6) and it has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Parish Council Comments: We are concerned that this seems to be missing from your list of relevant local plan policies.	No	Policy CP 4 has been added to the list of relevant policies upon which the Development has been assessed. Policy CP 4 has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	It contains detailed guidance on siting and design of new development, which apply not only to buildings, but also to the more functional items (such as the solar panel arrays and inverters) in the CHSP proposals.	No	This is noted.

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Graveney with Goodnestone Parish Council	We would like more information on how the proposals address this policy.	No	More information on how the proposal addresses this policy is available in Section 3.4 of the Planning Statement (document reference number 7.2)
Graveney with Goodnestone Parish Council	Policy reference: CP7 Conserving and Enhancing the Natural Environment – Providing for Green Infrastructure	No	No change required.
Graveney with Goodnestone Parish Council	Parish Council Comments: The background to this policy states: “Conserving and enhancing the Borough's outstanding natural environment is at the heart of a Local Plan strategy which seeks to create more robust ecological and landscape structures and reverse the decline in the quality and diversity of our landscapes and biodiversity” (para 5.6.6).	No	This is acknowledged.

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Graveney with Goodnestone Parish Council	"The Council also considers that Swale has the potential to become a centre for habitat creation as part of co-operation with other Councils. We will encourage the use of land here to potentially act as a receptor for mitigation and compensation of development schemes elsewhere in Kent and further afield when such actions cannot be taken closer to the point of impact and where such measures are not detrimental to the integrity of the Borough's own natural assets (para 5.6.8).	No	This is acknowledged.
Graveney with Goodnestone Parish Council	We would welcome more information on how the CHSP proposals will contribute to the achievement of the enhancement of Swale's natural assets and green infrastructure, as set out in policy CP7, paragraph 8.	No	Information on the contribution to natural assets and green infrastructure are set out in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Graveney with Goodnestone Parish Council	Policy reference: CP8 Conserving and Enhancing the Historic Environment	No	No change required.

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Graveney with Goodnestone Parish Council	Parish Council Comments: We note that this policy refers to the importance of both designated and non-designated heritage assets, and their settings, and we would like assessment of the impact of the proposed development to also include heritage assets which contribute to the character, appearance and cultural heritage of the area, but which do not benefit from statutory protection.	No	Consideration has been given to both designated and non-designated archaeological remains and heritage assets and their settings throughout Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11)
Graveney with Goodnestone Parish Council	The policy also refers to "protecting the integrity of heritage assets whilst meeting the challenges of a low carbon future".	No	This is acknowledged and addressed in section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Policy reference: DM3 The Rural Economy	No	No change required.
Graveney with Goodnestone Parish Council	Parish Council Comments: The CHSP proposals will clearly increase the use of renewable energy, as supported in this policy.	No	No change required.

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Graveney with Goodnestone Parish Council	We would like more information on the overall impact on the rural economy in terms of jobs provided or supported, and any benefits to local business in terms of supply chain opportunities. This assessment also needs to cover any impacts on existing farming and tourism businesses.	No	The overall impact on the rural economy in terms of tourism, jobs creation, benefits for local businesses have been addressed in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).
Graveney with Goodnestone Parish Council	This policy also requires proposals to avoid harmful impacts on the rural character of the countryside and on local traffic conditions. The latter is a particular concern for us during the construction phase of any development.	No	Policy DM 3 has been addressed in detail in Section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Policy reference: DM14 General Development Criteria	No	The policy has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Parish Council Comments: All the criteria in this policy are relevant to the CHSP proposals.	No	The policy has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Policy reference: DM20 Renewable and Low Carbon Energy	No	The policy has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).

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Graveney with Goodnestone Parish Council	Parish Council comments: This policy sets local planning policy criteria for renewable energy and low carbon development.	No	This is acknowledged.
Graveney with Goodnestone Parish Council	We note that large scale solar power is not identified for the Graveney area in the SBC Energy Opportunities Map; the priority afforded to sites on previously used land for renewable energy developments; and the various other criteria which will be used to assess such proposals.	No	No change required.
Graveney with Goodnestone Parish Council	Policy reference: DM21 Water, Flooding and Drainage	No	No change required.
Graveney with Goodnestone Parish Council	Parish Council comments: The CHSP site includes significant areas at high risk of flooding (EA-Zone 3, as shown in Fig 7.6.2 of the Local Plan).	No	This is acknowledged in Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1).
Graveney with Goodnestone Parish Council	We assume that any DCO application will be accompanied by a site specific Flood Risk assessment which will address all the matters in this policy.	No	A Flood Risk Assessment is provided in Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1).

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Graveney with Goodnestone Parish Council	Policy reference: DM 22 The Coast	No	No change required.
Graveney with Goodnestone Parish Council	Parish Council comments: This policy seeks to maintain or enhance public access to the coast, and its biodiversity, landscapes, seascapes and natural processes.	No	This policy has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Policy reference: DM24 Conserving and Enhancing Valued Landscapes	No	Policy DM 24 has been considered in the preparation of Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). The policy is also considered in Section 3.4.1 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	Parish Council comments: The CHSP site is within an “Area of High Landscape Value – Kent Level”, meaning that the local landscape is of importance in a county wide context.	No	No change required.
Graveney with Goodnestone Parish Council	We attach great importance to this designation and to the policy wording which states: Planning permission will be granted subject to the: 1. conservation and enhancement of the landscape being demonstrated;	No	Conservation and enhancement measures are demonstrated in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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Graveney with Goodnestone Parish Council	2. avoidance, minimisation and mitigation of adverse landscape impacts as appropriate and, when significant adverse impacts remain, that the social and or economic benefits of the proposal significantly and demonstrably outweigh harm to the Kent or Swale level landscape value of the designation concerned.	No	The Landscape and Visual impacts are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), whilst the social and economic impacts are assessed in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).
Graveney with Goodnestone Parish Council	Policy reference: DM 26 Rural Lanes	No	No change required.
Graveney with Goodnestone Parish Council	Parish Council comments: The CHSP site is served by narrow country lanes and we are particularly concerned about heavy lorry traffic through our villages during the construction phase of any development.	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) assesses traffic effects during construction.
Graveney with Goodnestone Parish Council	Head Hill Road, Seasalter Road and Sandbanks Road are all subject to this policy, with the first two on the preferred access route to the CHSP site.	No	A Construction Vehicle Routing Strategy is provided in Environmental Statement, Chapter 14: Access and Traffic, Section 14.2 (document reference number 6.1.14) which addresses the traffic and transport considerations during construction.
Graveney with Goodnestone	Policy reference: DM 28 Biodiversity and Geological Conservation	No	No change required.

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Parish Council			
Graveney with Goodnestone Parish Council	Parish Council comments: This policy differentiates between “designated sites” and “all sites”	No	Noted. Policy DM 28 has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	The CHSP site is adjacent to internationally (SPA, Ramsar) and nationally (SSSI) important sites for biodiversity, and part of the site is in a local nature reserve.	No	This has been addressed in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8).
Graveney with Goodnestone Parish Council	We do not feel that the policy should be applied in a narrow way as if a line on a map somehow affects how creatures move around, feed and breed. Assessment of the CHSP proposals needs to also look at connectivity between designated sites and their immediate surroundings	No	A detailed assessment of the biodiversity matters is set out in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8).
Graveney with Goodnestone Parish Council	Policy reference: DM30 Enabling Development for Landscape and Biodiversity Enhancement	No	No change required.

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Graveney with Goodnestone Parish Council	Parish Council comments: The PEIR suggests this policy is relevant. The background to this policy states in paragraph 7.7.92: "This policy is only likely to be applicable in a relatively small number of exceptional situations, normally involving development that is small in scale and substantial in benefit. The whole purpose of such proposals will be the substantial and disproportionate benefits to landscape and biodiversity that they will provide. These should be such that they decisively outweigh the impacts of potentially breaching other policies".	No	No comment required.
Graveney with Goodnestone Parish Council	We cannot see how this policy exceptionally applies to the CHSP proposals which are not small scale, nor offer disproportionate landscape or biodiversity benefits.	Yes	The inclusion of this policy has been reviewed and an amended in Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6)
Graveney with Goodnestone Parish Council	Policy reference: DM31 Agricultural Land	No	No change required.

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Graveney with Goodnestone Parish Council	Parish Council comments: Our comments above on site selection are relevant in the need to demonstrate that the CHSP proposals cannot be provided on non-agricultural land.	No	A detailed justification for the site selection is set out in Section 1.5 of the Planning Statement (document reference number 7.2) and in the Environmental Statement, Technical Appendix A4.1: Sequential Test Report (document reference number 6.4.4.1).
Graveney with Goodnestone Parish Council	We agree that policies DM7, DM8 and DM9 of the Kent Minerals and Waste Plan (2016) are relevant to the CHSP proposals. The Canterbury City Council (CCC) planning policies relate to the area beyond the parish boundary of Graveney with Goodnestone and we will leave adjacent parishes in the CCC area to comment on them.	No	This is noted.
GREAT Graveney	1. **Legislative and Planning Context**	No	No comment required.
GREAT Graveney	(a) **National policy**	No	No comment required.
GREAT Graveney	We accept that Government policy is to support the development of renewable energy sources, including solar power, to help to ensure that the country has a secure energy supply and to reduce greenhouse gas emissions. Reflecting Government policy, the National Planning Policy Framework advises that an application for renewable energy should normally be approved if its impacts are, or can be made, acceptable.	No	The provisions of the NPPF are assessed in Section 3.3.1 of the Planning Statement (document reference number 7.2). The impacts of the Development have been assessed and the findings are presented in the Environmental Statement (document reference number 6). A summary of findings is also available in chapter 3.4 of the Planning Statement (document reference number 7.2).

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GREAT Graveney	However, such proposals should also be assessed against the NPPF objective of achieving sustainable development as a whole, which includes the need to recognise the intrinsic character and beauty of the countryside. The NPPF also states that the planning system should protect and enhance valued landscapes, and that the character of the undeveloped coast should be protected.	No	The provisions of the NPPF are assessed in Section 3.3.1 of the Planning Statement (document reference number 7.2). The impacts of the Development have been assessed and the findings are presented in the Environmental Statement (document reference number 6). A summary of findings is also available in chapter 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	Current web based National Planning Practice Guidance (PPG) makes it clear that the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities. It states that cumulative impacts require particular attention, especially the increasing impact of wind turbines and large scale solar farms on landscape and local amenity as the number of turbines and solar arrays in an area increases, or the scale of individual proposals grows considerably bigger (as is the case here).	No	The cumulative impacts of the Development have been assessed as part of the EIA and the Findings have been presented in the Environmental Statement (document reference number 6) under each environmental topic. The cumulative effects on landscape and local amenity are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.8 (document reference number 6.1.7).

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GREAT Graveney	The PPG also sets out particular considerations that relate to large-scale solar farms. They should preferably be on previously developed land, on non-agricultural land or on buildings. There is a need to justify any use of agricultural land. Large scale solar farms could have a damaging effect on landscape and a need to recognise that "this impact can be as great in a predominantly flat landscape as in hilly or mountainous areas" (PPG-Para 007 Ref: ID-007-2014036).	No	A detailed justification for the site selection is set out in Section 1.5 of the Planning Statement (document reference number 7.2) and in the Sequential Test Report provided as a technical appendix to Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).
GREAT Graveney	The PPG states that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset.	No	Heritage effects are assessed in Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11).

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GREAT Graveney	(a) **NPS Guidance on national infrastructure projects**	No	No comment required.
GREAT Graveney	Developments of a certain size and type are deemed to be “national infrastructure”, which will not be subject to the usual process of a planning application to the local planning authority. Instead, such developments are subject to a Development Consent Order process determined by Ministers. This includes renewable energy development generating more than 50 MW, as in this case.	No	This has been discussed in Section 3 Planning Policy Framework of the Planning Statement (document reference number 7.2)
GREAT Graveney	Proposals which are referred to Ministers under the DCO regime must have regard to relevant National Policy Statements (NPS) on a range of national infrastructure matters. There is no national policy statement which provides specific policy in relation to solar PV and energy storage development.	No	Regard has been given to NPS-EN 1 and NPS-EN 3 in Section 3.3.1 of the Planning Statement (document reference number 7.2). Whilst there is no NPS that provides specific policy in relation to Solar PV, NPS-EN 1 sets out the overall national energy policy for delivering major energy infrastructure, and NPS-EN 3 provides national planning policy in respect of renewable energy infrastructure, such as the proposed Development.

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GREAT Graveney	However, where a national policy statement does not exist for the development, the Secretary of State must have regard to any Local Impact Report and to any other matters which relate to, and are important to, the decision. This can include national planning and local planning documents, including national policy statements if they have relevant provisions relating to solar PV and energy storage development. In this case, this includes:	No	This is acknowledged. A Local Impact Report will be prepared following the submission of the Development Consent Order. Other documents such as The National Planning Policy Framework has been considered in Section 3.3.1.4 of the Planning Statement (document reference number 7.2), whilst local planning policy is considered in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	NPS Reference: EN-1 Overarching NPS for Energy	No	NPS EN-1 has been taken regard of in section 3.3.1 of the Planning Statement (document reference number 7.2).
GREAT Graveney	GREAT Comment: The UK has ambitious targets to increase the diversity and security of energy supplies, including an increased role for renewable energy.	No	No comment required.
GREAT Graveney	However, we note that adverse landscape and visual impacts, and proximity to European wildlife sites (SPA and SAC) are highlighted as significant constraints on development	No	The Landscape and Visual impacts are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), while European Wildlife Sites (SPA and SAC) are considered in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).

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GREAT Graveney	NPS Reference: EN-3 Renewable energy infrastructure	No	Reference to NPS EN-3 has been made in Section 3.3.1 of the Planning Statement (document reference number 7.2).
GREAT Graveney	GREAT Comment: This note did not anticipate solar power generation facilities of the scale now proposed by CHSP at Cleve Hill and GREAT asks for clarification on the applicability of this NPS to the current proposals.	No	NPS EN-3 has been analysed in Section 3.3.1 of the Planning Statement (document reference number 7.2).
GREAT Graveney	NPS Reference: EN-5 Electricity networks	No	Reference to NPS EN-5 has been made in Section 3.3.1 of the Planning Statement (document reference number 7.2).
GREAT Graveney	GREAT Comment: We would like clarification on whether this NPS relating to overhead power cables of >132kV is also applicable to this case which involves a grid connection for a large solar power development, rather than new overhead lines, and if so, what elements of it. This clarification is a matter for the Planning Inspectorate rather than assertion by CHSP.	No	NPS EN-5 has been discussed and analysed in Section 3.3.1 of the Planning Statement (document reference number 7.2).
GREAT Graveney	(a) **Local planning policies**	No	No comment required.

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GREAT Graveney	The Swale Local Plan 2017 (Bearing Fruit) was formally adopted in July 2017. It includes planning policies to guide the development of the area up to 2031. As a very recently adopted local plan, following extensive local consultation, we expect its policies to be afforded great weight in the consideration of any future DCO application. We also commend the extensive evidence gathering and analysis that underpinned the Local Plan, which were also informed by extensive engagement with the local community, local business and various specialist consultees.	No	The Swale Local Plan (2017) has been considered in detail in Section 3.4 Assessment of the Development of the Planning Statement (document reference number 7.2).
GREAT Graveney	GREAT comments on the relevant Local Plan Policies are set out below. We note that CHSP have cherry-picked the policies they refer to because CP4 has been overlooked and DM30 is considered of no relevance?	No	Policy CP 4 has been added to the list of relevant policies upon which the Development has been assessed. Policy DM 30 has been included and considered of relevance, as it relates to contributions to landscape and biodiversity.
GREAT Graveney	**SWALE LOCAL PLAN (2017): POLICIES RELEVANT TO THE PROPOSALS**	No	No comment required.
GREAT Graveney	Policy reference: ST1 Delivering Sustainable Development in Swale	No	Policy ST1 has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	GREAT Comments: GREAT would like to have information on how the CHSP proposals will contribute to the sustainable development in Swale up to 2031, in the context of the various themes identified in this policy.	No	Policy ST1 has been assessed in Section 3.4.1 Principle of the Development in the Planning Statement (document reference number 7.2).

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GREAT Graveney	Policy reference: ST7 The Faversham area and Kent Downs Strategy	No	Policy ST 7 has been considered in the assessment of the Development in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	GREAT Comments: The background to this policy states that to the north of Faversham "landscape capacity (to accommodate new development) is generally low, because of the open and sensitive nature of the marshland landscape and the high visibility" (para 4.3.10).	No	Policy ST 7 has been considered in the assessment of the Development in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	The policy itself goes on to require new development to "value, serve and strengthen local landscape designations" (ST7 item 12), "where possible, achieve net gains for biodiversity" (ST7 item 15); and "protect and enhance the character, appearance and setting of the area's historic assets" (ST7 item 16).	No	Policy ST 7 has been considered in the assessment of the Development in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	GREAT would like the developers to explain which strategies would be put in place to address these aspects and to understand how "net gains" would be quantified.	No	Policy ST 7 has been considered in the assessment of the Development in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	Policy reference: CP4 Requiring good design	No	No change required.
GREAT Graveney	GREAT Comments: This is missing from the list of relevant local plan policies which is concerning as it contains detailed guidance on siting and design of new development, which apply not only to buildings but also to the more	No	Policy CP 4 has been added to the list of relevant policies upon which the Development has been assessed. Policy CP 4 has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).

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	functional items (such as the solar panel arrays and inverters) in the CHSP proposals.		
GREAT Graveney	GREAT would like more information on how the proposals will address this policy.	No	More information on how the proposal addresses this policy is available in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	Policy reference: CP7 Conserving and Enhancing the Natural Environment – Providing for Green Infrastructure	No	No change required.
GREAT Graveney	GREAT Comments: The background to this policy states: “Conserving and enhancing the Borough's outstanding natural environment is at the heart of a Local Plan strategy which seeks to create more robust ecological and landscape structures and reverse the decline in the quality and diversity of our landscapes and biodiversity” (para 5.6.6).	No	No comment required.

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GREAT Graveney	"The Council also considers that Swale has the potential to become a centre for habitat creation as part of co-operation with other Councils. We will encourage the use of land here to potentially act as a receptor for mitigation and compensation of development schemes elsewhere in Kent and further afield when such actions cannot be taken closer to the point of impact and where such measures are not detrimental to the integrity of the Borough's own natural assets (para 5.6.8).	No	No change required.
GREAT Graveney	GREAT asks that more information is provided on how the CHSP proposals will contribute to the achievement of the enhancement of Swale's natural assets and green infrastructure, as set out in policy CP7, paragraph 8.	No	Information on the contribution to natural assets and green infrastructure are set out in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
GREAT Graveney	Policy reference: CP8 Conserving and Enhancing the Historic Environment	No	No change required.

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GREAT Graveney	GREAT Comments: This policy refers to the importance of both designated and non-designated heritage assets, and their settings, and we would like assessment of the impact of the proposed development to also include heritage assets which contribute to the character, appearance and cultural heritage of the area, but which do not benefit from statutory protection. Some of these were specifically referred to the Heritage Consultant but ignored for assessment.	No	Consideration has been given to both designated and non-designated archaeological remains and heritage assets and their settings throughout Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11).
GREAT Graveney	GREAT asks for the reasons why all heritage assets were not included.	No	Consideration has been given to both designated and non-designated archaeological remains and heritage assets and their settings throughout Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11).
GREAT Graveney	The policy also refers to “protecting the integrity of heritage assets whilst meeting the challenges of a low carbon future”	No	No change required.
GREAT Graveney	Policy reference: DM3 The Rural Economy	No	No change required.
GREAT Graveney	GREAT Comments: The CHSP proposals would clearly increase the use of renewable energy, as supported in this policy	No	No change required.

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GREAT Graveney	GREAT would like more information on the overall impact on the rural economy in terms of jobs provided or supported, and any benefits to local business in terms of supply chain opportunities. This assessment also needs to cover any impacts on existing farming and tourism businesses.	No	The overall impact on the rural economy in terms of tourism, jobs creation, benefits for local businesses have been addressed in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).
GREAT Graveney	This policy also requires proposals to avoid harmful impacts on the rural character of the countryside and on local traffic conditions. The latter is a particular concern during the construction phase of any development	No	Policy DM 3 has been addressed in detail in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	Policy reference: DM14 General Development Criteria	No	No change required.
GREAT Graveney	GREAT Comments: All the criteria in this policy are relevant to the CHSP proposals.	No	This is noted and the policy has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	Policy reference: DM20 Renewable and Low Carbon Energy	No	No change required.
GREAT Graveney	GREAT comments: This policy sets local planning policy criteria for renewable energy and low carbon development.	No	This is acknowledged.

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GREAT Graveney	Large scale solar power is not identified for the Graveney area in the SBC Energy Opportunities Map ; the priority afforded to sites on previously used land for renewable energy developments; and the various other criteria which will be used to assess such proposals	No	No change required.
GREAT Graveney	Policy reference: DM21 Water, Flooding and Drainage	No	No change required.
GREAT Graveney	GREAT comments: The CHSP site includes significant areas at high risk of flooding (EA-Zone 3 , as shown in Fig 7.6.2 of the Local Plan)	No	The flood risk considerations have been addressed in Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10), and Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1).
GREAT Graveney	GREAT proposes that any DCO application should be accompanied by a full Flood Risk Assessment which addresses all the matters in this policy and considers the wider geographic area, not just the site.	No	A Flood Risk Assessment is provided in Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1).
GREAT Graveney	Policy reference: DM 22 The Coast	No	No change required.

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GREAT Graveney	GREAT comments: This policy seeks to maintain or enhance public access to the coast , and its biodiversity, landscapes, seascapes and natural processes.	No	This policy has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	Policy reference: DM24 Conserving and Enhancing Valued Landscapes	No	Policy DM 24 has been considered in the preparation of Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). The policy is also considered in Section 3.4.1 of the Planning Statement (document reference number 7.2).
GREAT Graveney	GREAT comments: The CHSP site is within an "Area of High Landscape Value – Kent Level", meaning that the local landscape is of importance in a county wide context.	No	This is noted and addressed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
GREAT Graveney	Planning permission will be granted subject to the: 1. conservation and enhancement of the landscape being demonstrated;	No	Conservation and enhancement measures are demonstrated in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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GREAT Graveney	2. avoidance, minimisation and mitigation of adverse landscape impacts as appropriate and, when significant adverse impacts remain, that the social and/or economic benefits of the proposal significantly and demonstrably outweigh harm to the Kent or Swale level landscape value of the designation concerned.	No	The Landscape and Visual impacts are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), whilst the social and economic impacts are assessed in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).
GREAT Graveney	Policy reference: DM 26 Rural Lanes	No	No change required.
GREAT Graveney	GREAT comments: The CHSP site is served by narrow country lanes and we are particularly concerned about heavy lorry traffic through our villages during the construction phase of any development.	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) assesses traffic effects during construction.
GREAT Graveney	Head Hill Road, Seasalter Road and Sandbanks Road are all subject to this policy, with the first two on the preferred access route to the CHSP site.	No	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) assesses traffic effects during construction.
GREAT Graveney	Policy reference: DM 28 Biodiversity and Geological Conservation	No	No change required.
GREAT Graveney	GREAT comments: This policy differentiates between “designated sites” and “all sites”	No	Noted. Policy DM 28 has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).

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GREAT Graveney	The CHSP site is adjacent to internationally (SPA, Ramsar) and nationally (SSSI) important sites for biodiversity, and part of the site is in a local nature reserve.	No	This is acknowledged and addressed in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).
GREAT Graveney	GREAT asks that the assessment of the CHSP proposals also look at connectivity between designated sites and their immediate environment	No	A detailed assessment of the effects on designated sites is set out in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).
GREAT Graveney	Policy reference: DM30 Enabling Development for Landscape and Biodiversity Enhancement	No	No change required.
GREAT Graveney	GREAT comments: The PEIR suggests this policy is relevant. The background to this policy states in paragraph 7.7.92: "This policy is only likely to be applicable in a relatively small number of exceptional situations, normally involving development that is small in scale and substantial in benefit. The whole purpose of such proposals will be the substantial and disproportionate benefits to landscape and biodiversity that they will provide. These should be such that they decisively outweigh the impacts of potentially breaching other policies".	No	The policy has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).

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GREAT Graveney	GREAT does not see how this policy exceptionally applies to the CHSP proposals which are not small scale , nor offer disproportionate landscape or biodiversity benefits	No	The policy has been assessed in Section 3.4 of the Planning Statement (document reference number 7.2).
GREAT Graveney	Policy reference: DM31 Agricultural Land	No	No change required.
GREAT Graveney	GREAT comments: Our comments above on site selection are relevant in the need to demonstrate that the CHSP proposals cannot be provided on non-agricultural land.	No	A detailed justification for the site selection is set out in Section 1.5 of the Planning Statement (document reference number 7.2) and Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).
GREAT Graveney	Policies DM7, DM8 and DM9 of the Kent Minerals and Waste Plan (2016) are relevant to the CHSP proposals.	No	No change required.
Swale Borough Council	· Planning Framework	No	No comment required.
Swale Borough Council	Planning Framework	No	No comment required.

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Swale Borough Council	Chapter 6 of the PEIR quotes the National Policy Statement for Energy (EN-1) at length, including around the importance of energy projects and the importance the Government attaches to them as well the significance of renewable energy targets. All of this is relevant and appropriate but a greater emphasis could be given to other impacts referenced in the national policy statements. Sections of EN-1, for instance, with regard to landscape are merely listed as issues in Chapter 6 of the PEIR.	No	The provisions of EN-1 on environmental impacts are considered in the Chapter 3.4 of the Planning Statement (document reference number 7.2) where they are assessed under each relevant topic.

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Swale Borough Council	EN-1 states in 5.9.5 'The applicant should carry out a landscape and visual assessment and report it in the ES. (See Section 4.2) A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development'. While this element is referred to in Chapter 7 (Landscape and Visual Impact Assessment) the importance of 'relevant policies based on these assessments' should be considered in this chapter, particularly with reference to Swale Local Plan Policy DM 24 (Conserving and enhancing valued landscapes) and the local designation (Area of High Landscape Value – Kent Level) which covers this site. Paragraph 5.9.14 of EN-1 recognises that local landscape designations should not be used in themselves to refuse consent, however, that 'where a local development document ... .has policies based on landscape character assessment, these should be paid particular attention.' The potential vulnerability of coastal areas is mentioned in 5.9.18 'coastal areas are particularly vulnerable	No	The provisions of EN-1 on environmental impacts are considered in the Chapter 3.4 of the Planning Statement (document reference number 7.2) where they are addressed under each relevant topic, including landscape. Landscape and Visual Considerations have been given further consideration in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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	to visual intrusion because of the high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast.' These sections of EN-1 should be included within Chapter 6 of the PEIR.		

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Swale Borough Council	Similar comments could be made with reference to other issues listed in paragraph 25 of Chapter 6 of the PEIR - air quality, biodiversity, aviation, coastal change, dust and pollution, flood risk, historic environment, landscape and visual, land use, noise and vibration, socioeconomics, traffic and transport, waste, water quality and resources. How the overarching national policy statements (particularly EN-1) deal with these issues is considered to an extent within other chapters of the PEIR, so, if full policy analysis of these issues is not presented within Chapter 6 itself (ideally), cross-referencing from this chapter (particularly paragraph 25) to other relevant chapters of the PEIR is essential. Omitting this from Chapter 6 gives an impression that these issues are of lesser importance than, for example, the role of renewable energy generation.	No	This is noted. The provisions of EN-1 on environmental impacts are considered in the Chapter 3.4 of the Planning Statement (document reference number 7.2) where they are assessed under each relevant topic.
Swale Borough Council	Paragraph 34 of Chapter 6 states that a more detailed review of the policies considered relevant to the Development is available in section 6.5.9, however, section 6.5.9 does not appear to exist. Section 6.5.1 is a list of relevant development plan policies, however, this is merely a list of policies and is not a 'more detailed review'. This is a significant omission which needs to be corrected.	No	This is noted and amended. Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6) only reference the relevant planning policies, whereas the detailed policy assessment is available in Section 3.4 of the Planning Statement (document reference number 7.2).

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Swale Borough Council	Paragraph 36 of Chapter 6 should be clearer about what presumption is being referred to (paragraph 14 of NPPF).	No	This has been amended and the NPPF text has been updated with the revised version (July 2018).
Swale Borough Council	Paragraph 39 of Chapter 6 refers to the weight to be given to existing and emerging plans. It	No	This is noted.
Swale Borough Council	should be noted here that the Swale Local Plan 2017 is NPPF compliant and as such was adopted in 2017.	No	This is noted and amended.
Swale Borough Council	Paragraph 39 of Chapter 6 also refers to paragraphs 109-125 of the NPPF. Explicit reference should be added to paragraph 109 'minimising impacts on biodiversity and providing net gains in biodiversity where possible'. Furthermore, it should also be noted in section 6.4 that in paragraph 168 of the draft updated NPPF (March 2018) wording on this issue has been updated and the phrase 'if possible' has been removed stating that 'planning policies and decisions should contribute to and enhance the natural and local environment by ...minimizing impacts and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.' The provision of net gains for biodiversity is a fundamental issue to be resolved in this development.	No	This is noted. The NPPF text has been updated with the revised version (2018).

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Swale Borough Council	Furthermore, paragraph 173 of draft updated NPPF is also relevant and should be referenced. This states that;	No	This is noted. The NPPF text has been updated with the revised version (2018).
Swale Borough Council	'When determining planning applications, local planning authorities should apply the following principles:	No	This is noted. The NPPF text has been updated with the revised version (2018).
Swale Borough Council	a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;	No	This is noted. The NPPF text has been updated with the revised version (2018). The revised NPPF is considered in detail in section 3.3.1.4 of the Planning Statement (document reference number 7.2).
Swale Borough Council	b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;'	No	This is noted. The NPPF text has been updated with the revised version (2018). The revised NPPF is considered in detail in section 3.3.1.4 of the Planning Statement.
Swale Borough Council	As stated above, tables 6.1, 6.2 and 6.3 of Chapter 6 are merely a list of local plan policies.	No	The relevant local planning policies are assessed in detail in Section 3.4 of the Planning Statement (document reference number 7.2).

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Swale Borough Council	Missing from table 6.1 are CP 4: Requiring Good Design, DM 19: Sustainable design and construction and DM 29: Woodland, trees and hedges. These omissions should be rectified.	No	These policies have now been included in the policy assessment Section 3.4 of the Planning Statement (document reference number 7.2).
Swale Borough Council	With reference to National Planning Practice Guidance the inclusion of Para 007 (Reference ID: 5-007-20140306) which acknowledges that the need for renewables ...does not automatically override environmental protections' and later states that 'large scale solar farms could have a damaging effect on landscape and recognize that the impact can be as great in predominantly flat landscapes as in hilly or mountainous areas' and furthermore that 'protecting local amenity is an important consideration which should be given proper weight in planning decisions' is welcome.	No	This is noted.
Swale Borough Council	The following items are missing from this chapter on legislative and planning policy context;	No	The missing items have been added.
Swale Borough Council	this should be rectified and appraisal of the contents and implications of these documents included in Chapter 6 of the PEIR:	No	This is noted and amended.

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Swale Borough Council	a. Babtie Report to Swale Borough Council (2003): Swale Landscape Assessment – Recommended Amendments to Landscape Designations and the Swale Borough Council (2014) Technical Paper No 6: Interim Review of Local Landscape Designations and Important Local Countryside Gaps (referenced as CD/053 and CD/090 to CD/090d at the Swale Local Plan Examination Document Library page: https://www.swale.gov.uk/examination-document-library/ . These documents assess and review the local landscape designation (Special Landscape Area renamed as Areas of High Landscape Value – Kent Level in the 2014 assessment) of the North Kent Marshes in which the site for Cleve Hill solar farm is sited. This designation recognises that this area forms part of the largest tract of undeveloped land in the County and combines an open, wild and untamed landscape with qualities of remoteness alongside high scientific value of national and international value. As such it is locally valued by many members of the public.	No	These documents have been referred to in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Swale Borough Council	b. HM Government – A Green Future: Our 25 Year Plan to Improve the Environment which sets out how the government will help the natural world regain and retail good health through a series of policies including aiming to ensure future development with environmental net gain. This aspiration is carried through into the draft updated NPPF as outlined above.	No	This document has been considered in Section 4 Material Considerations of the Planning Statement.
Swale Borough Council	Conclusion on Planning Framework	No	A conclusion on the planning framework has been set out in Section 5 of the Planning Statement (document reference number 7.2).

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Swale Borough Council	Chapter 6 provides an overview of the legislative and planning policy context for Cleve Hill Solar Park. Whilst it covers significant elements of the context, there are some omissions which are outlined here and which should be rectified. In particular, there is inadequate recognition of the relevance of the Swale Local Plan 2017 local landscape designation (Area of High Landscape Value – Kent Level) which crosses the site, as well as the Government's aspiration that environmental net gain is embedded into development. Finally, the inclusion of a review (rather than a list) of the local plan policies which are considered relevant to this development appears to be missing from this chapter and should be remedied.	No	This is noted and amendments have been made as follows: -The missing policies are included in the Policy List in Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6) and considered in detail in Section 3.4 of the Planning Statement (document reference number 7.2); -The relevant planning policies are assessed in Section 3.4 of the Planning Statement (document reference number 7.2); -The Area of High Landscape Value - Kent Level has been considered in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Swale Green Party	· The National Policy Planning Framework (NPPF) places great emphasis on sustainability. It is totally unsustainable to utilise vast acreages of what is nationally a rare landscape for the generation of electricity.	No	The presumption of sustainable development as set out in the revised NPPF is interpreted in section 3.3.1.4 of the Planning Statement (document reference number 7.2).
The Faversham Society	The National Planning Policy Framework (NPPF) advises at paragraph 100: 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is	No	The NPPF has been updated with its revised version (2018) and analysis is available in Section 3.3.1.4 of the Planning Statement (document reference number 7.2).

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	necessary, making it safe without increasing flood risk elsewhere'.		
The Faversham Society	Having concluded that the development cannot be located in a zone with a lower probability of flooding because there is no site big enough with a connection to the National Grid, the second test for the development to pass is the Exception Test.	No	The Flood Risk considerations are discussed in details in Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10), and Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1).
The Faversham Society	The NPPF advises: 'For the Exception Test to be passed: it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.'	No	The Flood Risk considerations are discussed in details in Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10), and Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1).

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The Faversham Society	In this case, the developers argue that the scheme is nationally necessary because of the amount of essential infrastructure it provides and that because of this it has a wider sustainability benefit outweighs the flood risk. In order to achieve this, the solar farm has been designed so that the non-critical elements of the development are flood resilient (the solar panels raised up above the flood level) and the critical elements are flood resistant (surrounded by a bund) and there are evacuation plans for all personnel at construction and operation stages. Further, there would not be any increase in flood risk elsewhere as a result of the development. The Faversham Society comments that because the site is in a flood zone with parts of the site vulnerable to a 1 in 100 year flood the design of the solar farm includes panels that will have to be raised so that the base of each panel is above ground level to an extent that it avoids the flood level, hence the overall height of the panels would be significantly higher than could be the case elsewhere to the detriment of the wider environment of the site. The panels would be 3-4 metres high and could be more if raised above the flood level.	No	The Flood Risk considerations are discussed in details in Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10), and Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1).

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7 Landscape and Visual Impact Assessment			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Canterbury City Council	Landscape and Visual Impact Assessment KCC commissioned Land Use Consultants (LUC) to review the LVIA and Canterbury City Council agree with the overall conclusions and recommendations of their report. The view that the assessment does not acknowledge the scale and extent of the project is considered to be a fundamental issue.	Yes	LUC comments have been addressed based on LUC comments and Environmental Statement (document reference number 6) texts reflects this where appropriate. A full response to LUC comments can be found in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) which is supported by Environmental Statement, Technical Appendices: S42 Consultation Comments (document reference number 6.4.7.6).

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CPRE Kent	1. Landscape CPRE's mapping of both dark skies1 and tranquillity2 reveals the application site scores well on both counts. As tranquil landscapes and the enjoyment of dark skies are being continually eroded by the development pressures facing the south east, we believe that measures must be taken to maintain and enhance such highly valued features where they exist. This proposal will only detract from both. Indeed, Swale Borough Council has used CPRE's tranquillity mapping data to formulate policies which seek to ensure that the impacts of development (including renewable energy) on tranquillity are 'minimised and mitigated'.	Yes	This has been developed in the Environmental Statement (document reference number 6) design stages in removal of panels in Field Y and J. Consideration on lighting and where this is located and operation times. Lighting as part of the design has been kept to a minimum to minimise effects. Details of lighting and when lighting is proposed to be used is discussed in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). It is reported in the text that the development will have visual impacts but through design of the panel layout and mitigation measures will assist in some degree of screening. This is covered in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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CPRE Kent	The application site is an AHLV and is by any consideration a valued landscape. If permitted, this project would have a catastrophically negative landscape impact on the existing Saxon Shore Way and the proposed route of the Whitstable to Iwade section of Natural England's coast path, industrialising the route for a length of some three miles. This section of the coast path is one of the relatively few which will follow the top of the sea defences, affording the path's users extensive views both inland towards the Downs and out across the estuary	No	It is reported in the assessment that the site is within Graveney Marshes AHLV and that there are effects on users of the Saxon Shore Way and other PRoW. These are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and supporting Appendices Environmental Statement, Technical Appendices (document reference number 6.4.7.1-7).
CPRE Kent	The solar installation would be a highly visible industrial intrusion in an otherwise open and natural landscape, and attempts at visual screening can only create an alternative incongruous element in that same landscape. To dismiss the visual impact of this development on this part of the Graveney Marshes as 'horizontal and low-lying' particularly in its proximity to the (very much smaller) existing sub-station is disingenuous given the significant extent of its zone of visual influence.	Yes	Text amended to reflect the development extent in length. Mitigation screening has been developed to provide screening where possible that is in keeping with the existing landscape characteristics and planting in that area. For example, not planting hedgerows or trees on the northern part of the development, along the Saxon Shore Way has been reflected in planting grasses and scrub type habitats. Mitigation proposed is illustrated and reported within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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Faversham Footpath Groups	4. The Graveney marshes are a very special area, with a beauty that largely lies in the ability of the eye to take in, especially from the coast path, huge horizons, both out to sea and across the flat landscape. People do not generally walk these paths to get from A to B, as they might do in some other areas. They go there primarily to enjoy the wonderful views, the open, unspoilt nature of the land and the glimpses of its wildlife, including scarce raptors such as marsh harriers, short-eared owls and merlins and other rare species such as little terns. The special nature of this area is recognised by the various wildlife designations given to neighbouring sites and to the popularity of the coastal path from Seasalter round to Faversham, which already forms part of the Saxon Shore Way and which will soon become part of the England Coast Path.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the existing open nature and characteristics of the site. The public rights of way within and around the site and these are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers public right of way and the user experience. Ecology and ornithological elements are reported in Environmental Statement, Chapter 8 Ecology and Chapter 9: Ornithology (document reference number 6.1.9), respectively.

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Faversham Footpath Groups	6. It is important to stress that the visual impact will not just be apparent to those walking the coast path adjoining the development but from many miles around, including even from the high ground at Harty on the Isle of Sheppey. This is because the landscape is so flat and contains very few trees to provide any sort of mitigation of its impact. Indeed, the scale of the project and the fact that the solar complex would be in low-lying land would, in any case, almost entirely obviate any serious attempt to lessen its visual impact.	No	Consideration from views of the Isle of Harty have been considered in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Mitigation and enhancement measures have been considered in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). Mitigation measures have considered the existing landscape characteristics to ensure planting is in keeping with existing planting and its current surroundings.
Ramblers Local Footpaths Officer for Graveney with Goodnestone and four other parishes in the vicinity	I wish to register my objection to the proposed solar park. It would have a hugely detrimental effect on the visual amenity of walkers on the Saxon Shore Way and on other public footpaths in the area.	No	Visual effects are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and consider effects on the Saxon Shore Way and footpaths within and around the site.

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Graveney with Goodnestone Parish Council	6. Landscape and Visual Impact Assessment Most of the land of Swale Borough – including the CHSP site – is within the Greater Thames Estuary Natural Area, whose key characteristics, as defined by Natural England, include	No	This area is included within the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Graveney with Goodnestone Parish Council	· Predominantly flat, low-lying coastal landscape where extensive open spaces are dominated by the sky, and the pervasive presence of water and numerous coastal estuaries extend the maritime influence far inland.	No	No comment required.
Graveney with Goodnestone Parish Council	· Coastline of major geomorphological interest for its coastal processes. Accretion of material carried by the sea from the north recharges intertidal coastal habitats, which are subject to coastal squeeze from rising sea levels.	No	No comment required.
Graveney with Goodnestone Parish Council	· Open grazing pastures patterned by a network of ancient and modern reed-fringed drainage ditches and dykes, numerous creeks and few hedges or fences, with tree cover a rarity.	No	No comment required.
Graveney with Goodnestone Parish Council	· Traditional unimproved wet pasture grazed with sheep and cattle combined with extensive drained and ploughed arable land protected from floods by sea walls, with some areas of more mixed agriculture on higher ground.	No	No comment required.

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Graveney with Goodnestone Parish Council	· Strong feelings of remoteness and wilderness persist on extensive salt marshes, mudflats and reclaimed farmed marshland, which support internationally important plants, invertebrates and populations of breeding and overwintering birds, notably overwintering Brent geese.	No	No comment required.
Graveney with Goodnestone Parish Council	· Some of the least settled parts of the English coast with numerous small villages and hamlets on higher ground and marsh edges reflecting medieval patterns and the coastal economy.	No	No comment required.
Graveney with Goodnestone Parish Council	· Highly urbanised areas within London and on marsh edges subject to chaotic activity of various major developments including ports, waste disposal, marine dredging, housing regeneration, mineral extraction and prominent power stations plus numerous other industry-related activities.	No	No comment required.
Graveney with Goodnestone Parish Council	The CHSP site is identified as an “area of high landscape value” at the county-wide level and this is carried forward in protective local planning policies in the Swale Local Plan, particularly policy DM24.	No	Area of High Landscape Value and Swale Local Plan policies are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Graveney with Goodnestone Parish Council	Notwithstanding the assessment of landscape and visual impact in chapter 7 of the PEIR, no amount of sophisticated methodology and analysis can avoid the simple fact that the CHSP will utterly transform the character and appearance of the landscape of Graveney Marshes.	No	Landscape and visual impacts are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Graveney with Goodnestone Parish Council	Over an area approximately 4km by 2km in extent, the CHSP proposals would obliterate the current open rural area of arable farm land and coastal grazing marsh with long horizons and big skies. The proposals will replace it with densely packed and orderly ranks of metal mounting structures with solar arrays (up to 3.9 metres above ground level), inverters, transformers and an – as yet unclear – large battery storage facility, all surrounded by a high wire fence and security cameras. Parishioners fear that such utilitarian development, on such a large scale, will "industrialise" the countryside.	No	The solar panel areas include 232 ha (approximately 2.3 square kilometres), not the 8 square kilometres as referred to. The fencing deer fencing proposed is 2m high with security camera height is 3m high. These are reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) along with the dimensions of all equipment associated with the Development. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) acknowledges that there is a loss to arable farm land and assesses the landscape and visual impacts associated with the development.
Graveney with Goodnestone Parish Council	Our earlier comments about "method driving conclusions" apply especially to this chapter of the PEIR, which frequently asserts that landscape and visual impacts are "minor" or "negligible". We do not accept the conclusion in the PEIR non-technical summary that "the overall effects of the development on landscape and visual amenity are limited to a small geographical area and a small number of receptors". One of the features of the local landscape is that even modest elevations like Broom Street and Cleve Hill (or even the sea wall) open up very extensive vistas to long horizons.	No	The assessment in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), has been undertaken using Guidelines for Visual Impact Assessment 3rd Edition. The methodology and approach are set out in this Chapter. The assessment is also found in this chapter and supporting tables are found in Environmental Statement, Technical Appendices: Assessment of Potential Landscape

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			Effects (document reference number 6.4.7.2) and Technical Appendices: Assessment of Potential Visual Effects (document reference number 6.4.7.3).
GREAT Graveney	1. **Landscape and Visual Impact Assessment**	No	No comment required.
GREAT Graveney	The land proposed for development falls within the Greater Thames Estuary Natural Area. This forms part of the area that has been identified by Kent as an "area of high landscape value". This is also reflected in the protective local planning policies in the Swale Local Plan (DM24).	No	Area of High Landscape Value and Swale Local Plan policies are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
GREAT Graveney	The addition of the proposed development would obliterate the extensive open spaces and vast horizons that have been here for hundreds of years and it would transform the character and appearance of the landscape of the Graveney Marshes beyond recognition for this and future generations. The existing farmland would be replaced by solar panels that are arranged in a roof formation with batteries, a substation, bunt, transformers, inverters, fencing and security	No	The fencing deer fencing proposed is 2m high with security camera height at 3m. These are reported in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) along with the dimensions of all equipment associated with the Development. The Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) acknowledges

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	cameras scattered among the site --- and become an alien landscape.		that there is a loss to arable farm land and assesses the landscape and visual impacts associated with the development.
GREAT Graveney	These marshes support internationally important plants, invertebrates and populations of breeding and overwintering birds, nationally important invertebrate collections and key populations of rare invertebrate species. As a result, there are many environmental opportunities for this area (defined by Natural England) and we ask the developers of CHSP how they would embrace these:	No	The Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) set out the baseline, effects and mitigation with respect to ecology and birds, and the Landscape and Biodiversity Management Plan is presented in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
GREAT Graveney	GREAT asks:	No	No comment required.

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GREAT Graveney	· What measures will the developers adopt to maintain and enhance the expansive, remote coastal landscape with its drowned estuaries, low islands, mudflats, and broad tracts of tidal salt marsh and reclaimed grazing marsh whilst maintaining internationally important habitats and their wildlife, and underlying geo- diversity, and at the same time addressing the impacts of coastal squeeze and climate change and considering dynamic coastal processes?	No	An area of 57 hectares in the eastern part of the site is proposed to be managed to provide habitats for a number of bird species. The Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2), sets out measures and species that are to be built into the design to encourage new habitats.
GREAT Graveney	· How will the developers work with the farmer to incorporate measures to improve biodiversity, geo-diversity, pollination, water quality, soil quality and climate adaptation to prevent soil erosion in this important food providing landscape, while maintaining its historic character?	No	Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2), sets out measures and species that are to be built into the design to encourage new habitats. Hydrology effects are assessed in the Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10), with mitigation of effects proposed as required.

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GREAT Graveney	· How will the developers ensure that the tranquil and remote character of the estuary is maintained by conserving and enhancing important coastal habitats and distinctive historic and geological features, while providing increased opportunities for recreation and enjoyment of the landscape?	No	Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) sets out that biodiversity of the site is expected to increase as a result of the Development. As part of the scheme there are a number of grassland habitats that are been created, replacing the current arable farmland. These are documented in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2), which also sets out measures built into the design to encourage new habitats. An area of 57 hectares in the eastern part of the site has not been developed which will continue as grazing marsh and provide habitats for a number of bird species. Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11) assesses historical features and proposes mitigation as appropriate. All existing public rights of way which run through the site or close to the site all remain. There is a new permissive path which is created in the eastern part of the site, facilitating circular

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			walks and increasing the opportunities for recreation.

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GREAT Graveney	· What strategies will the developers use to encourage a strategic approach to their development that is informed by, and makes a positive contribution to, the local character, incorporates green infrastructure - which provides ecosystem services where they are needed most - and promotes recreation and addresses climate change, while maintaining important open mosaic and coastal habitats, and historic and geological features?	No	Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) sets out that biodiversity of the site is expected to increase as a result of the Development. As part of the scheme there are a number of grassland habitats that are been created, replacing the current arable farmland. These are documented in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2), which also sets out measures built into the design to encourage new habitats. An area of 57 hectares in the eastern part of the site has not been developed which will continue as grazing marsh and provide habitats for a number of bird species. Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11) assesses historical features and proposes mitigation as appropriate. All existing public rights of way which run through the site or close to the site all remain. There is a new permissive path which is created in the eastern part of the site, facilitating circular

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			walks and increasing the opportunities for recreation.
GREAT Graveney	The chosen area is open and does not have hedges, trees, an orchard, security systems or fencing to screen this unique landscape. The use of screening cannot diminish against the visual pollution that the proposed solar power station would bring. Graveney does not have any industry and this proposal would turn 890 acres plus into an industrial zone. The assessments in the PEIR states that that the landscape and visual impacts are “minor” or “negligible” - we regard this as a predetermined outcome of a formulaic approach which has been applied in a subjective manner to achieve a pre-determined outcome.	No	Mitigation proposals set out in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2), do not entirely screen the development as mitigation planting needs to be in keeping with the surrounding landscape character. The assessment is based on Guidelines for Landscape and Visual Impact Assessment.

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GREAT Graveney	GREAT asks:	No	No comment required.
GREAT Graveney	· How will the developers ensure that the health and wellbeing of the villagers is not adversely affected by the change of use of this vast area?	No	A health impact assessment is included within the Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17). This refers to specific technical assessments and mitigation referenced elsewhere in the Environmental Statement (document reference number 6).
Kent County Council	Chapter 7: Landscape and Visual Impact Assessment	No	No comment required.
Kent County Council	KCC commissioned Land Use Consultants (LUC) on behalf of Swale Borough Council, Canterbury City Council and KCC to undertake a review of the Landscape and Visual Impact Assessment (LVIA) submitted as part of the PEIR.	No	No comment required.
Kent County Council	In summary, the review does not consider the PEIR to represent a robust assessment of the landscape and visual effects of the proposed development. There are several areas identified as lacking clarity, such as issues relating to the assessment methodology, baseline, mitigation and potential effects. KCC requests that these are addressed for the final Environmental Impact Assessment (EIA) report.	Yes	Text and assessment have built in comments made by LUC throughout Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council	The LVIA does not acknowledge the scale and extent of the proposed development, and the effect that it may have on the key characteristics of remoteness and openness in the area. The development is repeatedly compared to features such as pylons and an existing substation, which are of a different form and scale. The full LVIA review is appended (appendix 1).	Yes	Text has been amended based on detailed comments provided by LUC and acknowledges scale and extent of the development. This is report in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Introduction	No	No comment required.
Kent County Council Appendix 1	1.1 LUC was commissioned by Kent County Council (KCC) to undertake a review of the landscape and visual impact assessment (LVIA) contained in the Preliminary Environmental Information Report (PEIR) submitted for the Cleve Hill Solar Park.	No	No comment required.
Kent County Council Appendix 1	1.2 This review is based on an appraisal of these documents, and has been undertaken by Chartered Members of the Landscape Institute at LUC. No site work was undertaken, although our conclusions are informed by our familiarity with the area through current work for Swale Borough Council.	No	No comment required.
Kent County Council Appendix 1	The Solar Park Development	No	No comment required.

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Kent County Council Appendix 1	1.3 The proposed Cleve Hill Solar Park is described in full in Chapter 5 of the PEIR. Key parameters of relevance to LVIA include:	No	No comment required.
Kent County Council Appendix 1	· Total site area of 492.3 hectares (ha), of which 387.6 ha is arable land, where the development will take place (although the actual area of solar panels is not clearly stated);	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· Around 2,900 'tables' or solar panels, each approximately 28m by 25m and with a maximum height above ground level of between 3m and 3.9m, to allow for flood clearance;	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· The tables will be arranged across 26 'fields' across the development site;	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· 72no transformers across the site, each 8.2m by 2.3m, and 3m high, typically coloured green;	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5:

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			Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· An electrical compound of 325m by 250m, surrounded by a soil bund around 20m across and between 3.3m and 4.8m above ground level, and containing:	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	a substation, with various components up to 12.8m high; and	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	an electricity storage facility that occupies over half of the compound area, and comprises modules up to 2.2m high;	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· 15 km of 2m high deer fencing (timber and stock netting) enclosing the operational area;	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5:

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			Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· Around 240 CCTV cameras on 3m poles;	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· Lighting will be limited to the substation and transformers, and will be sensor-activated;	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· A stone 'spine road' of around 2.8km in length will provide the main access, with other access via existing farm tracks or grassed tracks; and	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	· The development site will be grazed by sheep during operation.	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) and is reported in Environmental Statement, Chapter 5:

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			Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	1.4 Embedded mitigation measures are described, including:	No	No comment required.
Kent County Council Appendix 1	· Existing public rights of way through the site will be retained;	No	Noted and no changes to the PEIR text were required prior to finalising the Environmental Statement (document reference number 6).
Kent County Council Appendix 1	· A habitat management area will be established, comprising 41 ha of arable land and 37.1 ha of freshwater grazing marsh – details of this area are set out in Appendix 5.2;	No	The PEIR text has been updated following the design changes during the Environmental Statement (document reference number 6) stage and is reported in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
Kent County Council Appendix 1	Other landscape proposals include:	No	No comment required.
Kent County Council Appendix 1	establishment of 3.52 km of native-species hedgerows, containing 554 native trees, in the southern part of the development;	No	Following design changes from PEIR to Environmental Statement (document reference number 6) there has been some change to the areas of mitigation. Revised quantities of hedgerows and hedgerow trees are found in the Environmental Statement, Technical

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			Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) and illustrated in Environmental Statement, Figures: Figure A5.2 (document reference number 6.2).
Kent County Council Appendix 1	establishment of 1.3 ha of native woodland shelterbelt in the southern part of the development;	No	Following design changes from PEIR to Environmental Statement (document reference number 6) there has been some change to the areas of mitigation. Revised quantities of hedgerows and hedgerow trees are found in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) and illustrated in Environmental Statement, Figures: Figure A5.2 (document reference number 6.2).
Kent County Council Appendix 1	establishment of 1.5 ha of native woodland on the bund around the electrical compound; and	No	Following design changes from PEIR to Environmental Statement (document reference number 6) there has been some change to the areas of mitigation. Revised quantities of hedgerows and hedgerow trees are found in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) and illustrated in

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			Environmental Statement, Figures: Figure A5.2 (document reference number 6.2).
Kent County Council Appendix 1	establishment of 4.3 ha of native species scrub along the northern edge and south eastern corner of the development.	No	Following design changes from PEIR to Environmental Statement (document reference number 6) there has been some change to the areas of mitigation. Revised quantities of hedgerows and hedgerow trees are found in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) and illustrated in Environmental Statement, Figures: Figure A5.2 (document reference number 6.2).
Kent County Council Appendix 1	1.5 The LVIA is included in Chapter 7 in Volume I the PEIR, and in appendices 7.1 to 7.5. Supporting figures are included in Volume II, with viewpoint photography and visualisations in Volume IIB.	No	No comment required.
Kent County Council Appendix 1	Scope of the LVIA	No	No comment required.

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Kent County Council Appendix 1	1.6 The proposals are briefly summarised at 7.1.1, although this does not refer to the unusually large extent of the development, which we consider is of particular relevance to the LVIA and could be highlighted more explicitly here.	Yes	Text has been added to Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.1.1 (document reference number 6.1.7).
Kent County Council Appendix 1	1.7 Scoping and consultation responses are set out in detail in Table 7.1. The second column of this table, headed 'Type and Date', is incomplete, and it is therefore difficult to tell when the comments recorded were made, and whether any follow-up consultation was carried out after the Scoping Opinion was received. For example, the Planning Inspectorate recommend "Consultation with the local planning authorities to discuss and agree the final selection of representative viewpoints and photomontages for the inclusion in the ES" (page 7-7). However, it is not clear if this consultation has taken place, or whether this is being done as part of the PEIR.	Yes	The Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), Table 7.1 includes a completed second column and when consultee comments were made. Consultation on viewpoints was undertaken at scoping and PEIR. Viewpoints that consultees have requested to be considered have been included, such as Whitstable Harbour and Kent Downs AONB. These viewpoint photographs are found in the Environmental Statement, Volume 3: Visualisations, Viewpoints (document reference number 6.3.1).
Kent County Council Appendix 1	1.8 Notwithstanding this, the responses to each consultation point are positive in tone, and refer to information that has been provided within the PEIR, and in some cases where further information will be provided in the ES (such as in relation to summer time photography).	No	As planned, summer visualisations have been undertaken and are found in Environmental Statement, Volume 3: Visualisations, Viewpoints (document reference number 6.3.1).

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Kent County Council Appendix 1	Methodology	No	No comment required.
Kent County Council Appendix 1	1.9 The LVIA methodology is set out in Section 7.2, beginning with a list of 'legislation and guidelines', although only guidance documents are listed.	Yes	Amended to say Relevant Guidelines and Policies in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.10 We question the relevance of the Scottish Natural Heritage guidance on "Assessing the Cumulative Impact of Onshore Wind Energy Developments". A key document for Swale relates to the review of local designations and this should be fully referenced (2003 and 2014 documents).	Yes	SNH Guidance reference removed and other relevant references have been added to Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.11 The methodology presented is aligned with the third edition of Guidelines for Landscape and Visual Impact Assessment ('GLVIA3') which is the appropriate guidance, and generally follows the key steps recommended. We comment below on the detailed application of GLVIA3.	No	No comment required.
Kent County Council Appendix 1	Study area and ZTV	No	No comment required.

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Kent County Council Appendix 1	1.12 It would be helpful to the reader if the study area was defined first, prior to discussion of the site visits and ZTV. In defining the 'Core Landscape Study Area' (paragraph 20) a reference is made to "vegetation changes visible from more than 100 m away". It is not clear how this level of visibility has been determined.	Yes	Study area text has been moved to sit in the report before site visits and ZTV. This can be found in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.2.2 Study Areas (document reference number 6.1.7).
Kent County Council Appendix 1	1.13 Paragraphs 21 and 22 describe a larger study area for landscape effects than for visual effects. In our experience, effects on views are more likely to be significant at greater distances than effects on landscape character.	Yes	Landscape and visual study areas have been amended so they are the same and cover up to 5km. These are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.3 (document reference number 6.1.7).
Kent County Council Appendix 1	1.14 The definitions of a Core Landscape Study Area 100m (CLS), Wider Study Area – 5km and Principal Landscape Study Area (PLS)/LVIA Study Area (2km) is confusing to the reader and greater clarity on the purpose of these areas and how they are used would be helpful.	Yes	Text has been amended to provide greater clarity on these study areas and they are used within the text. This is reported in Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.15 The ZTV is only shown to 2.5km (Figures 7.2 and 7.3), whereas almost all the other figures show the 5km study area. Given that some of the assessment viewpoints are outside the 2.5km area, it would be helpful to see the wider ZTV. We recommend 5km is adopted as an appropriate distance for assessing visual effects as well as landscape.	Yes	ZTV has been re-run to cover 5km for Environmental Statement, Figures: Figure 7.2 and 7.3 (document reference number 6.2).

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Kent County Council Appendix 1	1.16 It is accepted that the 'bare earth' approach to ZTV overestimates likely visibility. The approach described at paragraph 19 (and in Appendix 7.1) seeks to offset this through use of Lidar and modelling of trees: if trees are represented as solid bodies this may lead to visibility being underestimated, particularly in winter. We suggest clarity is sought in relation to how trees are modelled.	Yes	A paragraph has been added to Environmental Statement, Technical Appendices: LVIA Assessment Methodologies and in Paragraph 24 (document reference number 6.4.7.1), in relation to how the purchased National Tree data is modelled. This can be found in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Impact assessment methodology	No	No comment required.
Kent County Council Appendix 1	1.17 As a general point, this section is occasionally repetitive, for example paragraphs 49 and 50 repeat earlier paragraphs unnecessarily. The applicant should be asked to thoroughly proof-read the EIA Report to check for repetition/inconsistencies.	Yes	Reference to susceptibility twice in the text has been removed. Updated text is found in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Sensitivity	No	No comment required.
Kent County Council Appendix 1	1.18 The LVIA uses the correct definition of sensitivity considering susceptibility and value, although we comment on its application in practice.	No	No comment required.

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Kent County Council Appendix 1	1.19 At paragraph 30 it is stated that sensitivity assessment was undertaken "in consultation with statutory consultees and local interest groups", and "alongside other technical studies, principally ecology and cultural heritage". This section presents no evidence of stakeholder engagement, or how other technical disciplines have influenced the sensitivity assessment. We suggest confirmation is sought from the applicant on how this has been undertaken in practice.	Yes	Reference to this text has been removed from Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Reference to design evolution to reduce impact on sensitive receptors is reported in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) and meetings with statutory consultees which have been consulted are reported in the Consultation Report (document reference number 5.1).
Kent County Council Appendix 1	1.20 The assessment of landscape value is particularly unclear (para. 36 onwards). Two separate sets of criteria are presented for designated and undesignated areas in Tables 7.2 and 7.3 respectively. The former appears to be assessing 'importance', which is not a term defined in GLVIA3. This two-stage assessment is not an appropriate approach. We comment on the application of this approach below.	Yes	Reference has been removed to importance in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Table 7.2 and 7.3 (document reference number 6.1.7). The assessment table of Value has been modified and is set out in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council Appendix 1	1.21 GLVIA3 recommends that landscape designations are the 'starting point' for understanding landscape value. The criteria in Table 7.3 (taken from Box 5.1 in GLVIA3) can be applied more generally, with the presence of designation being an additional consideration. The assessment of landscape value also makes no reference to the European Landscape Convention, which attaches value to all landscapes. (Clearly, the site in question is a locally designated landscape as identified in the baseline and Table 7.2). We recommend that the applicant is asked to reconsider this aspect of the methodology.	Yes	Reference has been made to the European Landscape Convention in the value element in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Table 7.2 (document reference number 6.1.7). Box 5.1 in GLVIA was used to assess landscape value in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, section 7.2.6 (document reference number 6.1.7) to determine the value of the site and we have now referenced this accordingly in the methodology section.
Kent County Council Appendix 1	1.22 In assessing landscape susceptibility, it would be useful if Table 7.4 gave some clearer parameters on the factors which might affect susceptibility and make a landscape more or less able to absorb the development. The criteria also include an emphasis on views. And we note that landscape character sensitivity does not rely on views/visibility.	Yes	Reference to visual effects is removed from Table 7.4, which is now presented in Table 7.3 of Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.23 The criteria for assessing the value attached to views (Table 7.6) and visual receptor susceptibility (Table 7.7) look to be appropriate.	No	No comment required.
Kent County Council Appendix 1	1.24 Sensitivity: Tables 7.5 and 7.8 appear quite rigid in the approach to combining value and susceptibility to define sensitivity: we would encourage a more flexible approach informed by professional judgement.	Yes	The Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) includes the approach to sensitivity in Tables 7.5 and 7.8 and the

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			assessments are balanced by professional judgement.
Kent County Council Appendix 1	Magnitude of change	No	No comment required.
Kent County Council Appendix 1	1.25 The assessment of magnitude of landscape change is correctly broken down into evaluation of size and scale, geographical extent, duration and reversibility. However, the presentation of these as separate factors is not clear. For example, Table 7.9 defines categories of size/scale of change, but includes geographical extent, duration and reversibility in its descriptions. Nature of effect, described at paragraph 55, is not a factor in assessing magnitude. The criteria in Table 7.9 that refer to size/scale are appropriate. Those for geographical extent in Table 7.10 are somewhat vague and it is difficult to know what 'under consideration' means in practice. We recommend that the applicant is asked to reconsider this aspect of the methodology.	Yes	The reference to nature of effect in paragraph 55 has been removed from the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). The reference to under consideration has been removed, and text amended in Table 10 Geographical extent table in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.26 In defining 'reversible' effects, paragraph 62 uses the example of a quarry, though this is one of the least reversible forms of development. A better example might be a semi-permanent structure such as a wind turbine that can be fully removed.	Yes	Paragraph amended, this is reflected in Paragraph 69 Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council Appendix 1	1.27 The approach to assessing magnitude of visual change is more clearly set out and the criteria are generally appropriate. The way that geographical extent is brought in to the overall assessment in Table 7.15 is potentially confusing, and there is no reference in this table to duration or reversibility. This should be reviewed by the applicant.	Yes	Text has been added to include duration and reversability, these are set out in Table 7.15 of Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Significance	No	No comment required.
Kent County Council Appendix 1	1.28 The assessment of significance is made with reference to a matrix presented in Table 7.16. Only those effects assessed as 'major' or 'moderate-major' will be considered 'significant'. We note that this is inconsistent with the assessment sections, where moderate effects are reported as significant. We comment further on this in our review of the assessment. As a side note, it is recommended that the left axis of this table is titled landscape and visual receptor sensitivity (not visual sensitivity).	Yes	Text has been amended to contain moderate, and left axis of table has been titled landscape and visual receptor sensitivity. These are updated in Table 16 and in Section 7.2.9 of Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.29 Paragraphs 76 to 78 provide further criteria for the identification of significant effects. The applicant should be asked to clarify whether criteria are being used, or if the matrix is being relied on, or whether a combination of the two is applied.	Yes	Text edited to clarify the criteria used for the identification of significant effects, this is updated in Section 7.2.9 in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council Appendix 1	1.30 The section on cumulative assessment (7.2.11) covers baseline scenarios and types of cumulative effect, but does not present any methodology for assessing magnitude of cumulative change.	Yes	Cumulative sites are assessed in line with section 7.2 Assessment Methodology in terms of Magnitude; however further clarification will be provided within chapter 7 of the ES.
Kent County Council Appendix 1	Viewpoints and visualisations	No.	No comment required.
Kent County Council Appendix 1	1.31 Section 7.2.10 describes the approach to viewpoint selection and visualisations. There is no reference to consultation in this section. There are also several sentences referring to the PEIR in future tense. Paragraph 84 notes that visualisations were prepared for nine of the viewpoints, but does not describe the approach to selecting which viewpoints would be treated in this way. It is not understood what is meant by a "survey of visual reference points" in this paragraph.	Yes	The text has been revised to incorporate consultation at scoping and PEIR stages and the reason for selection reference. The reference to a survey of visual reference points has been removed. This is found in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.2.10 (document reference number 6.1.7).
Kent County Council Appendix 1	1.32 Appendix 7.1 presents a brief technical method for photography and photomontage. The approach described is broadly appropriate, though we note redundant references to wind farm modelling and "Highland Council single frame imagery" that suggest this may be a standard appendix that has not been fully adapted for the present purpose. This should be tightened up in the final EIA report, to provide clarity and confidence for readers.	Yes	The reference to the Highland Council has been removed from Environmental Statement, Technical Appendices: LVIA Assessment Methodologies (document reference number 6.4.7.1).

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Kent County Council Appendix 1	Summary	No.	No comment required
Kent County Council Appendix 1	1.33 Overall, the methodology follows GLVIA3 and appropriately breaks down the assessment process into its component parts. The assessment criteria and thresholds are generally appropriate. However, there are areas that lack clarity, particularly the approach to assessing landscape value and the approach to assessing the size and scale of landscape effects. The methodology is relatively rigid when it comes to combining the different components.	Yes	The text has been reviewed and amended based on the consultee comments on methodology and these are reflected in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Baseline	No	No comment required
Kent County Council Appendix 1	Landscape planning policy context	No	No comment required
Kent County Council Appendix 1	1.34 The baseline section begins with a review of planning policy context. It is stated at paragraph 91 that “The site has no specific landscape designation”. However, Figure 7.8 in Volume IIA of the PEIR clearly shows that the site is entirely covered by an Area of High Landscape Value (AHLV). This AHLV is identified as ‘Kent Level’ in the Swale Borough Local Plan, i.e. it is of county-	Yes	The text has been amended to reflect this in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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	level importance. There are several further AHLVs within the 5km study area		
Kent County Council Appendix 1	1.35 These AHLV designations are identified in the review of local plan policy, which quotes policy DM24 on 'designated landscape areas' (paragraphs 100-102). However, their status as landscape designations should be clearly stated at paragraph 91 and this is a major omission in the PEIR.	Yes	Reference to this has been made in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.3.11 (document reference number 6.1.7).
Kent County Council Appendix 1	1.36 Paragraph 91 does mention the Kent Downs AONB, but makes no reference to the special qualities of the AONB, or the relationship between the AONB landscape and the site area. It is also noted that the country parks listed at paragraphs 92 and 93 do not appear on Figure 7.8.	Yes	Reference has been made to the special qualities of the AONB in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.3.1.1 (document reference number 6.1.7).
Kent County Council Appendix 1	Landscape baseline	No	No comment required

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Kent County Council Appendix 1	1.37 The review of landscape character information (7.3.2 to 7.3.4) appears to be comprehensive in scope. The review of the Swale Landscape Character and Biodiversity Appraisal quotes key characteristics for a large number of character areas, but omits reference to relevant guidelines, such as “Conserve the undeveloped and distinctive character of the marshland, to maintain the integrity of the wider North Kent Marshes” and “Seek opportunities to restore coastal grazing marsh.... Where intensive arable production currently exists” (SLCBA page34 ‘5. Graveney Marshes’). The LCA text also references relevant and useful detail such as an ‘inaccessible landscape’, ‘sense of remoteness’ and ‘panoramic views’ which are relevant to the overall assessment.	Yes	Text has been added from the conserve and restore sections into LCA, in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.3.2 (document reference number 6.1.7).
Kent County Council Appendix 1	1.38 The description of the local landscape context at 7.3.5 appears to be accurate and comprehensive, although it is not clear what is meant at para. 182 that states that “The character is incongruous with the surrounding landscapes due to the scale of its land use, and its simplicity”. The meaning here should be clarified as the CLS area is an integral part of the wider Kent Marshes as evidenced in the LCA and the Local landscape Designation and cannot be described as incongruous.	Yes	Reference to "incongruous" has been removed and rephrased in paragraph in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council Appendix 1	1.39 The landscape value of the site is assessed at 7.3.6. We comment above on the unclear methodology for assessing landscape value, and also the oversight of the local landscape designation, an error that is repeated at paragraph 183 which wrongly states that "neither the CLS Area nor its immediate vicinity is included within a statutory or non-statutory landscape designation".	Yes	The Kent Level Area of High Landscape Value has been included in the text as a non-statutory designation and the values is judged as medium. This is reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.40 The site area is stated to be of "local importance and medium value". As previously noted, only one assessment should be made. We note that Table 7.2 Landscape Value Criteria lists local landscape designations as being of 'regional' importance and high/medium value.	Yes	Table removed as site is in a high landscape value area and one assessment is made. Text has been updated in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.41 Table 7.17 presents an assessment against each of the criteria from Table 7.3 Assessing the Value of Non-Designated Landscapes. Ideally the LVIA would present a single judgement of landscape value, based on landscape attributes and the presence of landscape designations. The assessment of landscape value in this LVIA is unclear. No assessment of landscape value is made for any area outside the Core Landscape Study Area.	Yes	Box 5.1 GLVIA is used to determine landscape value and this is now referenced accordingly in the methodology section. Each landscape has been assessed based on the qualities defined in the prescribed character assessments and box 5.1 has been used to confirm value throughout the assessment in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council Appendix 1	Visual baseline	No	No comment required
Kent County Council Appendix 1	1.42 The description of residential receptors appears to be accurate, but is not cross-referenced to the RVAA. Travelling receptors are also noted, including boat users. There is no reference to the ZTV in these paragraphs.	Yes	The Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5) is cross referenced in the relevant sections of the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). References to the ZTV have been included in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.43 At 7.3.10 it is noted that 21 representative viewpoints have been selected, but there is no list of their location, distance from the site, or reasons for selection. Photomontages are provided for nine of these viewpoints, though with no explanation of how they were selected from the main list and the different types of receptor they are representing (although some information is provided in the visual assessment of effects). This is required in the final EIA. We note that these views are all representative views and no specific or illustrative views are included. This is appropriate, although readers might find it helpful to have an illustrative view to	Yes	A table of viewpoints and photomontages is included to give reasons for the selection and distance from site of viewpoints as set out in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment Section 7.3.10 (document reference number 6.1.7). Lighting reflection is shown on the photomontages based on the angle of sun and time of year and day. This is particularly present on viewpoints 2 and 3 where the receptors see the visualisations from an elevated position

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	demonstrate glare (or an explanation of how it is covered in the photomontages).		where glare will be most prevalent. An additional montage has also been produced within the site (VP22), following PEIR which will also help to demonstrate glare. An assessment of glint and glare effects is provided in Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17).
Kent County Council Appendix 1	1.44 The RVAA (Appendix 7.5) identifies 16 individual properties or groups of properties within 1km, which is reasonable and comprehensive.	No	No comment required
Kent County Council Appendix 1	Mitigation and management	No	No comment required
Kent County Council Appendix 1	1.45 The LVIA describes 'embedded' mitigation that forms part of the proposed development, at Section 7.5. Because this is presented prior to the assessment of effects, the link between impacts and mitigation is not clear. No further mitigation is described following the assessment, and no assessment of residual effects is made, although year 10 effects are reported for visual receptors	Yes	Embedded mitigation has been incorporated into the proposed development as per section 4.21 of GLVIA3 as part of the iterative design process. The effects have then been assessed as recommended in section 4.21 accordingly. The iterative design process description has been elaborated on, in the Environmental Statement,

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			Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), to demonstrate the extensive primary mitigation undertaken to better inform the reader. We have also considered residual effects; however, we feel that there are no further secondary measures that can be implemented without a net adverse effect on the landscape character of the Core Study Area.
Kent County Council Appendix 1	1.46 Proposals for additional hedgerow, woodland and scrub planting are set out, and although these will offer some ecological benefit, their extent in relation to the solar farm is very small, and the landscape benefit is likely to be limited. Some of the aims appear contradictory, such as screening the development while maintaining open views. It is not clear which views across the site to the Swale are considered important. We also query how well this aim has been achieved, with regard to views from Graveney Hill (Viewpoint 6), since the year 10 photomontage shows that long views over the marshes to the Swale would be obscured by mitigation planting.	Yes	We consider that the impact of mitigation planting both ecologically and in visual terms is significant. There is approximately 3.5km of new hedgerow planting, a new woodland, large areas of shelter belt planting, buffer planting and scrub together with large swathes of wildflower and grass seed planting. This connects large disparate areas of vegetation together and creates a strong ecological corridor and low visual screen. In terms of screening the development whilst retaining open views, the context of this is to provide low level screening to remove views of the development whilst retaining views of large skies and wider views to the Isle of Sheppey and the surrounding landscape when viewed from

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			a range of viewpoints, whilst understanding that such viewpoints are representative and receptors experience the landscape in a dynamic way with areas of screening and openness in the current landscape experienced along the existing PROW (VP6 and 7) for instance as well as wider views. Proposed planting also provides a context to more distant views creating a landscape setting for the development through creation of layers within the landscape.
Kent County Council Appendix 1	1.47 It is not clear, for example, how scrub planting on the edge and between solar panels throughout the CLS area will add to the landscape character in this area.	No	The scrub is intended to add to the overall wildness of the area, which is in keeping of the surrounding landscape. It is acknowledged the scrub will not screen the development.
Kent County Council Appendix 1	Assessment of effects	No	No comment required
Kent County Council Appendix 1	1.48 The assessment is presented in Section 7.6, and is backed up by tables setting out separate judgements on sensitivity, magnitude and level of effect, and their components, within Appendices 7.2 (landscape) and 7.3 (visual).	No	No comment required

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Kent County Council Appendix 1	Effects of construction	No	No comment required
Kent County Council Appendix 1	1.49 Construction effects are dealt with briefly, noting their temporary nature. Effects will increase over the construction period towards the level of operational effects, as the number of installed panels increases. Minor effects are predicted for landscape resources and moderate effects are predicted for visual resources. We suggest this would increase over time as the development reaches its final form, at which point the scale of the effects would be the same as for the operational period. Construction effects are not detailed in the appendices.	Yes	An assessment of the Construction and Decommissioning phases of the project has been included and has been assessed in line with the proposed methodology in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Effects on landscape	No	No comment required
Kent County Council Appendix 1	Operational	No	No comment required
Kent County Council Appendix 1	1.50 In the assessment of landscape effects (Appendix 7.2), we would query whether the scale of the effect has been thoroughly considered against the relevant criteria in Table 7.9, since the narrative appears focused on geographical extent, as though the two are interchangeable. There is	Yes	The text has been reviewed and amended to set out scale and keep geographical area separate, in Environmental Statement, Technical Appendices: Assessment of Potential Visual Effects (document reference number 6.4.7.3).

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	little commentary in relation to changes in landscape characteristics in Appendix 7.2.		
Kent County Council Appendix 1	1.51 The landscape assessment in Section 7.6.2 does not always clearly report the level of effect and the significance as separate judgements. Terminology such as “an impact of minor significance”, or “moderate significant effects”, is used, rather than e.g. “a minor impact, which is not significant”. There is even one instance of “minor significant effects” (paragraph 223), although minor effects would not normally be considered significant. This is clearer in Appendix 7.2, where significant effects are indicated in bold text.	Yes	Text has been amended to be consistent through Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.52 The judgements in Section 7.6.2 are also frequently followed by qualifying statements on their duration and extent. According to the methodology, and as set out in Appendix 7.2, these factors are included in the impact assessment, so there is no need to qualify findings on this basis.	Yes	A review of the judgements has been undertaken to ensure no qualifying statements are presented in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.6.2 (document reference number 6.1.7).
Kent County Council Appendix 1	1.53 Paragraph 215 states that year 1 and year 10 assessments have been undertaken, but these are not separately reported either in the rest of Section	Yes	Columns have been added to magnitude to both landscape and visual receptor tables in Environmental Statement, Technical Appendices: Assessment of

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	7.6.2, or in Appendix 7.2. Year 1 and year 10 effects are only reported for visual receptors.		Potential Landscape Effects (document reference number 6.4.7.2).
Kent County Council Appendix 1	1.54 Paragraph 216 to 220 presents the assessment of effects on the Core Landscape Study Area. We agree with the assessment as major (significant), but there are a number of statements that we would query. The development is compared in height with the existing substation and pylons, which are stated to be 'larger'. However, the extent of the development, which is far greater than these existing features, is not mentioned. The development is also described (226) as 'low lying', although with a maximum height of the development of 3m - 3.9m, it is not in itself low lying. There is also little acknowledgement of the loss of remoteness and tranquillity that will result from the development.	Yes	Text has been added to Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) to describe the height and the geographical extent which the development would occupy, along with commentary in relation to remoteness.
Kent County Council Appendix 1	1.55 Effects are then reported separately for each landscape character area. The extent of the development relative to that of the character area appears to be the key determining factor, rather than the effect on key characteristics such as sense of remoteness.	Yes	Text has been added to Section 7.6.2 of Chapter 7 LVIA of the ES to further consider openness and remoteness where such components which contribute to landscape character are considered to be affected by the development. This is further assessed alongside all components which contribute to specific landscape character areas.

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Kent County Council Appendix 1	1.56 In summary, the LVIA reports that the development will result in major and significant effects on the landscape of the Core Landscape Study Area, within the Graveney Marshes LCA. We agree with this judgement of major although it is arguable if it could maintain a sense of openness in this area given the scale of the development.	Yes	The text in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) has been amended to provide clarity in relation to openness in the area, with the Development.
Kent County Council Appendix 1	1.57 Of the other LCAs assessed, only the adjacent Graveney Arable Farmland is predicted to experience significant effects. Minor effects on character will extend across some other LCAs. All effects are stated to be negative, with the exception of the Eastern Swale Marshes Regional LCA, and the Graveney Fruit Farms local LCA, where effects are predicted to 'turn positive over time'. It is not clear why this would happen in these particular areas.	Yes	The reference to effects becoming positive over time have been removed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.58 The AHLV is assessed as a landscape receptor at 7.6.2.6, despite being overlooked in the baseline section. Moderate effects are predicted for the AHLV, and we agree that this would be a significant effect. In our opinion effects here could be described as major rather than moderate as they change the essence of the local landscape designation (open, remote etc.). Again, it is not clear how the effects would become positive over time.	Yes	This has been further considered in the baseline section of the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). It was considered moderate due to the extent of the Area of High Landscape Value against the size of the CLS Area and the components affected by development. The text has been amended to remove reference to "turning positive over time".

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Kent County Council Appendix 1	Decommissioning	No	No comment required
Kent County Council Appendix 1	1.59 The landscape effects of decommissioning (7.6.3) focus primarily on the removal of small areas of mature mitigation planting, rather than the removal of the solar panels and other installations. This leads to the finding of a negative effect. Given the installation of the solar panels is considered to be negative their removal could be interpreted as positive, or at least neutral, returning the landscape to its current condition.	Yes	This statement has been revised to neutral, as the site would restore back to its original state. Updated text is found in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Visual effects	No	No comment required
Kent County Council Appendix 1	Operational	No	No comment required
Kent County Council Appendix 1	1.60 At paragraph 245, it is not clear whether year 5 or year 10 effects are being assessed, although only year 10 is referred to elsewhere.	Yes	This sentence has been removed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.61 Significant effects moderate and above are reported for the National Cycle Network, Saxon Shore Way, PRoW ZR485, PRoW ZR488.	No	No comment required

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Kent County Council Appendix 1	1.62 Effects on residential receptors are reported in the RVAA (Appendix 7.5) and briefly summarised at 7.6.4.2. We comment further on the RVAA below.	No	No comment required
Kent County Council Appendix 1	1.63 In relation to effects experienced by travelling receptors, there is no sense in the narrative of views changing along the course of routes. The assessment for NCN Route 1 focuses on the section on Seasalter Road (viewpoint 5) to the east of the site, but there is no evaluation of the view from the section on Sandbanks Road to the south.	Yes	Narrative text has been added for views along the route and is reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.64 In relation to the Saxon Shore Way, the assessment provides descriptions of changes in view at various points along the route, though it is not stated that the path is directly adjacent to the development for about 4km. It is stated that mitigation planting will reduce effects somewhat, though the year 10 montages for viewpoints 2 and 3 (Figures 7.50 and 7.51) indicate that planting will have no positive effects on these views.	Yes	Commentary on distances has been added to Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.65 The assessment of views experienced along PRoW ZR485, which will pass through the solar panel area, acknowledges that there will be clear open views of the panels, and the sense of containment created, but does not refer to the visual obstruction caused by the panels themselves. Again, it is not clear why these effects would reduce over time.	Yes	The assessment text has been revised to more clearly make these points, in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council Appendix 1	1.66 Paragraph 257 highlights mitigation planting that is intended to screen the development in views from PRoW ZR488, while retaining long views to the Swale. However, Figure 7.53 indicates that mitigation planting will obscure the long views over the flat marshes towards the Swale.	Yes	The assessment text has been amended as the design at Environmental Statement (document reference number 6) has changed from PEIR, most notably proposals for panels have been removed from Field Y. This is reflected in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.67 Views from roads assume that all receptors are of low sensitivity, which may be the case with passing motorists. However, the views from Sandbanks Road and Broom Street are likely to be experienced by recreational walkers and residents, both groups with more of an interest in the view.	Yes	The assessment has been updated to refer to residents and walkers in assessment from these locations. These are reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Summary	No	No comment required
Kent County Council Appendix 1	1.68 The impact assessment generally reports sensitivity, magnitude and the component judgements, though these are only clearly set out in the appendices. Some judgements are given without clear justification. The level of effect is stated in each case, but the significance is not clear due to inaccurate terminology. Effects are inappropriately qualified in many instances.	Yes	Terminology has been amended in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). A full review has been undertaken to ensure clear justification and that the level of effect is stated in each case, together with clarity of significance.

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Kent County Council Appendix 1	Residential visual amenity	No	No comment required
Kent County Council Appendix 1	1.69 The residential visual amenity assessment (RVAA) is presented in Appendix 7.5. The purpose of RVAA is not to assess significance of effects, but to assess whether the effects on any residential property would be so overwhelming that it would become an unattractive place in which to live, as described in Section 2. This latter judgement is beyond the guidance contained in GLVIA3, and bespoke methodology is generally used.	No	No comment required
Kent County Council Appendix 1	1.70 The 1km study area defined at Section 3 is appropriate, as is the approach to identifying and grouping properties.	No	No comment required
Kent County Council Appendix 1	1.71 We note that the Landscape Institute's draft Technical Information Note on Residential Visual Amenity Assessment is subject to change if and when it is finalised.	No	The Landscape Institute's draft Technical Information Note on Residential Visual Amenity Assessment is still in draft format so the same methodology and approach used at PEIR still applies to the Environmental Statement (document reference number 6) stage.

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Kent County Council Appendix 1	1.72 Sections 4.2 to 4.4 set out methodology for judging the significance of effects on views from dwellings. It is not clear why this is needed, or why it is significantly different from the methodology set out in the LVIA Chapter. We note that RVAA findings are reported alongside effects on other receptors in Section 7.6.4, however this may not be appropriate if the methodologies are different.	Yes	The descriptions of the methodology have been revised to ensure continuity between Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), and the Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5).
Kent County Council Appendix 1	1.73 The discussion on sensitivity at paragraph 24 appears to state that all residential receptors are considered to be of high sensitivity. The purpose of the rest of Section 4.2 is therefore unclear.	Yes	The Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5) is broken down into two stages. The first stage assesses groups of properties to understand which properties are likely to experience major effects. We assume that all properties in stage 1 are of high sensitivity (worst case) and take forward to a more detailed assessment only those properties that are likely to experience significant effects. At the second stage we assess those properties likely to have significant effects and assess these in detail, visiting (where consent was granted) the interiors of properties to define which views are affected within the curtilage of the property. This approach is in line with RVAA 'DRAFT' guidance and is used to

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			inform the impact of the property from the proposed development.
Kent County Council Appendix 1	1.74 It is stated at paragraph 26 that "the prescriptive categorising of different parts of the dwelling or curtilage based on use is avoided", and we would agree with this. However, at paragraph 29 a list of higher and lower sensitivity parts of the dwelling and curtilage is set out. We would reiterate GLVIA3 in that sensitivity is applied to receptors (people) not parts of a dwelling.	Yes	We have reviewed the descriptions to clarify that the sensitivity relates to the receptors (people) as opposed to the property or rooms themselves.
Kent County Council Appendix 1	1.75 The approach to magnitude of change is significantly reduced compared to the LVIA, and there is no indication that size/scale, extent, duration and reversibility have been considered. In our view, the LVIA methodology should be followed to determine whether significant effects on views would occur at residential properties.	Yes	The methodology applied in the Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5) has been reviewed and the descriptions revised to ensure consistency between the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and the

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			Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5).
Kent County Council Appendix 1	1.76 The approach to the additional judgement of the RVAA (i.e. whether effects are 'overwhelming'), beyond the scope of GLVIA3, is set out in Sections 4.5 and 4.7. The approach described is appropriate, and the factors influencing the judgement are clearly set out at paragraph 39.	No	No comment required.
Kent County Council Appendix 1	1.77 The assessment set out in Section 5 appears to be reliable in the terms of the methodology described, though we highlight the divergence from the LVIA methodology used elsewhere in the LVIA. In some cases it is not clear whether year 1 or year 10 effects are being reported.	Yes	The methodology applied in the Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5) has been reviewed and the descriptions revised to ensure consistency between the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and the Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5). The distinction between year 1 and 10 will be clarified; together with an assessment of year 5.

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Kent County Council Appendix 1	1.78 The additional RVAA judgement is not reported in the summary Section 5, and there is limited signposting to the assessments that are set out in Section 7. The conclusions at Section 6 therefore appear to be abrupt, but the assessments of significance are described for each property group in Sections 7.1 to 7.18. Only two locations (cluster 5 Nagden and property 6 Warm House) identified for further detailed assessment, due to major/moderate year 10 effects.	Yes	Further signposting has been added between section 5 and 7 of the Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5) to provide greater clarity.
Kent County Council Appendix 1	1.79 These detailed assessments are set out in Sections 7.19 to 7.21, and involve a room-by-room analysis of views. While this presents a high level of detail, there is a more limited sense of effects 'in the round', i.e. the effect on the experience of living in the property, rather than on individual views	Yes	A concluding overview for each property has been provided in the revised Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5) to bring out the effect on the experience of living in the property.
Kent County Council Appendix 1	Secondary, cumulative & combined impacts	No	No comment required
Kent County Council Appendix 1	1.80 Cumulative effects are considered at Section 7.7. Of the 29 cumulative schemes set out in Appendix 7.5, over half are for residential or mixed-use developments. Four are other solar farms, and two are for polytunnels. Paragraph 333 states that 'many' of these developments are not considered in the cumulative LVIA, but it is not stated which ones. The scope of the cumulative assessment is therefore unclear.	Yes	Further clarification is provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council Appendix 1	1.81 As noted above, the methodology for assessing cumulative effects is not clear, and this is apparent in Section 7.7. The sections on landscape character areas are particularly unclear, as it is not stated which other sites are being considered.	Yes	Further clarification is provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.82 The assessment of cumulative visual effects focuses on static receptors, and there is no consideration of sequential effects on views from routes.	Yes	Further clarification is provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	1.83 Overall, the cumulative assessment does not appear to be robust or comprehensive.	Yes	Further clarification is provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Summary and Non-technical summary	No	No comment required
Kent County Council Appendix 1	1.84 Section 7.8 presents a summary of effects, and the same text, with minor modification, appears in Section 7.4 of the NTS.	No	This text has been amended to reflect design changes during the Environmental Statement (document reference number 6) stage and assessment of summer viewpoints.

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Kent County Council Appendix 1	1.85 The summary records that major effects will occur within LCA 5 Graveney Marshes, but notes that effects in other LCAs will be 'limited', despite significant effects being recorded in the Eastern Swale Marshes and Graveney Arable Farmlands areas (Appendix 7.3). Moderate (significant) effects are recorded on the AHLV. Again there is emphasis on the existing infrastructure on site which is not appropriate since they are of an entirely different form and scale.	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.8 (document reference number 6.1.7) has been amended following design changes between the PEIR and Environmental Statement (document reference number 6), and assessments have been revised where required as a result.
Kent County Council Appendix 1	1.86 In relation to visual effects, there is no commentary on the distribution of significant effects, either in terms of distance from the site or the different receptor groups affected. The summary does note the loss of openness around PRoW ZR485, which is not fully explored in the actual assessment.	Yes	Environmental Statement, Chapter 7: Landscape and Visual Impact Assessment, Section 7.8 (document reference number 6.1.7), has been revised to make clearer that there will be a loss to the openness around PRoW ZR485, and to include commentary on the distribution of effects.
Kent County Council Appendix 1	1.87 The overall conclusion is that effects are limited to a small geographical area and a small number of receptors. While it may be the case that significant effects do not extend far beyond the site boundary, the area physically impacted is almost 4 km across: the conclusions appear to overlook the sheer scale of the proposed development. There is a strong reliance in paragraph 355 on the embedded mitigation to integrate the development into local landscape character. Again this appears to	Yes	The concluding text in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment, Section 7.8 (document reference number 6.1.7), has been revised to ensure the scale of the Development is acknowledged. The embedded mitigation proposals will assist to some degree in screening the development over time but it is acknowledged that some areas of the development site will be visible due to the

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	overlook the scale of the solar panels compared to the scale of planting proposed.		open nature of the landscape, particularly to the north of the site, close to the Saxon Shore Way.
Kent County Council Appendix 1	Conclusions	No	No comment required.
Kent County Council Appendix 1	1.88 Overall, we do not consider that the LVIA within the PEIR represents a robust assessment of the effects of the proposed development. There are a number of areas that lack clarity, and we recommend that the Applicant be requested to remedy these items within the final EIA Report.	Yes	Appropriate changes have been made throughout Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) from PEIR to Environmental Statement (document reference number 6) stage of reporting.
Kent County Council Appendix 1	1.89 Within the methodology, there are a number of sources of potential confusion, particularly with regard to landscape value and the magnitude of landscape change. We highlight the inconsistent approach to the AHLV designation which covers the site.	Yes	The methodology has been reviewed and revised where required with regard to landscape value and the magnitude of change, particularly with respect to the Area of High Landscape Value.

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Kent County Council Appendix 1	1.90 The impact assessment does not, in our view, acknowledge the scale and extent of the proposed development, and the effect that it may have on the key characteristics of remoteness and openness in the area. The development is repeatedly compared to features such as pylons and an existing substation, which are of a different form and scale. It is also described as low lying which is not strictly correct – it is of a large horizontal scale but not low lying. There are a number of statements that, while presumably helpful in intent, could be read as disingenuous and potentially as under-reporting the effects.	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) text has been amended in light of the comments, including to acknowledge the scale and horizontal nature of the development and specific reference is made to remoteness and openness.
Kent County Council Appendix 1	1.91 While many of the judgements of effect seem reasonable, these are not backed up by clear narrative evaluations of sensitivity and magnitude, and their components, as recommended in GLVIA3. The cumulative assessment in particular is unclear and cannot be considered robust.	Yes	Chapter 7 LVIA of the ES text has been amended in light of the comments, to clarify further where required.
Kent County Council Appendix 1	1.92 Areas where clarification should be requested are set out below.	No	No comment required.
Kent County Council Appendix 1	Description of development	No	No comment required.

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Kent County Council Appendix 1	· The total area of land that will be covered by solar panels should be clearly stated.	Yes	Reference has been made to the extent and size of the development in Section 7.1.1 in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). More detailed information on the extent of the Development is provided in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).
Kent County Council Appendix 1	Consultation	No	No comment required.
Kent County Council Appendix 1	· The date and source of consultation comments should be clearly stated in Table 7.1.	Yes	Table 7.1 in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) includes the date and source of consultation material.
Kent County Council Appendix 1	Assessment methodology	No	No comment required.
Kent County Council Appendix 1	· We recommend that a 5 km study area be adopted for both landscape and visual effects. This	Yes	A 5km study area has been adopted for landscape and visual effects where appropriate, in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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Kent County Council Appendix 1	would add clarity without introducing additional assessment burden, since viewpoints up to	Yes	A 5km study area has been adopted for landscape and visual effects where appropriate, in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	5 km and beyond are already included;	Yes	A 5km study area has been adopted for landscape and visual effects where appropriate, in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	· The ZTVs should be shown out to 5 km;	Yes	The ZTV has been re-run to 5km and is presented in Environmental Statement, (document reference number 6.1.7).
Kent County Council Appendix 1	· The approach to modelling trees in the ZTVs should be clearly explained;	Yes	A paragraph has been added to Environmental Statement, Technical Appendices: LVIA Assessment Methodologies (document reference number 6.4.7.1) and reference has been made in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) in relation to how the purchased National Tree data is modelled.

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Kent County Council Appendix 1	· The involvement of stakeholders, interest groups and other technical disciplines in the evaluation of sensitivity should be fully explained;	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) has been amended accordingly where required.
Kent County Council Appendix 1	· The approach to identifying landscape value should be reconsidered by the applicant, with reference to GLVIA3, so that designated and undesignated landscapes are considered on the same scale of relative value. Clarity is required in relation to the local landscape designation AHLV;	Yes	Further clarification has been provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	· The approach to assessing magnitude of landscape change is appropriate, but is not clearly presented, and the applicant should be asked to revisit Section 7.2.7 in general in Table 7.9 in particular;	Yes	Further clarification has been provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	· A similar review of Section 7.2.8, in relation to assessing magnitude of visual change, would also be beneficial;	Yes	Further clarification has been provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	· The applicant should clarify that moderate effects are considered significant, in the context of the EIA Regulations: although this is how the assessment is reported, the methodology proposes a higher cut-off at moderate-major;	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) has been amended to clarify that moderate effects may considered significant, subject to professional judgement.

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Kent County Council Appendix 1	· The reasons for using a different methodology in the RVAA for assessing significance of effect on residential properties should be set out, and justification provided that the findings of the two approaches are comparable;	Yes	The methodology applied in the Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5) has been reviewed and the descriptions revised to ensure consistency between the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and the Environmental Statement, Technical Appendices: Residential Visual Amenity Assessment (document reference number 6.4.7.5).
Kent County Council Appendix 1	· A methodology for identifying magnitude of cumulative change, and thereby levels of cumulative effect, should be supplied as part of the EIA Report.	Yes	Further clarification will be provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	Baseline	No	No comment required.
Kent County Council Appendix 1	· The applicant should be asked to include proper acknowledgement of the AHLV that covers the site, as well as other local landscape designations in the study area. If available, the reasons for designating these areas should be discussed in the LVIA, alongside the special	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) makes reference to the AHLV as a designation and qualities of the Kent AONB have been added.

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	qualities of the Kent Downs AONB in so far as they relate to the site area;		
Kent County Council Appendix 1	· The assessments of landscape value should be revisited following review of the methodology;	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) includes revised assessments where required following changes to the design of the Development since PEIR, and any revisions to the methodology adopted.
Kent County Council Appendix 1	· The reasons for selecting each viewpoint should be clearly set out by the applicant, in line with GLVIA3, as well as the further reasons for producing visualisations for only selected viewpoints.	Yes	A table has been added in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) which lists viewpoints, their reason for selection and their distance from site.
Kent County Council Appendix 1		No	No comment required.
Kent County Council Appendix 1	Mitigation	No	No comment required.
Kent County Council Appendix 1	· The link between the proposed mitigation measures, and the effects that they are aiming to	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference

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	mitigate, could be more clearly explained by the applicant.		number 6.1.7) includes additional text in the mitigation section and where required in the assessment of effects.
Kent County Council Appendix 1	Assessment of effects	No	No comment required.
Kent County Council Appendix 1	· The applicant should clarify whether year 1 and year 10 effects on landscape have been assessed;	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) makes clear where year 1, year 5 and year 10 effects are being assessed.
Kent County Council Appendix 1	· The applicant should be asked to revisit terminology used to report effects, so that the level of effect and its significance are both clear in each case;	Yes	Further clarification will be provided within Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
Kent County Council Appendix 1	· The applicant should be asked to remove the qualifications that follow most of the findings of effect, since these factors should have been included in the assessment;	Yes	Revised text has been added to Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) to describe views of routes rather than from static locations, and to consolidate the assessments around factors such as extent and duration.

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Kent County Council Appendix 1	· In the EIA Report, the applicant should more clearly explain how mitigation measures are linked to specific identified impacts, and how these lead to effects changing from negative to positive over time;	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) includes additional text to explain how specific mitigation measures are linked to specific identified impacts and how these have led to effects changing to negative to positive over time, where appropriate.
Kent County Council Appendix 1	· The applicant should be asked to reconsider effects from routes as a whole, rather than simply from static viewpoints on routes; and	Yes	Revised text has been added to Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) to describe views of routes rather than from static locations.
Kent County Council Appendix 1	The applicant should be asked to revisit the cumulative assessment, and to clearly present the scope and assessment steps, including the other developments that are contributing to any identified effect.	Yes	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) presents a reviewed and revised cumulative assessment.
Natural England Annex	Landscape Natural England welcomes the inclusion of consideration of views from the Kent Downs Area of Outstanding Natural Beauty (AONB) in the landscape assessment (Chapter 7). We note that the AONB is around 7.6km from the development site and that there are only distant views (Chapter 7, paragraph 323). Therefore, Natural England concurs with the assessment (at paragraph 324)	No	The Kent Downs AONB is located approximately 4 km to the south of the Development. The AONB is assessed in the LVIA. Viewpoint 20 of the PEIR and the ES is representative of the type of view likely to be available from the AONB.

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	that the proposal would result in effects on the AONB of minor significance.		
Swale Borough Council	· Landscape	No	No comment required.
Swale Borough Council	The review of the PEIR is contained in the following paragraphs except where the landscape issues are dealt with in the report jointly commissioned by the Council, Kent County Council and Canterbury City Council from Land Use Consultants, and appended to the County Council's response to the PEIR.	No	No comment required.
Swale Borough Council	Landscape	No	No comment required.
Swale Borough Council	Please refer to the report from Land Use Consultants dated June 2018	No	No comment required.
Swale Green Party	· A major concern is the size of the planned solar farm development. The development is out of scale with the local Kentish landscape and environment. Its size would be a considerable impact on the landscape, and would adversely affect the amenity value of the site which is popular with local people and other walkers using the Saxon Shore way. Permitting a development of this size on a green	No	The LVIA text in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) acknowledges that there are impacts on the landscape and effects on visual amenity, and assesses these effects.

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	field site could open the gates for other very large solar farm developments.		
Swale Green Party	· The solar farm will consist of panels oriented east-west installed back-to-back and inclined at just 9°. The site is 4Km across. In effect the whole site will become a huge industrial roof, more appropriate in an industrial park than in the rural English countryside. The east-west orientation and back-to-back installation will fit twice as many panels on the site than would be possible with a conventionally designed solar farm with south facing panels. The high density of panels will make a greater impact on the land and wildlife than would a south-facing solar farm. No solar farm of this design has been built in the UK. Therefore, no experience is available of the impact of this type of solar farm.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the landscape impacts based on the east - west orientation. Ecology elements are considered in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8), and Ornithology in Chapter 9: Ornithology (document reference number 6.1.9). Glint and glare effects are considered in Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17). The choice of panel design is considered in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). For clarity the panels remain at 8° as presented and assessed at PEIR which

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			will be further assessed in chapters of the Environmental Statement (document reference number 6). The project team has experience of an east-west orientation solar farm through one of the co-developers, Wirsol, that has such a development in Holland.
Swale Green Party	· The Non-Technical Summary of the Provisional Environmental Information Report (PEIR) tries to give an impression that this proposed development will be very sympathetic to what is already there on these widespread "horizontal" coastal marshes. But the present landscape embodies almost totally natural features whereas the solar farm will be composed of vast swathes of rigid, man-made, uniform structures – it will be an industrial landscape.	Yes	The Environmental Statement, Non-Technical Summary (document reference number 6.5.1) has been amended to reflect changes in design during the Environmental Statement (document reference number 6) stage of the project and acknowledges the impacts and effects from the proposed development.
The Faversham Society	5. **The Height of the Solar Panels**	No	No comment required.

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The Faversham Society	The proposed site was originally tidal saltings and is a Category 3a floodplain. Rising sea levels and more violent weather events both threaten the site. As a consequence, if construction were to go ahead, the developer has said the panels need to be 'around' 4 metres high, just short of the height of a double-decker bus.[1] This would be a severe detriment to the amenity value of the marshes to all those local people and visitors who use them.	No	The panels range from heights between 1.2m and 3.9m above ground level to allow for the varying potential extreme flood levels across the site. Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) contains more information on heights of the panels. Effects on the visual amenity and recreational users are assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
The Faversham Society	The industrial landscape created by the panels will also be completely visible from viewpoints such as Graveney Hill and Graveney Church, from Oare village, from the Isle of Sheppey and from all vantage points around Estuary View just to the south of Whitstable. On the lower ground, the Society questions the developer's assertion that the panels will not be visible above the sea wall. This hides the panels' effect on the amenity value of the Saxon Shore Way, shortly to become part of the Coastal Path, because this path runs atop the wall, not on the shoreline below. Even so, the panels will be visible above the seawall when walking towards Nagden Cottages from Faversham on the east side of the Creek and from Faversham to Hollow Shore	No	The height of the sea wall ranges from approximate heights of 5.5m to 6.29m and therefore provides significant screening reducing inter-visibility in the wider landscape. Views from Isle of Harty and Oare are discussed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). The solar development is visible from several areas within the wider landscape and from along the Saxon Shore Way. Recreational amenity effects are assessed in Environmental Statement, Chapter 13: Socioeconomics,

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	on the west side of Faversham Creek - including the views from Oare Nature Reserve at Harty Ferry.		Tourism, Recreation and Land Use (document reference number 6.1.13).
The Faversham Society	11. **Landscape, Amenity and Economic Value**	No	No comment required.

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The Faversham Society	The site forms part of a Kent Area of High Landscape Value and a Swale Area of High Landscape Value. The site is visible from long distances including Wraik Hill on the A299 at Whitstable, from Estuary View, from Boughton Hill on the A2 and from Oare village to the west of Faversham Creek – all which have extensive views encompassing the whole marsh, grazing land, fruit farms and orchards. It is an area of high amenity and economic value. However, the developer's intentions will completely change this view of open arable and wildlife marshland to a landscape with column after parallel column of dark panels stretching into the distance from almost every point of view.	No	The site falls within Kent Area of High Landscape Value as is reported in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). A range of viewpoints have been selected to represent a number of visual receptors and from varying distances from the site and these are reported and assessed in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), along with the landscape effects associated with the development. The viewpoint images and visualisations are located in Environmental Statement, Volume 3: Visualisations, Viewpoints (document reference number 6.3.1).
The Faversham Society	This extent of this change is hidden because of the photograph viewpoints that the developers been included in their promotional material for the public to assess the full impact of the proposal. Those images chosen by the developers suggest that the panels will only be seen when people are close to them rather than showing the more important views of the middle and longer distance. We believe that a 3D computer model allowing the public to 'see' the	No	22 viewpoints have been selected following advice from local consultees as set out in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). These represent a range of visual receptors and cover a geographical spread of viewpoints with varying distances from site. The assessment of these are considered in

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	site from all viewpoints would allow a more realistic assessment of impact.		Section 7.6 and in Environmental Statement, Volume 3: Visualisations, Viewpoints (document reference number 6.3.1).
The Faversham Society	The size of the site and the multiple points from which the panels and other site infrastructure will be visible will change the character of what has been a huge, open area of grazing and arable marshland into a heavily industrialized and developed landscape. This will create a loss of inestimable value to visitors and to local people, not just in the immediate future but for generations.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) reports on the baseline of the site and the landscape and visual effects of the Development. Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) considers recreation effects associated with the Development.
The Faversham Society	Views of the development	No	No comment required.

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The Faversham Society	The solar farm will occupy a large area of land extending from Nagden eastwards past Warmhouse and Coney Bank towards the Seasalter Road and out to the mouth of Faversham Creek, then extending inside the seawall past Castle Coote towards the west end of Seasalter, with the grassed areas intending eastwards towards the Sportsman public house. This area forms part of a Kent Area of High Landscape Value and a Swale Area of High Landscape Value. The site is visible from long distances including Wraik Hill on the A299 at Whitstable and Boughton Hill on the A2 which have extensive views encompassing the whole marsh, fruit farms with their orchards and polytunnels, Sheppey Bridge, the Swale and the Isle of Sheppey, Victory Wood at Dargate, Harty Church on the Isle of Sheppey, Shellness on Sheppey and Whitstable Harbour. Other more local views can be obtained from Oare Marshes nature reserve, Hollow Shore, Faversham Creek after the sewage works and from the seawall near the Sportsman public house.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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The Faversham Society	Some of the more distant viewpoints above together with other more distant locations and at Nagden, Graveney Hill, Graveney Church and on the seawall between the mouth of Faversham Creek and Castle Coote are assessed using a set of before and after photographs. The developers say that the panels will not be visible above the seawall from close locations such as the Oare nature reserve at Harty Ferry, but since the panels are likely to be well over four metres high on the inside of the wall because this area is one of the most likely to flood and have the highest base level for the panels at 1.2 metres, this is unlikely.	No	The panel top heights range between 3m to 3.9m above ground level. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effects from Oare Marshes and Isle of Harty, supported by viewpoint visualisation in the Environmental Statement, Volume 3: Visualisations, Viewpoints (document reference number 6.3.1).
The Faversham Society	Similarly, they are also likely to be visible over the sea wall when walking towards Nagden Cottages from Faversham and when walking from Faversham to HollowShore on the west side of Faversham Creek. The images show that at Nagden Cottages and Warmhouse, the panels will be dominant in the views of the site and cover most of the land. They will also be very prominent in views of the site all around the seawall from Nagden past Castle Coote, completely changing the character of the view from open arable marshland to an industrial style landscape of glass panels up to five metres at their apex in parallel columns stretching as far as the edge of the marsh. The panels will also be visible and change the character of the marsh from Graveney Hill and Graveney Church.	No	Visual effects of the Development are assessed and supported by viewpoint visualisations in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).

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The Faversham Society	From Seasalter Road and from the seawall near the Sportsman, the sub-station and battery storage compound will also be visible in front of the existing substation at Cleve Hill serving the London Array wind farm. The areas within 1 kilometre of the site are also likely to experience glint or glare from the panels on the site. These areas include the seawall around the site and where the panels can be seen above the seawall, from the surrounding areas of the coast path.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) considers the visual effects of the development from the visual receptors, which include the Saxon Shore Way and effects from Seasalter Road. Glint and glare effects are assessed in Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17).
The Faversham Society	The Faversham Society considers that not enough photograph viewpoints have been included to assess the full impact of the proposal on the surrounding area and nearby sites including around Faversham Creek and that those chosen seek to show that the panels will only be seen in close views and not in any long-distance views that matter. The extent of the site and the areas from which the panels will be visible will entirely change the character of what has been a huge open area of grazing and arable marshland into a heavily industrialized and developed landscape.	No	22 viewpoints have been selected following advice from local consultees as set out in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). These represent a range of visual receptors and cover a geographical spread of viewpoints with varying distances from site. The assessment of these are considered in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), supported by the Environmental Statement, Volume 3: Visualisations (document reference number 6.3).

8 Ecology			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Canterbury City Council	Ecology/Ornithology/Biodiversity Relevant policies from the Development Plan are missing from the list contained in Section 8.4.1 of Chapter 8. Canterbury City Council endorse the views of KCC on this matter.	No	Policies relevant to carrying out the assessment are included in the Environmental Statement, Technical Chapters (document reference number 6.1). Policies relevant to planning are included in the Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6).
CPRE Kent	4. Ecology We believe that the assumptions regarding mitigation contained in the PEIR are inappropriate, as there is no way to assess the ecological impacts of a solar installation of this extreme scale, unprecedented in any ecologically similar area. We are particularly concerned that the impacts on fauna at the lower end of the trophic chain can not be adequately assessed. We consider it highly unlikely that suitable ecosystems and biodiversity mitigation can be delivered nearby when such a varied array of species will be displaced from area as extensive as this.	No	The mitigation proposed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) and referred to in the Ecology PEIR Chapter are deemed suitable. Net gains in either area of habitat created or quality of habitat will provide an increased holding capacity for a range of species throughout the trophic chain.

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CPRE Kent	Natural England acknowledge that there is little evidence of the impact of solar installations on biodiversity (and what evidence there is comes from much smaller installations that that proposed here), but recommend that protected areas should be avoided3	No	Protected areas have been avoided. No direct impacts are predicted and indirect impacts are proposed to be mitigated where required.
CPRE Kent	We retain serious reservations over the assertion that, post-construction, the core study area will be '...able to return to its natural state pre agricultural cultivation4'. For the reasons stated in section 3, we contend that the soil profile will be profoundly affected by the construction and operation of the proposed works. By our calculations, the orientation and spacing of the panels mean that even in the spaces between the arrays the ground beneath will receive no direct sunlight at all for 6 months of each year and only limited direct light for the rest of the year. Sowing seeds of plants intended to be of benefit to invertebrates will be of limited use.	No	There will be gaps between the solar panel strings and 'corridors' of connecting natural habitats in areas of the site that are not currently represented by this habitat (i.e. monocrop or bare soil). During the peak botanical growth season and invertebrate activity period of spring/summer/autumn, sunlight will fall between the panels to provide habitat for invertebrate species occupying a range of ecosystem niches. When the sun is in the south, which happens at all times of year, it will land directly on the ground between the north-south lines of panels.

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CPRE Kent	We have also identified deficiencies in the ecological monitoring of species such as water vole, amphibians and invertebrates which we trust will be addressed in the full DCO application. Finally we trust that the recent CJEU ruling on Appropriate Assessment (and we acknowledge with thanks your correspondence with us on that matter) will be adequately reflected in the DCO application submitted to the Planning Inspectorate.	No	A suite of ecology surveys has been completed. The Environmental Statement, Technical Appendices: Phase 1 Habitat Survey (document reference number 6.4.8.1) was updated in spring 2018 and was not reported in the PEIR, but is included as technical appendices to the Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8). Water vole and great crested newt surveys will be required to support NE licencing post-planning and pre-construction, which is being addressed through consultation with NE and through seeking Letters of No Impediment (LoNI) from them. No further surveys are anticipated to be required to support the Development Consent Order (document reference number 3) application.
CPRE Kent	We note that the PEIR states that post-construction the site will be grazed by sheep. If sheep are to thrive they need access to 'sweet' grass which has grown with adequate rainfall and direct sunlight. Given the density of the proposed arrays, grass growth beneath the panels or in the gaps between them will be sparse (similarly, sowing the seeds of plants intended to be of benefit to invertebrates would be of little value).	No	There will be extensive open strips of grazing land suitable for grazing livestock that will be available between the strings and to the margins of the solar panel layout. These grazing areas will be available on a rotational basis for livestock. Further information is provided within the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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CPRE Kent	Good sheep husbandry requires daily visual checks on health and welfare, and requires the ability see and when necessary to recover animals that need attention. This would indicate that for safety and welfare grounds sheep would need to be fenced out of the areas directly under the panels, and confined to the buffer areas.	No	Temporary fencing will be used in areas where livestock graze. The livestock will be actively managed. The panels will be of sufficient height above ground that access to any sheep there will not be an issue. Further information is provided within the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
Environment Agency	Fisheries and biodiversity Chapter 8 of the PEIR, May 2018, reports that riparian mammals, including otters and water voles, could benefit from enhancement work that will be delivered as part of project.	No	Benefits to water voles are required and proposed for NE licencing regime purposes only and not beyond.
Environment Agency	While we generally support this activity and understand that there may be a need for it as a result of the loss of habitat that supports designated features of the Special Protection Area, we are, as previously indicated, concerned about the conflict that exists between this opportunity and the long term use of the site as an area of compensatory habitat for the delivery of the MEASS.	No	Benefits to water voles are required and proposed for NE licencing regime purposes only and not beyond.

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Environment Agency	Given that the area will become intertidal habitat and so unsuitable for water voles, we do not want any enhancement work, specifically for the benefit of water voles, to be delivered by the developer that will increase use of the site by this species. This is because they will need to be removed when the managed realignment project is delivered. Such work would be if the site was to be used as a translocation site or as a water vole hotel.	No	There are no proposals for use of the site as a translocation site or a water vole hotel, unless needed for NE licencing purposes.

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Graveney with Goodnestone Parish Council	7. Ecology and Ornithology The Parish Council shares the concerns raised by the Kent Wildlife Trust on several points: · Direct impacts on habitats within the development site: It appears that there will be a significant loss of habitat for those species that rely on the open farmland in this area (e.g. skylarks). Unlike “traditional” solar panel layouts, there will be little open land between the mounted structures and solar arrays. It is less clear what impact the solar panels will have on the areas of the site that will not be covered by solar arrays or the proposed battery storage compound, such as the ditches and their surroundings, which are home to water voles and reed buntings, as we have not seen a solar farm designed like this in the UK before. However, it is known that aquatic insects lay eggs on solar panels and this results in a reduction of these insects. This, combined with the loss of diving insects that will be killed following collision with the panels, has a significant effect on the insect population which in turn has	Yes -	Generally, the panels have been set away from aquatic habitats. The baseline arable fields extend to typically 2m from the ditches, and the increase of typically 13m of grassland either side of the main ditches represents a substantial increase in long-term habitat. design has been changed since PEIR to increase the separation between the majority of north-south ditches crossing the site, and the panels from 5 - 8 m typically at PEIR, to a minimum of 15m. No evidence of water voles was identified within the ditch to be removed/culverted under the substation footprint. Mitigation for water voles will be proposed as required by NE for licencing purposes.

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	a knock on effect on the feeding opportunities for birds.		

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Graveney with Goodnestone Parish Council	· Loss of the opportunity for habitat and landscape enhancement that this site provides: Such a significant area surrounded by designated habitat provides one of the best opportunities to restore lost coastal habitats in North Kent. Such habitats are being lost at a rapid rate due to “coastal squeeze” (the combination of sea level rise and hard coastal defences squeezing out inter-tidal habitats). Shoreline Management Plans assess coastal processes and the management of the coastline. Areas of the estuary have also been identified – including this one – as potential sites to store tidal waters during very large surge tides to help prevent increased flooding risk elsewhere. Graveney Marshes has been identified as a potential site for restored coastal grazing marsh (see later comments on flood risk).	No	The comment refers to the Environment Agency's Medway Estuary and Swale Strategy (MEASS), which has suggested a possible re-alignment of the coastal defences some decades in the future. This is a high-level strategy currently out for consultation, and is not considered as part of the future baseline. Were it to occur, it would have substantial detrimental effects as well, such as the loss of the Saxon Shore Way and other footpaths, the loss of productive land and the loss of freshwater habitat. That strategy will be subject to environmental assessment as an when it becomes a firm plan.

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Graveney with Goodnestone Parish Council	Underlying all these concerns are the unprecedented size, and unusual layout and density of the solar panel arrays, which mean that conclusions on wildlife impact drawn from much smaller solar power installations of traditional layout and design elsewhere may not be transferable to the CHSP proposals. We also assert that the ecology surveys undertaken by CHSP are out of date and that the water vole survey is incomplete.	No	The Environmental Statement, Technical Appendices: Phase 1 Habitat Survey (document reference number 6.4.8.1) was updated in Spring 2018, and the report, provided as a technical appendix to the Environmental Statement, chapter 8: Ecology (document reference number 6.1.8) confirms that the site remains suitable for all the species previously identified during earlier studies and the habitats remain largely unchanged. As a result, no further surveys are proposed to support the DCO application, with the requirement for further surveys to support NE licencing recognised at the post planning stage. The assessments have been based on professional and technical guidance, professional judgement and experience, drawn from knowledge of the behaviour of the species and habitats involved and from experience of a wide range of development types, not only ground-mounted solar schemes.
Graveney with Goodnestone Parish Council	The parish council will consider the advice on ecological and ornithological matters from the Campaign for the Protection of Rural England, Kent Wildlife Trust, and others who specialise in these matters.	No	It is recommended that advice is sought only from appropriately qualified and experienced individuals.
GREAT Graveney	1. **Ecology and Ornithology**		

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GREAT Graveney	The statements made in this section of the PEIR rely on research findings from small solar farms with low panels, no battery storage, not built on marshland, and with a north – south configuration with much larger spaces between the panels. As such, much of what is included is not valid as a comparison to the proposed Cleve Hill development site.	No	The assessments have been based on professional and technical guidance, professional judgement and experience, drawn from knowledge of the behaviour of the species and habitats involved and from experience of a wide range of development types, not only ground-mounted solar schemes.
GREAT Graveney	This section also includes a large amount of unnecessary reference to species which do not currently utilise the proposed site because the habitat is unsuitable for them, for example:	No	Responses have been provided on the individual species in subsequent paragraphs.
GREAT Graveney	· 26 references to badgers who inhabit sandy soil areas and would not, therefore, be expected to be found on marshland.	No	The opinion stated is at odds with the opinions of the professional ecologists that compiled the reports.
GREAT Graveney	· 15 references to otters who hunt in clean freshwater rivers and, as there are no freshwater rivers on the marshes, they would not be expected to be found here.	No	The opinion stated is at odds with the opinions of the professional ecologists that compiled the reports.
GREAT Graveney	It appears that extensive surveys have been undertaken to establish the reasons for their absence whilst the more important research into the indicative species which could	No	Responses have been provided on the individual species in subsequent paragraphs.

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	realistically be expected to be present on this site has been overlooked, for example:		
GREAT Graveney	· 4 references to brown hares which have a decreasing population trend	No	The scope of the surveys was agreed with statutory consultees through the EIA Scoping process and other consultation. Brown hare would not typically be separately surveyed. Environmental Statement, Chapter 8: Ecology, Section 8.6 (document reference number 6.1.8) sets out 'embedded' mitigation and Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) includes measures that will benefit brown hares.
GREAT Graveney	· 3 references to hedgehogs which have a rapidly decreasing population trend and are now considered to endangered	No	The scope of the surveys was agreed with statutory consultees through the EIA Scoping process and other consultation. Hedgehogs would not typically be separately surveyed. Section 8.6 of the ES sets out 'embedded' mitigation and Appendix A5.2 (Landscape and Biodiversity Management Plan) includes measures that will benefit hedgehogs.

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GREAT Graveney	We also assert that the ecology surveys undertaken by CHSP are out of date and that the water vole survey is incomplete.	No	Surveys were carried out in 2018 for Great Crested Newt and the habitat phase 1 to update previous surveys. The updated The Environmental Statement, Technical Appendices: Phase 1 Habitat Survey (document reference number 6.4.8.1) identified no significant changes from the previous surveys, and hence we would expect a similar distribution of protected and priority species. The surveys are therefore considered up to date. The water vole survey identified the distribution within the core study area sufficiently to inform the EIA and the identification of suitable mitigation measures. Further surveys will be required to support applications to Natural England for relevant licences.
GREAT Graveney	GREAT asks:		
GREAT Graveney	· No mention is made of the use of pesticides that would be required to manage the grounds of the solar power station. How will this be managed and which pesticides will be used to control weeds?	No	Pesticide use is not proposed within the application.

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GREAT Graveney	· In Mitigation (8.9.12, 8.9.4.2) it states “Habitats will not subsequently be allowed to develop and offer biodiversity where habitats are currently subject to agricultural management. Thus this avoids attracting protected and priority species into these areas and allowing the expansion to their range within the development". Can the developers explain exactly what the criteria is for this proposal?	Yes	Further explanation is provided in an Environmental Statement, Chapter 8: Ecology, Section 8.9.12 (document reference number 6.1.8). Should there be a delay between the cessation of agriculture and the commencement of construction that could lead to substantial enhancement of valued habitats that could then be impacted adversely by the Development, measures will be identified by an Ecological Clerk of Works to prevent such enhancement and these will be implemented.
GREAT Graveney	· What arrangements have been made with the Kent Bat Group to provide artificial bat roosts?	No	No such arrangement has been made nor are deemed required.
GREAT Graveney	· Can more clarity be provided about whether reptiles will be allowed on the site during and after construction?	No	Reptiles are and will remain on the Site.
GREAT Graveney	Great asks:	No	Responses have been provided on the individual species in subsequent paragraphs.

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GREAT Graveney	· In Mitigation (8.9.12, 8.9.4.2) you state “Habitats will not subsequently be allowed to develop and offer biodiversity where habitats are currently subject to agricultural management. Thus this avoids attracting protected and priority species into these areas and allowing the expansion to their range within the development". Can you explain exactly what your criteria is for this proposal?	Yes	Further explanation is provided in an Environmental Statement, Chapter 8: Ecology, Section 8.9.12 (document reference number 6.1.8). Should there be a delay between the cessation of agriculture and the commencement of construction that could lead to substantial enhancement of valued habitats that could then be impacted adversely by the Development, measures will be identified by an Ecological Clerk of Works to prevent such enhancement and these will be implemented.
GREAT Graveney	· What arrangements have been made with the Kent Bat Group to provide artificial bat roosts?	No	No such arrangement has been made nor are deemed required.
GREAT Graveney	· Can you give more clarity as to whether reptiles will be allowed on the construction site or not?	No	Reptiles are and will remain on the Site.
Kent County Council	Chapter 8: Ecology	No	No response required.
Kent County Council	KCC highlights that the surveys conducted have recorded water voles, foraging/commuting bats (nine species), grass snake, common lizard, invertebrates and nesting birds (not ground-nesting) within the site. KCC agrees with the conclusions that the proposed development is likely to result in an increase in suitable habitats for these species/species groups.	No	No response required.

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Kent County Council	However, KCC would like to highlight concerns that the style of the solar panels will result in an increase in shading. This is likely to alter and effect the suitability of the habitats underneath the panels.	No	Areas beneath the solar panel locations currently exist as either bare soil or monocrop. New, more varied habitats will develop in response to the more varied light environment provided by the solar panels as supported by Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3). Growth between the solar panels will benefit shade tolerant species post construction.
Kent County Council	In addition, the site plans indicate that grassland buffers will be created along the existing ditches. These areas appear to be very narrow and will increase the risk of shading, which will result in less habitat than anticipated.	Yes	The areas appeared to be very narrow because the site is so large. Actually, the design presented in the PEIR had those grassland buffers with a width of between 5 and 8 m on either side of each ditch, typically, which would not suffer much from shading from adjacent panels. The separation of panels from ditch-tops has been increased on the main north-south ditches crossing the site, however, to a minimum of 15 m either side of the ditch. Including the width of the ditch, this means a separation between panels of typically 35 m, which represents a substantial increase in grassland relative to the current baseline, which has typically 2 m either side of the ditch.

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Kent County Council	The PEIR also suggests that some species may utilise the habitat underneath the solar panels. This would be encouraged but KCC has a concern that the design of the solar panels may limit the amount of vegetation growth underneath, which would prohibit the use of the habitat.	No	Areas beneath the solar panel locations currently exist as either bare soil or monocrop. New, more varied habitats will develop in response to the more varied light environment provided by the solar panels as supported by Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3). Growth between the solar panels will benefit shade tolerant species post construction. The new habitats will attract species that forage, shelter or are associated with it.
Kent County Council	Technical Appendix A10.1: Flood Risk Assessment	No	No response required.
Kent County Council	The Flood Risk Assessment does not include details of surface water drainage within the site. As such, KCC requests that the Flood Risk Assessment should include a clear Drainage Strategy, which adheres to policies as set out in KCC's Drainage and Planning Policy Statement[1].	Hydrology	The PEIR assessed the potential for surface water pollution measures such as silt trap and buffer strips which will minimise sedimentation and erosion; further details of these measures are outlined in the ES, Technical Appendix A5.4 (document reference 6.4.5.4), Sections 2, 5 and 6. These measures will protect the hydrological environment during the construction phase. Subsequent communication with KCC has indicated that attenuation for the compound is unlikely to be required and that measures such as seeding the entirety of the area under the PV arrays is likely to be sufficient to control surface water run-off rates compared to the baseline scenario.

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Kent County Council	KCC also recommends that the applicant considers the "Guide for Master Planning Sustainable Drainage into Development" to fully incorporate drainage into the overall development to minimise flood risk[2].	Hydrology	The PEIR assessed the potential for surface water pollution measures such as silt trap and buffer strips which will minimise sedimentation and erosion; further details of these measures are outlined in the ES, Technical Appendix A5.4 (document reference 6.4.5.4), Sections 2, 5 and 6. These measures will protect the hydrological environment during the construction phase. Subsequent communication with KCC has indicated that attenuation for the compound is unlikely to be required and that measures such as seeding the entirety of the area under the PV arrays is likely to be sufficient to control surface water run-off rates compared to the baseline scenario.
Kent County Council	As the site is within the catchment of the Lower Medway Internal Drainage Board (IDB), KCC recommends that the applicant consults with the IDB for any works to ordinary watercourses in the area.	Hydrology	The Lower Medway IDB has been consulted and has provided relevant information on IDB controlled ditches within the Development site and the documentation necessary for the Applicant to make the necessary applications for IDB consents prior to the commencement of construction.
Kent Wildlife Trust	Ecology	No	No response required.
Kent Wildlife Trust	Determining Importance of Local Wildlife Sites	No	No response required.
Kent Wildlife Trust	Table 8.2 of section 8.4.5 includes "*Sites designated as...LWS's, or equivalents that may be*	No	No response required.

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Kent Wildlife Trust	designated according to criteria at the local authority level" for sites of 'local' importance. Table 8.7 of Section 8.7 states for Abbey Fields Local Wildlife Site that "The site is designated as a LWS according to criteria at the local authority level." Despite the name, all Local Wildlife Sites in Kent are designated by the Kent Nature Partnership based upon criteria developed at a County level. There are no 'local authority level' criteria so all qualify as Regionally important.	No	Criteria for selecting LWS level of importance follows that found in DEFRA's document; *Making Space for Nature: A review of England's Wildlife Sites and Ecological Network. DEFRA 2010.* This state: *' This is the primary designation in this (Tier 2) category. LWS are non-statutory sites identified by Local Wildlife Site partnerships, which are often led by local authorities and partnered by a range of local interests. Government policy is to provide protection to LWS through the planning system.'*
Kent Wildlife Trust	Designation Boundary Issue	No	No response required.

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Kent Wildlife Trust	Paragraph 104 of Chapter 8 states "*...there is a network of ditches that flow from south to north into the South Bank of the Swale LNR and beyond that through a non-return valve into The Swale SSSI/SPA, MCZ and Ramsar designated sites.*" This implies an incorrect understanding of the boundaries of the designated sites. The SSSI/SPA/Ramsar boundary with the development site is the same as the LNR, I.E. it includes the sea wall and borrowdyke/reedbed on the landward side of the sea wall. This has implications for the assessment of impacts, as it states in Paragraph 107 that "*Direct disturbance to designated sites from dust arising from construction activities is not anticipated to be higher than the baseline, with sea defences and wall providing a physical barrier to impacts from this source on the Swale SSSI/SPA/MCZ and Ramsar.*" The assessments need to be revised where this error has been made.	Yes	Further explanation is provided in a revised Environmental Statement, Chapter 8: Ecology, Section 8.8.12 (document reference number 6.1.8) of the ES.
Kent Wildlife Trust	Water Vole	No	No response required.

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Kent Wildlife Trust	The ditch network of the site would qualify as Local Wildlife Site under Criteria MA2 "...*any waterway or connected waterway complex where in total more than 2,000 linear metres of habitat is known to hold water voles during summer. Justification – these areas are core habitats in the county and provide local source populations.*" The wider area is also identified as a key area for Water Voles nationally[3]. As such, the Importance/Sensitivity of the feature should be considered at least Regional.	No	The importance/sensitivity of this feature is addressed within the Environmental Statement, Chapter 8: Ecology, Section 8.3 (document reference number 6.1.8).
Kent Wildlife Trust	Culverts have the potential to fragment the ditch network, and therefore should be (1) minimised in number and size and (2) designed so as to reduce fragmentation as much as possible.	No	Culvert upgrades will be completed at existing crossing locations where possible to minimise the number of culverts required. Where new culverts are required, these will be designed to ensure that ditch network connectivity is maintained and habitat fragmentation for water voles is avoided.
Kent Wildlife Trust	We remain to be convinced that all the planned new ditch crossing points are necessary. We would like to see justification for the need for multiple access points into each 'compartment' as well as justification that these need to be permanent (for the construction	Development description	New or upgraded ditch crossings have been proposed where the spine road or a fence crosses an existing or proposed ditch. These crossings have been kept to a minimum. In most cases, safe access to each field (compartment) is either directly from the spine road, or via an existing (upgraded if necessary with mammal friendly culverts) crossing point. All existing culverts

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	and operational life of the development) rather than temporary.		which are replaced will be replaced with mammal friendly culverts.
Kent Wildlife Trust	Bats	No	No response required.
Kent Wildlife Trust	We note that "...the site offers foraging and commuting habitat used by at least nine species of bat'. That's 50% of UK species and easily qualifies it for Local Wildlife Site status (BA4 "*Regular feeding and foraging sites for an assemblage of 4 species or more*"). As such the Importance/Sensitivity of this feature should be considered Regional.	No	The importance/sensitivity of this feature is addressed within the Ecology ES Chapter, Section 8.3. We note that the survey conclusions do not say that the foraging and commuting habitat is used "regularly", so the definition does not necessary apply.
Kent Wildlife Trust	Reptiles	No	No response required.

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Kent Wildlife Trust	The Reptile Mitigation Strategy set out in Paragraph 211 of Chapter 8 does not represent best practice. Given that the survey followed a presence/absence (rather than a Relative Population Assessment) methodology trapping should proceed on a 'Minimum days plus number of searches with no captures' approach before trapping is completed. Additionally, it is not stated what the basis is for the belief that "...*sufficient carrying capacity is available for reptiles without the need to provide additional habitat improvements*." It is generally believed that populations expand to fill, and are then limited by, the carrying capacity of their habitats. Unless there is reason to believe the situation is different in this case, some degree of habitat enhancement will be required before reptiles are translocated.	Yes	With design changes following the production of the PEIR, reptile mitigation requirements have been reviewed and revised in Section 8.9.7.5 of the Ecology ES Chapter. There are extensive reptile habitats within the core study area, with limited baseline reptile habitat requiring removal at the construction phase. Embedded mitigation, as detailed within the LBMP Appendix A5.2 will offset any initial losses of habitat suitable for reptiles by providing improved habitats and an overall net gain in habitats of value to species such as reptiles.
Kent Wildlife Trust	Inclusion of Grazing Marsh	No	No response required.

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Natural England Annex	Protected Species Natural England notes the surveys that have been carried out on the development site, and that these confirm the presence of a number of protected species, including great crested newts, water voles and bats. We will work with the applicant to ensure suitable mitigation is included where necessary, and that species licensing requirements are met.	No	A Letter of No Impediment response has been received from Natural England (TBC) confirming that the Development site is considered low risk and construction activities are licencable.
Natural England Annex	Environmental Enhancements As noted above, Natural England has been working with the applicant and other stakeholders through the HMSG. This group has been advising on necessary mitigation, and also environmental enhancements that will be beneficial to people and wildlife.	No	No response required.
Swale Friends of the Earth	be demonstrated that there is no net negative impact on local wildlife and biodiversity, which is Swale FoE's primary concern**.**	No	The Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) provides quantifiable figures for the 'Net positive gain' in habitat.

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Swale Friends of the Earth	Swale FoE is careful to take an evidence-based approach when considering planning applications. We have reviewed the PEIR and welcome the high level of detail provided and the extensive and the detailed environmental survey work that has been undertaken by consultants. We also welcome the engagement of the developers with the Kent Wildlife Trust, the RSPB and English Nature in relation to the potential ecological effects from the development. **In general, we will be guided by their expert response and input to the consultation and the EIA that accompanies the application and we would urge you to respond to their recommendations in full to ensure net negative impacts on biodiversity and habitats are avoided and that enhancements are made to maximise net gain in both the Development site itself and in the adjacent and surrounding areas, particularly sensitive designated sites.**	No	Consultation with Kent Wildlife Trust, RSPB and Natural England and others has taken place to ensure that net gains for biodiversity within the core study area through enhancements is achieved. Enhancements are included through 'Embedded Mitigation', the details of which are included in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). The Project response to those consultees is set out in this Consultation document.

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Swale Friends of the Earth	The land proposed to be used for the solar park is currently used for arable farming. We agree with the conclusions in the PEIR that there is likely to be a net benefit for wildlife from taking this out of production because of the cessation of chemical inputs (pesticides, nitrate fertiliser). The invertebrate survey noted low levels of invertebrates on the arable fields, probably due to chemical use. There is also chemical run-off into ditches and water and the soil quality is poor on the development area because of years of intensive farming and monocrops. **We agree with the conclusions of the PEIR that the change of land-use from arable farming will have knock-on benefits to invertebrates and other species that rely on them (birds, amphibians, etc), which we welcome.**	No	No response required.

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Swale Friends of the Earth	We do have concerns, however, about the proposed design of the solar panels and the impact of using a flatter, east-west orientation. We acknowledge that this gives a more steady generation profile throughout the day, with economic and reliability benefits, but we are concerned that the impact of this design on the biodiversity beneath the panels hasn't been fully researched and is not presented in enough detail in the PEIR. Natural England notes that "Solar arrays offer opportunities for enhancements through the management of the grassland between the panels. Sowing a seed mix to benefit invertebrates, including bumblebees, would be valuable in this location." However there does not appear to be an analysis as to the success of this kind of planting with limited sunlight beneath a canopy of east-west panels, compared to the more common south-facing panel design. Similarly, you quote the Barn Owl Trust as saying "Solar PV farms have the potential to be of great benefit to Barn Owls as the array frameworks	No	Solar panels and impacts of shading on vegetation have been addressed within Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3). The light environment will be different to that found between panels on a south-facing design, but it is expected that vegetation will grow. The long sections of buffer strip grassland adjacent to the ditch habitats will develop a thick litter layer over time to offer suitable field vole habitat (a key prey item) for barn owls

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	are typically at a height from which they can		
Swale Friends of the Earth	In the Ecology section of the PEIR when discussing riparian mammals, paragraph 157 with regard to brown hares doesn't make sense – there may be an error in wording. Similarly, paragraph 166 under Chapter 8.9.1 is unclear and we would welcome clarification.	Yes	Further clarification within Environmental Statement, Chapter 8: Ecology, Sections 8.8.7 and 8.9.1 (document reference number 6.1.8) has been made.

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Swale Green Party	· It is very evident that the land under consideration already provides excellent permanent and temporary habitat for a wide variety of bird, reptile, insect and assorted other grass and marshland species. Indeed, much of the adjacent land comprises the Swale Special Protection Area [SPA] and Ramsar site. The opportunities for mitigation of any habitat losses are extremely limited given the planned extensive use of a rare coastal environment. A report by Natural England (2016) concluded:	No	The site will continue to provide these benefits for species and additional benefits through 'embedded mitigation' to provide either no net loss or net gains in habitat of value to invertebrates, reptiles, bats, water voles, which would not otherwise be available in the absence of the Development. Embedded mitigation is detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
Swale Green Party	Unacceptable environmental impact.	No	This is a title. Responses to specific points made below have been provided.
The Faversham Society	4. **The governance of the SSSI**	No	No response required.

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The Faversham Society	We are equally disquieted about the fact that because of the recent enlargement of the site the future of an important SSSI will be put into the hands of a private sector developer. We know that the way that SSSIs are managed is critical and without oversight, by a public body we are not	No	The SSSI is already within private ownership. The land is not being acquired by the developer. The SSSI land was included within the site boundary so that the developer has an opportunity to positively influence the management of that area, however other consultees have advised that if the developer assists in meeting the SSSI objectives, this will not count towards mitigation for any adverse effects the Development may have. As a result, no such measures are included in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
The Faversham Society	confident that the incentives of the developer and operator would ensure the long-term protection of the site. The SSSI appears to have been included to assist the developer in increasing the biodiversity of the site merely by acquiring land already managed for diversity.	No	The SSSI is already within private ownership. The land is not being acquired by the developer. The SSSI land was included within the site boundary so that the developer has an opportunity to positively influence the management of that area, however other consultees have advised that if the developer assists in meeting the SSSI objectives, this will not count towards mitigation for any adverse effects the Development may have. As a result, no such measures are included in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
The Faversham Society	9. **Wildlife**	No	No response required.

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The Faversham Society	Although the noise and disturbance is a cause of anxiety for residents and the loss of amenity value distressing for those all who currently use the marshes, there is a much more serious and detrimental impact on wildlife. Construction of roads and excavation of ditches, the creation of culverts, clearing of the ground by removing plants and topsoil and installation of equipment would result in the whole site being unavailable as nesting habitat for ground-nesting birds nor as a feeding /foraging habitat for birds, bats and other animals and insects over a long period.	No	Land of value to wildlife will be retained and where required, mitigation has been proposed to ensure that there are net gains for wildlife, as detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). Mitigation for disturbance to wildlife is considered within Environmental Statement, Chapter 8: Ecology, Section 8.9 (document reference number 6.1.8). Construction would not occur across the whole site at one time, and would be phased. Given the size of the site, this will leave large areas undisturbed at any one time.
The Faversham Society	Water Voles and reptiles: Natural England has pointed to the need to address the impact on these protected species	No	Natural England's comments have been addressed separately, with consultation on protected species mitigation and licencing requirements made.
The Faversham Society	Rare Invertebrates: The marshes provide habitat for over 30 species of rare and scarce species of species of beetle, bugs, flies, bees and plant hoppers which are either of regional or national significance	No	Habitat net gains proposed for invertebrates are described in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8).

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The Faversham Society	Bats Species: Nine species of bat are present on the marsh including soprano pipistrelles, common pipistrelles, noctules and Daubenton's bats	No	Habitat net gains proposed for bats are described in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8).
The Faversham Society	Wildlife	No	No response required.
The Faversham Society	Natural England have confirmed that they consider the land to be functionally linked land to the Ramsar site and SSSI and that birds that contribute to the Swale Assemblage use the land in winter, in particular, Brent geese, lapwing and golden plover. As a breeding site, the land is functionally linked to the Ramsar site for marsh harriers. The letter from Natural England also advises the developer's wildlife consultant to address the needs of bats, water voles and reptiles as protected species. They comment that the addition of wildflowers in any new grazing land might assist with conditions for pollinating insects.	No	Natural England's comments have been addressed separately, with consultation and agreement on protected species mitigation and licencing requirements made.

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The Faversham Society	The bat surveys carried out between June and September 2015 demonstrate that the site functions as a foraging and commuting habitat for bats. Nine species are present including soprano pipistrelles, common pipistrelles, noctules and Daubenton's bats. Bat activity extends over the whole site and they use the open areas as well as just along the drainage ditches. It is likely that the disturbance during construction would deter bats, and the time taken for any new vegetation to establish may make the area unsuitable as a foraging habitat for several years after installation. This is because the new vegetation is likely to take up to three years to establish.	No	Bats are active at dusk and dawn, principally during the summer months, when construction activity will be restricted, which avoids disturbance impacts on foraging or commuting bats. Important foraging and commuting habitat for bats will be maintained along with habitat connectivity out with the Site. Strong linear habitat features of interest to foraging and commuting bats are proposed as part of embedded mitigation, with increased areas of bat foraging habitat and bat roosting opportunities to be created. Commuting routes, including open areas, will remain unrestricted by the Development. Embedded mitigation is detailed within the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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The Faversham Society	Although the site is largely used for arable at present, 172 species of invertebrate were found in the surveys carried out in July 2015. Of these, over 30 species were either locally significant or of national significance including species of beetle, bugs, flies, bees and plant hoppers. One variety of fly is nationally rare and eleven insects are nationally scarce. The clearing of parts of the site to install the spine road and install the panels is likely to have a detrimental impact on the insect population which in turn feeds birds and bats. Re-establishment of vegetation on the site will take several years, so that cover and food plants for insects will be absent.	No	Embedded mitigation to provide net gains in habitat of value to invertebrates is proposed. The retention of existing habitats of value to a range of protected and priority species is proposed, with limited habitat clearance of track and spine road crossings not impacting the favourable conservation status of wildlife at any trophic level. Habitat gains for protected and priority species are quantified within Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8), and embedded mitigation detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).

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The Faversham Society	The developers propose to add grazing land under the panels with a mix of grasses and wildflower species and to graze sheep. They state that it may be more difficult to establish such a mixture where the land has been arable as it is too fertile and that this land will need more intensive management. They also propose shelter belts including poplar and alder and other species along the southern boundary, some scrub near the seawall including hawthorn and blackthorn, supplementing existing hedgerows at the south and east sides of the site and boundary planting around the site compound. They also intend to convert the existing pill box so that it can contain a bat roost. All of these changes may improve the appearance of the area. However, they are not considered to constitute adequate compensation for the loss of a major area of marshland which contributes to and is functionally linked to the Swale estuary wildlife designations.	No	The solar panel build area will be within regularly disturbed arable fields that are not managed as grazing land, and which offers negligible value to biodiversity as outlined in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) and Chapter 8: Ecology (document reference number 6.1.8). The site will continue to provide ecological benefits for a range of protected and priority species, whilst providing additional benefits through 'embedded mitigation' to provide either no net loss or net gains in habitat of value to invertebrates, reptiles, bats, water voles, and a range of other species, which would not otherwise be available in the absence of the Development.

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The Faversham Society	41. When will we see the agreed plans with RSPB and KWT for the restoration of habitat?	No	At the time of submission, plans have not been agreed with RSPB and KWT for the restoration of habitat. Discussion has been had with the Habitat Management Steering Group, which includes RSPB and KWT, along with Natural England. The principal area of habitat management is for geese, golden plover and lapwing, as set out in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
The Faversham Society	42. What assurances are you able to give that the wildlife will continue to use the site as now?	No	Potentially significant effects on wildlife, including its use of the site, are set out in the Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8), and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).
The Faversham Society	43. When will you provide your detailed plans top explain how biodiversity on the site will be increased?	No	Plans to provide biodiversity benefits on the Site are included within 'embedded mitigation' detailed within Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
The Faversham Society	44. What is the environmental impact related to the manufacture of the SPS's solar panels, batteries and other hard facilities to be deployed?	No	Please see Chapter 15 of the Environmental Statement (document reference 6.1.15).

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9 Ornithology			
Section 42 Applicant Regard to Consultee Responses			
Respondent	Comment	Project change?	Applicant Response

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CPRE Kent	We note the recent CJEU judgment (C-323/17) which concluded that the Habitats Directive 'must be interpreted as meaning that…it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site'. PINS Note 05/2018 to inspectors further states: 'Inspectors should be aware that on 12 April 2018, the Court of Justice of the European Union (CJEU) issued a judgement which ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an appropriate assessment (AA) and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage'. In light of the CJEU judgment and PINS Note we would like to know whether you will be updating your assessment accordingly and resubmitting a revised PEIR and HRA. In the light of the short time remaining in the consultation period we would be grateful for a prompt response.	No	Thank you for your email received on 14 June RE: Solar Park Consultation and CJEU Judgment C-323/17. The Planning Inspectorate drew our attention to the C-323/17 judgement during our call on 30 April 2018 LINK. Cleve Hill Solar Park Ltd does not intend to make any changes to the PEIR in respect of this judgement. A Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) is submitted with the DCO application, which takes account of the CJEU ruling.

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CPRE Kent	We are particularly concerned at the site's location, coterminous with areas designated for biodiversity protection (and now that we have received notification that the application boundary has been extended it includes designated sites, which is not reflected in the documents which inform the existing PEIR). It is clear that this area of the marshes is regularly used by SPA and Ramsar species. There will be particularly significant harm to species such as skylark and marsh harrier (the nearby SPA boasts a population of 24 pairs of the latter, representing at least 15% of the breeding population in Great Britain). Many of the technical reports informing the PEIR (such as those covering breeding birds, passage birds and the habitat survey) are now 4 years old, and were undertaken before the proposed site boundary was extended. They therefore give an inaccurate representation of the proposals as they currently stand.	No	The additional areas included in the Development since the PEIR, which comprise part of The Swale SPA/SSSI/Ramsar site, will not contain any new development structures; they are included to facilitate ongoing maintenance of the sea wall and to bring biodiversity benefits through more appropriate management of the freshwater grazing marsh in the east of the site. Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) asses the effects of the full extent of the Development and provide a complete assessment of the potential effects birds, including the qualifying interest features of the designated sites. Surveys were undertaken over a period between January 2014 and April 2018, with reporting in 2018. The scope and timing of the baseline surveys are appropriate to inform the assessment, which has been agreed by Natural England. The geographical coverage of

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			the surveys already included the areas into which the Development site boundary was extended.
Faversham Footpath Groups	7. Other bodies, such as Kent Wildlife Trust and the RSPB, will no doubt comment on the proposal's impact on the environment and wildlife. But, as walkers who derive great enjoyment from seeing the area's distinctive flora and fauna, we are concerned about the prospective loss of important habitat, in particular for nesting marsh harriers and for other raptors.	No	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially

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			harmful impacts and provide biodiversity enhancements.
Graveney with Goodnestone Parish Council	· Loss of 'functionally linked' habitat: While the development site itself is adjacent to, rather than included in, areas with international and national wildlife designations, at certain times it does support species for which the designated habitats are noted (for example, lapwing, golden plover, Brent geese and marsh harrier). As such, it is 'functionally linked' to these designated areas, and its loss will have an impact on these and other species. The arable farm land is used from point to point as there is connectivity and by putting up fences and panels the bird population will be adversely affected. We note that the area counts more than 50% of bat species in one small area. We assume that CHSP will have to undertake a 'Habitats Regulations Assessment' to determine the impacts on these species and other species, what mitigation may be necessary, and ultimately demonstrate that any impacts will not be significant.	No	Chapter 9, Environmental Statement (document reference 6.1.9) and the Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) has been undertaken and submitted with the DCO application . A focus of the A Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) is the loss of functionally linked land for lapwing, golden plover, brent goose and marsh harrier.

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GREAT Graveney	· 10 references to the peregrine falcon which is a protected species	No	Peregrine was identified as an Important Ecological Feature in Environmental Statement, Chapter 9: Ornithology, (document reference number 6.1.9) and an assessment of the potential effects on this species has been provided.
GREAT Graveney	· 2 references to kestrels which have a decreasing population trend	No	Kestrel did not qualify as an Important Ecological Feature and therefore detailed assessment is not provided. The habitat enhancements through provision of substantial extents of lowland meadow is expected to improve conditions for foraging kestrels, which are known to use solar panels to perch on when hunting for prey.
GREAT Graveney	Even though some of the Schedule 1 birds received attention in this section, for instance the Harriers (54 references), the report is skewed towards water birds. As the core of the proposed land for development is dry land, greater emphasis needs to be given to birds that live, nest and feed on that land, not waterfowl who will still have the foreshore of the SSSI to feed on.	No	Water birds and marsh harrier are given a large degree of attention in the assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) because they are the species associated with the adjacent European designated site. The wintering and farmland bird communities are identified as Important Ecological Features in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and an assessment of the potential effects on

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			these species has been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).
GREAT Graveney	The mitigation areas within the development will result in a loss of habitat for those species that rely on the open farmland. In addition, it is known that aquatic insects lay eggs on solar panels and this results in a reduction of these insects. This, combined with the loss of diving insects that will be killed following collision with the panels, has a significant effect on the insect population which, in turn, has a knock-on effect on the feeding opportunities for birds. Additionally, removal of the arable land and replacement with solar panels will significantly reduce the prey available for predators such as the marsh harrier and peregrine falcon, including small mammals and invertebrates.	No	The ecological assessment in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) concludes that there will be improvements in conditions for invertebrates through the embedded design including large areas of lowland meadow and improved water quality in the drainage ditches. There is therefore no predicted decrease in foraging opportunities for birds in this respect. The embedded design enhancements involving creation of large areas of lowland meadow around the solar panel arrays, as well as grassland between solar panel tables, are predicted to improve the abundance of lower trophic animals and improve conditions for foraging predators.

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GREAT Graveney	While the development site itself is adjacent to, rather than included in, areas with international and national wildlife designations, at certain times it does support species for which the designated habitats are noted, for example, lapwing, golden plover, Brent geese and marsh harrier. As such, it is 'functionally linked' to these designated areas, and its loss will have an impact on these and other species.	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
GREAT Graveney	The arable farm land is used from point to point as there is connectivity. By putting up fences and panels the bird population will be adversely affected. Additionally, the area provides an important foraging resource utilised by nine species of bats, including the grassland and ditches.	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Environmental Statement, Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) identify fragmentation of habitat as a potential impact on birds, which has been assessed as having no likely significant effects.
GREAT Graveney	Having looked at the FAS mappings it is quite clear that a large amount of activity was recorded using the Vantage Point Method (VPM), and clearly shows the importance of the area to the birds surveyed. It is reported that "the survey used two vantage points providing excellent visual coverage of the majority of the solar park site"	No	No response required.

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GREAT Graveney	· Why only two Vantage Points (VPs)? This is not sufficient and can you advise if these VPs are at ground level?	No	The Flight Activity Survey method accords with best practice guidance (Scottish Natural Heritage guidance on Vantage Point (VP) methodology for wind farm developments) and is described in The Environmental Statement, Technical Appendices: Ornithology Technical Appendix, (document reference number 6.4.9.1). Observations were carried out from the two VPs by two observers simultaneously viewing the landscape from approximately 1 m above ground level. VPs were chosen parsimoniously according to best practice guidance to provide suitable coverage of the survey area. GIS modelling of the visible area from the VPs is provided in Environmental Statement, Figures: A9.1 (document reference number 6.2.9) and demonstrates over 90% theoretical coverage of the Development site. In practice, local topography is used advantageously to provide better coverage than predicted by the GIS model. The frequency and distribution of flight activity recorded attests to the suitability of the survey method.

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GREAT Graveney	· Are the observers skilled and licensed? Are binoculars or telescopes used?	No	The surveyors are highly skilled ornithologists with many hundreds of hours of flight activity survey experience. Binoculars and telescopes were used during the surveys when appropriate.
GREAT Graveney	· Please comment on the duration, timing and number of hours involved in survey.	No	These are provided in The Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1); this now includes additional details regarding the timing and weather conditions during each survey.
GREAT Graveney	· Who chose the VPs and what was the criteria used for this choice?	No	The Flight Activity Survey method accords with best practice guidance (Scottish Natural Heritage guidance on Vantage Point (VP) methodology for wind farm developments) and is described in The Environmental Statement, Technical Appendices: Ornithology Technical Appendix A9.1 (document reference number 6.4.9.1). VPs were chosen parsimoniously by experienced ornithologists according to best practice guidance to provide suitable coverage of the survey area. GIS modelling of the visible area from the VPs is provided in Figure 9.1 and demonstrates over 90% theoretical coverage of the Development site. In practice, local topography is used

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			advantageously to provide better coverage than predicted by the GIS model.
GREAT Graveney	· From our knowledge of the area and awareness of VP1 and VP2, we conclude that the visual coverage is not exceptional. What is the basis for the developers stating that the coverage is excellent?	No	The Flight Activity Survey method accords with best practice guidance (Scottish Natural Heritage guidance on Vantage Point methodology for wind farm developments) and is described in section Technical Appendix A9.1 to the ES. VPs were chosen parsimoniously by experienced ornithologists according to best practice guidance to provide suitable coverage of the survey area. GIS modelling of the visible area from the VPs is provided in Environmental Statement, (document reference number 6.2) and demonstrates over 90% theoretical coverage of the Development site. In practice, local topography is used advantageously to provide better coverage than predicted by the GIS

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			model. The frequency and distribution of flight activity recorded attests to the suitability of the survey method.
GREAT Graveney	· When were the nocturnal winter bird surveys conducted, where were these carried out, and who was involved in this exercise?	No	The Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1) now includes additional details regarding the timing and weather conditions during each survey. Surveys covered the core survey area and were carried out by the same experienced ornithologists that undertook the diurnal surveys in winter 2015/16.
GREAT Graveney	· The PEIR Ornithology section (Non-Technical Summary, 9.1 Baseline Bird Surveys) it states there were 5 winter surveys 2013/2014, 2014/2015, 2015/2016 and 2017/2018. Why was a survey not undertaken in 2016/2017?	No	The Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1) provides this information.
GREAT Graveney	· Below are examples of CHSP's ineffective mitigation and management:	No	No response required.

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GREAT Graveney	o "The HMA (Habitat Management/Mitigation Area) may not be able to replace entirely the loss of foraging provision for Brent Geese, therefore this would be a long term negative effect." (9.3.2)	Yes	The AR HMA has been extended since PEIR, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4), to provide additional resources for brent geese in the long term, such that a precautionary average measure of use of the site is provided for.
GREAT Graveney	o "Disturbance during construction is likely to cause displacement of foraging Marsh Harrier from areas near the construction works..", "Conditions may be enhanced" and " the AHMP could improve conditions for foraging Marsh Harrier" (9.3.4)	No	No response required.
GREAT Graveney	· Throughout the document CHSP uses words like may 'be', 'could' or 'likely'. Nothing appears exact, just vague and inconclusive and without any solid guarantee of mitigation. Why are these statements fluid and not precise?	Yes	The concept of likelihood is inherent in ecological assessment and explained in the assessment methodology of Environmental Statement, Chapter 9: Ornithology, section 9.2 (document reference number 6.1.9). At PEI stage of the application process, the Development design was not fixed, therefore there was less certainty in relation to effects and effectiveness of mitigation and enhancement measures. In the Environmental Statement (document reference number 6), additional mitigation and enhancement

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			measures have been included in the Development, such as wider lowland meadows between the arrays to provide more confidence in the effectiveness of the measures.
GREAT Graveney	· Other examples in relation to Cetti's Warbler and Bearded tit report that "construction works are likely to cause localised disturbance to breeding birds resulting in temporary displacement.....", followed by " the LBMP includes measures to improve the quality of the ditches...", and "Ditch enhancements and other measures set out in the Aquatic Habitat Management Plan or AHMP, may enhance conditions for Cetti's Warbler" (9.3.5	Yes	The concept of likelihood is inherent in ecological assessment and explained in the assessment methodology, ES Chapter 9, section 9.2. At PEI stage of the application process, the Development design was not fixed, therefore there was less certainty in relation to effects and effectiveness of mitigation and enhancement measures. In the ES, additional mitigation and enhancement measures have been included in the Development, such as wider lowland meadows between the arrays to provide more confidence in the effectiveness of the measures.

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GREAT Graveney	· 9.3.5 states that "One of the aims of the Development is to provide improved conditions where possible for breeding birds. This will be a positive effect on the breeding bird community, although due to a degree of uncertainty regarding how birds will react to the presence of the solar panels in the landscape, it is not certain to occur." Are there any guaranteed measures or is this merely a PR exercise?	No	The concept of likelihood is inherent in ecological assessment and explained in the assessment methodology, ES Chapter 9, section 9.2. At PEI stage of the application process, the Development design was not fixed, therefore there was less certainty in relation to effects and effectiveness of mitigation and enhancement measures. In the ES, additional mitigation and enhancement measures have been included in the Development, such as wider lowland meadows between the arrays to provide more confidence in the effectiveness of the measures.
GREAT Graveney	· The same applies for the wintering farmland bird community (9.3.6): "likely to cause localised disturbance to foraging birds resulting in temporary displacement", "likely to result in displacement of flocks of wintering foraging birds...", and "overall, it is considered that there will be a change in the wintering farmland bird community. The large numbers of flocking species that use the solar park site are not likely to be attracted because the temporarily rich resources they favour at and after harvest of crops will no longer be available. However, the habitat management measures set out in the LBMP might improve conditions for some other wintering seed-eating species that can forage in the grassland habitats."	No	The concept of likelihood is inherent in ecological assessment and explained in the assessment methodology, Environmental Statement, Chapter 9: Ornithology, section 9.2 (document reference number 6.1.9). At PEI stage of the application process, the Development design was not fixed, therefore there was less certainty in relation to effects and effectiveness of mitigation and enhancement measures. In the Environmental Statement

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			(document reference number 6), additional mitigation and enhancement measures have been included in the Development, such as wider lowland meadows between the arrays to provide more confidence in the effectiveness of the measures.
GREAT Graveney	· GREAT are not convinced that there is any real commitment that many of the concerns regarding the birdlife will be mitigated. The language used and the constant repetition of vague phrases such as 'likely', 'might', 'may' and the observations above would support this assertion.	No	The concept of likelihood is inherent in ecological assessment and explained in the assessment methodology, Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9), section 9.2. At PEI stage of the application process, the Development design was not fixed, therefore there was less certainty in relation to effects and effectiveness of mitigation and enhancement measures. In the Environmental Statement (document reference number 6), additional mitigation and enhancement measures have been included in the Development, such as wider lowland

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			meadows between the arrays to provide more confidence in the effectiveness of the measures.
GREAT Graveney	· It would appear from the commentary throughout the document that, ultimately, CHSP developers do not know how the construction/development will affect any birdlife although our belief is that this will be in a largely negative way.	No	The concept of likelihood is inherent in ecological assessment and explained in the assessment methodology, Environmental Statement, Chapter 9: Ornithology, section 9.2 (document reference number 6.1.9). At PEI stage of the application process, the Development design was not fixed, therefore there was less certainty in relation to effects and effectiveness of mitigation and enhancement measures. In the Environmental Statement (document reference number 6), additional mitigation and enhancement measures have been included in the Development, such as wider lowland

			meadows between the arrays to provide more confidence in the effectiveness of the measures.
Kent County Council	Chapter 9: Ornithology	No	No response required.
Kent County Council	The PEIR illustrates a good understanding of bird interest in the site, and the surveys have confirmed that the site provides functionally linked habitats with the adjacent SPA/Ramsar/SSSI (e.g. birds associated with the designated site were recorded within the application site) and that the site is utilised by ground nesting birds.	No	No response required.
Kent County Council	The surveys were carried out over several years and KCC notes that the results indicate that the numbers using the site fluctuated throughout the years. The applicant should take note that this may be linked to the management of the site or crops grown within the site during that time.	No	The assessment in the Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) notes that fluctuations in numbers of brent geese, lapwing and golden plover are most likely to be related to the type and growth stage of crops.

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Kent County Council	KCC would expect the Environmental Statement to acknowledge that the proposed development would result in a complete loss of habitat for ground nesting areas and birds associated with the SPA. These birds require open vistas to be able to feel secure when they are roosting/feeding/nesting, which will mean that the habitat directly adjacent to the solar panels is likely to be lost.	No	The assessment of loss of foraging resources for brent geese, lapwing and golden plover at Environmental Statement, Chapter 9: Ornithology, (document reference number 6.1.9) is made on the basis that there is total loss of foraging opportunity in the area developed for solar panels and other infrastructure. The assessment of loss of foraging and nesting resources for other species at Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) is made on the basis that there is total loss with respect to the built structures, with enhancement of the large areas around the arrays continuing to provide resources for some species.
Kent County Council	The application is proposing to carry out habitat enhancements and ongoing management within an area to the east of the solar panels. KCC agrees it is likely that this area will provide suitable habitat for breeding and wintering birds.	No	No response required.

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Kent County Council	However, the PEIR indicates that the proposal would lead to a significant reduction in habitat areas and KCC suggests there is a need for a greater area of habitat to be actively managed. KCC recommends that the applicant should investigate whether there are opportunities to support the management of habitats within the wider area. This would improve the quality of the remaining farmland for the birds that will be displaced as a result of the proposed development.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).
Kent County Council	Habitats Regulation Assessment (HRA)	No	No response required.
Kent County Council	In line with the identification within the PEIR that development will result in a 'Likely Significant Effect' on the adjacent designated sites, KCC advises that the applicant will need to carry out a Habitats Regulation Assessment.	No	Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) has been undertaken and submitted with the DCO application.
Kent Ornithology Society	Apologies for the late submission of these comments. As the PEIR document extends to some 500 pages, plus additional appendices, it took considerable time to assimilate the information and extract relevant issues and I was only able to action the task in the last few days.	No	No response required.
Kent Ornithology Society	My comments are restricted to Chapter 9 - Ornithology, in keeping with the aims of our Society, to promote the recording and conservation of birds in Kent.	No	No response required.

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Kent Ornithology Society	Having read the document at length, I have kept my comments brief to cover the main areas of concern.	No	No response required.
Kent Ornithology Society	The KOS has great concern about the scale and siting of the development.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) sets out the reasons for selecting this site and the impacts of the Development.
Kent Ornithology Society	Whilst acknowledging the national need for green energy, the Society believes that coastal land in the Swale Estuary, given its SPA, Ramsar and SSSI status, is a most insensitive and inappropriate location for a solar farm of this magnitude.	No	Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) sets out the reasons for selecting this site and the impacts of the Development.
Kent Ornithology Society	Although the actual site plan does not occupy land of SSSI status, it lies within an area of high wildlife and ornithological importance. The construction of the solar farm will prevent the area from being managed sensitively for birds and other wildlife in the future.	No	The Development site boundary includes land designated as SSSI and SPA, but this land will not be developed. The proposed management of the land for birds and other wildlife is set out in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). The potential effects of the Development on birds are assessed in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9). Negative effects are mitigated where possible and the Development also

			offers opportunities for sensitive habitat enhancement for the benefit of birds.
Kent Ornithology Society	The Society acknowledges that Arcus/AECOM have produced a very thorough assessment of the breeding, passage and wintering birds of the development site. However, the Society disagrees or takes issue with some of the conclusions drawn concerning the impact of the solar farm. It is also noted that no report is provided in A9.2 for the breeding survey in 2016, although it is noted (Table 9.5) that this was performed and that 72 species were recorded of which 40 were confirmed breeding, the highest of the three breeding surveys.	Yes	The assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) was carried out in accordance with the EIA Regulations and relevant guidance, including the process of drawing conclusions. Negative effects are mitigated where possible and the Development also offers opportunities for sensitive habitat enhancement for the benefit of birds. The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR AR

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			HMA, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). Section A9.4.2 of The Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1) provides the methods and results of the breeding bird survey in 2016. The results are displayed in Environmental Statement, (document reference number 6.2)

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Kent Ornithology Society	There is a general assumption in the PEIR that as species of conservation concern are present elsewhere in the Swale Estuary area, perhaps in greater numbers, that the impact of the development is therefore not significant. This approach is taken, for example, with Marsh Harrier. A problem with this line of assessment is that a piecemeal loss of important species and sites occurs over time, if repeated during further development land grabs, which leads to the fragmentation of habitat and erosion of important populations.	No	The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) describes the assessment methodology with respect to the determination of significance. The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4), which will provide enhanced foraging resources for marsh harriers.

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Kent Ornithology Society	An important species breeding within the development site is the Yellow Wagtail which is Red Listed in the UK as it has suffered a significant population decline. This species has undergone a significant change in breeding habitat in the UK over the last 30-40 years and now predominantly nests in crops. In Kent, coastal cereal crops are now an important habitat. The bird surveys noted 6-10 territories in the arable fields during 2014,2015 (no data given for 2016). It is stated that as part of the BBPP mitigation some 41 ha of arable land will be converted to grazing marsh to benefit this and other species as compensation for territories lost by construction of the solar farm. However, Yellow Wagtails now mostly breed in arable farmland, not grazing marsh, and would therefore not be mitigated.	No	Crops are the predominant nesting habitat for yellow wagtails in Kent because it is the predominant habitat, rather than the preferred nesting habitat. The RSPB provide advice regarding provision of habitats for yellow wagtails, which includes provision of grassland with an open sward for nesting, whilst grazing pasture provides insect-rich resources for them. The assessment in, Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) therefore concludes that the substantive habitat enhancements made within the Development site will provide suitable habitat for nesting and foraging yellow wagtails.
Kent Ornithology Society	It is mentioned that as a result of the first consultation, greater public access will be provided across the development site with cycle routes, bridle ways and footpaths. As these will obviously be along gaps and ditches between the solar panels, any improvements to habitat made in areas between the panels, to provide benefit to bird species affected by the development such as Marsh Harrier and Barn Owl, will be undone by the increased public disturbance.	Yes	As a result of the S42 consultation process, the proposed new permissive access ways are now restricted to one route, which will be a footpath only as there is no public access for horses or cycles at either end of this path, running north-south predominantly along an existing farm track between two arrays of solar panels. The majority of habitat enhancements throughout the site will therefore not be subject to increased public disturbance.

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Kent Ornithology Society	One of the most important habitats for breeding birds in the development site is the wide ditch with reeds extending along the landward side of the sea walls. The Society would like to see a wider buffer zone to protect this habitat, say 200m. This would allow for a reasonable buffer strip to keep solar panels away from the ditch.	Yes	Since PEIR, the offset distance from this boundary has been increased from a minimum of 5 m to a minimum of 15 m, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).
Kent Wildlife Trust	We are unconvinced the mitigation proposed, most notably in the form of a 41 hectare Habitat Management Area, will be sufficient to offset the impacts on a number of species, and this shortfall is confirmed for Dark-bellied Brent Geese within the documents. Marsh Harrier is also of particular concern, as a possible outcome of the proposals is the loss of this site and adjacent nature reserve as a breeding and foraging area. The proposals will adversely affect the integrity of the Special Protection Area (SPA).	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	Further detail on these and other issues is appended to this letter.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
Kent Wildlife Trust	Basic and Precautionary Principles	No	No comment required
Kent Wildlife Trust	Wintering Birds	No	No comment required

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Kent Wildlife Trust	Overwintering birds, particularly those associated with The Swale Special Protection Area (SPA), are a key issue with regard to the impacts of the proposals. It is essential that the proposals are able to demonstrate that there will not be an adverse impact on the SPA. The proposals in front of us have not done that.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
Kent Wildlife Trust	The key principle proposed with regard to mitigating the loss of habitat is the provision of a smaller but 'higher quality' area of equivalent 'carrying capacity' to that being lost (expressed as 'bird days' in the documents). The calculations presented are insufficiently robust, and the predicted outcomes overly optimistic.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4).

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			Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
Kent Wildlife Trust	In seeking to shrink 387 hectares of 'extensive' habitat into 41 hectares of 'intensive' habitat differing requirements of species are likely to come into conflict. It is important that this is taken into account when considering the area required and its management.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	Dark-bellied Brent Goose	No	No comment required
Kent Wildlife Trust	It is clear from the survey results that the percentage of the SPA's Dark-bellied Brent Geese population that the development site supports varies from year to year. Anecdotally it has been suggested that this is a result of changes in crop and crop development, and this would be consistent with what we know of this species, though site crop information to compare to the results to verify this would be welcome. There are no doubt other factors involved that influence the day-today differences in survey results, though these may be less well understood.	No	Since PEIR, information on historical cropping patterns have been obtained and are presented in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and the Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1).

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Kent Wildlife Trust	However, what is of little doubt is that at times the site supports a significant proportion of the SPA's population, occasionally over 100%[1]. There remains a question over how we attempt to quantify this in order to put in place adequate mitigation to ensure the integrity of the SPA is not adversely affected. At present, the Preliminary Environmental Impact Report (PEIR) appears to use the Wetland Bird Survey (WeBS) 5-year Mean of the Peak counts for the Swale Estuary as a proxy for the SPA population to calculate the percentage provision provided by the Habitat Management Area (HMA). If we use an equivalent figure (or as close as possible) from the development site survey results (mean of the peak counts) to calculate the provision the development site provides we get 64%. The PEIR also uses a 'mean of seasonal monthly peak means' and 'mean of seasonal means' of the development site survey results to quantify the value of the development site. Using the former figure we get 32%. While the true figure arguably falls somewhere between the lower and higher of these three figures, the validity of the approach taken, and other possible approaches, is clearly a subject that needs further discussion. This is of course as valid for other species as it is for brent geese. To enable further comment on the issues, we have worked with the approach taken in the PEIR and the figures provided therein.	No	In the PEIR, the comparison between the quantification of use of the Development site by birds (based on baseline survey counts) and the Swale Estuary population as a whole has caused confusion and did not fulfil the objective of its inclusion. Following consultation with the Habitat Management Steering Group, this aspect of the assessment has been modified in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9). Agreement has been reached with consultees that the average 'peak-mean' count from the baseline survey data (the inter-seasonal mean of the intra-seasonal monthly peak-mean) is an appropriate metric to measure the use of the site; the Environmental Statement (document reference number 6) has updated the assessment accordingly.

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Kent Wildlife Trust	Key to the calculations of the required area of mitigation for Dark-bellied Brent Geese is the paper by Vikery *et al.* (1994) '*The management of grass pastures for brent geese*'. Presented are two potential carrying capacities based upon management prescriptions studied in this paper (1,562 and 2,097 bird-days/ha). However, we note that the study cited (and therefore the figures in question) was of grassland that had been established for several years prior to the study being undertaken – as the title suggests, it was of management of grass pastures, not arable reversion as is the case at Cleve Hill.	Yes	A number of sources are quoted in the Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1) that inform the capacity value of the Arable Reversion Habitat Management Area for brent geese. With the appropriate management focussed on provision of resources for brent geese, the capacity value used in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) has been agreed with Natural England. This includes the application of organic fertiliser, and/or inorganic fertiliser if necessary in the Arable Reversion Habitat Management Areato achieve the desired outcome for geese. Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) has been modified accordingly, noting that the quantity of fertiliser applied to the land will be significantly less than the baseline arable farm environment. Re-seeded grassland is capable of supporting the higher capacity values of geese, so time lag to reach condition is not necessary. The Arable Reversion Habitat

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			Management Area has been extended since PEIR from 41 ha to 56 ha.

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Kent Wildlife Trust	The higher bird-day figure stated depends upon the inputs of fertilizers. However, many times in Chapter 8 (Ecology) the cessation of the input of fertilizers is stated as an outcome of the change from arable, leading to improvements in the water quality and habitats of the ditches, and indirect benefits for designated sites. The application of fertilizer to achieve more bird-days would contradict the assessments made for other ecological receptors.	Yes	A number of sources are quoted in the Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1) that inform the capacity value of the Arable Reversion Habitat Management Area for brent geese. With the appropriate management focussed on provision of resources for brent geese, the capacity value used in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) has been agreed with Natural England. This includes the application of organic fertiliser, and/or inorganic fertiliser if necessary in the Arable Reversion Habitat Management Area to achieve the desired outcome for geese. Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) has been modified accordingly, noting that the quantity of fertiliser applied to the land will be significantly less than the baseline arable farm environment. Re-seeded grassland is capable of supporting the higher capacity values of geese, so time lag to reach condition is not necessary. The Arable Reversion Habitat

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			Management Area has been extended since PEIR from 41 ha to 56 ha.

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Kent Wildlife Trust	For the reasons set out above, we consider even the lower figure of 1,562 bird-days/ha for brent geese to be overly optimistic. The actual figure, taking into account both the less intensive management prescriptions consistent with ecological assessments in Chapter 8, and the fact the site is arable reversion that is likely to take a while to 'reach condition' under these prescriptions, the actual figure is likely to be lower than this.	Yes	A number of sources are quoted in the Environmental Statement, Technical Appendices: Ornithology Technical Appendix (document reference number 6.4.9.1) that inform the capacity value of the Arable Reversion Habitat Management Area for brent geese. With the appropriate management focussed on provision of resources for brent geese, the capacity value used in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) has been agreed with Natural England. This includes the application of organic fertiliser, and/or inorganic fertiliser if necessary in the Arable Reversion Habitat Management Area to achieve the desired outcome for geese. Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) has been modified accordingly, noting that the quantity of fertiliser applied to the land will be significantly less than the baseline arable farm environment. Re-seeded grassland is capable of supporting the higher capacity values of geese, so time lag to reach condition is not necessary. The Arable Reversion Habitat

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			Management Area has been extended since PEIR from 41 ha to 56 ha.

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Kent Wildlife Trust	However, even using these figures (or rather a mid-point between the two) by admission "*The HMA may not be able to replace entirely the loss of foraging provision for brent geese*..." (Chapter 9, Paragraph 158). Based on the assumptions made (notwithstanding we consider these unsafe), it is stated that the HMA would have the capacity to support 22.7% of the foraging requirement of the SPA population (Chapter 9, Paragraph 157).	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	While it is not stated, based upon the figures provided for development site bird-days and SPA bird-days, the development site has supported ~32% of the foraging requirements of the SPA's brent geese. Paragraph 158 of this Chapter seeks to argue that the consistency of the HMA will offset this shortfall, compared to the present situation where the arable habitat does not provide the same foraging resource every season. However, this has already been taken into account in using mean, rather than maximum, figures. I.E. the fact that the site does not always provide foraging for brent geese, as evidenced by the survey results, has been taken into account by the use of those survey results in the calculations of development site bird-days. The Ornithology Technical Appendix states that 66.3 hectares are required for Dark-bellied brent geese, based on these metrics (Table A9.24).	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	Comparing the stated HMA provision (22.7%) to the current provision (~32%) we are left with a reduction of approximately 10% of the foraging availability for the SPA (comparing peak-means for the site and the SPA). As stated earlier, we consider the calculations for the HMA to be overly optimistic, so this shortfall is likely to be higher, at least in the short term.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	In addition, there will be impacts from disturbance during the construction phase. This is to be offset by the establishment of grassland across the site prior to construction works commencing, providing areas of forage away from the development site. The phasing of construction across the seasons will need to take this into account. Even with this reduction, it is predicted that brent geese will be displaced from the site for a season (with the loss of forage availability that this entails).	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	Considering the complete loss of forage ('on average') that the site provides for an entire season as a result of construction disturbance, followed by the shortfall in provision of what is likely to be >10% minimum in perpetuity, we are surprised that the assessment concludes that the impact on this feature of The Swale SPA is not significant. We **disagree** with this assessment.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	Lapwing and Golden Plover	No	No comment required
Kent Wildlife Trust	The calculation of bird-days for Lapwing and Golden Plover is based upon a related and relevant study that looked at the carrying capacity of mixed arable farmland. However, we consider that the assessment of what can be achieved is overly optimistic, and has not taken sufficient account of the constraints and context of the HMA	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and therefore the predicted capacity of the extended AR HMA to support plovers and lapwings has been reduced to be similar to mixed arable habitat, which has been agreed with Natural England. The A Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	Lapwing and Golden Plover feed on invertebrates in a range of open habitats. At present, it is fair to assume that they feed on invertebrates associated with the crops present at the time (phytophagous and saprophagous inverts and their predators). As stated in Paragraph 129 of the Ornithology technical Appendix, "...*abundance and availability of potential prey items present in different habitats is likely to be an important factor shaping the distribution of plovers*...". We do not contest that switching from an arable habitat to permanent pasture will increase the forage available to plovers per hectare, but (1) this may take some time (particularly with regard to soil fauna) and (2) is likely to be constrained, both with regard to rate of increase and maximum, by management for brent geese and grazing pressure from brent geese (which will be in competition with phytophagous insects plovers feed on). While we acknowledge that a more conservative metric has been applied for years 1-5 compared to after this period, without further evidence we consider this overly optimistic.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	We remain unconvinced that the HMA will provide adequate mitigation for Lapwing and Golden Plover for the reasons stated above. We therefore **disagree** that the impacts are not significant.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The management prescription for the AR HMA includes fertiliser application to optimise foraging conditions for geese and the predicted capacity of the extended AR HMA to support brent geese has been updated during consultation and agreed with Natural England. It is maintained that during the two winters over which construction could occur, the AR HMA and other areas that are grassed but not being developed will provide foraging opportunities for geese. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	Breeding Birds	No	No comment required
Kent Wildlife Trust	Marsh Harrier	No	No comment required
Kent Wildlife Trust	As stated in Paragraph 307 of the Ornithology chapter, the "*...core survey area and adjacent terrestrial habitats form an important foraging area for marsh harriers throughout the year*." We also note that "*Even with this mitigation however, the effect of construction activities might displace marsh harrier from nesting in the KWT South Swale reserve that borders the Development area*" (paragraph 313).	Yes	Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased from a minimum of 5 m to a minimum of 15 m, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). In the majority of the site where solar panels are located, the offset between the edge of the arrays and the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. This is expected to result in no net negative effects on marsh harrier and could result in positive effects as a result of an increased extent of suitable foraging habitat. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that

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			the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	Regarding the statement "*In the longer term, the effect is reversible as they may be expected to nest again if they are not displaced by the presence of the operational Development.*" (paragraph 314), the *may* and *if* express the considerable uncertainty regarding the impact the solar farm may have on Marsh Harrier. This is reinforced by the statement within the assessment of habitat loss: "*...the effect on nesting birds is uncertain as there is no evidence either way in the literature regarding the effects of the presence of solar panels on the proximity of nesting marsh harriers.*"	Yes	Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased from a minimum of 5 m to a minimum of 15 m, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). In the majority of the site where solar panels are located, the offset between the edge of the arrays and the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. This is expected to result in no net negative effects on marsh harrier and could result in positive effects as a result of an increased extent of suitable foraging habitat. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	It is clear from this that, while the outcomes are uncertain, a possible impact is the loss of this “important foraging area” and nesting areas, even with the proposed mitigation. The area in	Yes	Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased from a minimum of 5 m to a minimum of 15 m, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). In the majority of the site where solar panels are located, the offset between the edge of the arrays and the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. This is expected to result in no net negative effects on marsh harrier and could result in positive effects as a result of an increased extent of suitable foraging habitat. Report to Inform Appropriate Assessment (‘RIAA’) (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Kent Wildlife Trust	question is not inconsiderable, and is a significant part of The Swale SPA. We **disagree** that this impact is not significant. More needs to be done to avoiding these potential impacts with regard to the proximity of solar panels to nesting habitat and width of potential foraging corridors, which is of particular concern.	Yes	Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased from a minimum of 5 m to a minimum of 15 m, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). In the majority of the site where solar panels are located, the offset between the edge of the arrays and the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. This is expected to result in no net negative effects on marsh harrier and could result in positive effects as a result of an increased extent of suitable foraging habitat. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
Kent Wildlife Trust	Skylark and Yellow wagtail	No	No comment required

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Kent Wildlife Trust	As species that nest within the arable (and other open) habitats, the Skylark and Yellow Wagtail	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) has been updated to reflect the changes and take account of the advice received in S42 responses.
Kent Wildlife Trust	populations of the development site will lose the majority of their nesting habitat.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and

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			Consideration of Alternatives (document reference number 6.1.4). The assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) has been updated to reflect the changes and take account of the advice received in S42 responses.
Kent Wildlife Trust	The proposed mitigation for this is the HMA plus enhancements to the designated area to the east of this. However, given skylarks' preference for ungrazed grassland, set-aside and winter cereal (Browne et al., 20102) we are unconvinced that sufficient enhancement can be achieved to offset the impact on this species. While in theory the changes are more likely to benefit Yellow Wagtail than Skylark given slightly different habitat preferences, as mentioined earlier with regard to lapwing and Golden Plover, we are concerned that the requirements on the HMA to support so many species at a high density will result in compromises in management that may result in failure.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) has been updated to reflect the changes and take account of the advice received in S42 responses.

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Kent Wildlife Trust	We note the uncertainties regarding the overall impact on these species: "*There is some uncertainty with regards to the breeding opportunities in the areas between the solar arrays, as these species prefer more open habitats than the grassland between the arrays might provide.*" (Chapter 9 Paragraph 327).	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) has been updated to reflect the changes and take account of the advice received in S42 responses.
Kent Wildlife Trust	We support the inclusion of the area of grazing marsh at to the east of the development site within the wider plans, in the interests of consistent and complementary management for wildlife, and to potentially provide enhancement measures that would be consistent with UK environmental policy. However, we reiterate our previous communication that as there exists a statutory requirement to maintain this designated site in favourable condition, it cannot meaningfully contribute to	No	The inclusion of the grazing marsh in the Development is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).

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Kent Wildlife Trust	mitigation for the impacts of the solar park. We note that this is effectively stated in Paragraph 139 of Chapter 9, but in other Chapters this area is sometimes referred to separately from the HMA, and sometimes as part of the HMA. This causes ambiguity when discussing mitigation and the final submission documents should avoid this.	No	The inclusion of the grazing marsh in the Development is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9)
Natural England	· The development site is adjacent to The Swale Special Protection Area (SPA) and Ramsar site, and Natural England's view is that it is demonstrably functionally linked to the SPA/Ramsar by providing foraging habitat for dark-bellied brent geese, lapwing, golden plover and marsh harrier. The loss of this foraging area to the Cleve Hill Solar Park (the proposal) is likely to have a significant effect on the SPA/Ramsar. Furthermore, the construction and demolition phases are likely to lead to significant disturbance. Therefore, Natural England advises that an Appropriate Assessment will need to be carried out. It will be necessary to provide information on the mitigation measures to enable the competent authority to determine whether they are sufficient to demonstrate that an adverse effect on the integrity of the SPA/Ramsar can be avoided.	No	The information required to undertake the Appropriate Assessment is provided in the Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2).

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Natural England	· Clarity is needed on the calculation of losses of functionally linked land and how this has been used to calculate the size of the habitat mitigation area. Information on the cropping regime of the development site is necessary to understand the foraging resource available over time, and to help determine which metric to use to calculate losses.	Yes	The metrics and calculations to describe the use of the Development site by brent geese, lapwings and golden plovers and the capacity of the Arable Reversion Habitat Management Area to support them have been the subject of ongoing consultation with the Habitat Management Steering Group since PEIR. Agreement on these has been reached with Natural England. They have been clearly described in the Environmental Statement, Technical Appendices: Ornithology (document reference number 6.4.9.1).
Natural England	In principle, the loss of arable functionally linked habitat can be mitigated by the provision of permanent grassland. However, further work is needed to determine the necessary area, and appropriate management, of the grassland.	Yes	The metrics and calculations to describe the use of the Development site by brent geese, lapwings and golden plovers and the capacity of the Arable Reversion Habitat Management Area to support them have been the subject of ongoing consultation with the Habitat Management Steering Group since PEIR. Agreement on these has been reached with Natural England. They have been clearly described in the Environmental Statement, Technical Appendices: Ornithology Technical Appendix, (document reference number 6.4.9.1).

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Natural England	Further work is needed to determine the appropriate mitigation for potential impacts on foraging and breeding habitat for marsh harriers.	Yes	Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased from a minimum of 5 m to a minimum of 15 m, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). In the majority of the site where solar panels are located, the offset between the edge of the arrays and the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. This is expected to result in no net negative effects on marsh harrier and could result in positive effects as a result of an increased extent of suitable foraging habitat. Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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Natural England Annex	Designated nature conservation sites – further information required As detailed in the Environmental Statement (ES), the development site is in close proximity to, and has the potential to affect, the following designated sites: · The Swale Site of Special Scientific Interest (SSSI) · The Swale Special Protection Area (SPA) · The Swale wetland of international importance under the Ramsar convention (Ramsar site) · Swale Estuary Marine Conservation Zone (MCZ)	No	Potential effects on The Swale SSSI/SPA/Ramsar site are assessed in ES chapter 9 and the RIAA. Potential effects on the Swale Estuary MCZ are scoped out of the assessment in ES chapter 9, but are considered in ES chapter 8 (Ecology).
Natural England Annex	Natural England considers that there could be impacts to these sites through a number of pathways, including loss of functionally linked land, noise and visual disturbance, dust, surface water quality and lighting. These are discussed in more detail below.	No	Each of these potential effects is assessed in ES chapter 9 and the RIAA.

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Natural England Annex	Loss of functionally linked land Where SPA/Ramsar birds regularly forage on land outside the designated site, this land may be considered functionally linked to the SPA/Ramsar by providing supporting habitat. Its loss should, therefore, be considered in any in combination assessment of impacts under the Habitats Regulations. The bird surveys carried out in support of the application indicate that the development site is used by significant numbers of wintering dark-bellied brent geese (hereafter brent geese), golden plover, lapwing and breeding marsh harrier. These species are either individually named on the SPA/Ramsar citation, or are a part of the assemblage feature.	No	Potential effects on The Swale SSSI/SPA/Ramsar site are assessed in ES chapter 9 and the RIAA, including detailed assessment of the loss of functionally linked land for these species.

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Natural England Annex	Furthermore, JNCC's 3rd SPA Review[1] recommends that the boundaries of existing SPAs classified for dark-bellied brent geese, including The Swale, should be reviewed in order to ensure that important areas for feeding or other functional needs are included. The JNCC Review also recommends that the boundary of The Swale SPA (and other sites) is reviewed to ensure important functional areas for golden plover and lapwing are included, though it is noted that these species are not individually classified features of The Swale, but are part of the assemblage. The legal document against which the proposal should be assessed is the SPA/Ramsar citation, however the JNCC Review gives useful context to the importance of supporting habitat.	No	With regard to the 2016 Review, ES chapter 9 and the RIAA acknowledge the importance of functionally linked land for the qualifying interest features of The Swale SPA.
Natural England Annex	It is Natural England's advice that, without mitigation, the loss of functionally linked land would have a likely significant effect, under the Habitats Regulations, on SPA/Ramsar bird species. Therefore, an Appropriate Assessment will be needed to determine whether the mitigation proposed is sufficient to avoid an adverse effect on the integrity of the SPA/Ramsar.	No	A Likely Significant Effect has been assessed as a result of loss of functionally linked land in ES chapter 9 and information to inform the Appropriate Assessment is provided in the RIAA.

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Natural England Annex	Dark-bellied brent geese functional land When the development site is planted with a suitable crop (winter cereals) it is clearly an important foraging resource for brent geese. For example, the peak count recorded on the development site was 3000 brent geese in January 20142 (compared to the peak Wetland Bird Survey (WeBS) core count of 2288 for the whole of the Swale Estuary in 2013/143). The development site is adjacent to eelgrass beds, so is in an excellent location for brent geese in that they can feed on the eelgrass at low tide, and then on winter cereals at high tide, without having to fly far and expend energy.	No	No response required.
Natural England Annex	Chapter 9, paragraph 142, describes how the use of the development site by brent geese varies with the cropping pattern and growth of the crop. Fewer geese were recorded in 15/16 as the crop grew quickly and became unsuitable and in 17/18 the development site was either left fallow or planted with winter beans and so did not provide any food for geese. Paragraph 142 goes on to compare the peak mean count of geese using arable land within the development site to the peak mean WeBS count for the Swale. Whilst these figures show that the development site is very important for geese in two out of the four seasons, it is not clear where the figures come from4.	No	The comparison in Section 9.5 of ES chapter 9 between counts of birds on the arable land and the counts of birds made by WeBS for the Swale have been amended since PEIR to show direct comparison between the peak count made during each season of baseline survey with the peak count in the Swale made by WeBS.

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Natural England Annex	In principle, Natural England's view is that the loss of functionally linked arable land can be mitigated by providing an alternative area of permanent grassland.	No	ES chapter 9 and Technical Appendix A9.1 describe the approach to mitigating the loss of functionally linked arable land by provision of an alternative area of permanent grassland.
Natural England Annex	Natural England's view is that the amount of mitigation land should be determined by an assessment of the impacts. The goose-days metric provides an appropriate way of assessing losses against necessary mitigation. However, several different calculations of the number of goose-days are presented, based on peak or mean counts of birds. In order to determine which calculation is most appropriate, it is necessary to have information on the cropping regime for the development site.	Yes	Since PEIR, further consultations with Natural England have been undertaken regarding the appropriate metric to quantify bird use of the Development site. This is the peak-mean count as recorded by baseline surveys - or specifically, the inter-seasonal mean of the intra-seasonal monthly-peak mean. On this basis, the AR HMA has been extended since PEIR, as described this chapter and in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for. The approach to quantifying use and mitigating for habitat loss, including an information on the cropping regime, is set out in Technical Appendix A9.1 and Section 9.5 of ES chapter 9.

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Natural England Annex	Paragraphs 153 to 154 of Chapter 9 set out the goose-days metric for the lost arable and the new permanent grassland. These paragraphs show that, as the whole of the grassland area might not be used by geese, it only provides around half of the goose-days necessary to replace that lost. Paragraph 157 goes on to say that as the SSSI adjacent to the new permanent grassland will be enhanced, this will provide foraging habitat, which increases the number of goose-days the whole area will support.	No	COMBINE WITH NEXT
Natural England Annex	Whilst Natural England supports the intention to enhance the adjacent SSSI, this area cannot be included in any calculations of mitigation. This is because the site is already designated, is in favourable condition, and already provides a foraging resource for geese (and other birds).	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs. Any alteration in the management of the SSSI area will be subject to discussion and agreement with Natural England.

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Natural England Annex	Therefore, the calculations in Chapter 9 point to the mitigation grassland not being large enough, and on this basis, Natural England's view at this stage is that it is not possible to conclude that an adverse effect on the integrity of the SPA/Ramsar will be avoided. However, we note the calculations of goose-days in the ornithological technical appendix, particularly Table A9.24, which indicate that the amount of mitigation grassland required depends on the management regime and the way the goose-days metric has been calculated. Therefore, we will continue to work with the applicant, and other stakeholders, through the Habitat Management Steering Group (HMSG) to advise on the mitigation necessary.	Yes	The AR HMA has been extended since PEIR to approximately 56 ha (c. 50.1 ha functionally available), as described this chapter and in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for. The approach to quantifying use and mitigating for habitat loss (set out in Technical Appendix A9.1 and Section 9.5 of ES chapter 9), including consideration of field use and disturbance distances, has been consulted upon with Natural England.

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Natural England Annex	Golden plover and lapwing functional land The arable land within the development site is also used by golden plover and lapwing, though conversely to the brent geese, these species were more numerous in the winters of 2015/16 and 17/18. The same area of permanent grassland is proposed to mitigate for losses of wader functional habitat. In principle this is acceptable, though Natural England would welcome further discussion, though the HMSG, as to whether the optimal management required for brent geese will also provide conditions suitable for foraging waders.	Yes	Technical Appendix A9.1 sets out in detail the rationale for the management and capacity of the AR HMA. Based on the literature review and discussions with Natural England, the proposed management of the AR HMA will be primarily focussed on provision of resources for brent geese. The same area also provides for waders, but since PEIR, the expected capacity of the grassland to support lapwing and golden plover has been reduced in the analysis of area required in the AR HMA, such that it is no more than that of mixed arable land.

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Natural England Annex	Marsh Harrier functional land The flight activity surveys carried out, and illustrated in figure A9.34 of the ornithology technical appendix, demonstrate that the development site, and particularly the ditch habitat, is used by foraging marsh harrier. Improvements to the ditches and their margins are proposed to benefit foraging marsh harriers (Chapter 9, paragraph 315). However, it is uncertain as to whether marsh harrier will continue to forage along the entire length of the ditches given the presence of the solar panels creating a corridor effect. Whilst parts of these corridors are wide, there are pinch points where the solar panels are closer, and it is uncertain whether these will have a barrier effect.	Yes	Since PEIR, as described in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), in the majority of the site where solar panels are located, the offset between the edge of the arrays and the drainage ditch banks has been extended from 5 m to 15 m, allowing creation of large areas of lowland meadow habitat (in places extending to a width of c. 80 m) providing enhanced conditions to support prey species for marsh harrier. Marsh harriers are expected to continue to forage in these areas.
Natural England Annex	Paragraphs 317-318 of Chapter 9 state that marsh harriers breed within the adjacent KWT reserve, and that it is uncertain whether these birds will be displaced as a result of the presence of the solar panels within 10m of parts of the reserve.	Yes	COMBINE WITH NEXT

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Natural England Annex	Therefore, Natural England's view is that there is likely to be a significant effect on breeding and foraging marsh harriers and an Appropriate Assessment will be necessary. At this stage, our view is that it is uncertain whether an adverse effect on integrity of the SPA/Ramsar can be avoided. However, we will continue the helpful discussions we have had on this point through the HMSG.	Yes	A Likely Significant Effect has been assessed for marsh harriers in Section 9.5 of ES chapter 9 and information to inform the Appropriate Assessment is provided in the RIAA. Since PEIR, the offset distance from the boundary of habitats to the north of the site has been increased such that the minimum distance between the KWT reserve boundary and the solar panels is 20 m, as described in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives).
Natural England Annex	Noise and visual disturbance The birds for which The Swale SPA, Ramsar and SSSI are designated are susceptible to disturbance from noise, which may impact their energy budgets by causing them to cease feeding, or fly away from the source of disturbance. Loud, intermittent noise, for example produced by percussive piling, is particularly disturbing to birds.	Yes	Further assessment of construction noise has been undertaken in ES chapter 12 (Noise) which are reflected in Section 9.5 of ES chapter 9 and in the RIAA, including amendments to the threshold levels at which bird disturbance might occur. New measures have been introduced since PEIR to mitigate potentially adverse effects, including an outline SPA Noise Construction Management Plan and Breeding Bird Protection Plan.

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Natural England Annex	Evidence gathered by the Institute of Estuarine and Coastal Studies (IECS) suggests that birds begin to react (heads-up, alarm calls) to a noise level of above 50dB and that moderate to high disturbance (birds moving away) occurs above 70 dBA (Cutts *et al*. 2009). Although potentially a useful rule of thumb, the authors recognise that this is a relatively simplistic approach as it does not take into account the type of disturbance nor the sensitivity and prior experience of the birds. Furthermore, as the derivation of this threshold seems to be largely related to studies of noise disturbance associated with construction works on the Humber Estuary, it is probably most relevant to locations which already experience relatively high levels of background noise.	Yes	Further assessment of construction noise has been undertaken in ES chapter 12 (Noise) which are reflected in Section 9.5 of ES chapter 9 and in the RIAA, including amendments to the threshold levels at which bird disturbance might occur. New measures have been introduced since PEIR to mitigate potentially adverse effects, including an outline SPA Noise Construction Management Plan and Breeding Bird Protection Plan.
Natural England Annex	Evidence collected from monitoring work associated with construction disturbance undertaken on the Humber Estuary has either been carried out outside the sensitive season, when there are low numbers of birds present; or when the competent authority has already determined that the proposed works will not adversely affect the integrity of the designated site. Given these limitations it is not recommended that the 70dB threshold is used as a generic threshold for noise levels which result in moderate to high disturbance of birds.	Yes	Further assessment of construction noise has been undertaken in ES chapter 12 (Noise) which are reflected in Section 9.5 of ES chapter 9 and in the RIAA, including amendments to the threshold levels at which bird disturbance might occur. New measures have been introduced since PEIR to mitigate potentially adverse effects, including an outline SPA Noise Construction Management Plan and Breeding Bird Protection Plan.

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Natural England Annex	Natural England advises that a potentially more suitable approach is to assess the change in noise levels, both continuous noise and sporadic noise. A difference of 3 dBA in similar types of noise is just distinguishable to people, so it is reasonable to assume that if the change in noise is no more than 3dB it is unlikely to be significant.	Yes	Further assessment of construction noise has been undertaken in ES chapter 12 (Noise) which are reflected in Section 9.5 of ES chapter 9 and in the RIAA, including amendments to the threshold levels at which bird disturbance might occur. New measures have been introduced since PEIR to mitigate potentially adverse effects, including an outline SPA Noise Construction Management Plan and Breeding Bird Protection Plan.
Natural England Annex	Chapter 9, paragraph 105, states that birds using the intertidal habitat adjacent to the development site will not experience noise above 70 dB LAeq and therefore are unlikely to be disturbed. As noted above, Natural England does not recommend using this threshold, but advocates an assessment of the change in the noise levels, both continuous noise (dB LAeq) and sporadic noise (dB LAmax).	Yes	Further assessment of construction noise has been undertaken in ES chapter 12 (Noise) which are reflected in Section 9.5 of ES chapter 9 and in the RIAA, including amendments to the threshold levels at which bird disturbance might occur. New measures have been introduced since PEIR to mitigate potentially adverse effects, including an outline SPA Noise Construction Management Plan and Breeding Bird Protection Plan.

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Natural England Annex	Natural England notes that Chapter 9, paragraph 110, states parts of the designated site on the landward side of the seawall support species that are important parts of the breeding bird assemblage of the SPA, including marsh harrier. Furthermore, little terns have attempted to breed at Castle Coote, within the Kent Wildlife Trust reserve. Therefore, impacts on breeding and wintering birds may occur during construction (and demolition) and should be assessed and mitigation measures included if necessary. We note that noise mitigation measures will be included in the Construction Environment Management Plan (CEMP), along with a Breeding Bird Protection Plan, though these are not yet included in the draft CEMP at Appendix A10.2. We also note that Chapter 12, paragraph 114, recommends the use of acoustic screening to reduce construction disturbance to ecological receptors.	Yes	Further assessment of construction noise has been undertaken in ES chapter 12 (Noise) which are reflected in Section 9.5 of ES chapter 9 and in the RIAA, including amendments to the threshold levels at which bird disturbance might occur. New measures have been introduced since PEIR to mitigate potentially adverse effects, including an outline SPA Noise Construction Management Plan and Breeding Bird Protection Plan.
Natural England Annex	Dust, surface water quality and lighting Other than noise disturbance, construction impacts could include dust deposition, water quality impacts and disturbance from lighting. The draft CEMP at Appendix A10.2 addresses some of these issues, but Natural England would wish to see all necessary mitigation included in the final version of the document	No	Further assessment of potential impacts of dust emissions, changes in water quality and lighting have been undertaken in ES chapter 9 and in the RIAA. All necessary measures to mitigate adverse effects have been set out in the Outline CEMP (Technical Appendix A5.4).

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RSPB	· appropriate recognition is afforded to the internationally important coastal habitats, and the waders, wildfowl and seabirds these support within and adjacent to the development area	No	The importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site is recognised. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
RSPB	· A full understanding of the impacts of the development on those nature conservation interests;	No	The importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site is recognised. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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RSPB	· Appropriate measures identified to avoid, reduce or, where necessary, compensate for those impacts.	No	The importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site is recognised. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
RSPB	Nature conservation value of the area	No	No comment required
RSPB	As the PEIR acknowledges, the proposed development is located adjacent in an area of high nature conservation value. In particular, it is adjacent to the following protected areas:	No	The importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site is recognised. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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RSPB	· The Swale Special Protection Area (the SPA)	No	The importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site is recognised. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
RSPB	· The Swale Ramsar site (the Ramsar site) and	No	The importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site is recognised. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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RSPB	· The Swale Site of Special Scientific Interest (the Swale SSSI)	No	The importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site is recognised. The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
RSPB	Comments on the Preliminary Environmental Information Report (PEIR)	No	No comment required
RSPB	Our detailed comments on the PEIR are set out in the attached annex and the key issues summarised below under the following headings:	No	No response required (this is a summary introduction)
RSPB	· Designated sites	No	No response required (this is a summary introduction)
RSPB	· Potential impacts on nature conservation interests	No	No response required (this is a summary introduction)
RSPB	· Mitigation: consideration of management of land within The Swale SPA/Ramsar site	No	No response required (this is a summary introduction)
RSPB	Designated sites	No	No comment required

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RSPB	The RSPB welcomes the recognition given in the PEIR (ES chapter 9, section 9.3.1) to the national and international importance of the Swale estuary for nature conservation, in particular its breeding, passage and wintering bird populations. The information provided in Table 9.4 (page 9-16) and subsequent paragraphs is a fair summary of the qualifying features of these protected areas. However, the PEIR omits reference to additional pertinent information contained in 2001 and 2016 reviews of the UK Special Protection Area (SPA) network. Details of the most relevant information that should be taken in to account in preparing the ES to accompany the DCO is provided in the annex section.	Yes	Reference to the 2001 and 2016 JNCC SPA Reviews have been included in the Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2).
RSPB	Potential impacts on nature conservation interests	No	No comment required
RSPB	We welcome the effort that has been put in collecting data during 4 winters and 3 breeding seasons	No	No comment required
RSPB	as well as flight patterns for the proposed site.	No	No comment required
RSPB	We are content with the methodologies and surveys undertaken to assess the impacts of the development site on SPA designated features. However Further discussion is needed regarding the analysis and interpretation of this data as well as further references and clarity on assumptions carried out to determine the ecological requirements of these species and, therefore, the necessary amount of land required to accommodate displaced dark bellied brent, lapwing and golden plover.	Yes	The metrics and calculations to describe the use of the Development site by brent geese, lapwings and golden plovers and the capacity of the Arable Reversion Habitat Management Area to support them have been the subject of ongoing consultation with the Habitat Management Steering Group since PEIR. Agreement on these has been reached with Natural England. They have been clearly described in the Environmental Statement, Technical Appendices: Ornithology

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			Technical Appendix (document reference number 6.4.9.1).
RSPB	*Mitigation: consideration of management of land within The Swale Special Protection Area/Ramsar site*	No	No comment required
RSPB	It has been suggested that land within the current SPA/Ramsar site/SSSI could be considered as mitigation for the impacts of the development. We strongly urge caution in pursuing this.	No	The inclusion of the grazing marsh in the Development is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).

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RSPB	It is the RSPB's view that in respect of management of land within an existing SSSI (or SPA, Ramsar site etc) there are extremely narrow circumstances when it would be possible to consider such an approach. This is because the operating assumptions are that such protected areas are either in favourable condition (and cannot be further improved) or in unfavourable condition and will be subject to remedies agreed with Natural England to restore the site to favourable condition. Before any further consideration can be given to the use of this land, it is the RSPB's view that a set of actions would be required in order to demonstrate, with robust evidence, that it would be possible to implement management measures that enable the land to be "enhanced" above favourable condition (these action are described in the annex sections). Separately, Natural England would need to provide an updated condition assessment of the relevant parts of the SPA/Ramsar site/SSSI.	No	The inclusion of the grazing marsh in the Development is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).
RSPB	We also consider that further legal analysis is required to determine whether or not the envisaged measures are properly considered as mitigation or compensation, and how this should be considered within any Habitats Regulations Assessment.	No	The inclusion of the grazing marsh in the Development is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).

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RSPB	Therefore the RSPB remains concerned about this development and its impacts on the SPA, Ramsar site and SSSI until further information and clarifications are made available. As it stands, we do not agree that the current proposals enables a conclusion of no adverse effect on the integrity of the SPA/Ramsar site or SSSI.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
RSPB	As set out above, we have set our detailed comments in an annex and consider these will help ensure that robust evidence is presented so that the potential environmental impacts can be properly understood and evaluated and appropriate measures identified to avoid, reduce or, where necessary, compensate for those impacts.		No response required.

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RSPB Annex	Annex – Cleve Hill Solar Farm RSPB detailed comments on Preliminary Environmental Information Report (PEIR) Introduction This annex sets out the RSPB's detailed comments on the Cleve Hill Solar Farm PEIR as follows: · Designated sites · Potential impacts on nature conservation interests, including measures to avoid, reduce or compensate o Construction noise impacts o Impacts on Dark-bellied brent goose (DBBG) foraging grounds o Impacts on wintering golden plover and lapwing foraging grounds o Mitigation: consideration of management of land within The Swale Special Protection Area, Ramsar site and Site of Special Scientific Interest	No	No comment required.

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RSPB Annex	Overall, the RSPB is concerned at the implications of the scheme for features of the SPA, Ramsar site and SSSI. Our starting point is that there should be no loss of habitat from the SPA/Ramsar site/SSSI or functionally linked habitat. Without prejudice to that position, we strongly recommend that the key measures, such as the wildlife refuge are provided in a manner that effectively address the impacts of this project on features of the protected areas.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of grassland between arrays, removal of development and proposal for lowland grassland meadow in Field Y/Z (LGM HMA) and extension of the AR HMA, as described in ES chapter 4 (Site Selection, Development Design and Consideration of Alternatives).
RSPB Annex	Designated sites The RSPB welcomes the recognition given in the PEIR (ES chapter 9, section 9.3.1) to the national and international importance of the Swale estuary for nature conservation, in particular its breeding, passage and wintering bird populations. As Table 9.4 recognises, the coastal habitats immediately adjacent to the proposed solar farm are, among other things, designated as: · The Swale Special Protection Area (the SPA) · The Swale Ramsar site (the Ramsar site) · The Swale Site of Special Scientific Interest (the Swale SSSI).	No	No response required.

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RSPB Annex	The information provided in Table 9.4 and subsequent paragraphs is a fair summary of the qualifying features of these protected areas.	No	No response required.
RSPB Annex	However, the PEIR omits reference to additional pertinent information contained in the following reviews of the UK SPA network: · 2001 UK SPA Review · 2016 UK SPA Review	No	The 2001 and 2016 JNCC SPA Reviews have no legal standing but provide useful frame of reference for important features of The Swale SPA. Details from the 2001 and 2016 UK SPA Reviews have been included in the RIAA. With regard to the 2001 Review, Important Ecological Features have been appropriately identified in ES chapter 9 and the RIAA considers the relevant qualifying interest features that have been agreed in consultation with Natural England. With regard to the 2016 Review, ES chapter 9 and the RIAA acknowledge the importance of functionally linked land for the qualifying interest features of The Swale SPA.

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RSPB Annex	Below we give a brief description of the most relevant information that should be taken in to account in preparing the ES to accompany the DCO.	No	The 2001 Review has no legal standing in terms of the requirements of the Habitats Regulations but provide a useful frame of reference for important features of The Swale SPA. Important Ecological Features have been appropriately identified in ES chapter 9 and the RIAA considers the relevant qualifying interest features that have been agreed in consultation with Natural England.
RSPB Annex	2001 UK SPA Review The site account for the Swale identified additional qualifying features that should be considered:	No	The 2001 Review has no legal standing in terms of the requirements of the Habitats Regulations but provide a useful frame of reference for important features of The Swale SPA. Important Ecological Features have been appropriately identified in ES chapter 9 and the RIAA considers the relevant qualifying interest features that have been agreed in consultation with Natural England.

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RSPB Annex	Breeding: Avocet Marsh Harrier Mediterranean Gull	No	The 2001 Review has no legal standing in terms of the requirements of the Habitats Regulations but provide a useful frame of reference for important features of The Swale SPA. Important Ecological Features have been appropriately identified in ES chapter 9 and the RIAA considers the relevant qualifying interest features that have been agreed in consultation with Natural England.
RSPB Annex	Non-breeding: Avocet Bar-tailed godwit Black-tailed godwit Golden plover Grey plover Hen harrier Knot Ringed plover (passage) Pintail Redshank Shoveler	No	The 2001 Review has no legal standing in terms of the requirements of the Habitats Regulations but provide a useful frame of reference for important features of The Swale SPA. Important Ecological Features have been appropriately identified in ES chapter 9 and the RIAA considers the relevant qualifying interest features that have been agreed in consultation with Natural England.

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RSPB Annex	We draw attention to the fact that breeding marsh harrier and wintering golden plover are identified as qualifying features as these are some of the key species likely to be impacted by the proposed solar farm.	No	Breeding marsh harrier and wintering golden plover have been assessed in ES chapter 9 as qualifying interest features within the breeding and wintering bird assemblages of the Swale SPA.
RSPB Annex	2016 UK SPA Review Among other things, the most recent review of the UK SPA network reviewed whether the current SPA network provided adequately for species' ecological functions. In particular this considered the issue of whether the species relied on cropped habitats (e.g. arable farmland, improved grassland) outside the current SPA boundary.	No	The 2016 JNCC UK SPA Review has not yet been implemented and therefore has no legal standing. The assessment in ES chapter 9 recognises that the Development site provides functionally linked land important to some of the qualifying interest species of the SPA, particularly dark-bellied brent goose, lapwing and golden plover.
RSPB Annex	The 2016 UK SPA Review identified 17 species1 that required a review of the boundaries of some or all of the SPAs classified for them to ensure the sites' adequately provide for their ecological functions.		The 2016 JNCC UK SPA Review has not yet been implemented and therefore has no legal standing. The assessment in ES chapter 9 recognises that the Development site provides functionally linked land important to some of the qualifying interest species of the SPA, particularly dark-bellied brent goose, lapwing and golden plover.

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RSPB Annex	This is relevant to the Swale SPA as the review identified the need for Natural England to review the adequacy of the Swale SPA boundary for the following non-breeding species: · European white-fronted goose · Dark-bellied brent goose · Golden plover · Lapwing · Curlew.		The 2016 JNCC UK SPA Review has not yet been implemented and therefore has no legal standing. The assessment in ES chapter 9 recognises that the Development site provides functionally linked land important to some of the qualifying interest species of the SPA, particularly dark-bellied brent goose, lapwing and golden plover.
RSPB Annex	Given the importance of the Cleve Hill site for at least three of these SPA species (dark-bellied brent goose, golden plover, lapwing), the RSPB would expect Natural England to be including it as part of their area of search for any future SPA extension for these species.	No	No response required.
RSPB Annex	**Potential impacts on nature conservation interests, including measures to avoid, reduce or compensate** Our comments below concentrate on the impacts on the wintering DBBG, golden plover and lapwing features of the SPA, Ramsar site and SSSI. These focus on the approach to assessing the importance of the Cleve Hill site for these species, the predicted impacts and the adequacy of the habitat management measures to address those impacts, including the Habitat Management Area (HMA).	No	No comment required.

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RSPB Annex	The HMA comprises 41ha as mitigation for functionally linked habitat for DBBG, golden plover and lapwing. The PEIR highlights that only a fraction of this area will effectively be available for foraging by DBBG and a minimum of 64.6ha is required to mitigate for foraging habitat for golden plover and lapwing. We therefore consider the 41ha of HMA being proposed to be insufficient.	Yes	The AR HMA has been extended since PEIR, as described this chapter and in ES chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for. Areas required for lapwing and golden plover are not additional but can be co-located (the rationale is set out in ES Technical Appendix A9.1).
RSPB Annex	We are also aware that the Kent Wildlife Trust will be raising concerns relating to, among other things, breeding marsh harrier and defer to them on that species. As noted above, this species has been identified as requiring addition to the SPA's features.	No	Breeding marsh harrier has been assessed as a qualifying interest feature of The Swale SPA.
RSPB Annex	Construction noise impacts While we agree with the conclusion on operational noise being unlikely to cause permanent and significant levels of disturbance to wintering birds we remain cautious regarding the impacts of construction noise until detailed mitigation measures are made available as part of the CEMP.	Yes	Further assessment of construction noise has been undertaken in Section 9.5 of this ES Chapter 9 and new measures introduced since PEIR to mitigate potentially adverse effects, including an outline SPA Noise Construction Management Plan.

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RSPB Annex	We are particularly concerned with the noise impacts on DBBG, golden plover and lapwing foraging on grazing marsh at the east end of the site which is within the SSSI/SPA/Ramsar site - as mentioned in paragraph 114, page 9-34 of the PEIR - as well as the impacts on the wildlife refuge area which needs to be available for DBBG, golden plover and lapwing to forage on.	No	An assessment of construction noise on this area is provided in Section 9.5 of ES Chapter 9 and in the RIAA.
RSPB Annex	Impacts on dark bellied brent goose (DBBG) foraging grounds The key issues to address are: · Understanding the importance of the Cleve Hill site for the DBBG from the SPA/Ramsar site, including: o The temporal and spatial use of the site by DBBG; o Agreeing on a methodology to express use and importance and assess the impacts of the development o Using that to identify the habitat measures required to address the predicted impacts.	No	An assessment of impacts on dark-bellied brent goose is provided in Section 9.5 of ES chapter 9 and in the RIAA. It includes the rationale and approach to quantifying and mitigating the potential effects of habitat loss/change.

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RSPB Annex	In light of this, we set out our comments on the PEIR below.	No	No comment required.
RSPB Annex	Paragraph 142, page 9-37 of the PEIR: calculating importance of development site in respect of SPA/Ramsar site population In the bullet point section the number of birds using arable land were of peak mean counts while the number for The Swale were highest counts for the NNR and not for the WEBS counts. The correct number to make this assessment should be the following: · 2013/14: 2,000 birds in arable land compared to 2,280 in the Swale = 87% · 2014/15: 3,400 birds in arable land compared to 1,418 in the Swale = 240% · 2015/16: 370 birds in arable land compared to 3,326 in the Swale = 11%	No	The comparison in Section 9.5 of ES chapter 9 between counts of birds on the arable land and the counts of birds made by WeBS for the Swale have been amended since PEIR to show direct comparison between the peak count made during each season of baseline survey with the peak count in the Swale made by WeBS.

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	· 2017/18: 1,740 birds in arable land, Swale WeBS count currently unknown, but likely to be <50%.		

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RSPB Annex	On average, during the 3 years for which there is data available to calculate the percentage of SPA/Ramsar site population using the development site the site has hosted 82% of the DBBG SPA/Ramsar site population. However in paragraph 157 it is stated that the HMA will only provide for 22.7% of the SPA population with no further explanation or evidence on why the consultants think this is reasonable.	Yes	The quantification of bird use of the Development site has not been made simply on the basis of the highest peak count each season, but on the basis of an average measure of use as recorded by baseline surveys - specifically, the inter-seasonal mean of the intra-seasonal monthly-peak mean. The AR HMA has been extended since PEIR, as described this chapter and in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for. The approach to quantifying use and mitigating for habitat loss (set out in Technical Appendix A9.1 and Section 9.5 of ES chapter 9) has been consulted upon and agreed with Natural England.

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RSPB Annex	Paragraph 144, page 9-38 of the PEIR: implications of disturbance distances for amount of functionally available land As noted above, the HMA currently has a gross area of 41ha (which we consider insufficient for reasons set out elsewhere). However, it is the net area of functionally available land that it is critical to understand. This requires careful consideration of known factors affecting the spatial use of otherwise suitable land by DBBG, golden plover and lapwing. Key factors will include: disturbance distances, sightlines, topography, field shape and size, food supply. These will influence the overall land requirement and almost certainly require a larger area in order to ensure the functionally available land is sufficient to meet the ecological requirements of the SPA species.	Yes	The AR HMA has been extended since PEIR, as described this chapter and in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for. The approach to quantifying use and mitigating for habitat loss (set out in Technical Appendix A9.1 and Section 9.5 of ES chapter 9), including consideration of field use and disturbance distances, has been consulted upon and agreed with Natural England.

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RSPB Annex	For example, while we appreciate the reference to the IECS tool kit Meer (1985)2 has found that the distance at which brent geese changed their behaviour (in reaction to a disturbance event) before actually flying off was as much as 95% greater than the flight distance (205m and 105m respectively). Disturbance can be defined as “any situation in which a bird behaves differently from its preferred behaviour” and not only when a bird is observed flying off.	No	The reference to the IECS Toolkit is made in relation to construction disturbance. A thorough literature review of noise thresholds and distances is made in Section 9.5.2.1 of ES chapter 9 and the effect of disturbance to brent geese is assessed in Section 9.5.3.2 of ES chapter 9. Operational disturbance is scoped out of detailed assessment as significant effects are unlikely.
RSPB Annex	Paragraph 107, page 9-37 of the A9.1 appendix: methodological approaches to the use of bird days We recognise the application of bird days as presented in the report could be considered a precautionary approach to assessing the potential impacts of a project such as this one. This is because it appears to assume that the geese (and other species) are present every day throughout their winter period. In the absence of a detailed survey to determine day-to-day usage at a field level, this is a reasonable approach.	No	No response required.

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RSPB Annex	However, we consider further work is required to ensure a fuller understanding of the true value of the land for DBBG (as well as golden plover and lapwing). For this reason at this stage we consider it would be prudent to analyse the data using the mean of seasonal monthly peak mean counts instead of the mean of seasonal means which has implications for the area of HMA required. As we set out elsewhere, we consider the PEIR significantly underestimates the area required to provide sufficient functionally available land.	Yes	The mean of seasonal monthly peak mean counts has been used to provide a precautionary measure of the use of the Development site. The approach to quantifying use and mitigating for habitat loss (set out in Technical Appendix A9.1 and Section 9.5 of ES chapter 9) has been consulted upon and agreed with Natural England. As a result, the AR HMA has been extended since PEIR, as described this chapter and in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for.
RSPB Annex	We also wish to explore other metrics such as means with upper and lower confidence levels so that the variance of counts between years and months can be assessed. This is a standard metric used in offshore windfarms data analysis with which RSPB has experience.	No	Variance in the means was not considered necessary as the analysis is based on peak counts, which provides for a precautionary measure of use.

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RSPB Annex	Paragraph 123, page 9-40 of the A9.1 appendix: use of clover mix While we welcome the use of clovers (Trifolium sp.) at the wildlife refuge area for the purposes of calculating the amount of area needed, the RSPB is discounting this factor as there is no precise data on how much carrying capacity this grass mix will support.	No	The literature review of the management of grassland to support geese indicates that clover will increase its carrying capacity; however, no allowance for such a potential increase in capacity was included in the analysis in the PEIR and there is no inclusion of increased capacity from clovers in the quantification of required mitigation grassland area in the assessment in ES chapter 9 (document reference 6.1.9) and the RIAA (document reference 5.2).
RSPB Annex	Paragraph 120/1/2, page 9-40 of the A9.1 appendix: Carrying capacity calculation and area needs for DBBG As mentioned during our Habitat Management Board meeting the RSPB would prefer that the HMA is managed without the use of fertilizers including nitrogenous in order to secure improvements to water quality. This means that the reliance placed on the use fertilisers should be discounted as unsafe.	No	In consultation with Natural England, the assessment in ES chapter 9 places emphasis on the need to mitigate primarily for brent geese. The ideal grassland management for brent geese includes the application of fertiliser; however, the proposed management as set out in detail in Technical Appendix A9.1, is for application of organic fertiliser, which is restricted in spatial application in fields to avoid spreading near the field boundaries. The net application of fertiliser across the Development site will be considerably reduced compared with the current arable farming management.

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RSPB Annex	Having in consideration that we are discounting the use of clover and fertilizers, the maximum carrying capacity possible to achieve according to the scientific refers provided in these paragraphs would be 2,250 goose-days per hectare (Owen, 1977)[3]. In the RSPB's experience, while we agree that a heavily gazed grassland could provide such carrying capacity the reality of implementing such a regime in an optimum fashion is challenging and therefore we would consider it prudent to use the figure of 1,908 goose- day per hectare (Round, 1982)[4] as the maximum carrying capacity figure.	No	Technical Appendix A9.1 sets out in detail the rationale for the management and capacity of the AR HMA. Based on the literature review and discussions with Natural England , the proposed management of the AR HMA will be primarily focussed on provision of resources for brent geese, including application of organic fertiliser, such that a capacity of 2,097 goose-days per hectare is achievable.
RSPB Annex	In this case, using the total peak mean bird days provided on table A9.23 of the A9.1 appendix (103,590 bird days) the minimum area needed to mitigate for the loss of functionally linked habitat to DBBG would be 54ha of functionally available land. This significantly exceeds the 41ha being proposed as HMA.	Yes	The AR HMA has been extended since PEIR to approximately 56 ha (c. 50.1 ha functionally available), as described this chapter and in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for. The approach to quantifying use and mitigating for habitat loss (set out in Technical Appendix A9.1 and Section 9.5 of ES chapter 9), including consideration of field use and disturbance distances, has been consulted upon and agreed with Natural England.

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RSPB Annex	Paragraph 154, page 9-40 of the PEIR: geese avoidance issues It is mentioned in this paragraph that the geese might avoid areas close to the solar panels. The RSPB considers it crucial to determine the likelihood and the extent of this avoidance in order to accurately determine the area effectively available for foraging. A figure of 100m is suggested for avoidance and we would welcome a scientific reference that could confirm such distance.	Yes	Technical Appendix A9.1 sets out in detail the rationale for the management and capacity of the AR HMA, including a review of literature in relation to set-back distances from anthropogenic boundary features. This determined that there would be reduction in density of birds within 50 m of boundary features such that approximately 50 ha of the 56 ha AR HMA is functionally available.
RSPB Annex	It is also mentioned that only a fraction of the HMA will be used by the geese based on the usage recorded during the surveys i.e. DBBG were observed to only use land within 300m and occasionally 500m of the seawall and that as a consequence only approximately 29 ha would be available to DBBG. It is important to understand what factors are giving rise to this behaviour e.g. sightlines, topography, food supply, and whether this is typical behaviour for DBBG on the Swale. It clearly undermines the value of the HMA and emphasises the need for a much greater area of suitable habitat.	No	Technical Appendix A9.1 sets out in detail the rationale for the management and capacity of the AR HMA. Following further literature review and consultation with Natural England, as well as other anecdotal information, it was concluded that all fields within the AR HMA would be available to brent geese.

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RSPB Annex	The RSPB expects the HMA to be a minimum of 54ha functionally available for foraging by DBBG and not an area which is only partially available.	Yes	The AR HMA has been extended since PEIR to approximately 56 ha (c. 50.1 ha functionally available), as described this chapter and in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for. The approach to quantifying use and mitigating for habitat loss (set out in Technical Appendix A9.1 and Section 9.5 of ES chapter 9), including consideration of field use and disturbance distances, has been consulted upon and agreed with Natural England.
RSPB Annex	The developer will also need to consider the possibility that DBBG might choose not to use the HMA and a provision will be required to provide land elsewhere in The Swale area.	No	A monitoring plan and ongoing consultation with the HMSG during the operational phase will allow for adaptive management of the AR HMA.

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RSPB Annex	Impacts on wintering golden plover and lapwing foraging grounds Paragraph 133, page 9-43 of the A9.1 appendix: Carrying capacity calculation and area needs for lapwing and golden plover While we agree that the same HMA will be able to accommodate for the foraging needs of DBBG and golden plover/ lapwing under the correct management regime the same cannot be said for golden plover and lapwing. Table A9.26 shows that lapwing will need 45.6ha and golden plover 19.3ha meaning that during the first 5 years a total of 64.6ha functionally available for foraging will be required to mitigate for the functionally linked habitat of these two species.	No	The AR HMA has been extended since PEIR, as described this chapter and in ES Chapter 4 (Site Selection, Development Design and Consideration of Alternatives), to provide additional resources for brent geese, lapwing and golden plover in the long term, such that a precautionary average measure of use of the site is provided for. Areas required for lapwing and golden plover are not additional but can be co-located because the underlying data the capacities are based on are of counts of lapwing and golden plover in the same area (the rationale is set out in Technical Appendix A9.1).

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RSPB Annex	Mitigation: consideration of management of land within The Swale SPA/Ramsar site/SSSI Discussions between the developer, the RSPB, Kent Wildlife Trust and Natural England have considered the possibility of including land to the east of the development site and located within the SPA and SSSI. The discussion centred around whether or not it was both practicable and desirable to carry out management measures of the semi-improved grassland to support SPA non-breeding birds displaced from the Cleve Hill site, specifically: dark-bellied brent goose, golden plover and lapwing.	No	No response required.
RSPB Annex	The RSPB is working on the basis that the land being considered corresponds to units 49 and 63 of the Swale SSSI.	No	Yes, the area identified in ES chapter 9 and ES chapter 4 (Site Selection, Development Design and Consideration of Alternatives) comprises two SSSI units: S15 M Attwood Cleve Marsh (049) and Cleve Marsh West (063).

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RSPB Annex	It is the RSPB's view that in respect of management of land within an existing SSSI (or SPA, Ramsar site etc) there are extremely narrow circumstances when it would be possible to consider it. This is because the operating assumptions must be: · The protected area is in favourable condition and therefore there is no additional management that would improve its condition; or · The protected area is in unfavourable condition and therefore Natural England would be working with the landowner or manager to put in place the remedies to restore the land to favourable condition	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs.
RSPB Annex	In both circumstances, it would not be possible for a developer to demonstrate "additionality" to that which is already required to ensure the protected area is restored to or maintained at favourable condition.	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs.

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RSPB Annex	The narrow circumstances referred to relate to situations where it is possible to demonstrate, with robust evidence, that it would be possible to implement management measures that enable the land to be “enhanced” above favourable condition such that: · it address the predicted adverse impacts arising from the development; and · does so without causing harm to the qualifying features of the existing designated site(s).	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs.
RSPB Annex	Current condition of units 49 and 63 of the Swale SSSI The RSPB has reviewed the latest available information from Natural England with regards the condition of units 49 and 63. The condition assessment was last carried out on 28 January 2009. It states both units comprise semi-improved grassland and are in favourable condition.	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs.

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RSPB Annex	During meetings between the developer, the RSPB, Kent Wildlife Trust and Natural England, the view was expressed by both KWT and NE that units 49 and 63 were no longer in as good a condition as they had been previously, although no reference was made to whether or not they still met the standards for favourable condition.	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs.

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RSPB Annex	Therefore, before any further consideration can be given to the use of units 49 and 63, it is the RSPB's view that the following actions would be required: · Natural England to update its condition assessment for units 49 and 63 of The Swale SSSI; · The developer to: o set out the management measures it proposes would be required to address the predicted adverse impacts on the SPA/Ramsar site/SSSI arising from the development; o present robust scientific evidence that those measures would be capable of providing the necessary additionality; and o present robust scientific evidence that this additionality can be provided without causing harm to the relevant protected areas and their qualifying features i.e. the SPA, the Ramsar site and the Swale SSSI.	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs.

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RSPB Annex	Legal considerations In addition to our comments and concerns set out above, it will be important to consider the legal status of such management measures i.e. are they properly described as mitigation or compensation. This is important in terms of how the Habitats Regulations Assessment is carried out.	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs. Any alteration in the management of the SSSI area will be subject to discussion and agreement with Natural England.
RSPB Annex	The scenario being described is unusual and therefore needs to be thought through carefully.	No	The inclusion of the SSSI grazing marsh in the Development (the FGM HMA) is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in ES chapter 9, whereby any benefits from improved management of the SSSI is not reflected in the assessment of residual effects on IEFs. Any alteration in the management of

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			the SSSI area will be subject to discussion and agreement with Natural England.
RSPB Annex	The European Court of Justice has been clear in its judgments that where the loss of habitat within a Natura 2000 site mean an adverse effect cannot be ruled out, then habitat management measures elsewhere within the same Natura 2000 site are properly considered compensation. This is because nothing can be done to avoid the adverse effect.	No	The assessment presented in ES chapter 9 is clear that there is no loss of habitat within the Natura 200 site. Loss/change of habitat is restricted to areas of functionally linked land, where mitigation, rather than compensation is applicable.

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RSPB Annex	In this case, the predicted effect comprises the loss of currently non-SPA habitat used by significant numbers of SPA birds and will result in the displacement of those birds. This is predicted to result in an adverse effect on the birds themselves. Therefore, further legal analysis is required to determine whether or not the envisaged measures are properly considered as mitigation or compensation, and how this should be considered within any Habitats Regulations Assessment.	No	The assessment presented in ES chapter 9 is clear that there is no loss of habitat within the Natura 200 site. Loss/change of habitat is restricted to areas of functionally linked land, where mitigation, rather than compensation is applicable.
Swale Friends of the Earth	We also note – and welcome –the measures proposed for embedded mitigation and habitat enhancement, such as new grassland and wildflower planting, new native species hedgerow planting, tree planting in the shelterbelts, native scrub buffer planting areas and the protection of and enhancement of ditches, which will benefit insects, amphibians, birds, and the water vole population. **We would urge this to be maximised and to follow the recommendations of KWT, Natural England and the RSPB in this respect, and we would want to see these plans protected through a condition in the planning consent.**	No	KWT, Natural England and the RSPB are part of a Habitat Management Steering Group that has been actively engaged with the Applicant since March 2018.
Swale Friends of the Earth	perch-hunt." However, this is based on the typical south-facing design and there is no comment on if this applies to the proposed east-west design or the layout for this project. **We would like to see greater analysis of the pros and cons of east-west orientation versus the typical south-facing design with regard to impact on biodiversity and wildlife, as this is our major concern.**	No	The assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) is made on the basis of the proposed east-west design. Consideration of alternatives is presented in Environmental Statement, Chapter 4: Site Selection, Development

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			Design and Consideration of Alternatives (document reference number 6.1.4).
Swale Green Party	"When considering site selection for utility scale solar developments it is generally agreed that protected areas should be avoided. This is reflected in the scientific literature where modelling approaches include many factors such as economic considerations and visual impact but also often avoid protected areas such as SPAs. This is echoed by organisations such as Natural England and the RSPB that recommend that solar PV developments should not be built on or near protected areas." (p 40. emphasis added.) [Natural England (2016). Evidence review of the impact of solar farms on birds, bats and general ecology. Retrieved on 10/07/2018 from: http://publications.naturalengland.org.uk/publication/6384664523046912.]	No	The Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) sets out the reasons for selecting this site and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) sets out the assessment of effects of the Development, taking into account the proximity of the protected areas.

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Swale Green Party	· The Provisional Environmental Information Report (PEIR) considers potential displacement of dark-bellied Brent geese, lapwing, golden plover, and breeding marsh harriers from construction and operation of the solar farm. The analysis recognises a long-term negative effect of loss of foraging habitat on the site for dark-bellied Brent geese, lapwing, golden plover and breeding marsh harrier.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
Swale Green Party	· The PEIR also acknowledge likely displacement of two species, Cetti's warbler and bearded tit, which (in addition to the marsh harrier) are WCA Schedule 1 species. It also acknowledges that skylark and yellow wagtail will be disturbed. Furthermore, it is acknowledged that construction will disturb peregrines that have been recorded frequently at the site.	No	The Breeding Bird Protection Plan incorporated into the Environmental Statement, Technical Appendices: Construction Environment Management Plan (document reference number 6.4.10.2) that will be implemented during construction avoids disturbance to Schedule 1 species. Construction disturbance to peregrine and other breeding farmland birds is assessed in Environmental Statement, Chapter 9:

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			Ornithology, (document reference number 6.1.9) as not significant.
Swale Green Party	· Construction will disturb birds over at least two seasons. It is a matter of speculation whether disturbed birds will use alternative habitat nearby and will return after construction is complete. A solar farm with east-west panels has never been constructed in the UK so there is no evidence upon which to draw.	No	The assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) is made on the basis of the proposed east-west design, taking into account the substantive habitat enhancements in undeveloped areas of the site. Construction disturbance to breeding farmland birds is assessed in Environmental Statement, Chapter 9: Ornithology, (document reference number 6.1.9) as not significant.

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Swale Green Party	· The PEIR includes a quote from the Barn Owl Trust to the effect that solar farms have the potential to benefit barn owls as the frames of solar panels provide perches from which barn owls can hunt. However, this comment refers to solar farms with south-facing panels – the only type to have been built in the UK. The east-west orientation of panels will provide far fewer suitable perch sites because they will be mounted back-to-back and much closer together. This illustrates that the research and experience on which the environmental impact analysis is based is inappropriate for the current proposal. The east-west orientation and high density will lead to a greater environmental impact than a conventional solar farm. This issue is not adequately considered in the PEIR.	No	The assessment in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) is made on the basis of the proposed east-west design. Suitable perches will be available to barn owls on the solar panel frames, as well as fence posts throughout the Development site in close proximity to the large extents of new grassland habitat that barn owls' favour as foraging habitat. There will more suitable foraging habitat present within the site with the Development than is available in the current baseline arable farm landscape.
Swale Green Party	· The solar panels themselves may present a challenge to birds who may see them as a "watery surface".	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) assesses the potential effect of collision to birds; Natural England guidance states that there is no scientific evidence of collision risk associated with solar PV arrays.

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The Faversham Society	The site forms part of the North Kent Marshes Environmentally Sensitive Area. It is also directly adjacent to the Swale Ramsar site which is designated because it has an important assemblage of bird and plant species. The site will also affect the Swale Special Protection Area and the Swale Site of Special Scientific Interest, the South Swale Nature Reserve and the Swale Estuary Marine Conservation Area and on the opposite side of Faversham Creek, the Oare Marshes Nature Reserve managed by the Kent Wildlife Trust.	No	The importance of the bird populations associated with The Swale SPA/SSSI/Ramsar Site is recognised. Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
The Faversham Society	The Faversham Society's initial analysis suggests there should be particular concerns about the following species:	No	The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2)provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. A Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2)has been undertaken and submitted with the DCO application. A focus of RIAA

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			is the loss of functionally linked land for lapwing, golden plover and brent goose.
The Faversham Society	Brent geese, lapwing and golden plover: Natural England has identified the marshes as important wintering sites for these species.	No	The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2)provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. A Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2)has been undertaken and submitted with the DCO application. A focus of the RIAA is the loss of functionally linked land

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			for lapwing, golden plover and brent goose.
The Faversham Society	Avocet, Wigeon, Dunlin, Redshank, Shelduck, Teal, Little Egret, Grey Plover, Knot, Ruff, Black Tailed Godwit, Bar Tailed Godwit, Curlew, Short Eared Owls, Hobby and Peregrine Falcons: These marshes represent for these species nationally significant habitats that would be detrimental to the populations if lost. The birds use many parts of the site, not only the western end. There are breeding birds such as skylarks, dunnocks and yellow wagtails together with reed buntings, oystercatcher and lapwings nesting all over the site. Most of these are ground-nesting birds and rely on insects found in the existing vegetation to feed their young.	No	The Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts where possible and provide biodiversity enhancements.

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The Faversham Society	Marsh Harriers: Functionally linked to Ramsar site for breeding	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2)provide an assessment of the potential effects of the Development on this species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. A Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) has been undertaken and submitted with the DCO application in Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2). A focus of the RIAA is the loss of functionally linked land for marsh harrier.
The Faversham Society	The developers propose to preserve and improve a small part of the marsh at the eastern end of the site specifically for Brent geese, lapwing and golden plover. (It is worth noting that this includes the additional area within the SSSI to the east of the site proposed in the original scheme.) The Faversham Society considers that this gesture would not compensate for the loss of wildlife habitat across the whole site and cannot be considered mitigation for this wider destruction of habitat.	Yes	The area of arable farm developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site

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			Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.
The Faversham Society	The Society notes that a recent European Court of Justice ruling regarding Habitats Regulation Assessment suggests that a full 'appropriate assessment' will have to be completed to prove that there is no harm to the Swale Special Protection Area beyond reasonable scientific doubt for the scheme to be acceptable.	No	Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) has been undertaken and submitted with the DCO application, with full cognisance of this recent case law.
The Faversham Society	The site forms part of the North Kent Marshes Environmentally Sensitive Area. It is also directly adjacent to the Swale Ramsar site which is designated because of an important assemblage of bird species together with plant species, the Swale Special Protection Area and the Swale Site of Special Scientific Interest, the South Swale Nature Reserve and the Swale Estuary Marine Conservation Area. On the opposite side of Faversham Creek is the Oare Marshes Nature Reserve managed by the Kent Wildlife Trust.	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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The Faversham Society	Natural England have confirmed that they consider the land to be functionally linked land to the Ramsar site and SSSI and that birds that contribute to the Swale Assemblage use the land in winter, in particular, Brent geese, lapwing and golden plover. As a breeding site, the land is functionally linked to the Ramsar site for marsh harriers. The letter from Natural England also advises the developer's wildlife consultant to address the needs of bats, water voles and reptiles as protected species. They comment that the addition of wildflowers in any new grazing land might assist with conditions for pollinating insects.	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
The Faversham Society	The site is best known for birds and it is mainly in this context that it should be considered in connection with the wildlife designations of the Swale mudflats and beaches and the land along the seawall. Wintering bird surveys were taken in 2013/14, 2014/15 and 2017/18. The two earlier surveys show that up to 3400 Brent geese can be found on the farmland together with up to 600 oystercatcher, 300 golden plover, 240 avocet, 300 wigeon, 1000 dunlin and 300 redshanks. Figures from 2017/18 confirm that many birds use the arable and grazing marshland on the site including 1800 Brent geese, 115 shelduck, 690 wigeon, 160 teal, 22 little egret, 1190 oystercatcher, 194 avocet, 1770 golden plover, 150 grey plover, 1000 lapwing, 1660 knot, 23 ruff, 3000 dunlin, 380 black tailed godwit, 150 bar tailed godwit, 160 curlew and 370 redshank. These represent for most species at least nationally important numbers. The land is also used in winter by short eared owls and peregrine	No	Some of the numbers quoted in this comment are misleading and possibly include counts of birds in the intertidal habitats (avocet, for example, have never been recorded outside of the intertidal habitats). Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.

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	falcons in winter. The birds use many parts of the site, not only the western end.		
The Faversham Society	A map shows that there are breeding birds all over the site, not only in the ditches and along the existing tracks. These include skylarks, dunnocks and yellow wagtails together with reed buntings. There are also nest sites throughout the area for oystercatcher and lapwings. Most of these are ground-nesting birds and rely on insects to feed their young. They need cover and lack of disturbance that exists across the site because of its use as farmland with limited access.	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) provides an assessment of the potential effects of the Development on all of these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements that will benefit some species.

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The Faversham Society	As a feeding and roosting area, Brent geese use most of the land, shelduck use land at the west end, little egrets are widespread in their use of the land, mallards use the south parts of the land and golden plovers and lapwing use the whole site. Many species also use the land area at night including lapwing, golden plover, snipe, short eared owls, shelduck and mallard.	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
The Faversham Society	Maps also show that raptors feed and hunt over the whole site. They show the flight paths of the birds which include short eared owls, peregrine falcons, hobbies and marsh harriers. These birds mostly fly at less than 10 metres above the ground while hunting and thus are likely to find most of the site impossible to use either because of disturbance during construction or when the panels are in place.	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2)provide an assessment of the potential effects of the Development on these species, as well as the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements. For example, such species do not favour land for foraging, but frequently hunt along its margins where suitable wetland and grassland habitats occur. The Development will result in substantially more grassland habitat than the arable baseline, resulting in larger extents of foraging habitat.

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The Faversham Society	All of the species that nest or feed on the whole site, roost on it, rest on it or hunt over it would be affected by the panels which will cover much of the area. It is considered that for this reason, the development would be harmful to the Ramsar site, the SSSI and to the other wildlife designations by taking away a large area of functionally linked land.	No	Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) and Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) provide an assessment of the potential effects of the Development on these species, including the impact of loss of functionally linked land, as well as describing the measures implemented with the Development to mitigate potentially harmful impacts and provide biodiversity enhancements.
The Faversham Society	The developers have sought to mitigate against the loss of all the land by proposing to keep part of it at the east end and improving the habitat specifically for Brent geese, lapwing and golden plover. This includes the additional area which is within the SSSI to the east of the site proposed in the original scheme. The Faversham Society considers that this would not adequately compensate for the loss of wildlife habitat across the whole site. It is not mitigation to take away all but a small part of a site and retain this in a better condition with the inclusion of another area of land that is already suitable for a bird roost and feeding area.	Yes	The area developed for solar panels has been reduced since PEIR allowing for more areas to be dedicated to habitat enhancements for birds and other wildlife; these include larger areas of lowland grassland meadow between arrays, removal of development in Field Y/Z and extension of the AR HMA to c. 56 ha, as described in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4). The Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2) concludes that the Development will not adversely affect the integrity of the SPA.

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			The inclusion of the SSSI grazing marsh in the Development is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).

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The Faversham Society	We also wish to draw your attention to this recent court hearing	No	The Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2)has been undertaken and submitted with the DCO application, with full cognisance of this recent case law and it is expected that the competent authority will be undertaking an Appropriate Assessment. The inclusion of the SSSI grazing marsh in the Development is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).

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The Faversham Society	There has been a recent European Court of Justice ruling regarding Habitats Regulation Assessment. This is likely to require that the Planning Inspectorate, who will be determining the application given its size, will be required to carry out a Habitats Regulation Assessment on this development since it would have an effect on the Swale Special Protection Area. It is clear from the correspondence between the applicant's consultants and Natural England that they are concerned about the impact of the disturbance caused by works to create the development on over-wintering birds and in summer on breeding birds across the site which they confirm is functionally linked to the SPA. They are also concerned about the loss of overwintering and foraging habitat all year as a result of the development. This means that a full 'appropriate assessment' will have to be carried out of the development in which any mitigation measures such as the extension of the site to take in an improved part of the SSSI cannot be considered. This appraisal would have to prove that there is no harm to the SPA beyond reasonable scientific doubt for the scheme to be acceptable.	No	The Report to Inform Appropriate Assessment ('RIAA') (document reference 5.2)has been undertaken and submitted with the DCO application, with full cognisance of this recent case law and it is expected that the competent authority will be undertaking an Appropriate Assessment. The inclusion of the SSSI grazing marsh in the Development is not intended to provide mitigation for negative effects, but only to provide opportunity to enhance its management for the benefit of wildlife, particularly breeding and wintering birds. Clearer definitions and assessments have been provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9).

10 Hydrology, Hydrogeology, Flood Risk and Ground Conditions

Section 42 Applicant Regard to Consultee Responses

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Respondent	Comment	Project change?	Applicant Response
Canterbury City Council	Drainage/Flood Risk Relevant policies from the Canterbury District Local Plan are missing from the list of planning policies in Section 10.2.2 of Chapter 10. In addition, no details of surface water drainage have been included within the report.	Yes	Relevant policies from the Canterbury District Local Plan have been included within Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10) and the Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1). 2. Measures such as promoting vegetation and wildflower mix growth under the panels to promote soil cohesion and reduce the risk of soil erosion. The compound that houses the substation and energy storage will contain a permeable road surface with an underdrain that flows to a surface water drain with a non-return valve (at the north of the compound) into an existing drainage ditch draining north.

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CPRE Kent	2. Flood risk We have serious concerns over the quality of the Flood Risk Assessment and the Flood Modelling Document which inform Chapter 10 of the PEIR, inter alia the use of the term 'depth' to describe flooding when any qualified assessor of flood risk would expect to see flood modelling described in relation to Ordnance Datum. We also have been unable to establish with any clarity the underlying engineering and meteorological assumptions which have informed the flood risk modelling, and we trust that these deficiencies will be addressed in the full Development Consent Order application in order that the impacts of this project can adequately be assessed.	No	The Flood Risk Assessment submitted with the PEIR refers to modelled flood depth in metres AOD throughout the document. Flood levels in metres AOD are referenced throughout the Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) and in Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions, Section 10.6.1.9 (document reference number 6.1.10) (also the same sections of the PEIR). The depth measurements are relative to ground level, which was derived from a topographical survey. Modelling parameters are provided in Section 2 of the JBA costal flood modelling report which forms Appendix 1 of the Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) and these were agreed with the Environment Agency prior to the model being re-run.

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CPRE Kent	We are also concerned about the proposed conflict with the Environment Agency's Medway Estuary and Swale Strategy and the managed retreat proposed for this section of the Graveney Marshes.	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS.

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CPRE Kent	3. Soil micro-climate and hydrology There are few references to studies dedicated to the impact of solar technology on wetland hydrology. Those that are quoted deal, for the most part, with site preparation and installation works and are therefore confined to the first 2 to 3 years of the life of the scheme. These, however, highlight some issues of special concern, including soil compaction by heavy plant. In the case of Cleve Hill, underlain by alluvium and London Clay, this could lead to 'panning' and water-logging, with its implications for soil water quality and biodiversity throughout the site.	No	Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration. Depending on weather conditions during construction, temporary roadways (e.g., plastic matting) may be utilised to access parts of the Development site during construction to avoid excessive soil disturbance or compaction. During the operational phase, activity on the Development site will be minimal and would be restricted principally to vegetation and livestock management (the Development site is expected to be grazed by sheep), equipment/infrastructure maintenance and servicing including cleaning and replacement of any components that fail, and monitoring to ensure the continued effective operation of the Development.

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CPRE Kent	The dimensions and spacing of the panels will create a partial canopy covering approximately 40% of the site. This will reduce the evapo-transpiration component of the water balance, thereby increasing the total effective rainfall entering the soil profile. This increase in net infiltration could be sufficient to produce year-round water-logging, leading to profound ecological changes, and long-term damage to the agricultural potential of this area of marsh. Furthermore any measures to improve the drainage infrastructure could carry an increased risk of soil erosion.	No	The areas of the site proposed for solar panels are currently used for arable farming, in which it would be expected that the ground is bare earth, or effectively bare earth (i.e., seeded or seedlings only) for at least c. 30-40% of the time. With the Development, a level of vegetation will exist on a permanent basis across the site. Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3) sets out the likely vegetation under the panels. Between and around the panels, grass and wildflower mix will be seeded and maintained, as set out in Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). The vegetation will assist with preventing run-off and soil erosion, and increasing transpiration, relative to a bare-earth arable scenario.

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CPRE Kent	There is a lack of sufficient base-line data for a comprehensive assessment of the hydrological implications of the installed solar panel array. This should take the form of a programme of measurements of rainfall, evapo-transpiration, soil moisture and surface runoff for a trial solar 3 panel site covering a period of not less than 3 years, in order to achieve at least an approximation to the long-term average annual water balance for the site. We would also recommend concurrent ecological and habitat surveys of the trial plot.	No	The Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10), identifies and assesses the likely significant effects, as required and as informed by Scoping. Further to this, we comment as follows: Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration. Given that agricultural fields at the site remain tilled for substantial parts of the year a trial study is unlikely to give representative results of the conditions that would be present during the operational phase of the Development, where land under the PV arrays would be allowed to naturally vegetate and be grazed by livestock. As vegetation becomes established under the PV arrays there is likely to be a decrease in surface water runoff rates and a reduction in the potential for sediment and agricultural chemicals (e.g., phosphates and nitrates) to transfer into the wider hydrological

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			catchment compared to the baseline scenario.

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CPRE Kent	We also recommend at least one adjacent undisturbed and fully instrumented control plot of similar dimensions to the trial site. Full details and guidance on the evaluation programme could be sought from IOH at Wallingford who would also be available to consult on the interpretation of the outputs from the hydrological and ecological programmes. There are 'small plot' runoff models which could possibly be adapted for the Cleve Hill situation.	No	The Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10), identifies and assesses the likely significant effects, as required and as informed by Scoping. Further to this, we comment as follows: Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study, Section 2.3 (document reference number 6.4.5.3) concluded that soil moisture at Cleve Hill is likely to be high variable but overall will probably be higher under east-west PV arrays due to reduced wind speeds, lower evaporation and reduced transpiration. Given that agricultural fields at the site remain tilled for substantial parts of the year a trial study is unlikely to give representative results of the conditions that would be present during the operational phase of the Development, where land under the PV arrays would be allowed to naturally vegetate and be grazed by livestock. As vegetation becomes established under the PV arrays there is likely to be a decrease in surface water runoff rates and a reduction in the potential for sediment and agricultural chemicals (e.g., phosphates and nitrates) to transfer into the wider hydrological

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			catchment compared to the baseline scenario.
Environment Agency	Flood risk We have no concerns in terms of flood risk to the proposed development at this site. The submitted Flood Risk Assessment (Technical Appendix A10.1: Flood Risk Assessment (FRA)) details the development proposals and outlines flood risk mitigation measures. We are satisfied with the application of the Exception Test in relation the site layout and design and have reviewed the tidal flood modelling undertaken and have no concerns with this.	No	No action required.

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Environment Agency	As you are aware we are currently completing the Medway Estuary and Swale Strategy (MEASS). This will set out our plan for the management of the coastline for the next 100 years. The proposed plan for the Cleve Hill site is to provide managed realignment in the second epoch of the strategy (years 20-50). Managed realignment would create set back defences inland of their current position in order to provide intertidal habitat.	No	No action required.
Environment Agency	The proposed policy options set out within MEASS are based on government policy and treasury rules for allocation of public funding. All flood defence spending must be based on the cost / benefit of either building or maintaining an asset. The strategy shows that publicly funded maintenance of the defences at Cleve Hill is not economically viable without the associated justification of managed realignment in the future. We therefore expect major infrastructure owners such as Cleve Hill Solar Park Ltd to undertake maintenance of the defences whilst occupying the site. In the case of Cleve Hill Solar Park, we would expect this to come into effect once construction / use of the site commences.	No	No action required.

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Graveney with Goodnestone Parish Council	8. Hydrology, Hydrogeology, Flood Risk and Ground Conditions The CHSP site is within Environment Agency's (EA) Flood Zone 3a and therefore at high flood risk. The flood risks on this site are sea flooding, tidal flooding and surface water flooding. We are pleased to see that flood risk has been the subject of extensive analysis and consultation with the statutory authorities.	No	No action required.
Graveney with Goodnestone Parish Council	The EA's draft Medway Estuary and Swale Strategy (MEASS) has recently been the subject of consultation. It proposes to "hold the line" along the Graveney Marshes frontage (area BA6.2 in the Strategy) by maintaining the existing coastal defences for the next 20 years, but then switching to a "managed realignment policy" allowing the site to mitigate against coastal squeeze elsewhere. In effect, this would mean the gradual replacement of arable farmland with coastal grazing marsh which could be flooded at times. Other areas would be protected by new flood embankments. "Managed realignment" will not only mitigate the biodiversity impacts of coastal squeeze, it will also reduce flood risk elsewhere along the North Kent coast as sea levels rise.	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS.
Graveney with Goodnestone	We understand that the EA and CHSP have agreed that CHSP will take on maintenance of the coastal defences for the life of the solar farm (up to 40	No	No action required.

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Parish Council	years?) and this is reflected in the extension of the proposed DCO site boundary up to the sea wall.		
Graveney with Goodnestone Parish Council	We are concerned as to how this arrangement will be secured and maintain the expected standards of flood protection over the life of the MEASS (up to the year 2118). Accordingly, we would like further information on how CHSP's commitment to flood protection will be secured. Will CHSP provide a financial bond to ensure that flood defence funding is available if they vacate the site? What will be the approach to coastal flood risk management once decommissioning of the solar development occurs?	No	The Environment Agency's MEASS strategy sets out an anticipated approach to coastal flood risk management over the next 100 years. Without the presence of the solar park, the EA expects to cease maintenance of the existing defences sometime between 20 and 50 years in the future in order to facilitate a managed realignment of the existing defences on the site. With the presence of the solar park, the EA expects to cease maintenance of the defences earlier, on the basis that the maintenance will be carried out by the main beneficiaries of it (those who own assets which are protected by the coastal defences), as it is clearly in their interests to do so. The MEASS is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The majority of Cleve Hill Solar Park is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme

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			events. Only the electrical compound is designed to withstand a breach of the existing defences. It is therefore clearly in the asset owners' interest to maintain the current standard of defences, to at least the same standard that the EA currently do. This represents a significant investment in maintaining the current standard of protection over the operational lifetime of the project. Upon decommissioning, decisions relating to coastal flood risk management and specifically the ongoing maintenance of the defences in this area would revert to the EA, in consultation with any beneficiaries at that time. It is also relevant that the EA do not currently have an obligation to maintain the existing defences.
Graveney with Goodnestone Parish Council	Surface water flooding is also a concern. Our concern is based on two points: · The PEIR says that groundwater is evident about 1 metre below the surface and so the "normal" range of SUDS (sustainable drainage) measures are not likely to be effective over much of the site.	No	Due to the presence of groundwater at 1 m depth infiltration SuDS are unlikely to be effects and have therefore been discounted as a viable option to attenuate surface water. SuDS proposed are to attenuate surface water run-off rates before discharge back into the hydrological network not to serve as infiltration structures. SuDS also serve to manage the quality of run-off and limit the potential for pollution and have been demonstrated to be effective in environments with low permeability. The area in which the

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			Development is located is essentially flat and is drained by a series of agricultural ditches, meaning that any ponding surface water is unlikely to be transferred to adjacent land.
Graveney with Goodnestone Parish Council	· The design and layout of the solar arrays comprises large blocks of mounting structures and arrays without intervening gaps and the “drip lines” associated with “traditional solar array layouts (the surface area to drip line length ratio is much smaller).	No	Each table of panels will comprise several PV modules, with dimensions typically as set out in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). Each module will be of the order of 1m by 2m, and water will drip off each module (there will be small gaps between modules). This means that the surface area to drip line length ratio will be the same as for "traditional" solar array layouts, which use the same modules. Theoretically the introduction of PV panels will increase the run off rates due to the presence of the impermeable PV modules that rainfall can directly fall on, however once rainfall has fallen off the PV panel any flow will be able to spread and flow along the ground under the PV panels. Given the flat nature of the Core Study Area it is likely that

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			rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the panels were installed.

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Graveney with Goodnestone Parish Council	The combination of these two points suggests that rain water will drain off hard surfaces at fewer points and will go onto ground with very limited capacity to absorb it. The PEIR (pp 10-39) says that "surface water run off rates will potentially increase by 37.6% over the baseline". We are concerned that, in intense rainfall events, this could cause surface water flooding problems and would like reassurance that this will be properly handled and in particular will not cause problems for adjacent land owners. Even in current conditions, surface water sometimes sits on the land for days on end.	No	Due to the presence of groundwater at 1 m depth infiltration SuDS are unlikely to be effective and have therefore been discounted as a viable option to attenuate surface water. SuDS proposed are to attenuate surface water run-off rates before discharge back into the hydrological network not to serve as infiltration structures. SuDS also serve to manage the quality of run-off and limit the potential for pollution and have been demonstrated to be effective in environments with low permeability. Theoretically the introduction of PV panels will increase the run off rates due to the presence of the impermeable PV modules that rainfall can directly fall on, however once rainfall has fallen off the PV panel any flow will be able to spread and flow along the ground under the PV panels. Given the flat nature of the core Study Area it is likely that rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the panels were installed. Additionally, the area in which the Development is located is drained by a series of agricultural ditches, meaning that any ponding surface water is unlikely to be transferred to adjacent land.

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GREAT Graveney	1. **Hydrology, Hydrogeology, Flood Risk and Ground Conditions**	No	No action required.
GREAT Graveney	The CHSP site is within Environment Agency's (EA) Flood Zone 3a and therefore at high flood risk. The flood risks on this site are sea flooding, tidal flooding and surface water flooding. The flood risk has been the subject of extensive analysis and consultation with the statutory authorities.	No	No action required.
GREAT Graveney	The EA's draft Medway Estuary and Swale Strategy (MEASS) has recently been the subject of consultation. It proposes to "hold the line" along the Graveney Marshes frontage (area BA6.2 in the Strategy) by maintaining the existing coastal defences for the next 20 years , but then switching to a "managed realignment policy" allowing the site to mitigate against coastal squeeze elsewhere. In effect, this would mean the gradual replacement of arable farmland with coastal grazing marsh which could be flooded at times. Other areas would be protected by new flood embankments. "Managed realignment" will not only mitigate the biodiversity impacts of coastal squeeze, it will also reduce flood risk elsewhere along the North Kent coast as sea levels rise.	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS. Under the MEASS the preferred option is to allow managed retreat after the decommissioning of the Development.

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GREAT Graveney	CHSP have attempted to influence the consultation on the MEASS without even yet having applied for a DCO. The area from Faversham to Seasalter is identified in the Shoreline Management Plan as an area where Managed Realignment could lead to biodiversity opportunities – specifically by changing from its current agricultural purpose to a more dynamic habitat such as saltmarsh (p22 IGSF-SMP-Report.pdf[1]). The specific SMP information for the land says: "Realignment would create a coast that will not require ever increasing expenditure to maintain in the coming centuries, create important brackish and saline habitats, negate the impact of coastal squeeze and reduce the risk of uncontrolled flooding." (p73 Statement_4a07A.pdf[2]). If this land is no longer available for this environmentally-enhancing habitat creation purpose, then other land will be required instead.	No	The Environment Agency's "Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We will not take responsibility for continued maintenance of the defences in this area. • A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS. Under the MEASS the preferred option is to allow managed retreat after the decommissioning of the Development.
GREAT Graveney	It appears that EA and CHSP have discussed that CHSP would take on maintenance of the coastal defences for the life of the solar farm (up to 40 years ?) and this is reflected in the extension of the proposed DCO site boundary up to the sea wall.	No	No action required.
GREAT Graveney	GREAT asks:	No	No action required.

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GREAT Graveney	· Without a DCO in place, what gives the CHSP grounds for trying to influence Kent's flood strategy?	No	The Applicant is seeking to secure the existing level of protection which the Development site benefits from throughout the operational lifetime of the Development. The Applicant is not seeking to influence Kent's flood strategy.
GREAT Graveney	· What will CHSP do to compensate for the waste of time and unnecessary disruption to the MEASS consultation in the event that a DCO is not granted?	No	The Applicant responded to the EA MEASS consultation as part of their wider public consultation on the strategy. The response has prompted the EA to consider alternative proposals in respect of different scenarios in the MEASS which is one of the reasons for undertaking such a consultation.
GREAT Graveney	· What alternative land will CHSP make available to offset the loss of these future important habitats?	No	The EA is responsible for producing and implementing the MEASS.
GREAT Graveney	· The area proposed for the solar facility is currently part of the Environment Agency's	No	This is a partial sentence, it is unclear what the point was to respond to.

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GREAT Graveney	· How will this arrangement be secured to maintain the expected standards of flood protection over the life of the MEASS (up to the year 2118)?	No	The Environment Agency's MEASS strategy sets out an anticipated approach to coastal flood risk management over the next 100 years. Without the presence of the solar park, the EA expects to cease maintenance of the existing defences some time between 20 and 50 years in the future in order to facilitate a managed realignment of the existing defences on the site. With the presence of the solar park, the EA expects to cease maintenance of the defences earlier, on the basis that the maintenance will be carried out by the main beneficiaries of it (those who own assets which are protected by the coastal defences), as it is clearly in their interests to do so. The MEASS is expected to set out a "Plan B" scenario should the Development be constructed, which is likely to shift the expected timescales for managed realignment to between 50 and 100 years in the future. The majority of the Development is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme events. Only the electrical compound is designed to withstand a breach of the existing defences. It is therefore clearly in the asset owners' interest to maintain the

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			current standard of defences, to at least the same standard that the EA currently do. This represents a significant investment in maintaining the current standard of protection over the operational lifetime of the project. Upon decommissioning, decisions relating to coastal flood risk management and specifically the ongoing maintenance of the defences in this area would revert to the EA, in consultation with any beneficiaries at that time. It is also relevant that the EA do not currently have an obligation to maintain the existing defences.
GREAT Graveney	· How will CHSP's commitment to flood protection be secured?	No	Flood defence maintenance is an integral part of the Development Consent Order (document reference number 3.1) application and is likely to be the subject of Development Consent Order Requirement(s) (document

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			reference number 3.2), the NSIP equivalent of planning conditions.
GREAT Graveney	Surface water flooding is also a concern. Concerns are based on two points:	No	No action required.
GREAT Graveney	· The PEIR says that groundwater is evident about 1 metre below the surface and so the “normal” range of SUDS (sustainable drainage) measures are not likely to be effective over much of the site	No	Due to the presence of groundwater at 1 m depth infiltration SuDS are unlikely to be effective and have therefore been discounted as a viable option to attenuate surface water. SuDS proposed are to attenuate surface water run-off rates before discharge back into the hydrological network not to serve as infiltration structures. SuDS also serve to manage the quality of run-off and limit the potential for pollution and have been demonstrated to be effective in environments with low permeability

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GREAT Graveney	· The design and layout of the solar arrays comprises large blocks of mounting structures and arrays without intervening gaps and the “drip lines” associated with “traditional solar array layouts” (the surface area to drip line length ratio is much smaller)	No	Each table of panels will comprise several PV modules, with dimensions typically as set out in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5. Each module will be of the order of 1m by 2m, and water will drip off each module (there will be small gaps between modules). This means that the surface area to drip line length ratio will be the same as for "traditional" solar array layouts, which use the same modules. Theoretically the introduction of PV panels will increase the run off rates due to the presence of the impermeable PV modules that rainfall can directly fall on, however once rainfall has fallen off the PV panel any flow will be able to spread and flow along the ground under the PV panels. Given the flat nature of the Site it is likely that rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the panels were installed.

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GREAT Graveney	The combination of these two points suggests that rain water will drain off hard surfaces at fewer points and will go onto ground with very limited capacity to absorb it. The PEIR (page 10-39) says that "surface water run-off rates will potentially increase by 37.6% over the baseline".	No	Theoretically the introduction of PV panels will increase the run off rates due to the presence of the impermeable PV modules that rainfall can directly fall on, however once rainfall has fallen off the PV panel any flow will be able to spread and flow along the ground under the PV panels. Given the flat nature of the Site it is likely that rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the panels were installed.
GREAT Graveney	GREAT asks:	No	No action required.
GREAT Graveney	· What strategies would be employed when, in intense rainfall events, surface water flooding will present problems?	No	The site infrastructure is designed to remain above and function to a 1:1000 year plus climate change wave overtopping scenario, therefore it is unlikely an intense rainfall event could replicate the same water level. Due to the flat topography and implementation of seeding the Development area with wildflower the strategy in the event of an intense rainfall event is for the surface water to infiltrate.

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GREAT Graveney	· How will the prevention of flooding of adjacent land be dealt with?	No	There are no plans to increase the height of the existing flood defences, therefore the coastal risk to adjacent land is the same as the baseline scenario. Theoretically the introduction of PV panels will increase the surface water run off rates due to the presence of the impermeable PV modules that rainfall can directly fall on, however once rainfall has fallen off the PV panel any flow will be able to spread and flow along the ground under the PV panels. Given the flat nature of the Site it is likely that rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the panels were installed.
Kent County Council	Chapter 10: Hydrology, Hydrogeology, Flood Risk and Ground Conditions	No	No action required.

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Kent County Council	KCC as Lead Local Flood Authority (LLFA) notes that within Volume 1, Chapter 10 of the PEIR report, environmental effects such as increased surface water runoff and potential transfer of pollutants to surface water during construction are mentioned. However, there is no elaboration of what these effects will be and no mention of surface water drainage. KCC recommends full consideration is given to the method of removing pollutants and to the cleanliness of the water discharged from the site, when compiling the Flood Risk Assessment/Drainage Strategy.	No	The PEIR assessed the potential for surface water pollution measures such as silt traps and buffer strips will minimise sedimentation and erosion; further details of these measures are outlined in Sections 2, 6 and 7 of the Environmental Statement, Technical Appendices: Construction Environment Management Plan (document reference number 6.4.10.2). These measures will protect the hydrological environment during the construction phase. Subsequent communication with KCC has indicated that attenuation for the compound is unlikely to be required and that measures such as seeding the entirety of the area under the PV arrays is likely to be sufficient to control surface water run-off rates compared to the baseline scenario.
Marine Management Organisation	Thank you for your letter dated 31/05/2018, notifying the Marine Management Organisation (the "MMO") of Cleve Hill Solar Park Ltd.'s intention to submit an application for development consent under the Planning Act 2008 (the "2008 Act") to develop a solar park at Cleve Hill, Graveney.	No	No action required.
Marine Management Organisation	The MMO's role in Nationally Significant Infrastructure Projects	No	No action required.

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Marine Management Organisation	The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.	No	No action required.
Marine Management Organisation	The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Welsh and Northern Ireland offshore waters by way of a marine licence[1]. Inshore waters include any area which is submerged at mean high water spring ("MHWS") tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area.	No	No action required.
Marine Management Organisation	In the case of Nationally Significant Infrastructure Projects ("NSIPs"), the 2008 Act enables Development Consent Order's ("DCO") for projects which affect the marine environment to include provisions which deem marine licences[2].	No	No action required.

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Marine Management Organisation	As a prescribed consultee under the 2008 Act, the MMO advises developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works.	No	No action required.
Marine Management Organisation	Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence ("dML") enable the MMO to fulfil these obligations.	No	No action required.
Marine Management Organisation	Further information on licensable activities can be found on the MMO's website[3]. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note[4].	No	No action required.
Marine Management Organisation	Cleve Hill Solar Park	No	No action required.

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Marine Management Organisation	It is proposed that the Cleve Hill Solar Park would consist of solar photovoltaic panels, along with inverters and cables and battery storage. The electricity generated and stored would connect to the existing National Grid substation, located to the east of the proposed Cleve Hill Solar Park site, from where it will enter the national grid. An area of the site to the north east of the site is proposed to be dedicated as a managed habitat area for birds. Maintenance works may also be required during the operational lifetime of the project to the sea defence beneath the Saxon Shore Way, which is located along the north and west boundaries of the site.	No	No action required.
Marine Management Organisation	Although not initially consulted on the scoping completed as part of this development, a change of site boundary means that the works now fall partially below Mean High Water Springs, and therefore within the MMO's remit.	No	No action required.
Marine Management Organisation	The MMO has reviewed the consultation documents received 31/05/2018 and sets out our initial comments below. The MMO reserves the right to make further comments on the Project throughout the pre-application process and may modify its present advice or opinion in view of any additional information that may come to our attention.	No	No action required.
Marine Management Organisation	Comments on the Cleve Hill Solar Park Statutory Consultation	No	No action required.

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Marine Management Organisation	1 General Comments	No	No action required.
Marine Management Organisation	1.1. It is understood that the MMO were not consulted on the original scoping opinion for the project, as the site boundary was entirely above MHWS. It has subsequently been identified that there is a requirement to maintain coastal flood defences as set out in section 5.2 of the Preliminary Environmental Information Report (PEIR) (May 2018). These flood defence works are below MHWS, therefore fall under the remit of the MMO.	No	No action required.
Marine Management Organisation	1.2. The MMO understands that the applicant is in discussions with the Environment Agency with regard to the above flood defence works. Should these works be carried out by, **or on behalf of** the Environment agency, it is possible that they would be exempt from requiring a Marine Licence, and therefore would withdraw MMO's obligations relating to any potential DCO.	No	Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be

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			undertaken by CHSPL in the same way that the EA does currently. • Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.
Marine Management Organisation	1.3. It is up to the applicant to determine whether the activity satisfies the exempted activities criteria – this can be found on the MMO website at: https://ww.gov.uk/government/publications/marine-licensing-exempted-activities/marine-licensing-exempted-activities.	No	Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently.

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			• Deemed Marine Licence – CHSPL would include a DML in the DCO application with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.
Marine Management Organisation	1.4. Should the works below Mean High Water Springs not meet the above criteria, then MMO would look to carry out its obligations relating to post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. Should this be the case, we would recommend early engagement with the MMO to ensure our requirements are fully met within any potential DCO with a view to agreeing a Statement of Common Ground prior to the commencement of Examination, should the application be Accepted.	No	Following consultation with the MMO it has been agreed that two options for obtaining the necessary rights and abilities to undertake maintenance of the existing flood defences at Cleve Hill seaward of Mean High Water Springs will be included in the DCO application: • Exemption – In the DCO CHSPL would seek to replicate the Environment Agency's exemption from requiring a marine licence for flood defence works seaward of MHWS enabling maintenance works to be undertaken by CHSPL in the same way that the EA does currently. • Deemed Marine Licence – CHSPL would include a DML in the DCO application

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			with associated conditions which would require discharging by the MMO ahead of flood defence maintenance works seaward of MHWS. During the Examination phase, the Applicant in consultation with the relevant consultees and the Examining Authority will decide which of the above routes is most appropriate.
Marine Management Organisation	Your feedback	No	No action required.
Marine Management Organisation	We are committed to providing excellent customer service and continually improving our standards and we would be delighted to know what you thought of the service you have received from us. Please help us by taking a few minutes to complete the following short survey (https://www.surveymonkey.com/r/MMOMLcustomer).	No	No action required.
Marine Management Organisation	If you require any further information please do not hesitate to contact me using the details provided below.	No	No action required.
Medway IDB	Generally I have no issue with the solar park idea. The design and any proposed works need to take into account that IDB Land Drainage Consent will be needed for any works within 8m of the IDB adopted watercourse. You need to be mindful of the Board Byelaws which I have attached for your information.	No	The relevant consents will be sought prior to construction.

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	Any culverting or alterations to any of the ditches and water bodies on the site will also require the LMIDB's written consent. So I have also attached a consent application.		
Medway IDB	I have attached a plan showing all the IDB adopted watercourses in the area that the Byelaws will be effected by. Most of the ditches have annual maintenance carried out to them so access to the land will be important to me and my staff throughout the year.	No	A minimum separation of 8 m from ditches to Development infrastructure has been applied. Except for fences and the spine road. Where culverts are required to cross IDB managed ditched, appropriate consents will be sought prior to construction.
Medway IDB	I hope this information helps. If you have any further queries please come back to me.		No response required.
Medway IDB	At this stage I think the important thing is for you to tell me what you are proposing to do so I can let you know if its conflicting with anything the IDB does in the area.		Ongoing dialogue with the IDB will take place throughout the lifetime of the project.
Swale Green Party	· The present Shoreline Management Plan for this area indicates that protection of the existing shoreline will be maintained until 2025. After this a policy of "managed realignment" is planned with the idea that financial gains will accrue as the land will slowly become predominantly saline marshes under a policy of limited interference, i.e. as rising sea levels will almost certainly allow coastal flooding to occur. In fact, given that the present sea defences are about 60 years old and the Environment Agency does not have the resources to spend on sea defence strengthening, it is likely that the sea will reclaim the area relatively rapidly. The encroachment of the sea	No	The EA currently have responsibility for the maintenance of the defences and have agreed that the operator of the Development should economically contribute to the future maintenance of the defences. Given that the existing defences provide a level of protection up to the 1:1000-year flood event, there is no anticipated requirement for the defences to be raised beyond their current height.

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	could create positive conditions for coastal birds and for near shore natural coastal ecosystems. The increase in coastal wetlands is extremely important in terms of reversing losses that have occurred over past centuries.		
The Faversham Society	3. **Flood Risk**	No	no action required
The Faversham Society	These marshes are a protective floodplain for Faversham. The seawall is currently the responsibility of the Environment Agency and therefore under democratic control. If the Agency were to delegate responsibility to the operators of the site for the flood defences, they would be able to raise the height of the wall at will in order to protect their assets. This lack of public accountability for such important actions is unacceptable. We also have concerns about the impact of insulating such a large area of land from inundation – most particularly on increasing the flood risk in Faversham town - already prone to flooding. The marsh area has long been a coastal floodplain which protects Faversham.	No	The Site does not act as functional floodplain and is protected by existing flood defences to the north and west, and hence does not store flood water and protect Faversham from flooding. The EA currently have responsibility for the maintenance of the defences and have agreed that the operator of the Development should economically contribute to the future maintenance of the defences. Given that the existing defences provide a level of protection up to the 1:1000-year flood event, there is no requirement for the defences to be raised beyond their current height.

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The Faversham Society	Proper quantitative modelling of the long-term risks of the flooding of our town and surrounding villages is required.	No	The Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) includes an appendix that provides robust quantitative modelling of the current and future flood risk for the Site. The methodology and the conclusions of this assessment have been approved by the EA as the competent regulatory body responsible for commenting on tidal flood risk. The protection from flooding of the Site will not affect off-site locations relative to the baseline situation.

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The Faversham Society	In addition, it is our understanding that a large battery area (apparently the size of 15 football pitches) that developers intend to construct, will be built so as to block the existing drainage ditch which separates Graveney and Cleve Marshes. Moreover, the whole area is to be surrounded by a high earth bund. This will increase the risk of flash-flooding across and more particularly beyond the site in the downpours that are occurring with increasing frequency.	No	The proposed compound dimensions are set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). A section of drainage ditch will be diverted to accommodate the compound. As outlined in Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions, Section 10.6 (document reference number 6.1.10) the diverted ditch dimensions will be the same or better than the baseline scenario ensuring no loss of flow conveyance. The earth bund will protect the compound in the unlikely event of a breach in the existing flood wall to the north of the Site. Measures to control surface water run-off to greenfield rates within the compound area are outlined in Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1). Additionally, the outer facing slopes of the bund will be planted and vegetated, which is likely to limit the potential for rainwater to be transferred rapidly to the surrounding area, therefore there will be no increase in surface water run-off rates from the compound.

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The Faversham Society	10. **Soil and Soil Erosion**	No	No action required
The Faversham Society	Developers propose to create what they have called 'grazing land' under the panels with a mix of grasses and wildflower species. They propose the grazing of sheep. Even if this were to prove possible, such plans are less than adequate compensation for the loss of such a large, grazing marsh so productive of wildlife.	No	Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) sets out that there will be a net biodiversity gain from the Development. The solar panel areas are principally on areas of land currently used for arable farming.
The Faversham Society	The solar panels will prevent the soil from absorbing rainwater and will concentrate the flows so that rainwater will cascade onto the ground, causing soil erosions and general degradation. Moreover, the Society has yet to be assured that the ground beneath the panels will have sufficient sunlight to permit much vegetation and therefore animal life beneath the canopy of panels. We have seen no evidence to allay our fear that a 'desert' will be created over a very large area. Comparison with other solar panel sites is of little relevance because of the size, height and density of panels proposed for Cleve Hill.	No	The solar panels will not 'prevent soil from absorbing rainwater' as the panels will not be placed directly on the ground. The same area of soil will be available for infiltration. Theoretically the introduction of PV panels will increase the run off rates due to the presence of the impermeable PV modules that rainfall can directly fall on, however once rainfall has fallen off the PV panel any flow will be able to spread and flow along the ground under the PV panels. Given the flat nature of the Site it is likely that rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the panels were installed.

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The Faversham Society	The site is in a high-risk area for flooding, being in flood zone 3a. Therefore, the Sequential Test and the Exception Test have been applied. At paragraph 101 of the NPPF advises: 'The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding.'	No	Environmental Statement, Technical Appendices: Flood Risk Assessment, Section 8.1 (document reference number 6.4.10.1) concludes that the Development meets the requirements set out in Table 3 of the Planning Practice Guidance and meets the requirements of the Sequential Test. The Environment Agency has accepted this finding in a separate consultation response.
The Faversham Society	The site is vulnerable to flooding by the sea and is defended from flooding at present by the sea wall. The developers state that they have considered the need for a connection to the National Grid and they have found no other site in Kent that is suitable that is within flood zones 1 or 2. The Faversham Society considers that part of the reason they have found this to be the case is that the proposal is so large that only a site in this location can satisfy the requirement.	No	Section 8.1 of Environmental Statement, Technical Appendices: Flood Risk Assessment (document reference number 6.4.10.1) submitted as part of the PEIR concludes that it is considered that the Development meets the requirements set out in Table 3 of the Planning Practice Guidance and meets the requirements of the Sequential Test.
The Faversham Society	1. Given your intention to take ownership of the seawall, how does the Environment Agency retain responsibility and accountability for environmental protection?	No	The Applicant is seeking to secure the necessary rights to undertake maintenance of the seawall, CHSPL is not seeking ownership of the seawall. The EA will retain responsibility and accountability for environmental protection through existing

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			(and future) legislation such as the Environmental Protection Act.
The Faversham Society	2. How does the Environment Agency retain responsibility and accountability for flood protection of Faversham and the surrounding area?	No	There are three tiers of coastal defence planning which guide EA and lead local flood authority decision making in respect of flood protection: Shoreline Management Plans identifying general policies and general implementation; Strategy (the MEASS in the case of Faversham and the surrounding area, which is expected to take into account the potential presence of the Development) which identifies the nature and timing of works to be undertaken; and Schemes which are the design and construction of capital works and maintenance.
The Faversham Society	3. Are the developer's proposals for managing the seawall consistent with the Medway Estuary and Swale flood and coastal risk management strategy?	No	the EA's "The Medway Estuary and Swale Strategy - A Summary of Consultation Responses - Report – MMD-347800-S-RE-005-C", Section 4.2 (Comments on specific Benefit Areas) document states that, "Should the plans for the solar farm at Cleve Hill be approved and this moves forward to construction, the following will replace the current policy: • We [the EA] will not take responsibility for continued maintenance of the defences in this area.

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			• A Managed Realignment site would be proposed in the longer term following the lifetime of the solar farm". As such, the Development is not in conflict with most recent version of the MEASS.

11 Cultural Heritage and Archaeology			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**

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Canterbury City Council	Cultural Heritage/Archaeology Relevant policies from the Development Plan are missing from the list contained in Section 11.1.1 of Chapter 11.	No	Only policies relevant to the assessment are included in Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11). Policies relevant to the planning decision are included in Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6).
Canterbury City Council	During the Planning Inspectorate consultation on the Scoping Report, Canterbury City Council commented that any Environmental Statement (ES) should fully assess the impact of the project on heritage assets from longer views from the Canterbury district (including the historic setting of Whitstable) but this does not appear to have been carried out in Chapter 11.	Yes - change in assessments reported in the ES chapter.	Although these receptors are outside the study area and considered highly unlikely to receive any effects on heritage assets, in response to the comment, potential effects on this asset (the historic setting of Whitstable) have been assessed in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.2.5.3 (document reference number 6.1.11).
Canterbury City Council	Canterbury City Council endorse the views of KCC on this matter and in particular, their request for further details of the habitat mitigation area within the eastern part of the site that falls within Canterbury	No	No development is proposed within this area. Any archaeological concerns will be addressed through a Written Scheme of Investigation (document reference number 6.4.11.4) to be agreed with KCC.

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	district to assess its impact on archaeology.		
Graveney with Goodnestone Parish Council	9. Cultural Heritage and Archaeology We strongly agree that the "setting" of heritage assets is an important planning consideration (PEIR pp 11-13) and that setting also includes intangible matters such as atmosphere and ambience: the latter are very strong features of the coastal marshes over much of the CHSP site. In this regard, we recommend that CHSP have regard to the Conservation Area Appraisals for Graveney Church, Graveney Bridge and Goodnestone, prepared by Swale BC, which explain the wider landscape setting of these designated areas. These can be seen online at: https://www.swale.gov.uk/assets/Planning-Forms-and-Leaflets/Planning-General/Planning-Conservation/Graveney-Church-Graveney-Bridge-and-Goodnestone-conservation-areas.pdf	Yes	The change to design, since PEIR, excluding panels in Field Y was in part due to concern raised with respect to Graveney Church. No other effect on heritage significance of Areas was found or considered likely to occur.

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Graveney with Goodnestone Parish Council	CHSP's preferred route for traffic to access the proposed development site passes through all three of these conservation areas.	No	These would give rise to temporary effects only during construction, and minimal effects thereafter in terms of maintenance which are unlikely to ever generate significant effects (very limited traffic movements). This is therefore not included in the scope of the EIA.

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Graveney with Goodnestone Parish Council	Buildings which contribute to local heritage are not confined to the statutory listings. The role of these heritage assets to local character should also be given due consideration. Indeed, some of these were pointed out to the heritage consultant who seems to have chosen not to include them.	Yes - assessment of Warm House included in ES	These undesignated buildings may contribute to local character, but their significance is limited and not always dependent on the contribution made by their setting. They have not been included as no significant effect is considered likely (they are not statutorily protected, are considered of low/local importance, and using the matrix presented in the PEIR and Environmental Statement (document reference number 6), even a substantial change in setting may not lead to such a loss of overall significance that they are considered to receive an effect considered significant for purposes of the Regulations. Warm House is the building referred to in this response. This building was not identified by the statutory consultees as requiring assessment and has not been formally visited. It is not nationally protected, and does not appear on any local listing. Although assessment of this building was requested by the owner of Sparrow Court, the request was made too late for inclusion in the PEIR. Following the method set out in the PEIR the Proposed Development will not cause such a change in setting that the contribution of that setting to the significance of the building is so reduced as to lower the significance of the building itself in terms that are significant for the Regulations. The building is of "low" sensitivity (local

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			importance) and even if we allow an effect of "medium" magnitude" (expecting some reduction in the contribution setting makes to significance and some resulting loss of heritage significance, the result is still "minor" and not significant for the Regulations. The building is surrounded by intensively farmed land to its south-west, south and south-east, with poly tunnels a prominent local feature. The presence of panels pf the Proposed Development to the north will change the character of the more open rural aspect to its north and this will affect the relationship of the building to the former marshland with which it may have been historically linked. As the building is not listed, the s66 test is not engaged. To satisfy the consultee, this has been included in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.4 (document reference number 6.1.11).

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Graveney with Goodnestone Parish Council	The analysis set out in Chapter 11 of the PEIR of the significance of the settings of the listed buildings referred to and the impact of the solar park proposals on that significance is flawed.	No	The method set out in the PEIR and Environmental Statement (document reference number 6) is considered to be appropriate and in accordance with current good practice, and takes account of the relevant National Policy test, and is informed by the guidance set out by Historic England.
Graveney with Goodnestone Parish Council	To imply (paragraphs 220 & 226 cited above) that because a listed building, particularly a highly graded one, is not to be demolished or otherwise directly affected by the proposed solar park, the effect on its significance will only be 'minor' is not appropriate and flies directly in the face of the government guidance on the historic environment.	No	The assessment considers direct and indirect effects separately. The matrices presented in the methodology section of the PEIR and Environmental Statement (document reference number 6) make it clear that an asset *can* suffer a significant indirect effect through loss of significance caused by a substantial reduction in the contribution of its setting where there is a large-scale change in that setting (and where the significance of the asset in questions relies heavily on a visual or other contribution from that setting).
Graveney with Goodnestone Parish Council	At paragraph 144 that 'Whilst there would be indirect effects in terms noise and visual intrusion arising from the presence of cranes, vehicles, flashing lights etc. within the site and accessing the site, most of these effects are considered temporary and short term, limited to working hours and for the duration of the construction programme'.	No	No comment needed - see below

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Graveney with Goodnestone Parish Council	However, it is increasingly becoming recognized that a level of noise which does not currently exist will result from the solar park, inverters, battery storage, etc should it become operational.	No	No significant effect on the significance of the various assets out with the Proposed Development is considered likely as a result of noise generated in the solar park. The nearest elements of the scheme (Field Y) have been exclude on largely visual grounds and this will further reduce the likelihood that any significant aural effect will be caused (such that the contribution of the setting in terms of noise/tranquillity etc. to the asset will be so reduced as to actually reduce the Heritage significance of any asset). In no case is it considered that noise levels are such an important aspect of the heritage significance of an asset that any changes to the aural setting are likely to affect that significance.
Graveney with Goodnestone Parish Council	There are several references to the potential for planting as a 'mitigation measure', including during the site's 'operational phase'. In this context there is no mention of the advice at paragraph 40 of the Historic England Settings document that: 'as screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. Screening may have as intrusive an effect on the development it seeks to mitigate, so where	No	The relevant advice has been borne in mind during the design and assessment of the Proposed Development. Mitigation in the form of screening can alleviate effects for other purposes than heritage, and in the context of heritage can soften or further reduce effects even where these are already considered not significant for purposes of the Regulations.

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	it is necessary, it too merits careful design'.		
Graveney with Goodnestone Parish Council	While a degree of harm to the setting of All Saints' Church and Graveney Court (together with the Graveney Church Conservation Area) and Sparrow Court is conceded in Chapter 11, none at all is acknowledged with regard to Harty Church.	No	No significant effect to the significance of this asset is considered likely. It is noted that the relevant test for the NPPF is whether the *significance* of an asset is harmed through development within its setting which reduces the contribution of that setting to the asset's significance to such an extent that the asset itself loses significance, not whether the setting is harmed. Setting is not an asset in itself.
Graveney with Goodnestone Parish Council	There does not to be a basis for this other than the reference at para 168 that 'it is the prominence of the church and views towards it that are considered significant here, rather than view from it to the wider landscape'.	No	Whilst Harty Church serves a community which uses the former marshland, it is its physical presence that is the main factor in how it is perceived in the wider landscape. Consideration has been given to views from the Church across the wider landscape in the assessment presented in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, section 11.5.2.3 (document reference number 6.1.11).

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Graveney with Goodnestone Parish Council	It is assumed that it was the assessor's own subjective assessment that resulted in this consideration, not that of the great majority of holiday makers and visitors who come to the church to enjoy the building and the extensive, unimpeded prospect over the Swale estuary from its unenclosed churchyard.	Yes	The assessment was made using professional judgement informed by experience and the application of professional and technical guidance.
Graveney with Goodnestone Parish Council	This enjoyment would be severely diminished if the solar park was to be granted permission.	No	No comment needed. Difference in opinion.
Graveney with Goodnestone Parish Council	The level of harm caused is 'less than substantial' and as that term is defined where it is specifically acknowledged that 'in general terms, substantial harm is a high test, so it may not arise in many cases'	No	The assessment of effects on Harty Church, set out in Environmental Statement, chapter 11: Cultural Heritage and Archaeology, section 11.5.2.3 (document reference number 6.1.11), concludes that the magnitude of effect is negligible and the overall effect is **not significant,** consequently no harm is found.
Graveney with Goodnestone Parish Council	Claiming that the degree of harm caused would be at the lower end of 'the less than substantial' spectrum is clearly an attempt to underplay the harm that would be caused, which would be towards the upper end of 'the less than substantial' spectrum.	No	This claim has not been made. The PEIR and Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, section 11.10 (document reference number 6.1.11) clearly state the conclusions of the assessment and the basis on which it has been made.

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Graveney with Goodnestone Parish Council	A finding of 'less than substantial harm' does not equate with a 'less than substantial planning objection' meaning that even when the harm is 'less than substantial', the balancing exercise required by paragraph 134 of the NPPF is still subject to the statutory duty imposed by Section 66 (1).	No	This is a matter for the Inspector. The provisions of the Act do not mean that no change is ever permissible - the Decision Maker must simply give considerable weight to the desirability of preserving the setting, and be clear that they have done so, in the balancing exercise.
Graveney with Goodnestone Parish Council	Whatever the exact level of harm caused may be, its location anywhere on 'less than substantial' spectrum still means that harm is caused and this is therefore a material consideration for the decision maker to take fully into account when determining the proposals and must give considerable weight to the desirability of 'preserving' the settings of listed buildings as required by the Act.	No	This is a matter for the Inspector. The provisions of the Act do not mean that no change is ever permissible - the Decision Maker must simply give considerable weight to the desirability of preserving the setting, and be clear that they have done so, in the balancing exercise.
Graveney with Goodnestone Parish Council	The proposed solar park would cause a significant degree of harm to the settings of the heritage assets considered in the PEIR and their significance.	No	No comment needed. Difference in opinion. The assessment was made using professional judgement informed by experience and the application of professional and technical guidance.

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Graveney with Goodnestone Parish Council	It is clear that heritage is another aspect of the PEIR that is subjectively assessed and also includes circular arguments which are frequently used in this document.	No	The assessment was made using professional judgement informed by experience and the application of professional and technical guidance.
GREAT Graveney	1. **Cultural Heritage and Archaeology**	No	No comment required.
GREAT Graveney	We strongly agree that the "setting" of heritage assets is an important planning consideration (PEIR page 11-3) and that setting also includes intangible matters such as atmosphere and ambience: the latter are very strong features of the coastal marshes over much of the CHSP site. In this regard, we recommend that CHSP have regard to the Conservation Area Appraisals for Graveney Church, Graveney Bridge and Goodnestone, prepared by Swale BC, which explain the wider landscape setting of these designated areas. These can be seen online at: https://www.swale.gov.uk/assets/Planning-Forms-and-Leaflets/Planning-General/Planning-Conservation/Graveney-Church-Graveney-Bridge-and-Goodnestone-conservation-areas.pdf	Yes	The change to design, since PEIR, excluding panels in Field Y was in part due to concern raised with respect to Graveney Church. No other effect on heritage significance of Areas was found or considered likely to occur.

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GREAT Graveney	Buildings which contribute to local heritage are not confined to the statutory listings. The role of these heritage assets to local character should also be given due consideration. Indeed some of these were pointed out to the Heritage consultant who has ignored them.	No	These undesignated buildings may contribute to local character, but their significance is limited and not always dependent on the contribution made by their setting. They have not been included as no significant effect is considered likely (they are not statutorily protected, are considered of low/local importance, and using the matrix presented in the PEIR and Environmental Statement (document reference number 6), even a substantial change in setting may not lead to such a loss of overall significance that they are considered to receive an effect considered significant for purposes of the Regulations. Warm House is the building referred to in this response. This building was not identified by the statutory consultees as requiring assessment and has not been formally visited. It is not nationally protected, and does not appear on any local listing. Although assessment of this building was requested by the owner of Sparrow Court, the request was made too late for inclusion in the PEIR. Following the method set out in the PEIR the Proposed Development will not cause such a change in setting that the contribution of that setting to the significance of the building is so reduced as to lower the significance of the building itself in terms that are significant for the Regulations. The building is of "low" sensitivity (local

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			importance) and even if we allow an effect of "medium" magnitude" (expecting some reduction in the contribution setting makes to significance and some resulting loss of heritage significance, the result is still "minor" and not significant for the Regulations. The building is surrounded by intensively farmed land to its south-west, south and south-east, with poly tunnels a prominent local feature. The presence of panels pf the Proposed Development to the north will change the character of the more open rural aspect to its north and this will affect the relationship of the building to the former marshland with which it may have been historically linked. As the building is not listed, the s66 test is not engaged. To satisfy the consultee, this has been included in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.4 (document reference number 6.1.11).

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GREAT Graveney	The analysis set out in Chapter 11 of the PEIR of the significance of the settings of the listed buildings referred to, and the impact of the solar park proposals on that significance, is flawed.	No	The method set out in the PEIR and Environmental Statement (document reference number 6) is considered to be appropriate and in accordance with current good practice, and takes account of the relevant National Policy test, and is informed by the guidance set out by Historic England.
GREAT Graveney	To imply (paragraphs 220 & 226 cited above) that because a listed building, particularly a highly graded one, is not to be demolished or otherwise directly affected by the proposed solar park, the effect on its significance will only be 'minor' is not appropriate and flies directly in the face of the government guidance on the historic environment.	No	The assessment considers direct and indirect effects separately. The matrices presented in the methodology section of the PEIR and Environmental Statement (document reference number 6) make it clear that an asset *can* suffer a significant indirect effect through loss of significance caused by a substantial reduction in the contribution of its setting where there is a large-scale change in that setting (and where the significance of the asset in questions relies heavily on a visual or other contribution from that setting).
GREAT Graveney	'Whilst there would be indirect effects in terms noise and visual intrusion arising from the presence of cranes, vehicles, flashing lights etc. within the site and accessing the site, most of these effects are considered temporary and short term, limited to working hours and for the duration of the construction programme'.	No	No comment needed. See below.

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GREAT Graveney	However, it is increasingly becoming recognized that a level of noise which does not currently exist will result from the solar park, inverters, battery storage, should it become operational.	No	No significant effect on the significance of the various assets out with the Proposed Development is considered likely as a result of noise generated in the solar park. The nearest elements of the scheme (Field Y) have been exclude on largely visual grounds and this will further reduce the likelihood that any significant aural effect will be caused (such that the contribution of the setting in terms of noise/tranquillity etc. to the asset will be so reduced as to actually reduce the Heritage significance of any asset). In no case is it considered that noise levels are such an important aspect of the heritage significance of an asset that any changes to the aural setting are likely to affect that significance.
GREAT Graveney	There are several references to the potential for planting as a 'mitigation measure', including during the site's 'operational phase'. In this context there is no mention of the advice at paragraph 40 of the Historic England Settings document that: 'As screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. Screening may have as intrusive an effect on the development it seeks to mitigate, so where	No	The relevant advice has been borne in mind during the design of the Proposed Development. Mitigation in the form of screening can alleviate effects for other purposes than heritage, and in the context of heritage can soften or further reduce effects even where these are already considered not significant for purposes of the Regulations.

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	it is necessary, it too merits careful design'.		
GREAT Graveney	While a degree of harm to the setting of All Saints' Church and Graveney Court (together with the Graveney Church Conservation Area) and Sparrow Court is conceded in Chapter 11, none at all is acknowledged with regard to Harty Church.	No	No significant effect to the significance of this asset is considered likely. It is noted that the relevant test for the NPPF is whether the *significance* of an asset is harmed through development within its setting which reduces the contribution of that setting to the asset's significance to such an extent that the asset itself loses significance, not whether the setting is harmed. Setting is not an asset in itself.
GREAT Graveney	There does not appear to be a basis for this other than the reference at paragraph 168 that 'It is the prominence of the church and views towards it that are considered significant here, rather than view from it to the wider landscape'.	No	Whilst Harty Church serves a community which uses the former marshland, it is its physical presence that is the main factor in how it is perceived in the wider landscape. Consideration has been given to views from the Church across the wider landscape in the assessment presented in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology, Section 11.5.2.3 (document reference number 6.1.11).

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GREAT Graveney	It is assumed that it was the assessor's own subjective assessment that resulted in this consideration, rather than the great majority of holiday makers and visitors who come to the church to enjoy the building and the extensive, unimpeded prospect over the Swale estuary from its unenclosed churchyard. This enjoyment would be severely diminished if the solar park was to be granted permission.	Yes	The assessment was made using professional judgement informed by experience and the application of professional and technical guidance. Whether a view is enjoyed is subjective, and is not a matter for the cultural heritage assessment.
GREAT Graveney	The level of harm caused is 'less than substantial' and as that term is defined where it is specifically acknowledged that 'In general terms, substantial harm is a high test, so it may not arise in many cases' claiming that the degree of harm caused would be at the lower end of 'the less than substantial' spectrum is clearly an attempt to underplay the harm that would be caused, which would be towards the upper end of 'the less than substantial' spectrum.	No	The assessment of effects on Harty Church, set out in Environmental Statement, chapter 11: Cultural Heritage and Archaeology, section 11.5.2.3 (document reference number 6.1.11), concludes that the magnitude of effect is negligible and the overall effect is **not significant,** consequently no harm is found.
GREAT Graveney	A finding of 'less than substantial harm' does not equate with a 'less than substantial planning objection' meaning that even when the harm is 'less than substantial', the balancing exercise required by paragraph 134 of the NPPF is	No	This is a matter for the Inspector. The provisions of the Act do not mean that no change is ever permissible - the Decision Maker must simply give considerable weight to the desirability of preserving the setting, and be clear that they have done so, in the balancing exercise.

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	still subject to the statutory duty imposed by Section 66 (1).		
GREAT Graveney	Whatever the exact level of harm caused may be, its location anywhere on 'less than substantial' spectrum still means that harm is caused and this is therefore a material consideration for the decision maker to take fully into account when determining the proposals and must give considerable weight to the desirability of 'preserving' the settings of listed buildings as required by the Act.	No	This is a matter for the Inspector. The provisions of the Act do not mean that no change is ever permissible - the Decision Maker must simply give considerable weight to the desirability of preserving the setting, and be clear that they have done so, in the balancing exercise.
GREAT Graveney	The proposed solar park would cause a significant degree of harm to the settings of the heritage assets considered in the PEIR and their significance.	No	No comment needed. Difference in opinion. The assessment was made using professional judgement informed by experience and the application of professional and technical guidance.
GREAT Graveney	However, it is clear that heritage is another aspect of the PEIR that is subjectively assessed and includes circular arguments which are frequently used in this document.	No	The assessment was made using professional judgement informed by experience and the application of professional and technical guidance.
GREAT Graveney	GREAT asks:	No	No comment required.

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GREAT Graveney	· What was the reason for not assessing the Vicarage (16th Century) as an important heritage asset?	No	I assume that this refers to the property known as The Old Vicarage on Broom Street. If so, whilst the house may date back to the 16th century, none of the original structure appears to be readily apparent in the fabric and form of the current dwelling (no formal inspection has been made at this time). It is not nationally designated and does not appear on any local list. It was not highlighted by any of the statutory consultees as requiring assessment as a significant historic asset. This house still has and will continue to have a visual relationship with Sparrow Court and Graveney Church. If it has any significance, this will relate primarily to its historic relationships and these are not considered to be so affected that this non-designated building will suffer harm, even where the Proposed Development may be visible to the north. The exclusion of Field Y will also help in this regard, although this removal was not designed with this building in mind.

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GREAT Graveney	· What was the reason for not assessing the Shepherd's cottage (Warm House) as an important heritage asset?	No	This building was not identified by the statutory consultees as requiring assessment and has not been formally visited. It is not nationally protected, and does not appear on any local listing. Although assessment of this building was requested by the owner of Sparrow Court, the request was made too late for inclusion in the PEIR. In any case, following the method set out in the PEIR the Proposed Development will not cause such a change in setting that the contribution of that setting to the significance of the building is so reduced as to lower the significance of the building itself in terms that are significant for the Regulations. The building is of "low" sensitivity (local importance) and even if we allow an effect of "medium" magnitude" (expecting some reduction in the contribution setting makes to significance and some resulting loss of heritage significance, the result is still "minor" and not significant for the Regulations. The building is surrounded by intensively farmed land to its south-west, south and south-east, with poly tunnels a prominent local feature. The presence of panels pf the Proposed Development to the north will change the character of the more open rural aspect to its north and this will affect the relationship of the building to the former marshland with which it may have been historically linked. As the building is not listed, the s66 test is not engaged.

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GREAT Graveney	· What is the reason for ignoring and not adhering importance to the relationship between the listed properties and the vicarage in the assessment of the setting of these buildings in Graveney?	No	Whilst the house may date back to the 16th century, none of the original structure appears to be readily apparent in the fabric and form of the current dwelling (no formal inspection has been made at this time). It is not nationally designated and does not appear on any local list. It was not highlighted by any of the statutory consultees as requiring assessment as a significant historic asset. This house still has and will continue to have a visual relationship with Sparrow Court and Graveney Church. If it has any significance, this will relate primarily to its historic relationships and these are not considered to be so affected that this non-designated building will suffer harm, even where the Proposed Development may be visible to the north. The exclusion of Field Y will also help in this regard, although this removal was not designed with this building in mind.
GREAT Graveney	· It was pointed out to the Heritage consultant that the hedges were not cut at the time of the assessment because of the abundance of birds nesting in it – at all other times there is an unhindered view from Sparrow Court to the church, Graveney Court and the Vicarage. What is the importance of stating in the report that "The Church and Graveney Court are considered to fall within this setting in views to the east, even if partially	Yes	This was not made clear to the consultant. The statement referred to in the comment was intended to point out a direct visual linkage between these assets, so that the Church and Court are within the setting of Sparrow Court, and this relationship was taken into account in the assessment. Nevertheless, Field Y has been removed in its entirety to address some concerns with the potential effect on the significance of these assets by ensure they continue to have a direct visual linkage (where planting permits).

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	screened from direct view by the planting within the Sparrow Court's gardens."?		
GREAT Graveney	· There is a recurring theme in Chapter 11 of the PEIR which asserts that, because not all the land covered by the proposed solar park is marshland but is in agricultural (including arable) use, it is automatically less important in historic landscape terms and can therefore be developed without any significant harm being caused to the heritage assets affected. How was this statement arrived at? Which historical evidence underpins this assertion?	No	The majority of the Proposed Development site is indeed in arable use, and its historic status as marshland is not everywhere immediately apparent. This is important because the development of the main settlements was dictated by the need to occupy higher and dryer ground. Drainage and enclosure of the marshland has the result of divorcing the settlement pattern from the environmental condition which lead to the establishment of that pattern. The baseline against which the assessment is undertaken is therefore in the context of an agricultural landscape, albeit one that was formerly marshland, and one in which substantial infrastructure and a modern presence is readily apparent. This is relevant in that the Proposed Development will not be imposed in a pristine historic landscape (or primary context), but one in which layers of development and change have left some traces within its current condition. The evidence is from map regression exercises etc.,

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			as set out in Environmental Statement, Technical Appendices: Historic Environment Desk Based Assessment (document reference number 6.4.11.1) which was also appended to the PEIR.
Highways England	We look forward to continued consultation on the details of the PEIR, EIA and any future documents, as the currently outstanding information becomes available.		No comment required.

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Historic England	Thank you for consulting Historic England on the PEIR for the Cleve Hill Solar Array. We acknowledge this is a preliminary document and does not include the final environment assessments. We also acknowledge that changes in the PEIR reflect a constructive and on-going dialogue between the applicant and Historic England. We nevertheless wish to provide further advice, following receipt of the PEIR and hope this is helpful as you complete the full Environmental Assessment.	No	No comment required.
Historic England	Historic England's remit relates principally to the effect of the development on any highly graded heritage asset within the study area which here is the grade I listed All Saints Church. Nevertheless, we also comment here on effects to nearby grade II listed buildings identified in the study area and the conservation area in which the grade I listed church is found at its northern end.	No	No comment required.

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Historic England	Turning first to the assessed effect on the grade I listed church. All Saints dates to the medieval period and probably formed the focal point of a modest rural settlement which grew up around the production of salt on adjacent marshland and small scale farming. While much of that marshland has since been reclaimed for agricultural use, the sense that All Saints sits in a rural landscape surrounded by dispersed historic buildings is a key part of its significance that helps explain its origins. The former marshland to the north and west, now agricultural fields are notable for their distinctive level topography. These fields are part of the wider experience of All Saints church and form the foreground in long views from the north and west and south west and the background in views towards the church where the field network (i.e. the site) can be seen in filtered views through trees along the churchyard boundary.	Yes	Field Y has now been removed in entirety from the Proposed Development. This will help to reduce encroachment above the former marsh, and help to allow the church to be seen in a rural context (in this direction).

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Historic England	In our view the visual impact of such a large number of solar panels will impact on the significance the church derives from its setting because it would no longer be afforded a substantive rural setting; this would be compromised by seeing the panels in views towards the church from land to the north, west and south west and in a view of the church from its south in which the site can be seen to its rear. On these grounds we assess the impact to the significance of the grade I listed church to be moderate, not minor as noted in Para 155 of the PEIR. We think it right that the applicant explore whether a heritage gain, in the form of a contribution to the church to assist in securing its long-term future might be appropriate here to be taken account of in the weighing exercise carried out by the Planning Inspector. We would be pleased to discuss this further in due course.	Yes	Field Y has now been removed in entirety from the Proposed Development. This will help to reduce encroachment above the former marsh, and help to allow the church to be seen in a rural context (in this direction). Other changes include a separation of panel block edge from the Proposed Development Boundary, with suggested screening to soften the edges of the Development. Discussions are ongoing with the relevant Church authorities regarding what enhancement and gain can be achieved. Nevertheless, we have a difference of opinion with regard to the level of effect. We do not think the church's significance derives solely or even mainly from its location in a rural community, and our assessment concludes that other elements that make up its heritage interest are not affected by the Proposed Development. We recognise there is a change in wider setting, but this is only on one side of the Church, and whilst there is a reduction in the contribution that this element of its setting makes to this aspect of the Church's significance, we consider the overall effect to be "minor" in EIA terms, and to constitute "less than substantial harm".

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Historic England	We agree that the effects on the Graveney Conservation Area and other nearby listed buildings are likely to be lower than the effect on All Saints Church. Nonetheless we note that the effect on Sparrow Court, a grade II listed building south of the development site may be greater than minor given that the development will be very visible in long views towards the listed building from the east in which it can be seen and appreciated as a medieval building in a largely undeveloped rural setting. The ability to appreciate the listed building in a rural setting will be reasonably altered in this view by the introduction of a large number of solar panels to its north. We also note that the effect on Graveney Court is assessed as minor and while this building was clearly orientated towards the east (its rear west facing elevation is markedly informal in contrast to the principal west elevation), there are nevertheless long views from the west towards the building and adjacent church which would be altered by the introduction of the proposed development. We therefore think the effect on this grade II listed building is capable of being more than minor and suggest this is considered	Yes	Field Y has been removed in entirety. This serves to prevent intrusion into direct visual linkages between the Church, Graveney Court and Sparrow Court. The wider separation of the Proposed Development from Graveney Court will help maintain its linkage to the wider rural landscape, albeit panels will continue to be visible across the wider former marshland. Similarly, longer views towards Sparrow Court will still contain panels but these will not be as close into the house not in the foreground of views as seen from the Church and Graveney Hill. In any case, as with the Church, the significance of these assets does not rely solely on the former marshland and current rural setting. Their other heritage interests are not affected, hence the assessment that whilst there is some reduction in the contribution that setting makes to the significance of the assets (and to the ability to read/appreciate that element of their significance) as a result of the proposed Development, the overall effect on their significance is "minor" for purposes of the EIA regulations (in part because much of their historic, archaeological and architectural interest will still be readily appreciable and/or does not rely on longer distance visual contributions. The amendments to the scheme have been prompted in large part by the concerns raised in respect of these assets, and go considerably to ensuring the predicted "minor" effect will in fact be "minor". This will be reflected in the EIA.

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	again as part of the final Environmental Report.		

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Historic England	We also think it right that additional views which illustrate the impact of the proposed development on the settings of designated heritage are included in the final assessment. Historic England and Kent County Council's heritage team have raised the importance of key views towards the church and from its churchyard in previous discussions but we note that these views are not included in the visualisations submitted for the PEIR. We would be pleased to send you an annotated plan showing additional views we think necessary for the final report if helpful, and note we think approximately 6-8 additional views should be included. We think these views are from a footpath to the south east of the church towards the church; from the same footpath looking west towards Sparrow Court; from the churchyard boundary wall looking west; from the south of the church in which the development site can be seen beyond; from wider vantage points within the development and from high ground looking back towards the church from the north/north west.	No	Additional views have been prepared and presented to HE and KCC in subsequent consultation. These will be appended to the ES.

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Historic England	In addition to designated heritage the development site also has potential for non-designated heritage assets of an archaeological nature. Archaeological evidence has been found on the site dating from the Neolithic onwards. There is a high potential for evidence dating to World War Two in particular. Previous investigations within the development site have revealed features and artefacts relating to the site's use during World War Two. The site formed part of the north Kent coast defences and part of the 'Starfish' bombing decoy. The development site also includes the site of the so-called last battle on British soil between a crashed German aircraft and a patrol from the London Irish Rifles in September 1940. These military defences and decoy systems included pillboxes, trench systems and controlled fires and lighting, and although since decommissioned, remains can be seen on historic aerial photographs and may still exist as archaeological features. Therefore, non-designated heritage assets, particularly archaeological, should be assessed as part of this development proposal. The archaeological team at Kent	Yes	One element of the WWII defensive system (the undesignated Pillbox) will be preserved in situ. Consultation has been undertaken with KCC regarding archaeological issues and an outline WSI (document reference number 6.4.11.4) will be submitted for their approval to ensure archaeological matters are appropriately addressed. A reduction in the compound footprint and the removal of panels in Field Y is proposed and this will reduce potential effects on the higher ground where archaeological remains may be more likely to be encountered. Enhancement is proposed in the form of panels along footpaths through the Development to help make the historic development of the area including its wwII defences more appreciable to the public. Other enhancement options are in discussion.

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	County Council are the principal advisors for non-designated heritage assets of an archaeological nature, and should be consulted regarding the potential impact of this development on any archaeology present. We note that the nature of the development might limit the need for deeper intrusions into the ground and that it is such works that are most likely to harm any buried archaeology. We support the approach being taken to predict locations where archaeological potential may be highest and for these to be considered further should the .nature of the proposed construction create a potential for un-avoidable harm.		

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Historic England	We trust the above is helpful to you and are happy to answer any specific questions arising from this response and to talk in greater detail about additional views if necessary. We would also welcome the opportunity to discuss benefits for the Church of All Saints which might form part of the final proposal.	No	No comment required.
Kent County Council	Chapter 11: Cultural Heritage and Archaeology	No	No comment required.
Kent County Council	KCC notes that this chapter is supported by a Historic Environment Desk-Based Assessment (Technical Appendix A11.1) and a Geoarchaeological Watching Brief report (Technical Appendix A11.2). The PEIR describes the approach to understanding and assessing the effects of development on the historic environment and heritage assets and breaks these down into three categories:	No	No comment required.
Kent County Council	· Archaeology;	No	No comment required.
Kent County Council	· Built Heritage; and	No	No comment required.
Kent County Council	· Historic Landscape.	No	No comment required.

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Kent County Council	KCC would like to highlight that the study areas were discussed and agreed with the applicant. The PEIR and its supporting technical appendices provide a good, comprehensive account of the archaeological and historical background and baseline conditions. The report adequately describes the designated built heritage assets within the principal and wider study areas and includes the presence of a WW2 pillbox on the edge of the core study area.	No	No comment required.
Kent County Council	Archaeology	No	No comment required.
Kent County Council	KCC agrees with the applicant's approach that has identified the potential sensitive receptors, based on the known assets listed in the Kent Historic Environment Record, and other findings from the desk-based study and site visit. This is supported by a Geoarchaeological Study that has split the site into specific zones of potential importance. The study has included the drilling of several transects of boreholes to model the below ground profile and deposits. The study provides a good general understanding of the site's archaeological potential and the possible impacts of the proposed development.	No	No comment required.

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Kent County Council	The study identifies that archaeological features within the eastern part of the site would be left preserved in the bird habitat mitigation area, which will not be subject to development works. KCC requests that further details on the method of bird mitigation should be included in the forthcoming EIA, in order to confirm that there will be no ground works that may affect the archaeology in the area.	Yes	Management measures in the Arable Reversion Habitat Management Area will be adaptive, and decided in consultation with the Habitat Management Steering Group, in response to the efficacy of previous measures. The general approach is set out in the Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2). Changes are proposed in this area - more limited intrusive work is now envisaged, in part to reduce potential for damage to any surviving buried remains. Appropriate mitigation will be detailed in the outline WSI (document reference number 6.4.11.4) to be prepared for agreement with KCC, and will be highlighted in the ES.
Kent County Council	KCC agrees with the impacts on archaeology identified and with the 'worse-case' approach taken by the applicant, in the absence of specific confirmation through the fieldwork undertaken. KCC also agrees that the proposed mitigation set out in Points 11.6 and 11.8 are appropriate and would be keen to agree suitable works and a written scheme of investigation in due course. KCC would also request that there is scope for adjustment in the development to preserve any significant archaeological remains that may be identified.	Yes	An outline WSI (document reference number 6.4.11.4) will be prepared for agreement with KCC to set out proposed archaeological mitigation and to ensure significant remains (if encountered) can be appropriately dealt with (both in the field and in post-excavation reporting).

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Kent County Council	Built Heritage	No	No comment required.
Kent County Council	Table 11.6 of the PEIR sets out the potential sensitive receptors for built heritage. KCC would like to highlight that these receptors are mostly designated heritage assets. KCC requests that the applicant liaises with the Conservation Officer at Swale Borough Council and advisors at Historic England who will lead in providing advice on the effects of development on these assets. However, KCC can confirm that the heritage assets listed in the PEIR conform to those that were discussed directly with the applicant's heritage consultants.	No	Swale BC and HE have been consulted regarding indirect effects and their comments noted and used to inform the evolved design in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11).
Kent County Council	The PEIR also identifies a WW2 pillbox on the edge of the site. The setting and value of the asset is described in Point 11.3.3.9. The PEIR has identified that no built heritage assets will be directly affected by the development, but their settings may be subject to indirect effects.	No	No comment required.

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Kent County Council	KCC is pleased to see that design mitigation has included the retention of the WW2 pillbox and has excluded areas of panels to limit visibility from designated heritage assets. KCC would like to highlight that this is the only form of embedded mitigation set out in the PEIR. KCC recommends that the applicant works with the Conservation Officer at Swale Borough Council and advisors at Historic England, so they can advise on whether the impacts on the setting of designated heritage assets is acceptable.	Yes	Consultation has been undertaken with HE and Swale BC regarding indirect impacts on the settings of designated heritage assets and these are addressed in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11).
Kent County Council	KCC agrees that there should be a full recording of the WW2 pillbox. The proposed use of the pillbox as a bat roost is acceptable, given the limited communal value of the asset, due to its lack of access. Any modifications should avoid damage to the asset and preferably be reversible. The setting of the pillbox will fundamentally change, and mitigation should include recording the present setting. This could then be used to enhance any interpretation for the feature if appropriate. KCC would highlight that the setting of built heritage can be reversed on decommissioning.	Yes	Proposals to record this asset and its setting will be included in an Outline WSI (document reference number 6.4.11.4) to be agreed with KCC.

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Kent County Council	Historic Landscape Character	No	No comment required.
Kent County Council	The Historic Landscape Character of the development area is described in Point 11.3.4. The area is characterised by irregular enclosures formed by drainage ditches in reclaimed marshland. Many of the present boundaries have been evident since the 19th Century, though subdivision has been lost. Other areas are characterised by more regular enclosures or square and rectangular fields. KCC favours the applicant's proposals which intend to retain the internal boundaries of the site, preserving the character of the area.	No	No comment required.
Kent County Council	However, KCC would like to highlight that the PEIR does not cover in detail the nature of the landscape in terms of its historic use or, how it will be affected by the proposed development. The area is mainly arable farming land and the agriculture provides a contribution to the setting of those designated heritage assets that are connected to farming (e.g. the farm houses). The development is of a very large scale and would significantly change the landscape. KCC would	Yes	The assessment of effects on historic landscape is covered in more detail in the Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11) than it was in the PEIR.

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	request that this should be assessed as a minor adverse effect.		
Swale Borough Council	· Historic Environment	No	No comment required.
Swale Borough Council	Historic Environment	No	No comment required.
Swale Borough Council	Tables 11.1 and 11.6 and paragraph 171 of the PEIR refer to the Borough Council as the District Council, and Wey Street Farmhouse is listed as Way Street Farmhouse (although this error also appears on the Historic England listing). Wey Street Farmhouse also appears as Way Street in paragraphs 109 and 111 of the PEIR, although the reference to Town Farm in paragraph 111 raises this above what actually exists.	No	Amendments will be made in the EIA to ensure correct referencing.

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Swale Borough Council	There is no reference to the former Explosives Loading Company gunpowder works at Uplees or of the 2 April 1916 explosion that cost 109 lives, and which was situated on the opposite side of Faversham creek from the development site. The memorial and mass grave (listing number 1261010) in Faversham are listed grade II*.	No	This is included in Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11)
The Faversham Society	6. **Archaeology**	No	No comment required.
The Faversham Society	The Historic Environment Desk Based Assessment commissioned by the developer reveals that the site and its immediate environs make an important contribution to the historical and cultural setting of the town and that the creation of a large power station - albeit solar - would ignore Faversham's historical importance and compromise the setting of the town and its neighbouring villages to the north, Graveney and Goodnestone. We have evidence of medieval saltings and of a historically significant duck shoot that would be obliterated by the panels. We have seen no assessment of the damage to the archaeology of the area covered by the site.		Direct impacts on archaeological remains were considered as part of the PEIR and this assessment will be included in the ES. Geoarchaeological investigations have been carried out at the site to support the assessment, and this suggests that the Proposed Development may not cause significant damage (given the limited footprint of the poles supporting the panels) to important sub-surface deposits, if any). This report will be appended to the ES. Archaeological concerns regarding more extensive areas of ground disturbance (access tracks/transformer foundations and the construction and operational compound/substation) will be addressed through an appropriate programme of archaeological work to be agreed to be agreed with KCC and secured by condition.

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The Faversham Society	Archaeology	No	No comment required.
The Faversham Society	The Historic Environment Desk Based Assessment explains that within 1km of the site there are three conservation areas and one grade I listed building (Graveney Church) Within 5km of the site there are 534 Grade II listed buildings, 34 Grade II* listed buildings and 10 Grade I listed buildings, 15 conservation areas and 13 scheduled monuments. The Assessment sets out all archaeological finds within 1km of the site from pre-Roman to the 20th century. This includes sheep folds and sheep-washes from when the site was used partly for grazing and wildfowl decoys for trapping wild birds dating from the 18th and 19th century, the site of the medieval port of Faversham at Thorn Creek including the remains of timber quays and finds of high significance from World War II including the remains of a German aircraft from the last battle on British soil in 1940. Finally, the marshes themselves are artificial creations called 'innings', created in the 12th-15th centuries and superficially mask an as yet uninvestigated pre-medieval landscape	No	No specific comment required.

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	which was dry land until overtaken by rises in relative sea level.		
The Faversham Society	The Faversham Society comments that this shows that the site and its immediate environs make an important contribution to the historical and cultural setting of the town and that the creation of a large power generating site would compromise its historical importance and the setting of the town and its neighbouring villages to the north, Graveney and Goodnestone.	No	That is not the opinion of the heritage expert authoring Environmental Statement, Chapter 11: Cultural Heritage and Archaeology (document reference number 6.1.11). No harm to the heritage significance of the town from the Proposed Development being constructed within this wider setting is anticipated by the author. Further, it is worth noting Historic England's guidance in that "setting" in and of itself is not a designation or an

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			asset it its own right (unless specifically protected by other statute etc.) - the importance of "setting" is in its contribution to the significance of an asset.

12 Noise and Vibration			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**

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Canterbury City Council	Noise and Vibration Relevant policies from the Development Plan are missing from the list contained in Section 12.3.1 of Chapter 12.	No	Development control policies are included in the Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6). Policies are included in the Environmental Statement, Technical Chapters (document reference number 6.1) when they inform the technical assessment. The technical assessments do not draw conclusions relating to planning policy compliance; these are made in the Planning Statement (document reference number 7.2).
Graveney with Goodnestone Parish Council	10. Noise and vibration The CHSP site is a very quiet rural location with low ambient noise levels. We are concerned about several noise and vibration impacts from the proposed development, in particular:	No	No response required
Graveney with Goodnestone Parish Council	· The effect of wind direction: we would like more information on the effect of wind direction and strength on noise reception. There are frequently onshore winds which would bring noise from the site (particularly during the construction phase) to inland receptors.	No	Noise predictions made throughout the Environmental Statement (document reference number 6) are undertaken according to ISO 9613, which provides a prediction of noise levels likely to occur under conditions favourable to sound i.e. down-wind and under a moderate, ground-based temperature inversion. Predictions are therefore worst case.

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Graveney with Goodnestone Parish Council	· Noise and vibration from the piling of solar array support frameworks: the PEIR indicates that these structures will have to be piled some 1-2.5 metres into the ground and that there will be many thousands of them. We would like more information on the number of days and periods of the day over which piling operations will be undertaken. (PEIR pp 12-23 indicates “50% of a working day”).	No	Construction will be undertaken block by block, most of which will be complete within 3 to 4 weeks. Piling operations will be avoided in blocks A - I during winter months to avoid potential impacts on birds. The assessment of piling operations includes both manoeuvring equipment, and active piling. As a conservative assumption, for the purpose of assessing piling impacts on human receptors, it is assumed that 4 pilers could operate at the same time for 50 % of the working day (i.e. actively piling for 6 hours per day). Core working hours are set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) while the timing of construction vehicle movements is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Core working hours are proposed to be between 07.00 until 19.00, Monday to Friday and 07.00 until 13.00 on a Saturday (unless in exceptional circumstances where need arises to protect plant, personnel or the environment). In addition to this, a start-up and close down period for up to an hour before and after the core working hours is proposed. This does not include the operation of plant or machinery likely to cause a disturbance.

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Graveney with Goodnestone Parish Council	· Noise from transformers and inverters: a development of this scale has a very large number of inverters (3532) and transformers (72). We note that in PEIR pp 12-26 the candidate transformer supplier has indicated a sound power level of 84dB(A) and the candidate inverter supplier a level of 63dB(A).	No	Environmental Statement (document reference number 6) includes an updated candidate design, to fit within the Rochdale Envelope. This includes 72 inverters (the same as PEIR) and 3277 transformers, a reduction of 305 units from those assessed as part of the PIER.
Graveney with Goodnestone Parish Council	· Uncertainty over the noise and vibration impact of the proposed battery storage facility: the extent and design of this facility is unclear, even whether it will be an open storage facility or incorporated within a building. Presumably, the noise impacts of these options are very different.	No	Operational noise from the Development will be dependent on the noise level of the plant / equipment installed. The ES has assessed the worst-case likely design, resulting in the highest noise levels at the nearest properties. Going forward, operational noise from the development will be a key consideration in the final design, particularly the substation and energy storage, however noise from these areas will be limited to the noise limits set out in chapter 12 of the ES, resulting in a low impact.

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Graveney with Goodnestone Parish Council	· Noise and vibration from construction traffic: on Hill Head Road, Seasalter Road and on haul roads within the CHSP site. We would like more information on the number, frequency and noise impact of abnormal loads travelling at low speed.	No	The peak number of Heavy Goods Vehicles is 80 two-way movements per day, this is expected to last for around 4 weeks, occurring in week 27 of the construction programme. Peak Light Goods Vehicle movements are 162 two-way movements per day, this is expected to last for a week, around week 100 of the construction programme. Over the full 24-month construction period, average HGV movements are 62 per day, while LGV movements are 90 per day. In terms of noise, the assessment has been undertaken based on the peak HGV movements occurring on the same day. In practice, vehicle movements will be lower than those assessed for the majority of the construction period. The noise assessment is based on the change in noise level, using the existing levels of traffic and the expected peak movements during construction. As a worst case, this is predicted to result in a 2 dB increase in noise levels from Seasalter Road during periods of peak traffic movements, which is considered a minor impact.
Graveney with Goodnestone Parish Council	· Acoustic barriers and screening: we would like to know more about the design and siting of these mitigation measures.	No	The energy storage facility and substation will be surrounded by a 7 m high bund, which will provide acoustic screening to reduce impacts from these noise sources. The bund is located the entire substation / energy storage area. Depending on the final equipment selected for installation, additional screening may be specified, in order to ensure the noise limits specified in Environmental Statement (document reference number 6) are not exceeded.

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GREAT Graveney	1. **Noise and Vibration**	No	No response required
GREAT Graveney	Graveney is a very quiet village in a rural location. Noise and vibration are likely to significantly impact on the silence that currently exists.	No	Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) assesses noise at receptor locations. The operational noise assessment is based on the background sound level, and as such accounts for the existing levels of background noise.
GREAT Graveney	There are significant discrepancies between the information in the PEIR and the non-technical report. Whilst the PEIR has 32 pages of detailed assessment which includes references to:	No	No response required
GREAT Graveney	· "noise level will be significant if the construction noise exceeds the pre-construction ambient noise by 5dB(A) over a period of one month"	No	No response required
GREAT Graveney	· "construction being undertaken from 0700 – 1900 on weekdays and 0700 – 1300 on weekends"	No	No response required
GREAT Graveney	· "thresholds for construction noise during evenings and nights"	No	No response required
GREAT Graveney	· a reference to the NPPF which says: "Identifying and protecting areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason"	No	No response required

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GREAT Graveney	· "The daytime criteria is exceeded at Cleve Farm during the installation of the PV panel framework, primarily due to piling operations."	No	No response required
GREAT Graveney	· Sound power levels for the Substation and Battery Storage Operation for eleven different types of machinery at levels ranging from 60 dB(A) all the way up to 100 dB(A).	No	No response required
GREAT Graveney	…the non-technical report simply states that because of mitigation, "no significant noise and vibration effects are predicted as a result of the Development." GREAT finds this highly confusing.	No	The non-technical report provides a non-technical summary of the noise assessment. While the PEIR and the Environmental Statement (document reference number 6) assesses predicted noise against limits, and where required specifies mitigation to meet these limits, the Environmental Statement, Non-Technical Summary (document reference number 6.5.1) is simply a summary stating that with appropriate mitigation, no significant effects are predicted.
GREAT Graveney	As is common in the phase 2 consultation information, there is a lack of detail about the battery and other electrical equipment. No information is provided about the noise and vibration levels during construction of this equipment.	No	The Rochdale Envelope parameters for the energy storage facility are clearly set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) Two alternative scenarios are available for assessment, a battery powerpack solution, as included in the PEIR, and a containerised solution, similar to other energy storage sites recently deployed in the UK. There is a need to maintain flexibility but the realistic worst-case design parameters included in the chapter present a robust set of parameters such that the as-built Development will have

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			the same magnitude effects, or effects of lesser magnitude than those included in the Environmental Statement (document reference number 6).
GREAT Graveney	There is selective quoting of the Noise Policy Statement for England. The text used in the PEIR says:	No	No response required
GREAT Graveney	· Paragraph 2.24 of the NPSE states that in relation to minimising and mitigating adverse effects: "…all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development. This does not mean that such adverse effects cannot occur."	No	No response required
GREAT Graveney	· The guiding principles from the NPSE are clear and "should be used to assist in its implementation" but these have not been produced in the PEIR. For reference, they are:	No	No response required

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GREAT Graveney	o **Ensuring a Strong Healthy and Just Society** – Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all.	No	No response required
GREAT Graveney	o **Using Sound Science Responsibly** – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.	No	No response required
GREAT Graveney	o **Living Within Environmental Limits** – Respecting the limits of the planet's environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.	No	No response required
GREAT Graveney	o **Achieving a Sustainable Economy** – Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised.	No	No response required

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GREAT Graveney	o **Promoting Good Governance** – Actively promoting effective, participative systems of governance in all levels of society – engaging people's creativity, energy and diversity.	No	No response required
GREAT Graveney	The phrases "where possible" and "where required" are used frequently – see example in section 12.5.2 Operational Noise.	No	No response required
GREAT Graveney	GREAT asks:	No	No response required
GREAT Graveney	· How will the guiding principles from the NPSE be fully and completely taken into account in the construction and operation of the proposal?	No	The visions and aims of the NPSE are referred to in Environmental Statement, Chapter 12: Noise and Vibration, Section 12.3.6 (document reference number 6.1.12). These visions and aims of the NPSE should be interpreted by having regard to the shared guiding principles, listed by GREAT.
GREAT Graveney	· How were the non-human receptor points chosen, and why was a vital, precious and hugely important location missed out?	No	Non-human receptor points have been selected on a worst-case basis, i.e. at the closest point from the SPA to the development.
GREAT Graveney	· Why does the language in the PEIR say "where possible" and "where required" instead of "will"?	No	Due to the nature and size of the development, along with the range of receptors assessed, a range of responses are required, including specific mitigation, which will be applied, to generic mitigation which should be applied where practicable, to reduce noise impacts to as low a level as possible.

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GREAT Graveney	· How have the developers assessed the noise and vibration brought about by the traffic and the construction work? Was a recognised quality standard used to measure this and the impact? What were the results? How will this be mitigated?	No	The assessment of construction noise and vibration is contained within Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.1 (document reference number 6.1.12). The Standards used for assessing construction noise are discussed in Environmental Statement, Chapter 12: Noise and Vibration, Section 12.3.1 (document reference number 6.1.12) and is best practice for the assessment of construction noise.
GREAT Graveney	· How has the noise and vibration brought about by the traffic and construction work (35 vehicle movements per hour?) been assessed in relation to the primary school and the school for pupils with specific learning difficulties? What was the outcome? How will this be mitigated?	No	In terms of EIA effects, all receptors are assumed to be of high sensitivity. In terms of construction traffic noise, during peak levels of traffic there is a predicted 2 dB increase in noise levels along Seasalter Road, which is a minor effect. Construction traffic mitigation is contained within the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
GREAT Graveney	· How have the developers assessed the effect of wind direction and strength on the solar power station? Was a recognised quality standard used to measure this and the impact? What were the results? How will this be mitigated?	No	Noise predictions made throughout the Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) are undertaken according to ISO 9613, which assumes downwind propagation for all noise sources. As a worst case, it is assumed that all equipment associated with the Development could operate at the same time, at 100 % capacity, during both daytime and night-time periods.

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GREAT Graveney	· The panels will be secured using piles and there will be a great number of these. Can you confirm the number (over 140,000?) and the noise levels that piling operations will generate? When, for how long, and what period of the day will this operation take place?	No	Construction will be undertaken block by block, most of which will be complete within 3 to 4 weeks. Piling operations will be avoided in blocks A - I during winter months to avoid impacts on birds. The assessment of piling operations includes both manoeuvring equipment, and active piling. As a conservative assumption, for the purpose of assessing piling impacts on human receptors, it is assumed that 4 pilers could operate at the same time for 50 % of the working day (i.e. actively piling for 6 hours per day). Core working hours are set out in Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5) while the timing of construction vehicle movements is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Core working hours are proposed to be between 07.00 until 19.00, Monday to Friday and 07.00 until 13.00 on a Saturday (unless in exceptional circumstances where need arises to protect plant, personnel or the environment). In addition to this, a start-up and close down period for up to an hour before and after the core working hours is proposed. This does not include the operation of plant or machinery likely to cause a disturbance.

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GREAT Graveney	· How was the noise and vibration assessed from transformers and inverters and battery storage? What would the noise levels amount to? Could this exercise be completed in view of the uncertainty about the battery storage? How will this be mitigated?	No	The noise and vibration from transformers, inverters and the energy storage is undertaken in the Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.2 (document reference number 6.1.12). The predicted noise levels amount to a low effect at the nearest receptors.
GREAT Graveney	· How will the health and well-being of villagers be safeguarded against noise and vibrations?	No	Mitigation referred to in Environmental Statement, Chapter 12: Noise and Vibration, (document reference number 6.1.12) and Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1) will be employed to ensure noise and vibration effects from the construction and operation of the Development are not significant, in terms of EIA Regulations.
GREAT Graveney	What is your waste management plan, and what affect will disposal have on the traffic plan?	No	Traffic generation from waste has been included within the assessments of construction traffic set out in Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental impacts from construction traffic are predicted.
Kent Wildlife Trust	Impacts from Noise	No	No comment required.

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Kent Wildlife Trust	Paragraph 105 of Chapter 9 states "*In line with the recommendations of the IECS study, the noise assessment for the Development suggests that a level of 70 dB LAeq (at the bird receptor location) is a suitable threshold for significant effects on ecological designations.*" In Paragraph 19 of Chapter 12 more detail is given, stating that the study in question suggested a classification of noise levels of 70-85 dB(A) as a 'moderate – high effect level', that resulted in *"Headturning, scanning behaviour, reduced feeding, movement to other areas close by.*" It is also reported that noise levels of 50 – 70 dB(A), a 'moderate effect level' resulted in "*...headturning, scanning, behaviour, reduced feeding, movement to other areas close by*" We note that the recommendations within this report were developed specifically for the Humber.	No	No comment required.

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Kent Wildlife Trust	While the IECS study does state "*Ambient construction noise levels should be restricted to below 70dB*" nowhere can we find it this report that it concludes 70dB is a suitable threshold for significant effects on ecological designations. On the contrary, the IECS report states "...*regular construction noise between 50 and 70 dB (A) are categorised as moderate as these activities can have significant effects on avifauna*..." While useful as a starting point, the IECS study classified the significance of different disturbance events on birds and sought to classify the sensitivity of receptors within the area of study, it did not set universal thresholds.	No	The 50 dB and 70 dB thresholds are used to inform the assessments in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9). The IECS study is a robust and useful indicator of the noise levels that are likely to result in disturbance events on birds.

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Kent Wildlife Trust	It is clear from the above that noise levels below 70dB can induce a behavioural change, and therefore have the potential to cause an impact. The assessment of the impacts of noise should not be based solely on what may be considered a 'moderate – high level effect' (70dB) from a single noise event. What also needs to be taken into account is the frequency of disturbance and the significance of the birds involved (species and number). Habituation is also mentioned a few times. In the absence of alternative evidence it would seem wise to assume that the SPA birds are largely unhabituated to the potential noise events, and the proximity of sources, in question. While some may become habituated, the process itself requires exposure to disturbance.	No	The 50 dB and 70 dB thresholds are used to inform the assessments in ES Chapters 12 Noise and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9). Frequency of disturbance, seasonal variations in sensitivity and the species in question are all referred to in Environmental Statement, Chapter 9: Ornithology, (document reference number 6.1.9). The anticipated length of time of the construction phase in each Field is also relevant and is referred to in the assessment.
Kent Wildlife Trust	We remain unconvinced that birds will not be disturbed by construction noise and would like to see further assessment and more information on this issue.	No	Further assessment and more information is provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) (construction phase impacts).
Natural England	· Further information is requested regarding the noise impacts of the construction and demolition phases of the proposal. An assessment of the change in continuous and sporadic noise	No	Further assessment and more information on mitigation is provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) (construction phase impacts).

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	levels is necessary to be able to determine likely impacts and potential need for mitigation.		
RSPB	· Construction noise	No	No comment required.
RSPB	Construction noise	No	No comment required.
RSPB	Further information regarding mitigation measures needed to minimise the impact of construction noise on the SPA land adjacent to the development site is also required before we can agree with the magnitude of this impact of the development on the designated features of The Swale SPA.	No	Further assessment and more information on mitigation Environmental Statement, Chapter 9: Ornithology, (reference number 6.1.9) (construction phase impacts).
Swale Borough Council	· Noise and Vibration	No	No comment required.
The Faversham Society	7. **Noise and Disruption**	No	No comment required.

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The Faversham Society	If developers are forced to halt work over each summer's bird nesting season and to avoid disturbing overwintering birds, it is likely that the work will be spread over perhaps three or four years. This means that for residents close to the site and those living on or using the roads leading to it, there will be unacceptable noise and disturbance caused by construction traffic to and from the site over a long period.	No	Further assessment and more information on mitigation is provided in Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9) (construction phase impacts). The length of the construction phase is expected to be 2 years. Potentially disturbing construction activities within the fields closes to the SPA are expected to be undertaken in winter, as it is anticipated that SPA species will be more sensitive to disturbance effects at the closest locations in the SPA to the Development during the breeding season. There is adequate time within the 2-year construction phase to allow this construction phase mitigation to be delivered without impacting the overall construction programme.
The Faversham Society	The Faversham Society is also concerned about the level of disruption that will continue during the normal running of the power station. Although there is some technical detail, we have seen little intelligible analysis about the cumulative level of noise generated by the inverters, transformers, battery packs and other elements of the energy production process.	No	Noise during the operational phase of the development is assessed in Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.2 (document reference number 6.1.12). The predicted noise levels assume that all equipment associated with the Development could operate at the same time, at 100 % capacity, during both daytime and night-time periods. Therefore, in practice the noise emission levels are likely to be lower than those presented in this assessment. Noise at receptor locations will be required to be lower than the limits set out in Chapter 12: Noise and Vibration (document reference number 6.1.12).
The Faversham Society	Neither is there a convincing presentation about the level of, noise,	No	Construction noise is predicted and assessed in detail in Environmental Statement, Chapter 12: Noise and

	light and air quality pollution caused during the construction phase.		Vibration, Section 12.6.1 (document reference number 6.1.12).
The Faversham Society	Tables set out noise levels caused by construction equipment for receptor points at adjacent residential properties including at Nagden Cottages, Warehouse, Coney Banks and Crown Cottages. With the breaks over the summers for bird nesting, it is likely that the works will take up parts of three years. There is also concern about working in the winter because of wintering birds on the land that are part of the Swale Ramsar Assemblage This means that for residents close to the site, there will be noise and disturbance over a long period to the detriment of amenity.	No	During summer months, construction will continue at a distance at which birds will not be disturbed, which will mean that construction will not extend beyond the predicted 2-year period. Assessment of construction noise at the nearest receptors has been undertaken in Environmental Statement, Chapter 12: Noise and Vibration, Section 12.6.1 (document reference number 6.1.12) and shows that noise from construction will not be significant.

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The Faversham Society	The level of noise and disturbance is a problem for residents but is much more serious for wildlife. Construction of roads and excavation of ditches, creation of culverts, clearing of ground by removing plants and topsoil and installation of equipment would result in the whole site being unavailable as nesting habitat for ground nesting birds and feeding /foraging habitat for birds, bats and other animals and insects over a long period. Once complete, it is likely that new vegetation would not properly establish itself for at least three years. The impact of this is discussed in more detail in respect of particular species and the overall impact on the Statutory designations and local designated land that directly abuts the site.	No	The likely significant noise effects of the Development on human and ecological receptors are assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12). The Development site will be constructed field by field, therefore the construction impacts will be localised at any particular point in time. Assessments of construction activities on avian and non-avian ecological receptors including habitats and species is presented in Environmental Statement, Chapter 8: Ecology (document reference number 6.1.8) and Environmental Statement, Chapter 9: Ornithology (document reference number 6.1.9). Environmental Statement, Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2) sets out how it is anticipated that new vegetation will be established and maintained.

13 Socioeconomics, Tourism, Recreation and Land Use

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Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Canterbury City Council	Socioeconomics/Tourism/Recreation etc. Canterbury City Council endorse the views of KCC on the impact of the project on the PRoW.	No	No response required
Faversham Footpath Groups	1. The Faversham Footpaths Group urges the Secretary of State to refuse this application on the ground that its vast scale would have a massively detrimental environmental and visual impact, ruining the enjoyment of the many people who take great pleasure in walking the coastal path and other paths in the surrounding area.	No	The opinion that it would ruin the view is subjective. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7), and Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2(document reference number 6.1.13) set out the assessed impacts on users of the footpath network around the site.
Faversham Footpath Groups	2. Because the Group is concerned only with the enjoyment, preservation and protection of public rights of way our comments are necessarily confined to the impact which the proposal would have on people using public footpaths in the area. But that encompasses not merely the ability to walk particular routes – which would not be directly affected by the proposed complex – but the nature of the experience that this provides. It is clear that this would be drastically changed for	No	The ability to walk around the site would be directly affected by the Development, because of the creation of a substantial, new, permissive path across the site, facilitating a "round walk" from Seasalter Road. Other points are the opinion of the consultee.

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	the worse if the solar complex were built as planned: to a degree that makes the proposal wholly unacceptable, in our view, whatever its other merits.		
Faversham Footpath Groups	5. Any marring of this landscape would be regrettable but we consider that the extraordinary scale of the present proposal would cause unacceptable damage and loss of amenity. The fine views inland from the elevated coast path would be ruined, to be replaced by a vast sea of panels. The fact that the nearest panels will be set back some way from the coast path would make virtually no difference because of the open nature of the terrain. At 4 metres plus high, the nearest panels will be hugely intrusive and, behind them, other panels will stretch almost as far as the eye can see. The visual impact will be exacerbated by the east-west configuration of the panels, and their proximity to each other, which will make them appear continuous when viewed from the coastal path. As	No	The opinion that it would ruin the view is subjective. Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) sets out the assessed visual impacts on users of the footpath network around the site.

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	others have pointed out, it will be akin to looking across a sea of industrial estate roofs.		
Faversham Footpath Groups	8. We are aware that the developers have proposed some possible enhancement of the footpath network, including some permissive paths, but this does not afford any compensation in our view for the enormous loss which would be suffered as a result of the degradation of this landscape. It is worth adding that this would undoubtedly lead to fewer walkers using this section of the coast path than would otherwise be the case, with a loss of local tourism revenue.	No	The opinion expressed is their own. The proposed permissive path across the site is not intended to be a replacement for the loss of views from existing paths, but a new, beneficial effect to offset the assessed adverse effect of the change in views for walkers on existing paths.

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Graveney with Goodnestone Parish Council	11. Socio-economics, tourism, recreation and land use We note that "most components and infrastructure for the proposed development will be sourced outside the UK" (PEIR pp 13-2) and that there is no information at this stage on the degree to which local businesses will have supply chain opportunities. Therefore, the extent of any local economic benefit is unclear. We would like more information on the degree to which the CHSP proposals will benefit the local economy.	No	There will be some economic benefit captured locally, particularly during the construction period in hotels, local retailers. There is also the possibility of supply chain benefits at a sub-regional level. However, it is not possible to assess the precise scale of these locally at this stage.
Graveney with Goodnestone Parish Council	Tourism is an important part of the Swale economy, generating around £228 million per year in 2015 and supporting around 4,500 jobs (about 9% of all local jobs). The borough council wishes to develop tourism further over the coming years. Local tourism is based on two main types of attraction: first, history and heritage, and secondly, outdoor activities such as walking, cycling, sailing, bird watching and quiet enjoyment of the countryside. In both cases, the character and quality of the local environment is essential to support tourism. In other words, for Swale, "its face is its fortune".	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce. The recreation assessment finds that there will be a neutral impact on the number of walkers using the site as the new route opened up through the site is likely to attract new walkers or provide an alternative for existing walkers, that is anticipated to offset negative impacts on existing routes associated with a change in the view.

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Graveney with Goodnestone Parish Council	The PEIR says there is very little evidence about the impact of large solar power development on tourism, either generally or locally. We think that even if there were such studies, based on much smaller installations in other locations, they would have little relevance to a development of this unprecedented scale.	No	No response required
Graveney with Goodnestone Parish Council	The PEIR then goes on (pp 13-24) to say "The development size means that it is likely to affect the visual amenity of the landscape significantly from locations in close proximity" (presumably including the Saxon Shore Way and the prime bird watching areas overlooking the tidal Swale and its creeks). It then states "there is not enough evidence to suggest with confidence that effects on visual amenity will reduce tourist visits to the area".	No	No response required
Graveney with Goodnestone Parish Council	This is a very weak conclusion. The absence of evidence on tourist impact does not mean evidence of its absence.	No	It is correct that the absence of evidence on tourist impact does not mean evidence of its absence. However, similar objections have been made to other development types with substantially higher levels of visual impact, such as wind farms. In these cases, before and after studies have shown that there is no adverse effect on tourism.

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Graveney with Goodnestone Parish Council	The parish council strongly supports KCC's suggestion that people counters on public rights of way at key gateway locations should be utilised to gather data on tourist recreational use of the site. We would also like this information to be supplemented by a sample questionnaire survey of users (agreed with KCC) to gain qualitative information on the tourist and recreational impact of the CHSP proposals.	Yes	People counters on the public rights of way were used in a survey conducted during July and August. These are reported in the Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.3.4 (document reference number 6.1.13).
Graveney with Goodnestone Parish Council	We note that the CHSP "Public Pathways" information sheet refers to two "possible permissive pathways" across the proposed development site. We would like more information on the terms under which under such new paths would be provided, and the period over which they would be made available.	No	Whether any formal licencing of the proposed permissive path will occur is subject to ongoing discussions with KCC, but is not expected to affect the practical usability of the path. The path will be available from the cessation of the construction phase of the Development, to the start of the decommissioning phase.
Graveney with Goodnestone Parish Council	The PEIR non-technical summary concludes that "the effect of the development on land use will be negligible". Once again, this is a bold assertion that ignores the transformative effect of a development of this scale and type on isolated rural farmland.	No	Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.3 (document reference number 6.1.13) sets out (as the PEIR did) that: Land will be taken out of arable crop production, and instead areas of sheep grazing will be provided along with solar farm operation. Aspects such as views of the site ("transformative effect") and its setting ("isolated") are not relevant to the assessment of land use.

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GREAT Graveney	1. **Socio-economics, Tourism, Recreation and Land Use**	No	No response required
GREAT Graveney	It is stated that "most components and infrastructure for the proposed development will be sourced outside the UK" (PEIR page 13-2) and that there is no information at this stage on the degree to which local businesses will have supply chain opportunities.	No	Given the nature of the Development, there are some parts that will need to be sourced from outside the UK. However significant parts of the build will likely be locally sourced. The scale is not clear at this stage but we would expect the Developer to put in place measures to promote local benefits. However, this would need to be confirmed by the Developer/Prime Contractor
GREAT Graveney	The CHSP website, leaflets and brochures have headlined a figure of over £1 million of income per year for Kent and Swale, yet this is not mentioned in the PEIR.		
GREAT Graveney	GREAT asks:	No	No response required
GREAT Graveney	· All businesses have to pay tax and business rates, and this is not usually counted as a benefit. Aside from business rates and other taxes what would be the benefits to the local economy?	No	Socio-economic impacts are assessed in Section 13.5 and 13.7 of Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).
GREAT Graveney	· If £1 million per year will be paid in business rates, how much corporation tax will be paid?	No	Corporation tax payments will depend on the profits. As large-scale solar development currently attracts no subsidy from the Government, profit levels will be substantially reduced relative to most existing solar farms, and will depend on the wholesale electricity price at the time.

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GREAT Graveney	Tourism is an important part of the Swale economy and the Borough Council wishes to develop tourism further over the coming years. Local tourism is based on two main types of attraction: first, history and heritage, and secondly, outdoor activities such as walking, cycling, sailing, bird watching and quiet enjoyment of the countryside. In both cases, the character and quality of the local environment is essential to support tourism.	No	Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) sets out the assessed impacts on socio-economics, recreation, tourism and land use.
GREAT Graveney	GREAT asks:	No	No response required
GREAT Graveney	· How would the developers deal with the adverse effects on the English Coast Path?	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) and Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13) set out the assessed impacts on users of the footpath network around the site.
GREAT Graveney	· The developers conclude that there is very little evidence about the impact of large solar power development on tourism. It then states" there is not enough evidence to suggest with confidence that effects on visual amenity will reduce tourist visits to the area". Was there any evidence used to reach this conclusion? If so, what was it?	No	This was based on desk-based research of similar developments as well as academic research papers, as referenced in Section 13.5.2.1 of Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).

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GREAT Graveney	· Despite being asked to by Kent County Council, the developers have not carried out a survey on the use of public footpaths, including the Saxon Shore Way. How was the recreational impact of the scheme assessed?	No	People counters on the public rights of way were used in a survey conducted during July and August. These are reported in the ES, in chapter 13, section 13.3.4.
GREAT Graveney	· If the developer is already ignoring advice and requests from the local authorities, what certainty can the local people have about future advice and requests?	No	The developer is not ignoring advice and requests from the local authorities.
Natural England Annex	Access and recreation Natural England has a duty to provide coastal access on foot around the whole of the English coast and is aiming to complete this by 2020. This is a new National Trail with an associated margin of land predominantly seawards of this, for the public to access and enjoy. Natural England takes great care in considering the interests of both land owners/occupiers and users of the England Coast Path, aiming to strike a fair balance when working to open a new stretch. We follow an approach set out in the approved Coastal Access Scheme.	No	The expected adoption of the England Coast Path has been considered in ES Chapter 7: LVIA and ES Chapter 13: Socio-economics, tourism, recreation and land-use.
Natural England Annex	Natural England submitted proposals for the Whitstable to Iwade stretch of the England Coast Path, for approval by the	No	The expected adoption of the England Coast Path has been considered in ES Chapter 7: LVIA and ES

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	Secretary of State for Environment, Food and Rural Affairs, in June 20176. In the vicinity of the development site, the proposal is for the England Coast Path to follow the route of the Saxon Shore Way.		Chapter 13: Socio-economics, tourism, recreation and land-use.
Swale Borough Council	· Socioeconomics/Tourism	No	No response required
Swale Borough Council	· Recreation	No	No response required
Swale Borough Council	Socioeconomics/Tourism	No	No response required
Swale Borough Council	One of the most noticeable omissions in this chapter is the work that has been going on with Natural England around the Coastal Access Path and there needs to be a conversation with the Team Leader Anne Goddard if not those of her team (I suggest Jenny Bowen as her 'second') that are leading on the two coastal routes one of which will be in this particular area. The focus in the PEIR is on PROW at the expense of the next big project which is coastal access. Whilst construction activities interfering with PROWs are referenced, the PEIR appears to overlook a more significant Government backed	Yes	The England Coast Path, and specifically the Whitstable to Iwade section, Chapter 1: Whitstable Harbour to Nagden, is fully considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13). It is noted that no changes to the Saxon Shore Way are planned for when the route is adopted as part of the England Coast Path, and hence the assessment remains the same for both paths.

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	proposition. Coastal Access paths give an opportunity to add value to a diverse product base with something that will not only create paths but potentially support new SMEs along the route in terms of support services like the South West Coastal Path. It has the potential to open up the area to greater visitor opportunities.		
Swale Borough Council	As things move forward in terms of tourism there will be less emphasis placed on geographical boundaries and more focus on destinations in terms of clusters and in this context in terms of tourism clustering it is not clear that sufficient acknowledgement has been taken of the impact that this size and scale of development might pose on the wider landscape values which are integral to that offer.	No	The impact on the tourism economy has been assessed at a Kent County Council level to assess impacts on the wider sub regional economy, reported in the Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.1 (document reference number 6.1.13).

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Swale Borough Council	The whole area is a walkers (some cycling) paradise and a walking and cycling strategy will be going out to consultation over the summer with a view to adoption in autumn. Both KCC and DoT are keen to invest in the area to enable delivery of this agenda in a more	No	A component of the following comment, addressed below.
Swale Borough Council	meaningful way. This will largely be driven by cycling gains off the back of housing developments which in time will connect to form a grid of routes but also there will be less formalised cycling and walking arrangements which will be based on the landscape values in the area. Has sufficient thought therefore been given to increasing walking and cycling for leisure and recreation as well as supporting health and wellbeing work and the impact that such a development might have on this ambition?	No	Substantial thought has been given to this. There are conflicting effects. Birds associated with the adjacent Special Protection Area are disturbed by use of the footpaths around the coast, particularly by dogs and potentially more by cyclists. On this basis it was considered unacceptable to propose promotion of cycling along the coastal path. An additional permissive path is proposed that will allow "round" walks to be made from Seasalter road, potentially drawing walkers away from the SPA whilst also promoting walking in the area.

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Swale Borough Council	In relation to bird disturbance from construction (change and noise) has any dialogue been had with Medway Swale Estuary Partnership in this regard – they work closely with Birdwise which is the initiative managing the monies derived from developments to mitigate for recreation disturbance across North Kent. There are opportunities to establish volunteer wardens perhaps through development longer term which supports safeguarding the landscape in the longer term along similar lines to the Kent Wildlife Trust's HLF funded Guardians of the Deep project which is all about coastal management.	No	

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Swale Borough Council	The document references the fact that there are few studies to say how such a development might impact on tourism – this is therefore an opportunity to do some baseline study and post implementation research to start a body of research. The author proudly suggests that this is biggest in UK if not Europe so should the project not be contributing to academic research to build that evidence base for studies associated with renewables? This could be a trailblazer and might then build a reputation which in itself could create opportunity as a centre/destination of excellence in this regard. Recreation Notwithstanding the above comments, the main consideration in terms of the on-site or nearby resource is the public footpath network including the long distance Saxon Shore Way and NC1 cycle route. It does appear that the network has been considered in terms of both direct and indirect impact. However there is no mention of the Coastal Access Route being led by Natural England (although it is referenced in Chapter 7 Landscape & Visual Impact). Perhaps some cross referencing required.		Although this would be a useful study, it is not within the current scope of the Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13). The merits of a wider review would require consideration from the Development Team.

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	Other recreation impacts are considered within the Landscape and Visual Impact Chapter 7 and this has picked up on the element such as boating/sailing, designated sites and visual impact from the water. Otherwise this topic appears to have been covered in a comprehensive and considered manner. Climate Change and Sustainability It should be noted that the UKCIP18 projections are due to be published in Nov 2018 and should as mentioned be incorporated into further modelling. Using the central estimate from the UKCIP09 projections seems sensible as does looking at three effects – climate change on the development, the development on climate change and effects of climate change on receptors. During the lifetime of the development (up to 40 years) there will be no significant climate change effects on the development or receptors, however the development will contribute to reducing climate-changing gas emissions. Overall the development will contribute to the reduction of UK emissions and increase generation from renewable		

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	sources and to meeting UK and EU targets.		

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Swale Friends of the Earth	Local economic benefits for the community	No	No response required
Swale Friends of the Earth	We note the socio-economic impact assessment in the PEIR. We are concerned, however, that there has been no exploration of the potential for local community benefit. A community benefit scheme is common for renewable energy projects – indeed, it is industry-standard in the UK. This can come in a variety of shapes and sizes, depending on the wishes of the local community – from discounts on electricity bills, to a community pot to fund local projects, to shares in the development.	No	With the withdrawal of subsidies from Government for large scale solar schemes, the financial viability of such schemes no longer allows community benefit payments to be proposed.
Swale Friends of the Earth	We would like to see this addressed and for opportunities to be explored. We believe that, while the development of renewable energy has wide-ranging benefits for the environment and for society as a whole, those communities that host projects should receive direct economic benefits and we are disappointed that, despite this being raised during the consultation process, it hasn't been addressed in the PEIR or elsewhere.	No	With the withdrawal of subsidies from Government for large scale solar schemes, the financial viability of such schemes no longer allows community benefit payments to be proposed.

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Swale Footpaths Group	I write on behalf of the Swale Footpaths Group (Registered Charity 261252). We are affiliated to the Ramblers, though not a Ramblers group.	No	No response required
Swale Footpaths Group	The public footpath that follows the coast from Nagden to the "Sportsman" is currently part of the Saxon Shore Way and will soon also be part of the England Coastal Path. It is popular with bird watchers and also with walkers for the extensive views both across the Swale to Sheppey and inland across low, open countryside as far as the hills to the east and south. As Ian Wild of the Ramblers has pointed out, the views inland would be replaced by a lengthy and repetitive array of solar panels which, I imagine, would reduce the enjoyment and interest of the walk for most of us.	No	From the Saxon Shore Way, as it runs along the sea defence to the north of the Development site, the views inland will be altered, as set out in Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). The views of "low, open countryside" will, where panels are present, be replaced by views of the array of solar panels. Views of the hills to the east and south will remain. Whether this affects enjoyment is a subjective matter, but it is conservatively assessed as an adverse effect in the Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).

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Swale Footpaths Group	On a relatively minor issue, the "Public Pathways" document which I picked up at your exhibition at Faversham on June 16 shows a "possible permissive pathway" along the west side of the Seasalter Road just south of the "Sportsman". This is in fact already on the Definitive Map as a public footpath (the majority, which is in Swale, as ZR 692, the northern section, which is in Canterbury as CW 90) in consequence of a Public Path Creation Agreement made on 22-9-11.	No	This is correct, except to note that CW90 stops short of the Sportsman pub, leaving walkers the option of using an existing path to the north, over which there is no public right of access, or walking along the adopted highway for c. 300 m, which has no provision for pedestrians.
Swale Green Party	· The site provides a much-loved amenity value for local people. The development would substantially change the character of views from Saxon Shore Way, a long-distance footpath that runs along the edge of the site. The panels will also be a huge visual impact to walkers in the area, and in this existing natural environment it would be very difficult to create alternative walking routes. The panels will be visible from several places around the site, e.g. from Cleve Hill, Graveney and Sheppey.	No	It is correct that the Development would change views, and this is assessed in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). An additional walking route is proposed as part of the Development, this being a permissive path of length approximately 1.5 km, south from the Saxon Shore Way to join with path ZR692 on the south side of Graveney Hill.

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Swale Green Party	Limited economic benefit of the scheme. · The proposed solar farm will create very few jobs per unit of expenditure. Therefore, it would be better to widely distribute the investment among thousands of small scale beneficiaries rather than a single large-scale development.	No	There will be some economic benefit captured locally, particularly during the construction period in hotels, local retailers. There is also the possibility of supply chain benefits at a sub-regional level. The beneficiary is the climate, and consequently users of the ecosystems that depend on it, in having electricity produced by a means that does not involve emissions of climate changing gases during operation, as set out in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15).
The Faversham Society	This will have a knock-on effect on the local economy. The Faversham and Graveney Marshes 'brand' attracts a large number of visitors – whether interested in history, marine life, birds or general recreational walking - to this part of Swale. Although developers assert that for Kent the impact will be negligible, we have seen no analysis of the short and longer economic impact the development will have on Faversham and the businesses that support and service our visitors.	No	There is currently no strong evidence to suggest the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
The Faversham Society	12. **Footpaths**	No	No comment required

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The Faversham Society	The entire footpath through the site from Nagden Cottage to the seawall near Castle Coote, would – if the development goes ahead as proposed - run between lines of solar panels 4 metres high making it impossible for walkers to see over them. Any additional permissive paths provided as part of the development would have similarly stark industrial views.	No	There would be substantial horizontal separation between the path and the solar panels, however it is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
The Faversham Society	As we have noted above , the Saxon Shore Way runs along the top of the seawall, and so any walker from Faversham to Seasalter would start by looking along the parallel ranks of solar panels and then as they turn east looking over row after row of panels stretching east to west to the back of the marsh. The monotony would only be relieved as walkers passed gaps for the spine road and the drainage ditches. At the eastern end of the site, walkers' next view would be the battery compound and sub-station across the grazing marsh. Walking the Saxon Shore Way from the Seasalter Road end, there would be views of the sub-station and other works and across the marsh towards the solar panels extending to the sea wall. New security fencing and surveillance is also expected	No	Views across the site from locations on the Saxon Shore Way are provided in Environmental Statement, Volume 3: Visualisations (document reference number 6.3) as photomontages in support of Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Views in other directions will not change. It is noted that the term "monotony" could be applied to the existing views across the site, as walkers pass c. 10 arable fields in 6 km of footpath. Views of features other than the fields will not be altered by the Development.

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	to be installed along all footpaths which would add to the unsightliness and serve to intensify the hostile industrialised atmosphere across the marshes. The character of all of these well established and much-used footpaths that are part of the Saxon Shore Way would be changed beyond recognition. On a more detailed point, we would want to be assured that the footpath across the site from Nagden to Castle Coote would remain open during the construction phase.		
The Faversham Society	The Faversham Society considers that the detrimental impact on the amenity of users of the footpaths both through and around the Cleve Hill Power Station would be unacceptable both in the short term during building works and in the longer term once the panels were connected to the grid and battery storage was installed.	No	This is not the conclusion of the assessment set out in the Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13).

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The Faversham Society	Footpaths	No	No comment required
The Faversham Society	As part of the assessment of the visual impact of the proposal, the developers have assessed each of the viewpoints for the sensitivity and susceptibility of the users. The series of viewpoints include two sites on the sea wall which is the Saxon Shore Way and the National Cycle Network. The footpath through the site at the Seasalter Road end is also assessed and the path through the middle of the site from Nagden to Castle Coote. In all cases, it is considered that the development would have a substantial impact on the appearance of the paths and in all cases, the users would be highly sensitive and susceptible to being affected by the change.	No	Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7) assesses the effect on views. The effects on amenity are considered in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
The Faversham Society	For the footpath through the site from Nagden Cottage to the seawall near Castle Coote, the entire path would run between lines of solar panels that are around 4 metres high so that a walker would not be able to see over them, only along and drainage ditches and when crossing the spine road. Any additional permissive paths provided as part of the development	Yes	There would be substantial horizontal separation between the path and the solar panels, including an increase in this separation since PEIR, such that the footpath will be within a corridor of width c. 35 m between panels. It is the case that the panels are likely to be higher than walkers on the paths that run through the site, and long-distance views will be occasional, as views along gaps between the rows arise. This is acknowledged as a change from the baseline in the

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	would have similar views. For the sea wall which is the Saxon Shore Way, the location of the panels has been altered so that they would be set back 60 metres from the path.		Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7).
The Faversham Society	Despite this, any walker from Faversham to Seasalter would start by looking along lines of solar panels parallel with them and then looking down columns of panels stretching as far as the back of the marsh except for the gap of the spine road and the drainage ditches. A line of new culverts would stop the end of all the ditches. At the end of the solar farm, their next view would be the battery compound and substation across the grazing marsh. For the path at the Seasalter Road end, there would be views of the sub-station and across the marsh towards the solar panels extending to the sea wall. New security fencing is also expected to be provided along the footpaths as has been installed at the smaller solar farm off Abbey Fields. The character of all of these footpaths would be changed beyond recognition. Further, itis	No	Views across the site from locations on the Saxon Shore Way are provided in the Environmental Statement, Volume 3: Visualisations (document reference number 6.3) as photomontages in support of Environmental Statement, Chapter 7: Landscape And Visual Impact Assessment (document reference number 6.1.7). Views in other directions will not change. The elevated nature of the path will ensure that long distance views from the path are not impeded, and the sense of place and location are not affected. Views of the fields behind the sea defence will largely be replaced by views of solar panels, but that is the extent of the change.

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	likely that for the first three years from 2021, the footpath across the site from Nagden to Castle Coote would be closed for construction works and the Saxon Shore Way would be a view of a building site.		
The Faversham Society	For these reasons, the Faversham Society considers that the impact of the works on the amenity of users of the footpaths through and around the site would be unacceptable both in the short term during building works and in the longer term with the solar farm and its connection to the grid and battery storage installed.	No	The effect on amenity is assessed in the Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
The Faversham Society	4. What was the result of any consultations with Natural England about it their planned coastal path from Whitstable to Iwade? At the moment you plan shows	No	Natural England have been consulted in general about the proposals, and have not raised objections on grounds of effects on the England Coast Path.

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	the area you intend for the power station as 'South Swale Local Nature Reserve'.		
The Faversham Society	5. How do you gain approval from Natural England when their consultation about this section of the English Coastal Path ended on the 17th September 2017?	No	Natural England have been consulted in general about the proposals, and have not raised objections on grounds of effects on the England Coast Path.
The Faversham Society	6. Since you have been planning the solar power station (SPS) why did you not take part in that consultation – given the detrimental effect the SPS will have?	No	The Development will not impede existing or proposed access to the coast, and will improve it by creating a permissive path to join the coast path from the south.
The Faversham Society	7. When do you intend to consult the Kent Ramblers' Association about the destruction of amenity value?	No	Effects on amenity of footpath users is assessed in the Chapter 13: Socioeconomics, Tourism, Recreation and Land Use, Section 13.5.2.2 (document reference number 6.1.13).
The Faversham Society	47. What analysis have you undertaken of the effect that the destruction of the amenity value of the marshes will have on the small and medium-sized local businesses that serve residents and visitors? What will be the economic impact on businesses in and around Faversham?	No	There is currently no strong evidence to suggest that visitors will be restricted from enjoying the amenity value but the Applicant is focusing on the impacts to recreation. There is also no strong evidence that the Development would have a significant negative impact on local tourism. There could however be some local expenditure benefits associated with construction workforce.
The Faversham Society	48. How many jobs will be created during the construction phase?	No	The precise scale of temporary construction jobs is not clear at this stage but we would expect there to be a modest number of jobs created

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The Faversham Society	49. How many of those jobs will be reserved for local people?	No	This is not clear at this stage but we would expect the Developer to put in place measures to promote local benefits. However, this would need to be confirmed by the Developer/Prime Contractor
The Faversham Society	50. How will the developers ensure that they or the contractors they use do not draft in their workforce from outside the region or country?	No	This is not clear at this stage but we would expect the Developer to put in place measures to promote local benefits. However, this would need to be confirmed by the Developer/Prime Contractor
The Faversham Society	51. What guarantees can you give the people of Faversham and Swale that they will not be subject to an influx of migrant labour putting pressure on public services that are already hard-pressed to meet demand?	No	It is not possible to assess the scale of labour brought in from outside the local area at this stage but we would expect the temporary incoming workforce to be easily accommodated by existing accommodation and service. This could also be a benefit to the local economy through expenditure on local goods and services.
The Faversham Society	52. If there were to be such a workforce how do developers and their contractors intend to satisfy their housing and service needs?	No	It is not possible to assess the scale of labour brought in from outside the local area at this stage but we would expect the temporary incoming workforce to be easily accommodated by existing accommodation and service. This could also be a benefit to the local economy through expenditure on local goods and services.
The Faversham Society	53. What plans do developers have to meet the healthcare needs of any such workforce?	No	It is not possible to assess the scale of labour brought in from outside the local area at this stage but we would expect the temporary incoming workforce to be easily accommodated by existing accommodation and service. This could also be a benefit to the local economy through expenditure on local goods and services.

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The Faversham Society	54. What arrangements are there to compensate local people with reduced energy costs to compensate for the disruption to their lives during the construction phase and the loss of amenity value once the plant is operational?	No	Disruption is likely to be temporary with limited negative impacts to residents. Separate to this, the developer may be considering schemes for feeding renewable electricity to local users.

14 Access and Traffic			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Canterbury City Council	Access and Traffic Canterbury City Council endorse the views of KCC on this matter	NO	Acknowledged - no response required.

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Canterbury City Council	The Construction Environmental Management Plan (CEMP) at Technical Appendix A 10.2 does not appear to refer to construction working times and deliveries. This has been included in Chapter 12, where a 12 hour working day (07:00 - 19:00) is proposed on weekdays, however a 10 hour day (08:00 - 18:00) would be preferred - these hours are the most commonly used hours in the UK with regards to noisy work from construction projects and have been applied to projects like the Channel Tunnel Rail Link and HS2.	NO	Core working hours are set out in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) while the timing of construction vehicle movements is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Core working hours are proposed to be between 07.00 until 19.00, Monday to Friday and 07.00 until 13.00 on a Saturday (unless in exceptional circumstances where need arises to protect plant, personnel or the environment). In addition to this, a start-up and close down period for up to an hour before and after the core working hours is proposed. This does not include the operation of plant or machinery likely to cause a disturbance. All construction traffic movements will be within the core working hours. It is proposed that the Development will not accept HGV deliveries of bulk materials to site before 09.30 and between 15.00 and 16.00. Similarly, the Development will not allow HGVs to leave site between 08.30 and 09.30 and 15.00 and 16.00 to avoid Graveney Primary School start/finish times.

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CPRE Kent	5. Transport We contend that a two-year construction period with some 75 HGV movements a day can not be tolerated in this rural location. We are aware that the Grade I-listed All Saints Church in Graveney suffered damage from the vibration of passing HGVs during the construction of the Cleve Hill converter which supports the London Array. We strenuously object to activities that would exacerbate the deterioration of an important heritage asset.	NO	The amount of construction traffic predicted to be generated by the Development has reduced from that identified in the Preliminary Environmental Information Report (PEIR). Predicted traffic volumes are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). The potential for vibration from construction vehicles is discussed within Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12). Neither Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) or Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) identify any significant residual environmental impacts associated with construction traffic from the proposed development. In addition, a Construction Traffic Management Plan has been produced to support the Development Consent Order (document reference number 3) application which sets out a number of mitigation measures.

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Graveney with Goodnestone Parish Council	12. Access and traffic We are very concerned that CHSP's preferred traffic access route to the proposed development site uses narrow rural roads in Head Hill Road and Seasalter Road. This is a particular concern during the construction phase of the development which will last up to two years overall.	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) identifies no significant residual environmental impacts from construction traffic. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these is detailed within the supporting Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
Graveney with Goodnestone Parish Council	The preferred route will pass through the centre of the villages of both Graveney and Goodnestone, which include a primary school, church, holiday park, a number of residential properties and access to several public rights of way. A local bus service between Faversham and Whitstable covers the same route. Over much of their length, these routes do not have footways. Currently, they are used by very little HGV traffic. All three of our designated conservation areas are along this route.		It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no residual significant environmental effects from construction traffic are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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Graveney with Goodnestone Parish Council	We question whether this makes a suitable route for heavy lorry traffic, even for a limited construction period and taking into account the proposed traffic mitigation measures, given the residual problems of noise, vibration, severance, delay and intimidation caused by heavy traffic.	NO	Chapter 14: Access and Traffic (document reference number 6.1.14) discusses the suitability of the proposed construction traffic route while Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) discusses the potential for construction traffic vibration. It is proposed that a detailed highway condition survey be undertaken prior to construction. Any significant defects identified that are likely to exacerbate the potential for vibration from vehicles will be repaired prior to construction starting. In addition, vehicle speeds are expected to be low, particularly through sensitive areas.
Graveney with Goodnestone Parish Council	We note the PEIR indicates an up to 10 to 12-fold increase in heavy lorry traffic over current levels during the peak construction period. Will CHSP make any financial contribution to the repair and maintenance of public roads which do not normally carry such heavy traffic? For example, a financial bond might be provided, which could be drawn upon if any consequent damage to road surfaces is evident.		The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the Preliminary Environmental Information Report (PEIR). Predicted traffic volumes are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). It is proposed that a detailed highway condition survey be undertaken both before and after construction of the proposed development. If the condition of the road surface or verges has deteriorated as a result of the proposed construction traffic, the Applicant will undertake

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			remedial works to ensure the condition of the highway is as it was prior to construction. The methodology and assessment of the highway condition surveys will be agreed and undertaken in consultation with KCC Highways.
Graveney with Goodnestone Parish Council	The review of local planning policies (PEIR pp 14-16 to 14-19) does not include Swale Local Plan policy DM26 on Rural Lanes. This is an important omission as the local access roads to the CHSP are covered by this policy.		Policy DM26 has been included and considered within the planning policy review section of Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
Graveney with Goodnestone	We would like to know how any agreed traffic management plans will be enforced? To whom would local people refer any problems? The local police would be hard pressed to fulfil this role.		Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1) details the proposed

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Parish Council			communication procedures, proposed monitoring of construction traffic and enforcement.
Graveney with Goodnestone Parish Council	We accept that, once operational, even a solar power scheme of this size will generate a relatively modest amount of traffic		The volume of traffic expected to be generated once the site is operational is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
GREAT Graveney	2. **Access and Traffic**	NO	No response required.
GREAT Graveney	CHSP's preferred traffic access route to the proposed development site would be to use narrow rural roads in Head Hill Road and Seasalter Road. This would be particularly intrusive during the construction phase of the development which will last up to two years overall.	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) discusses any potential transport related environmental effects associated with the construction of the proposed solar park. It identifies no significant residual environmental effects resulting from the proposed construction traffic.

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GREAT Graveney	The preferred route would pass through the centre of the villages of both Graveney and Goodnestone, which include a primary school, a school for pupils with specific learning difficulties, the church, a holiday park, a number of residential properties and access to several public rights of way. A local bus service between Faversham and Whitstable covers the same route. Over much of their length, these routes do not have footways. Currently, they are used by very few HGV lorries. All three designated conservation areas are along this route.	NO	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental impacts are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and this are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). This includes proposals to avoid HGV traffic movements during school start and finish times.
GREAT Graveney	In Chapter 13 – Socioeconomics, Tourism, Recreation and Land Use, page 13-13 mentions that “Faversham is located to the southwest of the Development and the port of Sheerness is located within 20 miles of the Development.” In Chapter 14 Access and Traffic, page 14-3 has a table that refers to “London Medway Port (Chatham)” and states it as being 45km away which is 28 miles.	NO	The Port of Sheerness is approximately 28 miles to the proposed development site via the M2. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
GREAT Graveney	GREAT asks:		No response required.

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GREAT Graveney	· How has the suitability of the roads been assessed? What was the outcome?	NO	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and no significant residual environmental effects from construction traffic are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
GREAT Graveney	· How was the use of vehicular transport assessed? What was the outcome?	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) details the methodology used to assess the environmental effects of road traffic. It follows guidelines set out by the Institute of Environmental Assessment 'Guidelines for Environmental Assessment of Road Traffic' (1993) and the Design Manual for Roads and Bridges.

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GREAT Graveney	· Can you provide specific details about the road users should the development go ahead: cars, HGV, Light GV, farm vehicles, cyclists, motorbikes and walkers?	NO	Details on the existing road users and the volumes/type of construction traffic are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Furthermore, mitigation and management measures are set out within the supporting Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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GREAT Graveney	· Can you provide specific details about the timings of the road use of the above vehicles should the development go ahead?	NO	Core working hours are set out in Environmental Statement, Chapter 4: Site Selection, Development Design and Consideration of Alternatives (document reference number 6.1.4) while the timing of construction vehicle movements is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Core working hours are proposed to be between 07.00 until 19.00, Monday to Friday and 07.00 until 13.00 on a Saturday (unless in exceptional circumstances where need arises to protect plant, personnel or the environment). In addition to this, a start-up and close down period for up to an hour before and after the core working hours is proposed. This does not include operation of plant or machinery likely to cause a disturbance. All construction traffic movements will be within the core working hours. It is proposed that CHSP will not accept HGV deliveries of bulk materials to site before 09.30 and between 15.00 and 16.00. Similarly, CHSP will not allow HGVs to leave site between 08.30 and 09.30 and 15.00 and 16.00 to avoid Graveney Primary School start/finish times.

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GREAT Graveney	· How would the safety of walkers and cyclists be addressed?	NO	Highways safety is assessed and discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental effects from construction traffic are predicted. Furthermore, mitigation and management measures are set out within the supporting Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
GREAT Graveney	· How would the safety of school children be addressed?	NO	Highways safety is discussed within Chapter 14: Access and Traffic (document reference number 6.1.14). No significant environmental effects from construction traffic are predicted. It is proposed that construction HGV movements are controlled during school start/finish times. This along with further management and mitigation is set out within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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GREAT Graveney	· What is the reason for not including the Swale Local Plan policy DM26 on Rural Lanes?	NO	Policy DM26 has been considered within Chapter 14: Access and Traffic (document reference number 6.1.14). It is considered that the proposals will not significantly harm the character of the roads along the proposed access route. Any potential environmental impacts resulting from construction traffic will be temporary. Once operation the proposed site is expected to generate minimal traffic and will result in a reduction of large agricultural vehicles using Head Hill Road and Seasalter Road.
GREAT Graveney	· What are the reasons for identifying Headhill and Seasalter Roads as suitable for use by heavy goods lorries, the number of which would lead to a 1000% increase during peak times.	NO	It is considered that the most suitable construction traffic access route from the strategic road network to the proposed development site has been selected. This is discussed within Chapter 14 of the ES (Access and Traffic) and no significant residual environmental effects from construction traffic are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within the accompanying Construction Traffic Management Plan, available in the ES, technical appendix A14.1.

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GREAT Graveney	· How would CHSP developers' transport arrangements reflect the mobility needs of villagers?	NO	Baseline highway conditions are discussed within Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental effects from construction traffic are predicted. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
GREAT Graveney	· What was the outcome of the impact assessment of the amount and length of construction traffic on the local economy?	NO	Chapter 14 of the ES (Access and Traffic) identifies that no significant environmental impacts from construction traffic are predicted.
GREAT Graveney	· Who would enforce agreed traffic management plans?	NO	Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1) has been produced and will be submitted as part of the application. This details proposed communication procedures, proposed monitoring of construction traffic and enforcement.
GREAT Graveney	· How has the impact on human health and well-being been assessed, based on the amount and length of construction time traffic required for construction of the development, and what was the outcome?	NO	A Human Health assessment, which considers proposed construction traffic, has been undertaken and is detailed within Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17).

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GREAT Graveney	· How was the impact of noise, dirt, dust and vibration on residential properties and the church assessed? What was the outcome?	NO	The potential for noise and vibration from construction traffic is discussed within Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12) while dirt and dust are discussed in Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Both Chapter 12: Noise and Vibration (document reference number 6.1.12) and Chapter 14: Access and Traffic (document reference number 6.1.14) identify that no significant residual environmental impacts from construction traffic are predicted. Furthermore, construction traffic mitigation measures are proposed in the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1.
GREAT Graveney	· What is your waste management plan, and what affect will disposal have on the traffic plan?	NO	Traffic generation from waste has been included within the assessments of construction traffic set out in Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental impacts from construction traffic are predicted.

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GREAT Graveney	· Are the developers clear about the differences between the port at Chatham and the port at Sheerness?	NO	The differences between the port at Sheerness and Chatham are noted within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
Highways England	Thank you for your letter dated 31 May 2018, inviting Highways England to comment on the above consultation and indicating that a response was required by 13 July 2018. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case, particularly the M2 and A2.	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) discusses any potential road traffic related environmental effects associated with the construction of the proposed solar park on the SRN. It is concluded that there would be no significant residual environmental effects resulting from the proposed construction traffic.
Highways England	Having examined the PEIR documents, we offer the following comments:	NO	No response required.
Highways England	Construction Phase	NO	No response required.

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Highways England	We understand that volume and routing of HGVs is not available at this stage. We will be particularly interested in this information, and therefore should continue to be consulted as the PEIR is revised and the full EIA developed.	NO	Further information on traffic routing and predicted construction vehicle volumes is provided within the Access and Traffic chapter of the Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
Highways England	As part of the full Environment Impact Assessment, the effect of traffic flows on the SRN must be considered, in addition to junctions on the Local Road Network (LRN).	NO	The effect of construction traffic flows on the SRN has been considered within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental effects from construction traffic are predicted.
Highways England	We require confirmation on how the impact of the proposals on the SRN will be assessed, in particular the M2 Junction 7. This should include consideration of how restrictions outlined for HGV traffic on the LRN may impact on HGV arrival / departure profiles, and thus Peak Period use of the SRN.	NO	The effect of construction traffic flows on the SRN has been considered within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14)). No significant residual environmental effects from construction traffic are predicted.
Highways England	A separate assessment will need to be undertaken to identify suitable routes to transport AILs to Site. Highways England will need to be in agreement of this. We recommended contact with the HE Abnormal Load Team abnormal.loads@highwaysengland.co.uk to discuss your/our requirements.	NO	A separate assessment to identify suitable routes for AILs to access the site will be undertaken and shared with HE.
Highways England	Operational Phase	NO	No response required.

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Highways England	Minimal traffic is expected in relation to the Operation and Decommissioning Phases. Whilst we are in agreement that it is unlikely that the trips generated during these phases would have a severe impact on the SRN, we will require confirmation of the likely volume of trips associated with this phases to confirm this.	NO	The volume of traffic expected to be generated once the site is operational and during decommissioning is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
Highways England	I trust that the above is of assistance. Should you have any queries regarding this response, please do not hesitate to contact us.		No response required.
Highways England	We look forward to continued consultation on the details of the PEIR, EIA and any future documents, as the currently outstanding information becomes available.		No response required.
Kent County Council	Chapter 14: Access and Traffic	NO	No response required.
Kent County Council	KCC notes that in Point 19, the report lists the possible ports that can be considered for freight by sea. Table 14.1 details the road distances from the site and lists the London Medway Port as Chatham. In Point 22, the location of the London Medway Port is later referred to as Sheerness. The applicant should ensure that the correct port is detailed in future submission documents.	NO	Within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1), the description of the London Medway Port has been updated.

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Kent County Council	The applicant should be aware that in Point 36, the report refers to a non-existent crawler lane on the A299, 350m from the A299/Whitstable Road junction. There is a layby on the eastbound approach to the junction, located approximately 350m away, so it is assumed this may be the feature to which reference is being made. This change should also be reflected in the Draft Construction Traffic Management Plan.	NO	Within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1), the description of the A299 has been updated.
Kent County Council	In Point 37, the applicant should be aware that the left turn route from the A299 onto Whitstable Road will take vehicles in a westerly direction, rather than the easterly direction as described in the PEIR. This will be relevant for eastbound A229 vehicles, although it should be appreciated that westbound A229 vehicles, that may have originated their journeys from Ramsgate, will turn left onto Staple Street in an easterly direction, before turning right onto Staple Street Road to cross over the A229. This will be the case unless they stay on the A229 and use the M2/A2/Homestall Lane/Brenley Lane roundabout to approach the Whitstable Road junction from the west instead. This change should also be reflected in the Draft Construction Traffic Management Plan.	NO	Within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1), the description of the A299 has been updated.

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Kent County Council	KCC acknowledges that the applicant has considered a transport-related effect on the impact of the condition of the highway, due to the additional HGV traffic using the local highway network. This is likely to deteriorate the structural integrity of the highway, accelerate wear and tear, whilst also causing overrunning of the carriageway edges and adjacent verges where road widths are narrow. The condition surveys referred to will be required to identify where construction traffic has caused damage and the applicant will be expected to detail how they will rectify the damages.	NO	As detailed within the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1). It is proposed that a detailed highway condition survey be undertaken both before and after construction. The scope of the survey will be agreed with KCC to ensure that any damage to the highway surface or verges as a result of the proposed construction traffic will be rectified.
Kent County Council	14.3.1 Method for Assessing Significance	NO	No response required.
Kent County Council	KCC considers the methodology set out in the associated sections 14.3.1.1 to 14.3.16 and subsequent sections 14.3.2 and 14.3.3 to be acceptable.	NO	Acknowledged.
Kent County Council	14.4.4 Traffic Flows	NO	No response required.
Kent County Council	It is noted that Point 114 lists the roads that have had initial traffic surveys undertaken. KCC will require further surveys to inform the assessment of Staple Street, Staple Street Road and Whitstable Road, if the data cannot be extrapolated from the existing surveys.	NO	Further surveys have been undertaken on the roads identified and discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).

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Kent County Council	KCC agrees that the application of TEMPRO growth factors to the survey data, in order to set the 2018 baseline, is appropriate and can be taken through to consider the future traffic flows at the predicted year of construction, as noted in Point 151.	NO	Acknowledged.
Kent County Council	14.4.5 Personal Injury Accident Data	NO	No response required.
Kent County Council	As detailed in Point 118, the full data obtained from KCC will be used for analysis purposes, so that the specific circumstances of the accidents can be understood. An opinion can then be formed on whether the delivery of the development proposals are likely to influence the probability or severity of similar accidents occurring.	NO	Road accident data has been obtained from KCC and assessed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental effects from construction traffic are predicted.
Kent County Council	14.6.1 Construction Effects	NO	No response required.
Kent County Council	KCC has noted that the current predictions of traffic movements are likely to change as further details are obtained. A simple “first principles” breakdown of how the figures are derived should be provided by the applicant to demonstrate the validity of the predicted vehicle numbers.	NO	A breakdown of how the predicted construction traffic generation has been derived is included within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).

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Kent County Council	Whilst an estimation of the HGV and LGV movements has been provided, it would be appropriate to consider the likely vehicle movements associated with the transportation of site personnel during the construction period, within the final EIA. It is noted that it is referenced in Point 169 through the CTMP in respect to staff routing, minibuses and an associated Travel Plan.	NO	An allowance has been made in the predicted traffic generation for site personnel movements. This is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).
Kent County Council	14.7 Mitigation	NO	No response required.
Kent County Council	The general mitigation detailed in this section of the PEIR and Point 169 are suitable measures that KCC would expect to see to accommodate the traffic generated during the construction period. Whilst it is accepted that the operational traffic generated during the life of the Solar Park will be minimal and does not require any mitigation, it is considered that mitigation measures may be required during the decommissioning period.	NO	The volume of traffic expected to be generated once the site is operational and during decommissioning is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). No significant residual environmental effects from additional road traffic are predicted.
Kent County Council	KCC welcomes the commitment given in Point 173 to continue detailed mitigation discussions to ensure the effects of the development are minimised.	NO	Acknowledged.
Kent County Council	Volume IIA Figure 14.1 Construction Traffic Routing	NO	No response required.

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Kent County Council	When further details are known, KCC requests that the plan shows the A249 route from the M2 to the London Medway Port at Sheerness, if materials are to be transported from the Port to the proposed site.	NO	The plans accompanying Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) have been updated to reflect the route from the M2 to the London Medway Port at Sheerness.
Kent County Council	Technical Appendix A14.1: Outline Construction Traffic Management Plan (CTMP)	NO	No response required.
Kent County Council	The Local Highway Issues and Constraints section of the CTMP appears to be misplaced with the text of Section 4.4 Internal Roads. In addition, KCC recommends that Point 4.4.2 listing the common constraints/issues for construction traffic, should also reference the impact on the condition of the road/adjacent verges and potential damage caused.	NO	The Local Highways Issues and Constraints section of the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1) has been updated. In addition, reference has been made to the potential impact to the condition of the highway (surface and verges) within Point 4.4.2 of the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
Kent County Council	6.1 Access Route and Point Signing	NO	No response required.
Kent County Council	KCC accepts the measures proposed through the suggested approval process.	NO	Acknowledged.
Kent County Council	7.0 Mitigation Measures	NO	No response required.

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Kent County Council	KCC agrees that the general measures identified are considered workable in respect of the timing and routing of vehicle movements with the booking system, to spread these over the whole day and allowing monitoring. However, KCC recommends that the measures should include contingency plans to cater for a holding area, in the event of HGV traffic nearing the site outside of the permitted timings.	NO	Consideration has been given to contingency planning within the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
Kent County Council	7.12 Highway Condition Surveys	NO	No response required.
Kent County Council	KCC requests that a highway condition survey should take place before the commencement of the development. Further, the description of another survey to be undertaken after commencement needs clarifying. The intention would also be for a final highway condition survey to be carried out at the end of the construction period and an agreement for any damage identified at that time to be repaired accordingly. Currently, the CTMP does not identify what actions will be expected from the outcome of comparing the highway condition surveys.	NO	It is proposed that a detailed highway condition survey be undertaken both before and after construction. The scope of the survey will be agreed with KCC to ensure that any damage to the highway surface or verges as a result of the proposed construction traffic will be rectified. Further information with regards to the process of comparing the highway condition surveys before and after construction has been included within the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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Kent County Council	KCC requests there should be scope within the CTMP to identify issues associated with damage occurring on or adjacent to the highway during the construction period, as a result of the development traffic. The applicant should detail how they will facilitate repairs where necessary. The detail will need to be available outside of the Traffic Management Group timetable and structure outlined in Section 8.2.	NO	Further information with regards to remedial highway works during construction has been included within the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
Kent County Council	Section 8.3 Monitoring and Review and Section 8.4 Compliance	NO	No response required.
Kent County Council	Within the CTMP, KCC requests that the applicant identifies how certain mitigation measures will be monitored and, ensuring compliance with the speed restrictions to be imposed along the identified vehicular route.	NO	The Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1) has been updated to identify how certain mitigation measures will be monitored. This includes the monitoring of vehicle speeds along the identified access routes.
Kent County Council	Impacts on the PRoW Network	NO	No response required.
Kent County Council	KCC recommends that the applicant takes account of KCC's statutory duty to protect and improve Public Rights of Way (PRoW) in the County. KCC is committed to working in partnership with the applicant to achieve the aims contained within the Countryside and Coastal Access Improvement Plan (CCAIP). Specifically, these relate to quality of life, supporting the rural economy, tackling	NO	The applicant acknowledges KCC's statutory duty with regards to its Countryside and Coastal Access Improvement Plan (CCAIP) and welcomes the opportunity to work together to meet its aims. Reference to this is made within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).

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	disadvantage and safety issues and providing sustainable transport choices.		
Kent County Council	To this end, it is appreciated that the applicant has acknowledged the existence of the PRoW network and considered the potential impacts of the Solar Park, during both the construction and operational phases of the development. KCC is pleased to note that the proposed site layout has incorporated the existing PRoW along their definitive alignments, which should avoid the need for any path diversions or extinguishments.	NO	Acknowledged.
Kent County Council	Construction Phase	NO	No response required.
Kent County Council	With regards to the construction phase of this project, the applicant has stated that a PRoW Management Plan will be produced, setting out how PRoW will be managed. This is referred to in technical appendix A14.1 (Outline Construction Traffic Management Plan).	NO	A PRoW Management Plan has been produced and appended to Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1)

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Kent County Council	It is anticipated that temporary path closures will be required during this period, to enable the construction work to proceed safely. The applicant is reminded that a Temporary Traffic Regulation Order (TTRO) will be required to temporarily close a PRoW. It should be noted by the applicant that the KCC PRoW and Access Service requires a minimum of six weeks to process this request.	NO	If required, any temporary path closures would be discussed and agreed with KCC and an application made for a Temporary Traffic Regulation Order (TTRO).
Kent County Council	KCC requests that any path closures are kept to a minimum to reduce disruption for path users. Alternative access routes/temporary diversions should also be provided where possible, in order to avoid fragmentation of the PRoW network.	NO	Any PRoW closures will be kept to a minimum during the construction of the solar park. If any temporary PRoW closures are required alternative access routes or diversions will be provided where possible. This detail is described within the PRoW Management Plan appended to Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
Kent County Council	Operational Phase	NO	No response required.

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Kent County Council	With regard to the operational phase of the site, the applicant has completed a 'Glint and Glare' study (technical appendix A17.1) to assess the impacts of the Solar Park. However, KCC notes that PRoW users have not been included in this assessment. The study has only assessed the potential impacts of the photovoltaic (PV) development upon surrounding roads and dwellings. Considering the proximity of Public Footpaths ZR484 and ZR485 to the solar panels, KCC requests that the 'Glint and Glare' study is extended to assess the impact on PRoW users. This is especially for users of the Saxon Shore Way, who would be walking along an elevated sea wall overlooking the site.	NO	A 'Glint and Glare' study taking account of PRoW users has been undertaken and is detailed within Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17).
Kent County Council	In addition, KCC highlights that Public Footpath ZR485 currently passes through expansive arable fields and would be significantly affected by the Solar Park. Although this footpath would be accommodated within a green corridor, the character of the route would be substantially transformed by the presence of solar panels and fencing enclosures. Due to the changing nature of the route, there is a risk that the path would become obstructed by overgrown vegetation without regular maintenance.	NO	Regular maintenance will be undertaken to keep PRoW within the site visible and not to obstruct or endanger users.

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Kent County Council	KCC therefore requests that the applicant clarifies what the intention is for the future surface of this route. If the path is to be left unsurfaced, the applicant should contribute towards a future vegetation clearance programme, to ensure that it remains open and accessible for the public to use.	NO	It is proposed that that Public Footpath ZR485 remains unsurfaced, apart from the point where it is dissected by the solar access track. Regular maintenance will be undertaken to keep the route visible and not to obstruct or endanger users.
Kent County Council	The applicant should be aware that no furniture, fence, barrier or other structure may be erected on or across PRoW without the express consent of the Highway Authority. Furthermore, there must be no disturbance of the surface of the PRoW, or obstruction of its use, either during or following any approved development without the express consent of the Highway Authority. KCC therefore requests that the applicant provides details of the proposed surface appearance of all PRoW located within the development site, following the completion of the construction work.	NO	No furniture, fence, barrier or other structure will be erected on or across a PRoW without consultation and agreement with KCC.
Kent County Council	New PRoW & Access Provision	NO	No response required.
Kent County Council	With reference to Figure 13.1 (Recreational Receptor and Study Areas), the applicant has proposed two permissive access routes across the site. KCC supports the creation of these new routes as they would provide valuable links to the existing PRoW network. Consideration will	NO	Only one permissive route is proposed to the east of the proposed development site. This is shown Figure from the Socio-economics, Tourism, Recreation and Land-use chapter (Chapter 13). It is intended that this route remains a permissive path.

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	need to be given to the future status of these paths.		
Kent County Council	KCC strongly advises that the applicant enters into a permissive path agreement with the County Council for the 'western' link (between NGR TR 03101 63799 and NGR TR 02750 64508). Whilst the applicant could dedicate permissive access on their own, it is recommended that a formal licence is agreed, as this would clearly define conditions and areas of responsibility. The benefits of this approach are that the County Council would have details of the permission registered and would be able to promote responsible use of the route by the public. Furthermore, the landowner would be afforded greater protection against claims for new PRoW across their land made under the Wildlife and Countryside Act 1981.	YES	The permissive path being referred to is no longer proposed.

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Kent County Council	With regards to the 'eastern' link (between NGR TR 04265 64829 and NGR TR 05008 63325), KCC requests that this route is dedicated as a Public Footpath through a Creation Agreement with the County Council (Highway Act 1980 s25). This would allow the route to be shown on recreational ordnance survey maps and provide a valuable PRoW link through the site, connecting Footpath ZR484 to the wider network. The dedication as a PRoW would also secure the long-term sustainability and protection of this route, creating a positive legacy for the Solar Park.	NO	It is intended that this route remains a permissive path which, subject to the specific terms of the licence, will be agreed formally with KCC. This is because CHSP only has control of the land for a set duration, (identified in the terms of the lease agreement), and the use beyond that time reverts to the landowner. It also provides the Developer more control over access through the solar park at this location.
Kent County Council	In addition to these paths, KCC requests that a third new access route is created along the eastern edge of the site, connecting Public Footpaths CW55 and CW90. Located within the eastern boundary of the site, this walking route would provide a valuable off-road alternative to the Faversham Road. KCC requests that this new route is dedicated as a Public Footpath through a Creation Agreement with the County Council (Highway Act 1980 s25), as it would be a valuable public amenity and address safety concerns along the Faversham Road	NO	This has been discussed with the landowner of the route and we understand they are amenable to progressing with the adoption of this route, however whilst CHSPL is happy to support the landowner in their application for this, the adoption of this route is not included in the DCO application.
Kent Police	We note that several Public Rights Of Way (PROW) cross the site. It is important that both sides of any PROW or access track that members of the public have legitimate access to,	Yes	It is proposed that all public access areas are secured with 2m high fencing. No CCTV will directly cover any PRoW.

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	are secured with 2m fencing. Any CCTV cameras should not directly cover any PROWs.		
Kent Wildlife Trust	Permissive Accessways		
Kent Wildlife Trust	Proposed permissive accessways create a number of new circular routes. These have the potential to increase or decrease disturbance to wildlife occurring at the SPA depending upon a number of factors, not least of which is potential users' reaction to the solar panels. They will also increase disturbance to the ditch network, compromising its capacity to support species like Water Vole and Marsh Harrier. We are also concerned by the potential for additional 'permissions' (E.G. cycling) along these permissive accessways that may increase disturbance on the SPA sections of the circular routes.	NO	Since PEIR, the more western proposed permissive path has been removed from proposals. The more eastern one does create the potential for circular routes. This will be a footpath only, and not a cycle route. The effects of this are assessed in Environmental Statement, Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) and Chapter 9: Ornithology (document reference number 6.1.9). No substantial changes to the ditch network are proposed as a result of this, and no consequent impact on water vole or marsh harrier.
Kent Wildlife Trust	As the outcome with regard to disturbance at the SPA is uncertain, but the increased disturbance to the ditch network is likely, we are, at present, opposed to the proposed permissive accessways. We are open to further discussion regarding these and how access may be managed to reduce disturbance, however.	NO	Since PEIR, the more western proposed permissive path has been removed from proposals. The more eastern one does create the potential for circular routes. This will be a footpath only, and not a cycle route. The effects of this are assessed in the ES, Chapter 13 (recreation) and chapter 9 (ornithology). No substantial changes to the ditch network are

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			proposed as a result of this, and no consequent impact on water vole or marsh harrier.
Ramblers	Introduction	NO	No response required.
Ramblers	The Ramblers works to help everyone enjoy the pleasures and benefits of walking and to enhance and protect the places where people walk. We are committed to encouraging and supporting walking, protecting and expanding public rights of way and access land and protecting the beauty of the countryside and other areas.	NO	Acknowledged - no response required.
Ramblers	We have been working with Natural England since 2010 to provide the best possible route for the England Coast Path around Kent that will be accessible and enjoyable to walk.	NO	Acknowledged - no response required.
Ramblers	England Coast Path		

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Ramblers	Despite the fact that Natural England published their proposals in June 2017, you have failed to acknowledge in your report that the new "England Coast Path" will follow the line of the "Saxon Shore Way" along the northern and western perimeter. Natural England expects to receive approval from the Secretary of State to their proposals for this stretch of the coast later this year. It should be open well before construction of the solar park is proposed and will form part of the longest and most prestigious and iconic National Trail in England. It will encourage many more people to walk and enjoy the coast and its countryside.	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) and Chapter 13: Socioeconomics, Tourism, Recreation and Land Use (document reference number 6.1.13) have been updated to refer to the "England Coast Path" which will follow the route of the Saxon Shore Way along the northern and western perimeter of the site.
Ramblers	Impact on the Coast Path	NO	No response required.
Ramblers	Kent has some of the longest stretches of reclaimed marshland along the entire English coast. What makes this particular section almost unique is that the Coast Path will be along the top of the sea defence providing great views over the mudflats and across the Swale and Faversham Creek to seaward and across the marshes to the Downs to landward. Other similar sections of the Coast Path are likely to be below the sea defence on the landward side with no view of the sea.	NO	Acknowledged - no response required.

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Ramblers	It is easily accessible from Faversham and Seasalter. It is already popular with walkers and birdwatchers.	NO	Acknowledged - no response required.
Ramblers	The solar park, if approved, would create a monotonous, industrial landscape for some 5 km of the new England Coast Path. It would take an hour to walk from one end to the other. The solar park would be the dominating feature of the landscape and spoil the enjoyment of this section of the England Coast Path.	NO	This comment is subjective - no response required.
Swale Borough Council	The Access Road	NO	No response required.

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Swale Borough Council	As you are aware the wide and well surfaced access road to the London Array substation extends all the way from the Seasalter Road and passes right around the southern perimeter of the substation, eventually reaching the farmyard at Cleve Hill Farm immediately next to where you propose the solar farm substation compound. This road is little used but offers excellent access options right up to the main focus of traffic on your site. Despite this, you appear to propose a substantial length of new or upgraded roadway leaving the London Array road east of the substation to approach your substation to the north of the London Array site and the ditch that fronts it. This is largely be on land otherwise unaffected by the solar panels themselves and intended to mitigate the ecological impacts of the development. The northern edge of the wider London Array substation site was deliberately designed to be without hard fences or intrusive infrastructure to allow the marshland character to be maintained. This upgrading of an existing informal trackway will disrupt this achievement. The new work seems unnecessary and incompatible with the conservation of visual amenity and maximum ecological enhancement of this area. I would like to see a thorough exploration of the maximum use being made of the full length of the London Array access road	YES	Development proposals have been updated to include the option to provide an alternative access road to the south of the London Array Substation. This is discussed in detail within Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5).

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	before contemplating the new works you indicate.		
Swale Friends of the Earth	Traffic and transport		

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Swale Friends of the Earth	We would urge you to adopt a sustainable transport plan to minimise lorry and road traffic movements during construction and operation, for safety and air quality reasons.	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) assesses the potential for road traffic related environmental effects associated with the construction of the proposed solar park. It is concluded that there would be no significant residual environmental effects resulting from the proposed construction traffic. Similarly, an assessment into the potential effects of construction traffic on air quality has been undertaken within the Environmental Statement, Chapter 16: Air Quality (document reference number 6.1.16), and no significant residual effects are predicted. Furthermore, construction traffic mitigation measures are proposed in the accompanying Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
The Faversham Society	8. **Access and Traffic**	NO	No response required.

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The Faversham Society	This is a very large site that would not only be covered with new solar installations but would also require substantial works to provide the roads, new ditches and the electrical plant - including a substantial compound for battery storage. The Faversham Society is concerned that the roads to the site, in particular, Head Hill Road and Seasalter Road are not suitable for the weight and frequency of traffic required to transport such a high volume of materials and equipment to the site. We are unclear about future responsibilities for road maintenance, repair and general restitution.	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within the supporting Construction Traffic Management Plan. It is proposed that a detailed highway condition survey be undertaken both before and after construction. The scope of the survey will be agreed with KCC to ensure that any damage to the highway surface or verges as a result of the proposed construction traffic will be rectified. Further information with regards highway condition surveys has been included within the Construction Traffic Management Plan, available in the ES, technical appendix A14.1.

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The Faversham Society	The developers have provided no information about the level of traffic to be expected nor any modelling on the effect that this will have not only on roads leading to and from the site but those in the wider area such as the M2, the A2 and the Thanet Way. Society members know that it only takes a little extra traffic or a small accident to reduce the entire local road network to a standstill.	NO	Predicted traffic generation from the proposed development and vehicle routing is discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). The environmental effects of the construction traffic have been assessed in the context of both local roads and the strategic road network and no significant residual environmental impacts are predicted. In addition, a Construction Traffic Management Plan, available in Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1), has been produced to support the DCO application which sets out a number of mitigation measures.
The Faversham Society	Construction traffic	NO	No response required.

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The Faversham Society	The Construction Traffic Management Plan (CTMP) only addresses the first phase of the project, the construction phase, and does not cover the operation of the site or its decommissioning. The construction phase is expected to last 18-24 months but given the exclusion of the bird breeding season and problems with winter work as well, is likely to take up parts of three years or more. The CTMP states that the stakeholders to be consulted on road traffic movements are Highways England, Kent County Council, Swale Borough Council, Graveney Primary School, Graveney Parish Council and Graveney Residents Environmental Action Team.	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) discusses construction, operational and decommissioning phases of the project and concludes no significant residual environmental impacts from construction traffic are predicted. Construction of the development is expected to be completed within a 24-month programme.
The Faversham Society	The route to be used from the M2 is the A299 to the Whitstable Road junction then via Head Hill Road to Seasalter Road through Graveney including over the narrow bridge over the railway line close to Graveney Primary School. Construction work in phase 1 includes bringing in all new materials and equipment, creation of a main construction compound, creation of the spine road which will have to be constructed first to reach the furthest extent of the site, other tracks and culverts over the ditches, marking out the locations of the infrastructure, construction of the solar array including piling for the module mountings, trenching and installation,	NO	Statement - no response required.

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	construction of a flood protection bund and site protection for the sub-station and development of the sub-station.		
The Faversham Society	Phase 2, a further 3-6 months includes the creation of the energy storage facility including the installation of cabling, importing components, transformers and battery pads. It is stated that at the peak period for construction, there will be up to 75 heavy goods vehicles per day and 48 light goods vehicles. All of the equipment and building materials have to come through Graveney village, and the road from Head Hill to the site is no more than 5 metres wide. The traffic serving the site would operate between 0700-1900 Monday to Friday and 0700-1300 on Saturdays with no traffic on Sundays or public holidays. No lorries would run for half an hour either side of school opening or closing times. There is no table that sets out levels of vehicles over time during any day or over the construction period	NO	The amount of construction traffic predicted to be generated by the proposed development has reduced from that identified in the Preliminary Environmental Information Report (PEIR). Predicted traffic volumes and timings are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14).

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	except this maximum figure. Details of procedures to receive deliveries and to inform contracting lorry firms of procedures are set out, and there will be a complaints procedure. There will also be a transport co-ordination officer and a traffic management group. This traffic includes abnormal indivisible loads of a type which need to travel with a police escort.		

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The Faversham Society	A table sets out that at Head Hill and Seasalter Road, existing levels of HGV traffic are in the range 0.5% to 0.9% of vehicles using the road. This is expected to rise to between 5.4% and 8.6%, the latter figure at Seasalter Road near the entrance to the site. This means that instead of less than one in a hundred vehicles using the road is a heavy goods vehicle or one in two hundred at Head Hill, up to one in twelve vehicles will be a heavy goods vehicle. These will be going past a school, houses fronting onto the road and a grade I listed church, quiet junctions from minor roads and a small housing estate and a caravan park and over a narrow, angled railway bridge. There are no parts of the road suitable for passing places for lorries and it is likely that on any trip along the road a motorist or walker would meet a lorry. This will make the character of the road feel very different for users in cars or the occasional bus and for residents and will be more dangerous since there are no pavements at all except in short stretches in the central part of Graveney village and the road at present generally has the appearance of a quiet country lane.	NO	A description of the predicted increases in road traffic during construction of the proposed development along Head Hill Road and Seasalter Road are discussed within Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14). Chapter 14: Access and Traffic (document reference number 6.1.14) also assesses the environmental impacts of construction traffic on sensitive receptors and no significant residual environmental effects are predicted. This includes effects associated with fear and intimidation, and highway safety. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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The Faversham Society	The Faversham Society is concerned that the roads to the site, in particular Head Hill Road and Seasalter Road are not suitable for the amount and frequency of traffic and the transport of such a high volume of materials and equipment to the site. This is much more extensive in its volume than the works that created the existing Cleve Hill sub-station because of the very large site that will be covered with new installations and the works needed to provide the roads, new ditches and the electrical plant including a substantial compound for battery storage. There is no other route to the site from the major route network, and the roads are enclosed by farmland and houses and runs over a narrow bridge and past a listed church with a walled enclosure so cannot be widened. This traffic is expected to occur over a period taking in parts of three years or more, and afterwards, there will be a small increase in traffic serving the site when in use but this has not been quantified.	NO	Environmental Statement, Chapter 14: Access and Traffic (document reference number 6.1.14) predicts no significant residual environmental impacts from construction traffic. Furthermore, a number of mitigation measures are proposed in relation to construction traffic movements and these are detailed within the supporting Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).

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15 Climate Change			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Canterbury City Council	Climate Change Relevant policies from the Development Plan are missing from the list contained in Section 15.2 of Chapter 15.	No	Policies relevant to development planning are referred to in Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6). Where policies affect the method or outcome of the assessment, they are included in the Environmental Statement, Technical Chapters (document reference number 6.1). The technical chapters do not assess compliance with planning policy, they instead identify and assess the likely significant effects.
CPRE Kent	We recognise the challenges of climate change and the Government's commitment to meeting its carbon emission targets, but we do not consider the renewable energy benefits of this project can outweigh the harm it will cause to the environment of the marshes (indeed, we also question the sustainability of reliance on lithium-ion battery technology with its own remote but very real ecological impacts). We therefore wish to register our strong objection to this proposal.	No	No response required

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Faversham Footpath Groups	3. Like the great majority of people, our members share the wish to see more of our energy generated from renewable sources and to see carbon emissions reduced. We understand that it is vital that governments take urgent action to halt climate change and that this means, with present technologies, that we must look to wind and solar power in particular to compensate for carbon-based fuels. Offshore in Kent, we already have major windfarms, while, onshore, there are already a number of smaller solar farms, but nothing anywhere near approaching the size of this proposed development, which we understand, is some four times larger than any existing solar park in the UK.	No	No response required
Graveney with Goodnestone Parish Council	13. Climate change We accept that the UK has international obligations, statutory goals and planning policies to increase the role of renewable energy. We also accept that achievement of these goals should assist in managing and mitigating the impacts of climate change. However, this does not mean that all renewable energy projects are acceptable, particularly if they have a significant and harmful impact on their host environment. There is a balance to be struck and national and local planning policies (see section 5 above) set out some of the planning considerations that need to be taken into account.	No	The authors agree with this statement.

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Graveney with Goodnestone Parish Council	We have already commented on flood risk aspects of the proposals in section 8 above. These are especially sensitive to climate change both on the CHSP site and as part of a wider integrated strategy for managing flood risk on the North Kent coast (MEASS).	No	The effects of climate change on flood levels are taken into account in the Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10) and Technical Appendix: Flood Risk Assessment (document reference number 6.4.10.1).
Graveney with Goodnestone Parish Council	We would like more information on the impact of the proposed development on the local microclimate and, by extension, the plants and animals that live there. The large expanses of solar arrays could affect soil temperature and moisture, plant processes and so the habitats for a range of plants and animals. This research paper indicates some of the issues, which could well be magnified by the scale of the CHSP proposals: http://ec.europa.eu/environment/integration/research/newsalert/pdf/solar_park_impacts_microclimate plants greenhouse gas emissions 479na4 en.pdf	No	An up to date link to the article can be found at: http://ec.europa.eu/environment/integration/research/newsalert/pdf/solar_park_impacts_microclimate_plants_greenhouse_gas_emissions_479na4_en.pdf . The purpose of the EIA process, which results in the Environmental Statement (document reference number 6), is to identify and assess the likely significant effects. The panels will affect the light and temperature environment at ground level, and therefore the plant communities that would grow there. There is information on the vegetation that is likely to develop under and around the panels in a study carried out for the Development, provided in the Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3).
GREAT Graveney	1. **Climate Change**	No	No response required

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GREAT Graveney	The CO_2 cost of construction has been shown on page 15-9 of the PEIR. The calculation uses IPCC figures dated as from 2014 and it is not clear whether this includes the full cost of transportation of panels from China and the decommissioning. No costs have been shown for the battery and the other associated electrical equipment. There are grounds for large inconsistencies here, and yet CO_2 savings of 3.15million tonnes over 40 years are claimed.	No	The Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15), updates the PEIR for the Development as applied for.
GREAT Graveney	The UK has international obligations, statutory goals and planning policies to increase the role of renewable energy. Achievement of these goals should assist in managing and mitigating the impacts of climate change. However, this does not mean that Graveney would be suitable for the development of the solar power station that is being proposed.	No	It is correct that the first two sentences do not, alone, imply the third. A decision on whether the project should go ahead are a matter for the decision maker, informed by the Environmental Statement (document reference number 6) and other information.
GREAT Graveney	There are many reasons as to why Graveney is not suitable for such development.	No	The effects are assessed in the Environmental Statement (document reference number 6).
GREAT Graveney	GREAT asks:	No	No response required
GREAT Graveney	· Can a proper and accurate calculation of CO_2 costs be undertaken showing how this was worked out, including all equipment, and associated costs such as transport and decommissioning?	No	The sources of information used in the Environmental Statement, Chapter 15: Climate Change (document reference number 6.1.15), are referenced in the chapter. Aspects for which CO2 costs are not available are identified.

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GREAT Graveney	· What would the impact of the proposed development be on the local microclimate and, by extension, the plants and animals that live there? How would you address these negative impacts?	No	The panels will affect the light and temperature environment at ground level, and therefore the plant communities that would grow there. There is information on the vegetation that is likely to develop under and around the panels in a study carried out for the Development, provided in the Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3). Management of the site is set out in the Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5), and Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2).
GREAT Graveney	· Results from a survey carried out at Westmill Solar Park showed that PV arrays caused a seasonal and diurnal variation in air and soil microclimate. In summer there was a cooling of up to 5.2C and drying under the arrays compared to the gaps in between. This resulted in poor plant biomass and species diversity. How are you going to maintain vegetation for the sheep you plan to graze under the panels?	No	An up to date link to the article can be found at: http://ec.europa.eu/environment/integration/research/newsalert/pdf/solar_park_impacts_microclimate_plants_greenhouse_gas_emissions_479na4_en.pdf . The report identified poor species diversity relative to wildflower meadow planted in the control plots. The baseline at the Development site is not wildflower meadow, but arable farmland. Sheep will graze the site at appropriate densities in response to the available vegetation, which will vary depending on location relative to the panels, as set out in the Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3).

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GREAT Graveney	· Photosynthesis and net ecosystem exchange in spring and summer were lower under the arrays. How is the vegetation going to be managed to provide healthy growth for the sheep and other species to utilise?	No	The vegetation will respond to the light environment. The solar panels will reduce the available light, affecting the species and density of plants growing underneath, as set out in the Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3). Sheep will graze the site at appropriate densities in response to the available vegetation.
GREAT Graveney	· Impact due to change in temperature, wind speed and turbulence affecting exchange of biogenic gases and water vapour affecting the distribution of precipitation was shown, what studies have you done to understand the effects on a solar park the size you intend to build?	No	The effect of microclimate on vegetation is reported in a study carried out for the Development, provided in the Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3).
GREAT Graveney	· It was found that very limited germination occurred under these conditions, plant biomass was 4 x higher in the gaps between the arrays, with significantly fewer species under the panels. What is your management plan to reseed, mow and fertilise to provide a strong determination of ecosystem response?	No	The effect of microclimate on vegetation is reported in a study carried out for the Development, provided in the Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3). This concludes that the environment would be analogous to that below a hedge. There are no plans to reseed, mow nor fertilise under the panels.
GREAT Graveney	· Dew formation was found to be inhibited, dew normally reduces temperature, the soil temperature was found to be higher at night. Do you have any studies to show what effect this will have on the microclimate and its sustainability?	No	The effect of microclimate on vegetation is reported in a study carried out for the Development, provided in the Environmental Statement, Technical Appendices: Microclimate and Vegetation Desk Study (document reference number 6.4.5.3). This concludes that the environment would be analogous

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			to that below a hedge, where the same effects would be expected.
GREAT Graveney	· Soil compaction and soil horizon mixing following installation: can you tell us what plans you have in place to correct erosion, risk of flooding from surface water run-offs (in your example you show a photograph of panels facing one direction, not the array you have stated) and sedimentation (from air and water) in the ditches?	No	These issues are addressed in the Environmental Statement, Chapter 10: Hydrology, Hydrogeology Flood Risk and Ground Conditions (document reference number 6.1.10).
GREAT Graveney	· Where will your general waste water go?	No	It is anticipated that there will be a connection to the mains sewer for waste water from the control building, though a cess tank is a second option.
Kent Wildlife Trust	Summary We are generally supportive of initiatives to reduce human reliance on fossil fuel energy generation, and renewable energy no doubt has a role to play in this. However, this should not be at the expense of the natural environment. The proposals set out in this consultation will result in significant impacts on wildlife and are unacceptable.	Yes	Since PEIR, the proposals, including mitigation, have been revised in order to reduce the impacts on wildlife, as set out in the Environmental Statement Technical Appendices: Landscape and Biodiversity Management Plan (document reference number 6.4.5.2), and Chapter 9: Ornithology (document reference number 6.1.9).
Ramblers	We recognise the threat posed to our countryside by climate change, which could severely alter many of our cherished landscapes. We support measures to mitigate this by switching to	No	No response required

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	renewable sources of energy including the use of solar photovoltaic (PV) technology.		
RSPB	The RSPB, Climate Change and Renewable Energy Generation	No	No response required
Swale Borough Council	· Climate Change and Sustainability	No	No response required
Swale Friends of the Earth	Friends of the Earth campaigns to change the world for good, creating a cleaner, healthier, fairer world for everyone, for today and generations to come. Swale Friends of the Earth (Swale FoE) is affiliated to national Friends of the Earth and is a group of local volunteers aiming to increase environmental awareness locally and bring a different perspective to debates in Swale. Our current campaign priorities are climate change, plastic pollution, biodiversity (eg the FoE bee campaign), sustainable transport and traffic, food and sustainable development (housing, etc).	No	No response required

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16 Air Quality			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Canterbury City Council	Relevant policies from the Development Plan, the Planning Policy Guidance (PPG) on Air Quality and the 2017 publication 'Land-Use Planning and Development Control: Planning for Air Quality' are missing from the list contained in Section 16.2.2 of Chapter 16.	No	Policies relevant to development planning are referred to in the Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6). Where policies affect the method or outcome of the assessment, they are included in the Environmental Statement technical chapters (document reference number 6.1). The technical chapters do not assess compliance with planning policy, they instead identify and assess the likely significant effects. The NPPF and PPG were introduced in section 16.2.2.4 - these have been updated since PEIR so further information is provided in the same section of the Environmental Statement, Chapter 16: Air Quality (document reference number 6.1.16). The PEIR did have reference to Land-Use Planning and Development Control: Planning for Air Quality in section 16.2.3, in Table 16.2, where it was applicable to assessment methodology.

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Canterbury City Council	Whilst the submission includes proposed mitigation, an Emissions Mitigation Assessment to quantify the damage costs associated with the project and calculate the effectiveness of the proposed mitigation in reducing the impact of the project on air quality does not appear to have been carried out. This is an approach to the impact of a development on air quality that takes into account and accords with the recent judgement of the High Court in Gladman -v- SSCLG & Swale BC, which found that it can no longer be assumed that the mitigation measures funded by the 5 year total damage cost would fully mitigate the impact of a development on air quality.	No	EIA requires the applicant to identify and assess the likely significant effects. This does not include the effect on air quality from operational phase traffic, as this was not identified at the Scoping stage. The approach referred to is intended for long term emissions such as operational effects. Given that the effects assessed were only construction related emissions over a short period of time it is not considered necessary or appropriate to undertake the Emissions Mitigation Assessment. This position is supported by the negligible effects assessed in the Environmental Statement, Chapter 16: Air Quality (document reference number 6.1.16). Operational traffic flows are referred to in the Environmental Statement Chapter 14: Access and Traffic (document reference number 6.1.14), and are negligible.
Graveney with Goodnestone Parish Council	14. Air quality We agree with the PEIR that construction dust and vehicle exhaust emissions (both on site and on access roads) are the main air quality impacts of the proposed development.	No	No response required

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Graveney with Goodnestone Parish Council	We are particularly concerned with the air quality impact along the access route (where it passes the primary school and residential property) and on site (in terms of ecological impact). We would like this to be monitored and managed during the construction phase of any development, with appropriate interventions if air quality falls below set standards.	No	This is assessed in the Environmental Statement, Chapter 16: Air Quality, section 16.4 (document reference number 6.1.16). Mitigation is proposed in respect of construction and decommissioning dust, in the Environmental Statement, Chapter 14: Access and Traffic, section 14.4.5.1 (document reference number 6.1.14) and in non-road mobile machinery in Environmental Statement, Chapter 16: Air Quality, section 16.4.5.3 (document reference number 6.1.16). The conclusion of the assessment of traffic emissions was that given the negligible predicted air quality effects arising from construction and decommissioning phase traffic emissions, no mitigation is proposed or considered necessary.
GREAT Graveney	1. **Air Quality**	No	No response required
GREAT Graveney	The PEIR states that construction dust and vehicle exhaust emissions (both on site and on access roads) are the main air quality impacts of the proposed development.	No	No response required
GREAT Graveney	GREAT asks how air quality would be addressed on the access routes when it affects villagers, a primary school and a school for pupils with specific learning difficulties:	No	Air quality effects are assessed in the Environmental Statement, Chapter 16: Air Quality (document reference number 6.1.16). This considers construction and decommissioning dust, emissions from construction traffic and emissions from non-road mobile machinery.
GREAT Graveney	· How would this be monitored?	No	No monitoring is proposed. Mitigation is set out in the Environmental Statement, Chapter 16: Air

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			Quality, section 16.4.5 (document reference number 6.1.16).
GREAT Graveney	What are the quality standards that would be used?	No	Air quality objectives are detailed in the Environmental Statement, Chapter 16: Air Quality, section 16.2.2. in Table 16.1 (document reference number 6.1.16).
GREAT Graveney	· How would this be managed?	No	A Construction Environmental Management Plan (CEMP) is provided in the Environmental Statement, Technical Appendix: Construction Environmental Management Plan (document reference number 6.4.10.2), which includes dust management measures. Some measures are detailed in the Environmental Statement, Chapter 16: Air Quality section 16.4.5.1 (construction and decommissioning dust) and 16.4.5.3 (non-road mobile machinery) (document reference number 6.1.16). No measures are required for construction traffic emissions, given the negligible predicted impact.
GREAT Graveney	· What would happen if air quality falls below an acceptable standard?	No	Air quality objectives are detailed in the Environmental Statement, Chapter 16: Air Quality, section 16.2.2.2, in Table 16.1 (document reference number 6.1.16). Should pollutant concentrations exceed these objectives then the local authority would need to consider declaring an Air Quality Management Area (AQMA) with a corresponding Action Plan. Given the low background concentrations of pollutants arising from the Development (NO2 and PM10), along with the

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			negligible predicted effect, there is little likelihood of air quality objectives being exceeded.
GREAT Graveney	· What is your dust abatement plan?	No	A Construction Environmental Management Plan (CEMP) is provided in the Environmental Statement, Technical Appendix: Construction Environmental Management Plan (document reference number 6.4.10.2), which includes dust management measures. Some measures are detailed in the Environmental Statement, Chapter 16: Air Quality section 16.4.5.1 (construction and decommissioning dust) and 16.4.5.3 (non road mobile machinery) (document reference number 6.1.16). No measures are required for construction traffic emissions, given the negligible predicted impact.
GREAT Graveney	GREAT also asks how air quality would be addressed in respect of the ecological impact on site in terms of ecological impact:	No	Air quality effects on ecological receptors are assessed in the Environmental Statement, Chapter 16: Air Quality, section 16.4 (document reference number 6.1.16). Specifically, section 16.4.1 (construction phase dust), 16.4.2 (decommissioning phase dust) and 16.4.3 (construction phase vehicle emissions) (document reference number 6.1.16).
GREAT Graveney	· How would this be monitored?	No	No monitoring is proposed. Mitigation is set out in the Environmental Statement, Chapter 16: Air

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			Quality, section 16.4.5 (document reference number 6.1.16).
GREAT Graveney	· What quality standards would be used?	No	Air quality objectives are detailed in the Environmental Statement, Chapter 16: Air Quality, section 16.2.2.2, in Table 16.1 (document reference number 6.1.16).
GREAT Graveney	· How would this be managed?	No	A Construction Environmental Management Plan (CEMP) is provided in the Environmental Statement, Technical Appendix: Construction Environmental Management Plan (document reference number 6.4.10.2), which includes dust management measures. Some measures are detailed in the Environmental Statement, Chapter 16: Air Quality section 16.4.5.1 (construction and decommissioning dust) and 16.4.5.3 (non road mobile machinery) (document reference number 6.1.16). No measures are required for construction traffic emissions, given the negligible predicted impact.
GREAT Graveney	· What would happen if air quality falls below an acceptable standard?	No	Air quality objectives are detailed in the Environmental Statement, Chapter 16: Air Quality, section 16.2.2.2, in Table 16.1 (document reference number 6.1.16). Should pollutant concentrations exceed these objectives then the local authority would need to consider declaring an Air Quality Management Area (AQMA) with a corresponding Action Plan. Given the low background concentrations of pollutants arising from the Development (NO2 and PM10), along with the

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			negligible predicted effect, there is little likelihood of air quality objectives being exceeded.
Swale Borough Council	· Air Quality	No	No response required
Swale Borough Council	Air Quality	No	No response required
Swale Borough Council	It is a remote site with very few existing residential properties, but nevertheless there are some. The main concern for a development of this type and scale would be noise and associated air pollution, firstly from the construction of the site, if permission is granted; there will be a significant number of vehicle movements in an existing area of few, if any, existing roads. Air pollution levels will therefore be raised during these vehicle movements – luckily, in an area of little existing pollution of this type, but background levels will be raised throughout the borough as a result.	No	Air quality effects are assessed in the Environmental Statement, Chapter 16: Air Quality (document reference number 6.1.16). This considers construction and decommissioning dust, emissions from construction traffic and emissions from non-road mobile machinery.

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The Faversham Society	40. What will be the exact impact on air quality during the construction phase?	No	Air quality effects are assessed in the Environmental Statement, Chapter 16: Air Quality (document reference number 6.1.16). This considers construction and decommissioning dust, emissions from construction traffic and emissions from non-road mobile machinery.

17 Miscellaneous Issues			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Canterbury City Council	Miscellaneous Issues Relevant policies from the Development Plan are missing from Chapter 17.	No	Policies relevant to development planning are referred to in Environmental Statement, Chapter 6: Legislative and Planning Policy Context (document reference number 6.1.6). Where policies affect the method or outcome of the assessment, they are included in the Environmental Statement, Technical Chapters (document reference number 6.1). The technical chapters do not assess compliance with planning

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			policy, they instead identify and assess the likely significant effects.
Graveney with Goodnestone Parish Council	15. Miscellaneous issues (a) Hours of working: we are concerned that the proposed hours of working during construction (Mon-Fri 0700-1900 and Sat 0700-1300) do not exclude bank holidays (when local people might expect some relief) and would appear to require site floodlighting to enable work to continue during the darker winter months. The latter has potential to be very intrusive in a rural location. This could be avoided by making the end of the working day 1900 or dusk, whichever is earlier.	No	The Environmental Statement, Chapter 5: Development Description, section 5.4.2.2 (document reference number 6.1.5), details the working hours proposed.
Graveney with Goodnestone Parish Council	(b) Glint and glare: we note some glint and glare impacts on residents are assessed as moderate. Can you confirm whether there any means of mitigation?	No	Section 9.2 of the Environmental Statement, Technical Appendices: Glint and Glare Study (document reference number 6.4.17.1) stated: No mitigation requirement has been identified. However, section 8 of the same assessment does provide an overview of potential mitigation measures.

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Graveney with Goodnestone Parish Council	(c) Waste: What material will be used for the proposed flood bunding around the battery storage facility? Where will it be sourced?	No	The Environmental Statement, Chapter 5: Development Description, section 5.3.5.1 (document reference number 6.1.5), states: The bund is expected to be formed predominantly of site won material, in particular clays to form the core of the bund, and topsoil to provide a planting medium into which landscaping planting will be planted.
Graveney with Goodnestone Parish Council	(d) Major accidents and disasters: Have KCC and Swale BC emergency planning officers been consulted on the proposals and, if so, what have they said about potential risks and any management and mitigation measures?	No	No comments in this regard have been raised by KCC or Swale BC
Graveney with Goodnestone Parish Council	Thank you once again for the opportunity to comment. I would be grateful if you could acknowledge safe receipt of this letter. The parish council would be happy to discuss any matters arising with you.	No	No comment required
GREAT Graveney	1. **Miscellaneous Issues**	No	No response required
GREAT Graveney	(a) **Hours of working :**	No	No response required
GREAT Graveney	GREAT asks:	No	No response required

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GREAT Graveney	· How did the developers assess the impact of the working hours and working days during construction on the health and well-being of villagers of Graveney? Did they use a recognised well-being scale and standard? What factors were taken into account? What measures would the developers take to reduce the effects?	No	A Health Impact Assessment is presented in the Environmental Statement, Chapter 17: Miscellaneous Issues (document reference number 6.1.17) in section 17.3. This considered the potential health impacts of the construction of the development on local residents. The potentially significant effects are identified and assessed in Environmental Statement, Chapter 12: Noise and Vibration (document reference number 6.1.12), Chapter 14: Access and Traffic (document reference number 6.1.14), Environmental Statement, Chapter 16: Air Quality (document reference number 6.1.16).
GREAT Graveney		No	No response required
GREAT Graveney	(b) **Glint and glare:**	No	No response required
GREAT Graveney	GREAT asks:	No	No response required
GREAT Graveney	· How did the developers assess the impact of the glint and glare on the health and well-being of the residents of Graveney? Did they use a recognised well-being scale and standard? What factors were taken into account? What measures would the developers take to reduce the effects?	No	Environmental Statement, Technical Appendices: Glint and Glare Study (document reference number 6.4.17.1) details the methodology used in section 3 and various Appendices.
GREAT Graveney		No	No response required

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GREAT Graveney	(c) **Major accidents and disasters:**	No	No response required
GREAT Graveney	GREAT asks:	No	No response required
GREAT Graveney	· Who has been involved in emergency planning? Can you supply a complete risk assessment to the villagers of Graveney for major accidents and disasters and also for all other risks associated with the scheme?	No	The likely significant effects associated with major accidents and disasters is covered in the Environmental Statement, Chapter 17: Miscellaneous Issues, section 17.7 (document reference number 6.1.17), and specifically the potential for the Development to cause major accidents or disasters is covered in section 17.7.2. No significant effects are identified, nor have been raised by consultees.
GREAT Graveney	Conclusion	No	No response required
GREAT Graveney	As described and evidenced above numerous times, the consultation on this pre-application has been poor. In addition to providing confusing and misleading information, the organisation has been of a low quality and insensitive to the local community in terms of its ability to access, process and respond to the information.	No	The applicant disagrees with the opinion stated.
GREAT Graveney	Cleve Hill Solar Park Ltd has, by its own admission (to the Faversham Society) set itself a "challenging" timescale in order to get the DCO application by Summer 2018. GREAT understands that the target for submission is the end of August 2018. Given that the (low quality	No	The resolution of key issues with consultees has led the application submission to be delayed beyond August 2018.

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	and insufficient) 2nd phase consultation concludes in the middle of July it is difficult to see how enough time has been allowed to take the feedback properly on board. This is yet another example of how the overall consultation process has been, and is, inadequate.		
Health and Safety Executive	Would Hazardous Substances Consent be needed?	No	No - the Development does not contain materials that fall under the Infrastructure Planning (Hazardous Substances) Regulations 2015
Health and Safety Executive	The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.	No	No - the Development does not contain materials that fall under the Infrastructure Planning (Hazardous Substances) Regulations 2015
Health and Safety Executive	Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities ',set out in schedule 1 of these Regulations.	No	No - the Development does not contain materials that fall under the Infrastructure Planning (Hazardous Substances) Regulations 2015
Health and Safety Executive	Further information on HSC should be sought from the relevant Hazardous Substances Authority. **Other information**	No	No response required

Health and Safety Executive	While the red line site boundary does not fall within the consultation zones of any Major Accident Hazard Pipelines, you may wish to note that the following Major Accident Hazard Pipelines are within the 2 km and 5 km areas identified for study:	No	No response required
Health and Safety Executive	HSE ref Operator Pipeline ref Pipeline name 9124 Southern Gas Networks 1395 Salters Lane Fav / Blean PRS 7123 Southern Gas Networks 1394 Murston / Salters Lane Fav	No	No response required
Health and Safety Executive	Explosives sites	No	No response required
Health and Safety Executive	HSE has no comment to make, as there are no licensed explosive sites in the vicinity.	No	No response required
Health and Safety Executive	**Electrical Safety**	No	No response required
Health and Safety Executive	No comment from a planning perspective	No	No response required

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Kent Police	Given the size and location of the site, along with the large quantities of valuable materials that will be required, not only during construction but following commission, the site may be subject to unwanted attention from metal thieves and/or become targets for vandalism. As such, Appropriate, Realistic and Cost effective (ARC) security measures will need to be incorporated within the final design to reduce the opportunities for crime and the fear of crime. It is clear from the PEIR Security section 17.3.6, that Cleve Hill Solar Park Ltd (CHSPL) is aware of the potential for criminal opportunities that the site may attract.	No	No response required
Swale Borough Council	· EMF/Glint/Glare	No	No response required
Swale Borough Council	· Land/ALC/Contamination	No	No response required
Swale Borough Council	EMF/Glint/Glare	No	No response required
Swale Borough Council	There is less concern about light nuisance transmission from the solar panels, as this is much less of a problem than it used to be – modern farms have much less reflection from panels than used to be the case. Nevertheless there is still the potential for glint and glare to	No	Environmental Statement, Technical Appendices: Glint and Glare Study (document reference number 6.4.17.1), details the methodology used in section 3 and various Appendices.

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	occur and this needs to be recognised and quantified.		
Swale Borough Council	A light nuisance assessment should be submitted with predicted light levels, glint and glare measurements/predictions and mitigation, if any.	No	Environmental Statement, Technical Appendices: Glint and Glare Study (document reference number 6.4.17.1), details the methodology used in section 3 and various Appendices. Section 9.2 of the Glint and Glare Assessment stated that no mitigation requirement has been identified. Detail on lighting is provided in the Environmental Statement, Chapter 5: Development Description, section 5.9.3 (document reference number 6.1.5), - Visible lighting, which will only switch on when activated by sensors for security purposes, will be deployed around the electrical compound and at the transformers. The lighting will likely be fixed to the plant itself rather than being stand alone. No areas of the Development are proposed to be permanently lit.
Swale Borough Council	It is not made clear whether permanent lighting will be required across the majority of the site amongst the solar panels or around the site perimeter. Hopefully, this will not be necessary, and any fixed lighting will be contained to the confines of the substation compound, and even then kept to a minimum both in terms of scale, number and hours of use of such lighting. It would be helpful if this matter could be	No	Detail on lighting is provided in the Environmental Statement, Chapter 5: Development Description, section 5.9.3 (document reference number 6.1.5), - Visible lighting, which will only switch on when activated by sensors for security purposes, will be deployed around the electrical compound and at the transformers. The lighting will likely be fixed to the plant itself rather than being stand alone. No

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	addressed more clearly and the likely impacts of site lighting proposals explained.		areas of the Development are proposed to be permanently lit.
Swale Borough Council	Land/ALC/Contamination	No	No response required
Swale Borough Council	The issue of Agricultural Land Quality is fairly straightforward and is adequately addressed at this stage in the PEIR, the Scoping Report in Technical Appendix A3.1 to the PEIR, and the Soils and Agricultural Land Classification Report in Technical Appendix A13.1 to the PEIR. The fact that virtually none of the land concerned falls into the BMV category simplifies matters, as it means that loss of better quality agricultural land, per se, is not realistically a factor in this case.	No	No response required
Swale Borough Council	The first part of Swale Local Plan Policy DM31 will still clearly apply, i.e. “development on agricultural land will only be permitted when there is an overriding need that cannot be met on land within the built-up area boundaries”.	No	No response required

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Swale Borough Council	As is to be expected for a site on this scale, any existing contamination should be explored and mitigated where found. A contaminated land Assessment should be carried out prior to development and any contamination found to be mitigated.	No	A Phase 1 Preliminary Site Assessment has been undertaken as presented in the Environmental Statement, Technical Appendices: Curtins Phase 1 Report (document reference number 10.3). This identifies potential contaminants of concern and provides recommendations for further investigations
The Faversham Society	8. What are the risks of a major incident on the site in the during construction? During operation? During decommissioning?	No	Major Accidents and Disasters is covered in the Environmental Statement, Chapter 17: Miscellaneous Issues, section 17.7 (document reference number 6.1.17), and specifically the potential for the Development to cause major accidents or disasters is covered in section 17.7.2. No risk of major incidents is identified in any development phase.
The Faversham Society	9. What is the particular risk of explosion on the site? What would be the consequences? Have those risks been mitigated in the proposal? If so how?	No	Major Accidents and Disasters is covered in the Environmental Statement, Chapter 17: Miscellaneous Issues, section 17.7 (document reference number 6.1.17), and specifically the potential for the Development to cause major accidents or disasters is covered in section 17.7.2. No risk of major incidents is identified in any development phase.
The Faversham Society	10. Have Kent Fire Services, Kent Police and SECAmb been consulted about how they will service the site?	No	Kent Police have provided comment on the proposals and raised comment with regards to security.

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The Faversham Society	11. As this would be the biggest solar power station in Europe, it will be an obvious and relatively 'soft' terrorist target? Have there been discussions with the Home Office about this new national security issue?	No	Solar Farms are not considered to be a terrorist target, much like any other grid infrastructure. There have been no discussions with the Home Office regarding this.
The Faversham Society	12. How do the security arrangements you propose compare with those made for a UK nuclear power station?	No	We are not privy to the security arrangements of a nuclear power station. The security arrangements proposed for the Development have been designed to be appropriate and sufficient, based on other solar developments and substations. Kent Police have been consulted with regards security arrangements and have raised no concerns
The Faversham Society	13. What effect will effective counter-terrorism security arrangements impact on the amenity value of the Saxon Way and Natural England footpaths?	No	No specific counter-terrorism security arrangements are required. The security arrangements proposed for the Development have been assessed, in terms of fencing and lighting.
The Faversham Society	14. What conversations have you had with SECAmb to ensure that local resident's access to emergency medical care is not compromised particularly in the construction phase?	No	This will be managed through the Construction Traffic Management Plan, which is in the Environmental Statement, Technical Appendices: Construction Traffic Management Plan (document reference number 6.4.14.1).
The Faversham Society	15. How sensitive is the viability of the SPS to fluctuations in the price of energy?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	16. At what price would the SPS become unsustainable?	No	This question is not relevant to the planning application submission for the Development.

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The Faversham Society	17. How sensitive is the viability of the SPS to the cost of capital / cost of borrowing?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	18. How have these risks been mitigated?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	19. What are the periods going forward where the viability of SPS is particularly sensitive to these or other risk?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	20. Assuming energy prices remain stable and no new supply enters the market how long will it be before the SPS becomes profitable?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	21. If the SPS is built how long have you estimate it will its operation remain sustainable?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	22. What will make the plant unsustainable?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	28. Have you modelled the effect on the SPS sustainability if fracking is allowed in this country?	No	Fracking is allowed in this country, subject to the appropriate consents. In the currently hypothetical scenario that fracking becomes a mainstream source of mined hydrocarbons in the UK, there remains no likelihood that electricity prices will fall substantially. The fracked gas would have to be a small fraction of the price of mains gas, and there would have to be a substantial government change of policy away from low-carbon sources for this to have a noticeable effect on wholesale electricity price.

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The Faversham Society	29. Who actually owns the companies involved in developing and constructing the SPS?	No	The Applicant is detailed in Chapter 1: Introduction, Section 1.4 (document reference number 6.1.1).
The Faversham Society	30. Are they UK based companies for legal and tax purposes?	No	The Applicant is detailed in Chapter 1: Introduction, Section 1.4 (document reference number 6.1.1).
The Faversham Society	31. Are all the Directors with fiduciary responsibilities on the Boards of developers and builders UK domiciled?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	32. How can you assure the public that all the companies involved directly and indirectly through contracts are UK based and will pay full UK taxes?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	33. How can you assure the public that all of the companies directly involved and their contractors pay their staff a living wage?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	34. How can you assure the public do not use zero-hours contracts?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	35. How can you assure the public abide by best practice regarding equality and diversity?	No	This question is not relevant to the planning application submission for the Development.
The Faversham Society	38. What processes will be required to ensure data protection relating to the security cameras surrounding the site? How will walkers' anonymity be protected?	No	CCTV is detailed in section 5.3.4.7 of Environmental Statement, Chapter 5: Development Description (document reference number 6.1.5). Cameras are proposed 1 m within the security perimeter fence in operational areas of the Development and are internal facing

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The Faversham Society	39. Who will see images and under what circumstances?		
The Faversham Society	45. Where will the solar panels and batteries be manufactured?	No	The exact panel or energy storage model has not been confirmed and would be subject to competitive tendering. As such, at this stage, it is not possible to confirm where the panels or batteries will be manufactured.

Responses received from Section 44 Consultees to the Section 42 Consultation.

3. Consultation			
Section 42 Applicant Regard to Consultee Responses (Section 44 Respondents)			
Respondent	**Comment**	**Project change?**	**Applicant Response**
London Array Limited	These representations are provided in response to the letter of Cleve Hill Solar Park Limited dated 31 May 2018 inviting comments on the proposed application for a development consent order in respect of Cleve Hill Solar Park and on the Preliminary Environment Information Report.		Noted.

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London Array Limited	The representations are made by London Array Limited on behalf of the consortium Participants in the London Array wind farm project (being Orsted London Array II Limited, E.ON Climate & Renewables UK London Array Limited, Masdar Energy Limited and Boreas (Investment) Limited)) (together referred to in this letter as the Participants).		Noted.
London Array Limited	Your letter of 31 May 2018 specifies that you expect to be able to secure the land and rights you require for the solar park through negotiation. The Participants require clarity as to specifically what land, rights and releases you require in order that we can consider and respond.		This was addressed through engagement with the land agent team.

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London Array Limited	We would welcome a meeting with you in the near future to understand your plans for the proposed development more fully and to discuss these preliminary representations.		Meetings and communications were undertaken with London Array Limited as set out in the Statement of Reasons (document reference 4.1).
London Array Limited (Covering Letter)	As you are aware, London Array Limited has the benefit of interests in land within your potential DCO application site (as further set out in the response attached).		Noted.
London Array Limited (Covering Letter)	Enclosed with this letter is a response to the Land Interest Questionnaire and preliminary representations made on behalf of the participants of London Array Limited regarding the proposed solar park.		Meetings and communications were undertaken with London Array Limited as set out in the Statement of Reasons (document reference 4.1).

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London Array Limited (Covering Letter)	In the circumstances, I would suggest a meeting in order that we can discuss the proposed construction and operation of the Solar Park and your proposals for acquisition of any interests held by London Array Limited. If you could contact [redacted] with proposed dates for a meeting, that would be helpful.		Meetings and communications were undertaken with London Array Limited as set out in the Statement of Reasons (document reference 4.1).
SCOA	I am responding to your letter dated 31st May 2018, addressed to me in my capacity as a Trustee of the land adjoining your proposed site for the Cleve Hill Solar Park. As you may know I am a member of the Seasalter Chalet Owners Association, which has a vested interest in this land and I am also expressing the views of my fellow Trustees, as stated below.		Noted.

5. Development Description

Section 42 Applicant Regard to Consultee Responses

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Respondent	Comment	Project change?	Applicant Response
Kent Wildfowling and Conservation Trust	It is clear to us that the creation of the Solar Park, whilst bringing indisputable national benefits in terms of energy supply, will have a detrimental effect on the KWCA's land and the quiet enjoyment of that land by our members both during the construction phase and indeed once the Solar Park is operational.		The Applicant engaged with the Kent Wildfowling and Conservation Trust as set out in the Statement of Reasons (document reference 4.1).

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London Array Limited	These preliminary representations focus on the development and construction implications of the proposed development which would appear, at this stage, to have the most impact on the property owned by the Participants and the operation of the wind farm. We would welcome a meeting to understand the project further and anticipate submitting additional comments on the proposed application and the PEIR in due course.		The Applicant engaged with London Array Limited as set out in the Statement of Reasons (document reference 4.1).
London Array Limited	We have also attached the Land Interest Questionnaire to this response, together with the Title K956906 official copy (Register), the Title Plan and 1 October 2012 transfer (Transfer). The registered K956906 Title Plan accurately reflects the Participants' ownership, but please also refer to the registered title for further details.		Acknowledged.

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London Array Limited	3. Grid Connection The solar park substation is shown as connecting into the existing NGET substation at Cleve Hill, which will require NGET to carry out modification works to their substation and connection, via two gantrys, to the 400kV transmission network. We would welcome more information on the timing and duration of any outages which may affect the operation of London Array Limited.		The Applicant engaged with London Array Limited as set out in the Statement of Reasons (document reference 4.1).

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London Array Limited	4. Infrastructure / Land Interests As you are aware, the Participants have the benefit of an easement corridor running through the proposed application site, in which service infrastructure is retained and maintained. The Participants need to ensure that infrastructure is not interfered as a result of the construction or operation of the solar park and the risk of that requires further assessment.	No	The Applicant confirms the protected provision as included in the Applicant's DCO (document reference 3.1) and refers to Chapter 17, Environmental Statement (6.1.17).

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London Array Limited (Covering Letter)	In the first instance, London Array Limited is concerned to ensure that the operation of the offshore wind farm is not affected during the construction and operation of any Solar Park that may achieve consent. Particular issues of concern include continued access to infrastructure serving the wind farm, the safeguarding of that infrastructure during construction and long-term access for maintenance and renewal. Any planned works to the substation will also need to be understood. I note the information contained in the Preliminary Environment Information Report does not address the detail of those concerns.	No	The Applicant has engaged with London Array Limited as set out in the Statement of Reasons (document reference 4.1). The Applicant addresses current infrastructure on site in Chapter 17, Environmental Statement (6.1.17).

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London Array Limited (Covering Letter)	Further, I understand that the Solar Park may wish to include compulsory purchase powers within the proposed DCO in order to secure operation of the Solar Park and to "clean title". This would be premature ahead of any formal proposal by you on these matters. This is also a matter of concern to us.	No	The Applicant has engaged with London Array Limited as set out in the Statement of Reasons (document reference 4.1) and does not seek to include compulsory purchase powers with the DCO where individual agreements can be made.
Mr and Mrs Cocking	Thank you for your information on the proposed development of the Cleve Hill Solar Park dated 31 May 2018.We wish to register our opposition to your plans and do so as consultees under the relevant sections of the Planning Act 2008 and Infrastructure Planning Regulations 2017 on the following grounds:		Comment noted. The Applicant has engaged with Mr and Mrs Cocking as set out in the Statement of Reasons (document reference 4.1).
Mr and Mrs Cocking	1. Such is the scale of the proposed solar park (approx. 890 acres) that it would effectively destroy a site of unique historical interest going back to Saxon times and degrade an area of outstanding natural beauty.	No	To confirm, of the apx 950 acres of developable area, 45.5% of this would contain solar PV modules. The Applicant has undertaken an assessment of the impacts on cultural heritage as set out in Chapter 11 of the Environmental Statement (6.1.11).

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Mr and Mrs Cocking	3. In a field characterised by rapid development through improving and new technologies government policy recognises the importance of proposals which include a consideration of longer term and contingent planning strategies, elements which are lacking in your report. To give an example, you refer to a 'storage facility with an export capacity of over 50MW' and yet it is quite feasible that within five years this figure and its supporting infrastructure may appear out of date as new and innovative developments become available. Given this circumstance what is the strategy for Cleve Hill?	No	The Applicant has designed the Development within a range of parameters known as a Rochdale Envelope, to account for such technological changes or advances. Please see Chapter 5, Development Description, of the Environmental Statement (document reference 6.1.5).

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Mr and Mrs Cocking	6. There is reference to the decommissioning of the development, a phrase which needs further clarification, particularly the circumstances under which decommissioning would take place; what are the financial and legal responsibilities of the joint — venture companies with regard to this process, particularly in the medium and longer term?	No	
SCOA	Firstly let me say that both the Trustees and the chalet owners, whom we represent, are unanimously against your proposed development.	No	Comment noted. The Applicant has engaged with SCOA as set out in the Statement of Reasons (document reference 4.1).

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SCOA	The chalet owners have enjoyed the facilities of the Graveney Marshes for many generations and feel the proposed development will industrialise what is essentially a unique rural and estuary landscape. The scale of the proposal is out of all proportion to the benefits obtained and we feel there are other brown field sites which would be more appropriate and would not cause such an environmental impact.	No	The Applicant has sought to reduce the scale of the Development from 56.5% of the developable area to 45.5% of the developable area. Owing to the removal of field J and total habitat mitigation area of 56 ha, the beginning of the solar PV modules is significantly set back from the chalets, as shown in Figure 3 of the Consultation Report (document reference 5.1). Chapter 4, Environmental Statement sets out the site selection and alternatives process for the Development (document reference 6.1.4).

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SCOA	When the current Cleve Hill Electricity Sub Station was in the development stage, we voiced the opinion that this was the tip of the iceberg and would lead to further development on the site. We were assured this would not be the case and that no further building would take place in the future; we now know this to be absolutely disingenuous. We now find that even your proposed substation and battery array is almost 4 times larger than the existing substation without even taking into consideration the area occupied by the actual solar panels. We understand the battery installation will be the largest in the world and, given that you have recently stated that the output of the site will be increased, we would imagine this area will again be enlarged from its current 8.5 hectares. I should be grateful if you would advise me if it is Hive's intention to further increase the size of this area. Given the predictions of the noise pollution of the batteries would be over 100 decibels we are concerned that even more units would make the noise levels intolerable.	No	The Applicant cannot comment on the dialogue had with other commercial parties. The Applicant can confirm that the electrical compound area including batteries for the Development is apx 10ha, which is similar to that of the existing Cleve Hill substation, being apx 10ha. The Applicant has undertaken a noise assessment as presented in Chapter 12, Environmental Statement (Chapter 6.1.12).

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SCOA	As you will gather, as the Trustees of the stated land and as representatives of the 27 chalet owners we are against development consent being given and will use all our legitimate powers to object.	No	Comment noted. The Applicant continues to engage with SCOA as detailed in document reference 4.1.

8. Ecology			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
Kent Wildfowling and Conservation Trust	I look forward to discussing with you how your plans will impact on KWCA's land and its use by members. I note that you seek to apply environmental mitigation and would expect to be involved in those discussions both as the KWCA kentwildfowlers.co.uk, and indeed its wildlife charitable arm Wild Spaces Fund wildspacesfund.org.uk	No	The Applicant has engaged with Kent Wildfowling and Conservation Trust as detailed in document reference 4.1.

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Mr and Mrs Cocking	2. The case for the protection and conservation of the site's environment is specious, lacking detail and serious analysis.	No	Please see the Environmental Statement (document reference 6.1), most notably the Applicant's Landscape and Biodiversity Management Plan (document reference 6.4.5.2).
SCOA	Having read all the literature you have published, we believe you will not be able to maintain the existing level of biodiversity and wildlife population and will ruin the existing natural habitat of many species. Given the orientation of the panels, the views currently enjoyed from the Saxon Shore Way across open farm land will be replaced by what will, in effect, be a sea of plastic stretching for miles.	No	Please see the Applicant's Landscape and Biodiversity Management Plan (document reference 6.4.5.2).

10. Hydrology, Hydrogeology, Flood Risk and Ground Conditions			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**

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London Array Limited	2. Flood Defences The NTS indicates that in addition to building a bund to protect the development substation and battery array from flood risk, the intention is to access and maintain the existing defences to continue to protect the solar park site from flooding if necessary.	No	The Applicant has consulted with the Environment Agency throughout the pre-application consultation and as part of the statutory consultation. Following this consultation, the Environment Agency is expected to set out a scenario for managed realignment to be between 50 and 100 years in the future. As acknowledged by the Environment Agency, the proposals for the Medway Estuary and Swale Strategy (MEASS) strategy are strategic and there are a number of factors to be considered and overcome for the strategy to be implementable. The majority of the Development is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme events. Only the electrical compound is designed to withstand a breach of the existing defences. It is therefore clearly in the asset owner's interest to maintain the current standard of defences, to at least the same standard that the EA currently do. The Applicant therefore increased the Development site boundary to include the flood defences. This was consulted on in the PEIR and at phase two Section 47 consultation. Subsequently a position between the EA and the Applicant was reached as shown in Appendix 26.

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London Array Limited	As noted in the Land Interest Questionnaire, the delineation of the freehold land edged red in the plan attached to the NTS is incorrect in that we believe that the sea wall and strip of land between the drainage ditch and Mean High Water is owned by Kent Wildlife Trust, with whom the Participants have a lease of rights to maintain cables passing through KWT land. These additional interests need to be considered in determining whether Cleve Hill Solar Park will be in a position to maintain the existing flood defences as intended. This, in turn, may affect the design of the flood protection, the quantity of construction material to be brought to site and the amount of traffic using the Access Road.	No	The Applicant has engaged with London Array Limited as detailed in document reference 4.1.

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SCOA	As an Association we also have concerns regarding your strategy for preventing the site from flooding . It is understood you may need to place large boulders at the foot of the sea wall to prevent damage to the foot of the structure and would be interested to know if you have implemented a study to show how this may affect the defences between the Association properties and the start of the concrete sea wall. Your comments will be appreciated. In recent years, flood water has overtopped the beach in this area and caused water to inundate the rear of our site and we are worried that any reinforcement further along the coast will have a detrimental effect .	No	The Applicant has consulted with the Environment Agency throughout the pre-application consultation and as part of the statutory consultation. Following this consultation, the Environment Agency is expected to set out a scenario for managed realignment to be between 50 and 100 years in the future. As acknowledged by the Environment Agency, the proposals for the Medway Estuary and Swale Strategy (MEASS) strategy are strategic and there are a number of factors to be considered and overcome for the strategy to be implementable. The majority of the Development is designed to withstand an overtopping of the existing defences taking into account future projections of sea level rise and extreme events. Only the electrical compound is designed to withstand a breach of the existing defences. It is therefore clearly in the asset owner's interest to maintain the current standard of defences, to at least the same standard that the EA currently do. The Applicant therefore increased the Development site boundary to include the flood defences. This was consulted on in the PEIR and at phase two Section 47 consultation. Subsequently a position between the EA and the Applicant was reached as shown in Appendix 26.

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14. Access and Traffic			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**
London Array Limited	1. Access for Construction The PEIR indicates that the main construction route for the proposed development would be along the Access Road owned by the Participants. The owner of Cleve Hill Farm, NGET and the OFTO, Blue Transmission London Array Limited (BTLA), also have rights to use this road.	No	The Applicant has engaged with London Array Limited as detailed in document reference 4.1.

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London Array Limited	An Access Road Maintenance Agreement is in place between the Participants and the owner of Cleve Farm. Under the terms of this agreement the Participants have agreed to keep the Access Road repaired and maintained, subject to contribution from the owner of Cleve Hill farm towards the costs for doing so secured by means of mutual estate rent charges.	No	The Applicant has engaged with London Array Limited as detailed in document reference 4.1.
London Array Limited	The NTS expects construction of the solar park to take between 12 and 24 months, and that during the peak of construction of 16-weeks up to 75 HGVs and 48 LGVs could be using the Access Road each day. This is clearly of a very different magnitude of use to that by an arable farmer, as at present, and is unlikely to be confirmed until the civil works for the solar park, the electricity substation and battery bunds are finalised.	No	The Applicant has engaged with London Array Limited as detailed in document reference 4.1.

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London Array Limited	Depending on the magnitude and time of year of the construction traffic, wheel washing facilities will need to be installed and other measures taken to ensure that the Access Road will be kept clear for the vehicles for London Array, NGET and BTLA (which access is required 24 hours every day), and that there will be no overspill onto Seasalter Road.	No	The Applicant has engaged with London Array Limited as detailed in document reference 4.1. The Applicant includes a detailed Construction Traffic Management Plan (document reference 6.4.14.1), which sets out such measures.

17. Miscellaneous Issues			
Section 42 Applicant Regard to Consultee Responses			
Respondent	**Comment**	**Project change?**	**Applicant Response**

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Mr and Mrs Cocking	4. The project which claims to be the largest energy development in the UK is described as a joint venture involving Hive Energy and Wirsol Energy, two small companies with a modest track record during their relatively short existence. It is questionable whether such companies have the capacity to undertake responsible development on the scale envisaged. Will other larger partners such as TESLA be encouraged to underwrite the project?		The Applicant has extensive experience in delivering solar schemes across the UK and internationally. The Applicant refers to Chapter 1 of the Environmental Statement (document reference 6.1.1) and to the websites of both developers: https://wirsol.com/en/ and http://www.hiveenergy.co.uk.

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Mr and Mrs Cocking	5. Your literature states that the project 'could be the lowest cost generator of energy in the UK ... [and] could provide enough affordable and clean electricity to power over 110,000 homes'. Other cost benefits include claims that 'over £1,000,000 income per annum will be generated for local authorities' and that there will be positive effects on local employment. What is the evidence for these assertions?	No	Owing to the reduction of solar PV modules in response to consultation, the Development will provide clean power to over 91,000 homes based on the calculations provided by the Solar Trade Association that: For every 5MW installed, a solar farm will power over 1,500 homes annually (based on an average annual consumption of 3,300 kWh of electricity for a house) and save 2,150 tonnes of CO2. Approximately 25 acres of land is required for every 5 megawatts (MW) of installation. The Applicant has received the figure for the business rates of over £1million/yr from the Valuations Office.

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Consultation Report

Appendix 4: Section 46 Notification to Planning Inspectorate

CLEVE HILL
SOLAR PARK

Tracey Williams
Case Manager
Major Applications and Plans
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol, BS1 6PN

31 May 2018

Dear Tracey,

CLEVE HILL SOLAR PARK LIMITED: PROPOSED SOLAR PARK AND ENERGY STORAGE FACILITY

DUTY TO NOTIFY SECRETARY OF STATE OF PROPOSED APPLICATION UNDER SECTION 46 OF THE PLANNING ACT 2008 (AS AMENDED)

I write on behalf of Cleve Hill Solar Park Ltd ("**CHSPL**") in relation to the Cleve Hill Solar Park project (the "**Project**"). I confirm that the Applicant intends to submit an application (the "**Proposed Application**") to the Secretary of State for Business, Energy and Industrial Strategy (the "**SofS**") for a Development Consent Order ("**DCO**") under section 37 of the Planning Act 2008 (as amended) (the "**PA 2008**").

This letter is CHSPL's formal notification to the SofS of the Proposed Application pursuant to s46 of the PA 2008, 'Duty to notify Secretary of State of proposed application'.

If the DCO is made for the Project, it would authorise:

- Construction, operation, maintenance and decommissioning of a solar PV electricity generating and storage facility with an export capacity of over 50MW;
- Associated and/or ancillary works including construction of a substation and cable works to connect to the National Grid substation, maintenance works to the sea defence, and the creation of a habitat mitigation area;
- The permanent and/or temporary compulsory acquisition (if required) of land and/or rights;
- The overriding of easements and other rights over or affecting land;
- The application and/or disapplication of legislation including inter alia legislation relating to compulsory purchase and landlord and tenant; and
- Such ancillary, incidental and consequential provisions, licenses, property rights, permits and consents as are necessary and/or convenient.

Section 42 of the PA 2008 ('Duty to consult') requires prospective applicants for a DCO to consult on their proposed applications with the persons specified in the PA 2008 and in the regulations made pursuant to the PA 2008. CHSPL will commence consultation pursuant to section 42 of the PA 2008 and the associated regulations by issuing a letter (accompanied by consultation documents) to such persons. The letter will be issued so that it arrives by 31 May 2018. The deadline stated in the letter for the receipt of responses to the consultation is 13 July 2018, which is 43 days.

CLEVE HILL
SOLAR PARK

Enclosed with this letter is a list of persons CHSPL is consulting with pursuant to section 42 of the PA 2008.

This section 42 statutory consultation follows the non-statutory engagement that CHSPL carried out in December 2017.

The consultation documents that are to be provided to the persons to be consulted pursuant to section 42 are provided on the USB that is enclosed with this letter. These documents are:

1. Example copies of the section 42 letters (one letter type being for prescribed consultees and the other one to landowners);
2. A copy of the notice that has been published pursuant to section 48 of the PA 2008 in The Guardian on 31 May 2018, the London Gazette on 31 May 2018, the Lloyds List on 31 May 2018 and the Fishing News on 31 May 2018 and for two successive weeks in the Kentish Gazette Series on 24 May 2018 and 31 May 2018 and the Sittingbourne News Extra and the Sheerness times Guardian on 23 May 2018 and 30 May 2018.
3. A copy of the Cleve Hill Solar Park site plans including the proposed site boundary;
4. The Preliminary Environmental Information Report ("PEIR"); and
5. The Non-Technical Summary of the findings in the PEIR.

I look forward to receiving the Planning Inspectorate's formal acknowledgement of this section 46 notification.

Please do not hesitate to contact me should you require further information on the consultation process carried out.

Yours sincerely,

Hugh Brennan

[redacted]

For and on behalf of Cleve Hill Solar Park Ltd

Consultation Report

Appendix 5: Section 42 Consultees Consulted Under Section 42 of the 2008 Planning Act

Appendix 5: Section 42 Consultees Consulted Under Section 42 Of The 2008 Planning Act

Prescribed Organisations	
Schedule 1 Description	**Organisation**
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	Canterbury and Coastal Clinical Commissioning Group

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Schedule 1 Description	Organisation
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England - South East

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The relevant fire and rescue authority	Kent Fire and Rescue Service

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Schedule 1 Description	Organisation
The relevant police and crime commissioner	Kent Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Graveney with Goodnestone Parish Council
The Environment Agency	The Environment Agency - Kent, South London and East Sussex

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The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency -	The Maritime and Coastguard Agency -

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Schedule 1 Description	Organisation
Regional Office	Dover
The Marine Management Organisation	Marine Management Organisation (MMO)
The Relevant Highways Authority	Kent County Council
The relevant strategic highways company	Highways England - South East

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The relevant internal drainage board	Lower Medway Internal Drainage Board
Trinity House	Trinity House

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Schedule 1 Description	Organisation
Public Health England, an executive agency of the Department of Health	Public Health England
Relevant statutory undertakers	See Table 2 below
The Crown Estate Commissioners	The Crown Estate
The Secretary of State for Defence	Ministry of Defence

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Table 2: Relevant Statutory Undertakers

Statutory Undertaker	Organisation
The relevant Clinical Commissioning Group	Canterbury and Coastal Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Foundation Trust	South East Coast Ambulance Service NHS Foundation Trust

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Railways	Highways England Historical Railways

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Statutory Undertaker	Organisation
Dock and Harbour authority	Whitstable Harbour
Dock and Harbour authority	Peel Ports London Medway (Port of Sheerness Ltd)
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Environment Agency - Kent, South London and East Sussex

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The relevant water and sewage undertaker	South East Water (Mid Kent)

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Statutory Undertaker	Organisation
	Southern Water
	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd

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The relevant public gas transporter	ESP Connections Ltd
	ESP Networks Ltd

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Statutory Undertaker	Organisation
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited

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	Quadrant Pipelines Limited

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Statutory Undertaker	Organisation
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
The relevant electricity distributor with CPO Powers	Energetics Electricity Limited
	Energy Assets Networks Limited
	Energy Assets Power Networks

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Statutory Undertaker	Organisation
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	G2 Energy IDNO Limited
	Harlaxton Energy Networks Limited

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	Independent Power Networks Limited
	Leep Electricity Networks Limited

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Statutory Undertaker	Organisation
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited

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	Vattenfall Networks Limited

Cleve Hill Solar Park Ltd.
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Statutory Undertaker	Organisation
	Utility Distribution Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	Blue Transmission London Array Limited
	National Grid Electricity Transmission Plc

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Local Authority
Canterbury City Council
Swale Borough Council
Ashford Borough Council
Maidstone Council
Medway Council
Folkstone and Hythe District Council

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Local Authority
Thanet District Council
Dover District Council
Kent County Council
Thurrock Council
London Borough of Bexley
London Borough of Bromley
East Sussex County Council
Surrey County Council

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Non-Prescribed Consultation Bodies

Note: Under Section 42 of the 2008 Act, the Applicant has consulted on the Project with the statutory bodies prescribed under Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ("APFP Regulations"). The Applicant also consulted on the Project with all bodies listed by the Infrastructure Planning Commission ("IPC") (whose functions have now transferred to the Secretary of State) under Regulation 9(1)© of the Infrastructure Planning (environmental Impact Assessment) Regulations 2009.

In addition, the Applicant scoped in 21 non-prescribed organisations to be consulted (as below), which included local, national and regional organisations.

Non-prescribed organisations
Royal National Lifeboat Institution
RSPB
Kent Wildlife Trust
Swale Footpaths Group

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Kent Ornithological Society
Visit Kent
Explore Kent
Medway Swale Estuary Partnership
Swale of Friends of Earth
Faversham Society
Local Footpath Officer for Graveney and Goodnestone Ramblers
Sustrans
Canterbury District Green Party

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Graveney and Goodnestone Parish Footpaths Warden
Canterbury Greenpeace Group
Apiary Manager, Whitstable & Herne Bay Beekeepers
Faversham Health Walks, Faversham Footpaths Group, Faversham U3A Walking Group
National Farmers Union
CPRE Kent
GREAT Graveney
Swale Green Party

Cleve Hill Solar Park Ltd.
Autumn 2018 ©

Consultation Report

Appendix 6: Notification to Section 42 Consultees of Section 42 Consultation (31 May – 13 July 2018)

Archived: 07 November 2018 17:16:02
From: info@clevehillsolar.com
Sent: 24 May 2018 18:37:56
To: info@clevehillsolar.com
Subject: Advance Notice of Consultation in Respect of Proposed Development - the Cleve Hill Solar Park
Importance: Normal

Dear Sir/Madam,

You have been identified as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is an advance notice of the statutory consultation which will commence on 31st May 2018 and close on **Friday 13th July 2018.**

In accordance with the statutory consultation, we will be sending you the following documentation on 31 May via email and post for your information and response:

- Preliminary Environmental Information Report (PEIR) (electronic copy)
- Preliminary Environmental Information Report (PEIR) - Non-technical summary (electronic copy)
- Cleve Hill Solar Park Site Plans
- A notice publicised in accordance with Section 48 of the Act. This notice includes details of public consultation events and locations where the consultation material can be inspected free of charge.

Should you have any questions or queries regarding the information provided or process, please don't hesitate to contact the team at the details provided below.

Yours faithfully,

Hugh Brennan

cid:image001.jpg@01D
3F35E.19C0FDB0

Managing Director

For and on behalf of the Cleve Hill Solar Park

171107_cleve-hill-email-footers_V2 (002)

T: 0800 328 2850
E: info@clevehillsolar.com
W: www.clevehillsolar.com

Archived: 07 November 2018 17:14:07
From: info@clevehillsolar.com
Sent: 24 May 2018 18:39:28
To: info@clevehillsolar.com
Subject: Advance Notice of Consultation in Respect of Proposed Development - the Cleve Hill Solar Park
Importance: Normal

Dear Sir/Madam,

In addition to the relevant statutory consultees, we have scoped in your organisation as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is an advance notice of the statutory consultation which will commence on 31st May 2018 and close on **Friday 13th July 2018.**

In accordance with the statutory consultation, we will be sending you the following documentation on 31 May via email and post for your information and response:

- Preliminary Environmental Information Report (PEIR) (electronic copy)
- Preliminary Environmental Information Report (PEIR) - Non-technical summary (electronic copy)
- Cleve Hill Solar Park Site Plans
- A notice publicised in accordance with Section 48 of the Act. This notice includes details of public consultation events and locations where the consultation material can be inspected free of charge.

Should you have any questions or queries regarding the information provided or process, please don't hesitate to contact the team at the details provided below.

Yours faithfully,

Hugh Brennan

cid:image001.jpg@01D
3F35E.19C0FDB0

Managing Director

For and on behalf of the Cleve Hill Solar Park

171107_cleve-hill-email-footers_V2 (002)

Freepost: Cleve Hill Solar
T: 0800 328 2850

E: info@clevehillsolar.com
W: www.clevehillsolar.com

Contact Name

ADDRESS Line 1

ADDRESS Line 2

ADDRESS Line 3

ADDRESS Line 4

Postcode

31 May 2018

Dear Sir/ Madam,

IMPORTANT: THIS COMMUNICATION AFFECTS LAND THAT YOU HAVE AN INTEREST IN

Consultation in respect of proposed development – the Cleve Hill Solar Park

Statutory Consultation under Section 42 of the Planning Act 2008 and Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

You have been identified as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This statutory consultation commences on 31st May 2018 and closes on **Friday 13th July 2018.** Please see below for more information on how to view and comment on our proposed application.

We are writing to consult with you on a proposed solar park, the Cleve Hill Solar Park that the applicant, Cleve Hill Solar Park Ltd (hereafter referred to as "CHSPL") is proposing to develop. Cleve Hill Solar Park is planned to be located at Cleve Hill, Graveney, situated approximately 2 km north-east of Faversham and 5 km west of Whitstable on the north Kent coast, with a proposed generating capacity of over 50 megawatts (MW).

It is proposed that the Cleve Hill Solar Park would consist of solar photovoltaic panels, along with inverters and cables and battery storage. The electricity generated and stored would connect to the existing National Grid substation, located to the east of the proposed Cleve Hill Solar Park site, from where it will enter the national grid. An area of the site to the north east of the site is proposed to be dedicated as a managed habitat area for birds. Works of maintenance may also be required during the operational lifetime of the project to the sea defence beneath the Saxon Shore Way, which is located along the north and west boundaries of the site.

THE DEVELOPMENT CONSENT ORDER APPLICATION

As the proposed generating capacity of the Cleve Hill Solar Park would exceed 50 MW it is classified as a Nationally Significant Infrastructure Project as defined by Section 15(3) of the Planning Act 2008 (as amended) ("the Act"), for which CHSPL must apply for a Development Consent Order ("DCO"). If the DCO application is accepted, the Planning Inspectorate will then process and examine the application and then make a recommendation to the Secretary of State for Business, Energy and Industrial Strategy. The final decision on the DCO application will be made by the Secretary of State.

The DCO application will contain full details of the Cleve Hill Solar Park and will be accompanied by an Environmental Statement prepared under Section 37(3) of the Act and in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("the Regulations").

The proposed DCO will include powers for CHSPL to construct, operate, maintain and decommission the Cleve Hill Solar Park. Maintenance works may be required to the sea defence. If so, those works and access to them may be required along the foreshore seaward of Mean High-Water Springs. Therefore, the proposed DCO will also include a Deemed Marine Licence to authorise those works.

CHSPL expects to be able to secure the land and rights it requires for the Cleve Hill Solar Park through private negotiation and has already secured an interest in the majority of the site. However, to ensure that the land and rights required for the entire project can be obtained, the proposed DCO application will also seek powers for the compulsory acquisition of land, and rights over land, including the power to take temporary possession of land to construct and maintain Cleve Hill Solar Park and associated works.

In accordance with Regulation 13 of the Regulations and section 48 of the Act, CHSPL must publicise the proposed application. A notice publicising the proposed application is enclosed with this letter.

The Cleve Hill Solar Park is currently in the pre-application phase, with a DCO application expected to be submitted in Summer/Autumn 2018. Under the Act, CHSPL is required to carry out consultation on the proposed DCO application before submission. It will have regard to the responses received in the final design of the Cleve Hill Solar Park, and in the assessment and mitigation of its environmental impacts. A Consultation Report explaining how CHSPL has had regard to responses will be submitted as part of the DCO application.

This consultation includes:

- Consultation with prescribed bodies, host and neighbouring authorities and any persons with an interest in land affected by the Cleve Hill Solar Park (under Section 42);
- Consultation with the local community in the vicinity of the Cleve Hill Solar Park (under Section 47); and
- General public consultation on the Cleve Hill Solar Park (under Section 48).

CHSPL has prepared a Preliminary Environment Information Report ("PEIR"). The PEIR sets out the preliminary findings of the Environmental Impact Assessment ("EIA") undertaken to date and forms the basis of this statutory consultation. A non-technical summary of the PEIR has also been prepared. The purpose of the PEIR is to enable consultees to understand the likely environmental effects of Cleve Hill Solar Park and to help inform consultation responses.

Consultees are invited to consider the proposed application for the Cleve Hill Solar Park and the information provided in the PEIR. CHSPL is keen to receive your comments on the Cleve Hill Solar Park and the PEIR.

It should be noted that the EIA is an on-going process and the project design for Cleve Hill Solar Park continues to evolve.

PLEASE FIND ENCLOSED

- Hard copy of the Cleve Hill Solar Park site plans.

- Hard copy of the notice publicised in accordance with Section 48 of the Act. This notice includes details of public consultation events and locations where the consultation material can be inspected free of charge.
- A USB device containing full PEIR including a Non-Technical Summary.

FURTHER INFORMATION

Documents, plans and maps showing the nature and location of the Cleve Hill Solar Park, including the PEIR (with a non-technical summary) for the Cleve Hill Solar Park, will be available for viewing free of charge during consultation from 31 May 2018 until 13 July 2018. Details of the venues, including opening times are provided in the Notice enclosed with this letter.

The consultation documents will also be available at public exhibitions to be held in June, details for which are provided in the Notice enclosed with this letter.

Further information regarding the Cleve Hill Solar Park can be found on the Cleve Hill Solar Park website: www.clevehillsolar.com

RESPONDING TO THIS CONSULTATION

CHSPL welcomes your comments on the Cleve Hill Solar Park and the PEIR**.** Any responses to, or other representations in respect of, the Cleve Hill Solar Park and/or the PEIR should be sent to CHSPL:

- By email to: info@clevehillsolar.com or;
- By post to:

  FREEPOST: Cleve Hill Solar

Any response or representation must be:

- received by CHSPL no later than 13 July 2018 to be considered;
- be made in writing;
- state the grounds of the response or representation;
- indicate who is making the response or representation; and
- provide an address to which any correspondence relating to the response or representation may be sent.

Please note that responses and other representations will be recorded in the Consultation Report and may be made public.

Guidance on the pre-application process and the Act can be found on the Planning Inspectorate's website: http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/

NEXT STEPS

As mentioned above, consultation under section 42 of the Act and Regulation 13 of the Regulations is a formal part of the pre-application process for a DCO application. CHSPL will have regard to comments received during the consultation period and a Consultation Report explaining how CHSPL has had regard to responses will be submitted as part of the DCO application.

If you have any questions regarding the process or content of this consultation, please do not hesitate to get in touch.

CLEVE HILL
SOLAR PARK

Yours faithfully,

[redacted]

Hugh Brennan

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

Contact Name

ADDRESS Line 1

ADDRESS Line 2

ADDRESS Line 3

ADDRESS Line 4

Postcode

31 May 2018

Dear Sir/ Madam,

Consultation in respect of proposed development – the Cleve Hill Solar Park

Statutory Consultation under Section 42 of the Planning Act 2008 and Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

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- By email to: info@clevehillsolar.com or;
- By post to:

FREEPOST: Cleve Hill Solar

Any response or representation must be:

- received by CHSPL no later than 13 July 2018 to be considered;
- be made in writing;
- state the grounds of the response or representation;
- indicate who is making the response or representation; and

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NEXT STEPS

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If you have any questions regarding the process or content of this consultation, please do not hesitate to get in touch.

Yours faithfully,

Hugh Brennan

[redacted]

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

CLEVE HILL SOLAR PARK

ARCUS

Site Boundary

1:20,000 Scale @ A3

0 0.5 1 km

NORTH

Produced By: SC	Ref: 2238-PUB-033
Checked By: MB	Date: 01/05/2018

Site Boundary

Cleve Hill Solar Park

Reproduced from Ordnance Survey digital map data © Crown copyright 2018. All rights reserved. License number 100048606

N:\Projects\Environment\Environment EIA\2238 Cleve Hill.aprx\2238-PUB-033 Site Boundary

Archived: 07 November 2018 17:18:11
From: info@clevehillsolar.com
Sent: 31 May 2018 11:43:58
To: info@clevehillsolar.com
Subject: Consultation in Respect of Proposed Development - the Cleve Hill Solar Park
Importance: Normal
Attachments:
CHSP S42 Attachments.zip ;

---

31 May 2018

Statutory Consultation under Section 42 of the Planning Act 2008 and Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Dear Sir/Madam,

In addition to the relevant statutory consultees, we have scoped in your organisation as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This statutory consultation commences on 31st May 2018 and closes on Friday 13th July 2018.

Please see the following consultation documents attached for your information and response:

- Cover letter
- Preliminary Environmental Information Report (PEIR), which can be accessed here: https://drive.google.com/drive/folders/1WBTM7mnU7RY_sSZeNtjj59QGVMEGwL4E?usp=sharing
- Preliminary Environmental Information Report (PEIR) - Non-technical summary, which can be accessed here: https://www.clevehillsolar.com/s/Non-Technical-Summary.zip
- Cleve Hill Solar Park Site Plans
- A notice publicised in accordance with Section 48 of the Act. This notice includes details of public consultation events and locations where the consultation material can be inspected free of charge.

Should you have any questions or queries regarding the information provided or process, please don't hesitate to contact the team at the details provided below.

Yours faithfully,

Hugh Brennan

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

171107_cleve-hill-email-footers_V2 (002)

Freepost: Cleve Hill Solar
T: 0800 328 2850
E: info@clevehillsolar.com
W: www.clevehillsolar.com

Archived: 07 November 2018 17:18:39
From: info@clevehillsolar.com
Sent: 31 May 2018 11:02:34
To: info@clevehillsolar.com
Subject: Consultation in Respect of Proposed Development - the Cleve Hill Solar Park
Importance: Normal
Attachments:
CHSP S42 Attachments.zip ;

---

31 May 2018

Statutory Consultation under Section 42 of the Planning Act 2008 and Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Dear Sir/Madam,

You have been identified as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This statutory consultation commences on 31st May 2018 and closes on Friday 13th July 2018.

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- Preliminary Environmental Information Report (PEIR) - Non-technical summary, which can be accessed here: https://www.clevehillsolar.com/s/Non-Technical-Summary.zip
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Yours faithfully,

Hugh Brennan

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

171107_cleve-hill-email-footers_V2 (002)

Freepost: Cleve Hill Solar
T: 0800 328 2850
E: info@clevehillsolar.com
W: www.clevehillsolar.com

Archived: 07 November 2018 17:19:08
From: info@clevehillsolar.com
Sent: 12 July 2018 16:10:50
To: info@clevehillsolar.com
Subject: Reminder of Statutory Consultation Deadline Friday 13 July
Importance: Normal
Attachments:
CHSP S42 Attachments.zip ;

Dear Sir/Madam,

This is a reminder that you have been identified as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Please be reminded that this statutory consultation closes on **Friday 13 July 2018**.

Should you have any questions or queries regarding the information provided or process, please don't hesitate to contact the team at the details provided below.

Yours faithfully,

Hugh Brennan

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

171107_cleve-hill-email-footers_V2 (002)

Freepost: Cleve Hill Solar
T: 0800 328 2850
E: info@clevehillsolar.com
W: www.clevehillsolar.com

From: info@clevehillsolar.com <info@clevehillsolar.com>
Sent: 31 May 2018 11:02
To: 'info@clevehillsolar.com' <info@clevehillsolar.com>
Subject: Consultation in Respect of Proposed Development – the Cleve Hill Solar Park

31 May 2018

Statutory Consultation under Section 42 of the Planning Act 2008 and Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Dear Sir/Madam,

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Should you have any questions or queries regarding the information provided or process, please don't hesitate to contact the team at the details provided below.

Yours faithfully,

Hugh Brennan

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

171107_cleve-hill-email-footers_V2 (002)

Freepost: Cleve Hill Solar
T: 0800 328 2850
E: info@clevehillsolar.com
W: www.clevehillsolar.com

Archived: 07 November 2018 17:19:27
From: info@clevehillsolar.com
Sent: 17 July 2018 10:46:49
To: info@clevehillsolar.com
Subject: Statutory Consultation Deadline Passed Friday 13 July
Importance: Normal
Attachments:
CHSP S42 Attachments.zip ;

Dear Sir/Madam,

This is a reminder that you have been identified as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environment Impact Assessment) Regulations. Please be advised that this statutory consultation period **closed on Friday 13 July 2018**.

According to our records, we have not received a response from your organisation. If you were still intending to respond to our section 42 notice please could you do so as soon as possible.

Should you have any questions or queries regarding the information provided or process, please don't hesitate to contact the team at the details provided below.

Yours faithfully,

Hugh Brennan

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

171107_cleve-hill-email-footers_V2 (002)

Freepost: Cleve Hill Solar
T: 0800 328 2850
E: info@clevehillsolar.com
W: www.clevehillsolar.com

From: info@clevehillsolar.com <info@clevehillsolar.com>
Sent: 12 July 2018 16:14
To: 'info@clevehillsolar.com' <info@clevehillsolar.com>
Subject: Reminder of Statutory Consultation Deadline Friday 13 July

Dear Sir/Madam,

This is a reminder that you have been identified as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Please be reminded that this statutory consultation closes on **Friday 13 July 2018**.

Should you have any questions or queries regarding the information provided or process, please don't hesitate to contact the team at the details provided below.

Yours faithfully,

Hugh Brennan

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

171107_cleve-hill-email-footers_V2 (002)

Freepost: Cleve Hill Solar
T: 0800 328 2850
E: info@clevehillsolar.com
W: www.clevehillsolar.com

From: info@clevehillsolar.com <info@clevehillsolar.com>
Sent: 31 May 2018 11:02
To: 'info@clevehillsolar.com' <info@clevehillsolar.com>
Subject: Consultation in Respect of Proposed Development – the Cleve Hill Solar Park

31 May 2018

Statutory Consultation under Section 42 of the Planning Act 2008 and Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Dear Sir/Madam,

You have been identified as a consultee for the purposes of section 42 of the Planning Act 2008 and/or Regulation 13 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This statutory consultation commences on 31st May 2018 and closes on Friday 13th July 2018.

Please see the following consultation documents attached for your information and response:

- Cover letter

- Preliminary Environmental Information Report (PEIR), which can be accessed here: https://drive.google.com/drive/folders/1WBTM7mnU7RY_sSZeNtjj59QGVMEGwL4E?usp=sharing
- Preliminary Environmental Information Report (PEIR) - Non-technical summary, which can be accessed here: https://www.clevehillsolar.com/s/Non-Technical-Summary.zip
- Cleve Hill Solar Park Site Plans
- A notice publicised in accordance with Section 48 of the Act. This notice includes details of public consultation events and locations where the consultation material can be inspected free of charge.

Should you have any questions or queries regarding the information provided or process, please don't hesitate to contact the team at the details provided below.

Yours faithfully,

Hugh Brennan

Managing Director

For and on behalf of Cleve Hill Solar Park Ltd

171107_cleve-hill-email-footers_V2 (002)

Freepost: Cleve Hill Solar
T: 0800 328 2850
E: info@clevehillsolar.com
W: www.clevehillsolar.com

Consultation Report

Appendix 7: Section 47, Duty to Consult Local Community – Statement of Community Consultation Cover Letter to Planning Authorities

CLEVE HILL
SOLAR PARK

James Freeman
Head of Planning
Planning Services
Swale Borough Council
Swale House
East Street
Sittingbourne
Kent
ME10 3HT

02 October 2017

Dear Mr. Freeman,

R.e: Section 47 Planning Act (2008) Consultation on Draft Statement of Community Consultation with Local Planning Authorities under Section 43(1).

Cleve Hill Solar Park Ltd is intending to develop land on the North Kent coast as a solar farm development to be known as the Cleve Hill Solar Park ('Solar Park'). Due to its proposed generation capacity being over 50MW, the Solar Park will be classified as a Nationally Significant Energy Project (NSIP) and so must comply with the new development consent order regime under the Planning Act 2008 ('2008 Act').

As part of our duty to consult the local community on the proposals for the Solar Park, we have prepared a draft Statement of Community Consultation (SoCC). The draft SoCC outlines how communities can engage throughout the development process and explains how Cleve Hill Solar Park Ltd intends to consult with communities in vicinity of the Solar Park.

Host and neighbouring local authorities have an important role in the Act 2008 process. In accordance with Section 47(2) of the 2008 Act, Cleve Hill Solar Park Ltd is required to consult with the host local authorities as set out under Section 43(1) of the 2008 Act on the draft SoCC. As a host authority in which the development is situated, we wish to invite comments to the draft SoCC from Swale Borough Council.

Cleve Hill Solar Park Ltd recognise effective and appropriate consultation to be a vital part of the development of the Solar Park. As a local authority, we strongly welcome local knowledge and insight from Swale Borough Council to advise us on how best community consultation should be conducted for the Solar Park. In particular, we seek your guidance to inform:

- Section 8. Public Consultation: We welcome your comments and suggestions to where and when consultation events should take place. We have suggested holding consultation events in Graveney, Seasalter and Faversham. Also, we would like to ensure that we have included the correct locations of local authority offices for the display of any hard-copy project materials.
- Section 10. How Will We Consult? We welcome your thoughts and suggestions on any additional methods to consult with communities or hard to reach areas to those which we have listed.

In accordance with Section 47(3) of the 2008 Act, a statutory 28 days for comments is provided, commencing on the day after the day on which the local authority receives the

consultation documents. Therefore, we kindly request all comments to the draft SoCC to be received by **31 October 2017**.

Following receipt of all comments from the local authorities, we will seek to incorporate comments and suggestions and, as required in Section 47(5) of the 2008 Act, demonstrate the regard had to all comments received.

Cleve Hill Solar Park Ltd intends to publicise the SoCC at the beginning of November 2017, at which point the project will enter the public domain.

We invite all comments to be received by 31 October 2017 through the following contact details:

Postal Address:
Counter Context
St. James House
Vicar Lane
Sheffield
S1 2EX

Project email: info@clevehillsolar.com

Please do not hesitate to get in contact with the project team at any time using the details provided or via our project phone line: 0800 328 2850

Yours Sincerely,

[redacted]

Hugh Brennan
Managing Director
Hive Energy
For and on behalf of Cleve Hill Solar Park Ltd

CLEVE HILL
SOLAR PARK

Tom Marchant
Head of Strategic Planning and Policy Environment, Planning and Enforcement
Kent County Council
Invicta House
Maidstone
Kent
ME14 1XX

02 October 2017

Dear Mr. Marchant,

R.e: Section 47 Planning Act (2008) Consultation on Draft Statement of Community Consultation with Local Planning Authorities under Section 43(1).

Cleve Hill Solar Park Ltd is intending to develop land on the North Kent coast as a solar farm development to be known as the Cleve Hill Solar Park ('Solar Park'). Due to its proposed generation capacity being over 50MW, the Solar Park will be classified as a Nationally Significant Energy Project (NSIP) and so must comply with the development consent order regime under the Planning Act 2008 ('2008 Act').

As part of our duty to consult the local community on the proposals for the Solar Park, we have prepared a draft Statement of Community Consultation (SoCC). The draft SoCC outlines how communities can engage throughout the development process and explains how Cleve Hill Solar Park Ltd intends to consult with communities in vicinity of the Solar Park.

Host and neighbouring local authorities have an important role in the Act 2008 process. In accordance with Section 47(2) of the 2008 Act, Cleve Hill Solar Park Ltd is required to consult with the host local authorities as set out under Section 43(1) of the 2008 Act on the draft SoCC. As a host authority in which the development is situated, we wish to invite comments to the draft SoCC from Kent County Council.

Cleve Hill Solar Park Ltd recognise effective and appropriate consultation to be a vital part of the development of the Solar Park. As a local authority, we strongly welcome local knowledge and insight from Kent County Council to advise us on how best community consultation should be conducted for the Solar Park. In particular, we seek your guidance to inform:

- Section 8. Public Consultation: We welcome your comments and suggestions to where and when consultation events should take place. We have suggested holding consultation events in Graveney, Seasalter and Faversham. Also, we would like to ensure that we have included the correct locations of local authority offices for the display of any hard-copy project materials.
- Section 10. How Will We Consult? We welcome your thoughts and suggestions on any additional methods to consult with communities or hard to reach areas to those which we have listed.

In accordance with Section 47(3) of the 2008 Act, a statutory 28 days for comments is provided, commencing on the day after the day on which the local authority receives the consultation documents. Therefore, we kindly request all comments to the draft SoCC to be received by **31 October 2017**.

Following receipt of all comments from the local authorities, we will seek to incorporate comments and suggestions and, as required in Section 47(5) of the 2008 Act, demonstrate the regard had to all comments received.

Cleve Hill Solar Park Ltd intends to publicise the SoCC at the beginning of November 2017, at which point the project will enter the public domain.

We invite all comments to be received by 31 October 2017 through the following contact details:

Postal Address:
Counter Context
St. James House
Vicar Lane
Sheffield
S1 2EX

Project email: info@clevehillsolar.com

Please do not hesitate to get in contact with the project team at any time using the details provided or via our project phone line: 0800 328 2850

Yours Sincerely,

Hugh Brennan
Managing Director
Hive Energy
For and on behalf of Cleve Hill Solar Park Ltd

CLEVE HILL
SOLAR PARK

Cherry Jones
Planning Applications Manager
Canterbury City Council
Military Road
Canterbury
Kent
CT1 1YW

02 October 2017

Dear Ms. Jones,

R.e: Section 47 Planning Act (2008) Consultation on Draft Statement of Community Consultation with Local Planning Authorities.

Cleve Hill Solar Park Ltd is intending to develop land on the North Kent coast as a solar farm development to be known as the Cleve Hill Solar Park ('Solar Park'). Due to its proposed generation capacity being over 50MW, the Solar Park will be classified as a Nationally Significant Energy Project (NSIP) and so must comply with the development consent order regime under the Planning Act 2008 ('2008 Act').

As part of our duty to consult the local community on the proposals for the Solar Park, we have prepared a draft Statement of Community Consultation (SoCC). The draft SoCC outlines how communities can engage throughout the development process and explains how Cleve Hill Solar Park Ltd intends to consult with communities in vicinity of the Solar Park.

Host and neighbouring local authorities have an important role in the Act 2008 process. In accordance with Section 47(2) of the 2008 Act, Cleve Hill Solar Park Ltd is required to consult with the host local authorities as set out under Section 43(1) of the 2008 Act on the draft SoCC. Whilst Canterbury City Council is a neighbouring rather than a host local authority, due to the proximity of the authority boundary to Cleve Hill Solar Park, it is appropriate to consult Canterbury City Council informally on the draft SoCC.

Cleve Hill Solar Park Ltd recognise effective and appropriate consultation to be a vital part of the development of the Solar Park. As a local authority, we strongly welcome local knowledge and insight from Canterbury City Council to advise us on how best community consultation should be conducted for the Solar Park. In particular, we seek your guidance to inform:

- Section 8. Public Consultation: We welcome your comments and suggestions to where and when consultation events should take place. We have suggested holding consultation events in Graveney, Seasalter and Faversham. Also, we would like to ensure that we have included the correct locations of local authority offices for the display of any hard-copy project materials.
- Section 10. How Will We Consult? We welcome your thoughts and suggestions on any additional methods to consult with communities or hard to reach areas to those which we have listed.

In accordance with Section 47(3) of the 2008 Act, a statutory 28 days for comments is provided, commencing on the day after the day on which the local authority receives the consultation documents. Therefore, we kindly request all comments to the draft SoCC to be received by **31 October 2017**.

Following receipt of all comments from the local authorities, we will seek to incorporate comments and suggestions and, as required in Section 47(5) of the 2008 Act, demonstrate the regard had to all comments received.

Cleve Hill Solar Park Ltd intends to publicise the SoCC at the beginning of November 2017, at which point the project will enter the public domain.

We invite all comments to be received by 31 October 2017 through the following contact details:

Postal Address:
Counter Context
St. James House
Vicar Lane
Sheffield
S1 2EX

Project email: info@clevehillsolar.com

Please do not hesitate to get in contact with the project team at any time using the details provided or via our project phone line: 0800 328 2850

Yours sincerely,

[redacted]

Hugh Brennan
Managing Director
Hive Energy
For and on behalf of Cleve Hill Solar Park Ltd

Archived: 07 November 2018 17:27:15
From: [redacted]
Sent: 02 October 2017 17:03:24
To: [redacted]
Cc: [redacted]
Subject: Cleve Hill Solar Park: Draft SoCC Consultation
Importance: Normal
Attachments:
021017_Swale BC_Draft_SoCC.pdf 71002 Cleve Hill SOCC A3_V3.13.pdf

---

Dear James

Cleve Hill Solar Park: Draft Statement of Community Consultation (SoCC) Consultation

Please find attached the draft SoCC and an associated letter relating to Cleve Hill Solar Park.

The 28 day consultation period relating to this document will begin tomorrow, therefore please respond with any comments no later than **31 October 2017**.

Following receipt of comments we will incorporate any changes into a Final SoCC which we expect to publish in early November 2017.

If you have any questions regarding this process please get in touch.

Regards,

Clare
[redacted]

Tel: 01904 715470
Email: [redacted]

Arcus Consultancy Services Ltd
1C Swinegate Court East
3 Swinegate
York
YO1 8AJ

www.arcusconsulting.co.uk

Archived: 07 November 2018 17:23:29
From: [redacted]
Sent: 02 October 2017 17:03:55
To: [redacted]
Subject: Cleve Hill Solar Park: Draft SoCC Consultation
Importance: Normal
Attachments:
021017_Canterbury City_Draft_SoCC.pdf 71002 Cleve Hill SOCC A3_V3.13.pdf

---

Dear Cherry

Cleve Hill Solar Park: Draft Statement of Community Consultation (SoCC) Consultation

Please find attached the draft SoCC and an associated letter relating to Cleve Hill Solar Park.

The 28 day consultation period relating to this document will begin tomorrow, therefore please respond with any comments no later than **31 October 2017**. We appreciate Canterbury are the neighbouring authority to the site and as such there is no statutory obligation to respond to the SOCC, however given the sites proximity to Canterbury we would welcome your input.

Following receipt of comments we will incorporate any changes into a Final SoCC which we expect to publish in early November 2017.

If you have any questions regarding this process please get in touch.

Regards,

Clare

From: [redacted]
Sent: 02 October 2017 15:48

[redacted]

Tel: [redacted]
Email: [redacted]

Arcus Consultancy Services Ltd
1C Swinegate Court East
3 Swinegate
York
YO1 8AJ

www.arcusconsulting.co.uk

Archived: 07 November 2018 17:23:51
From: [redacted]
Sent: 02 October 2017 17:03:07
To: [redacted]
Cc: [redacted]
Subject: Cleve Hill Solar Park: Draft SoCC Consultation
Importance: Normal
Attachments:
021017_Kent_CC_Draft_SoCC.pdf 71002 Cleve Hill SOCC A3_V3.13.pdf

---

Dear Tom

Cleve Hill Solar Park: Draft Statement of Community Consultation (SoCC) Consultation

Please find attached the draft SoCC and an associated letter relating to Cleve Hill Solar Park.

The 28 day consultation period relating to this document will begin tomorrow, therefore please respond with any comments no later than **31 October 2017**.

Following receipt of comments we will incorporate any changes into a Final SoCC which we expect to publish in early November 2017.

If you have any questions regarding this process please get in touch.

Regards,

Clare

[redacted]

[redacted]

Arcus Consultancy Services Ltd
1C Swinegate Court East
3 Swinegate
York
YO1 8AJ

www.arcusconsulting.co.uk

Consultation Report

Appendix 8: Section 47, Duty to Consult Local Community – Draft Statement of Community Consultation

1. Introduction

Cleve Hill Solar Park Ltd is intending to develop land on the north Kent coast as a solar farm development to be known as Cleve Hill Solar Park (the "Solar Park"). Cleve Hill Solar Park Ltd would welcome your views about our proposals for the Solar Park.

This document, known as a Statement of Community Consultation ("SoCC"), outlines the opportunities available for you to engage throughout the process. It also explains how Cleve Hill Solar Park Ltd intends to consult with you, the local community, during the development of the Solar Park. Cleve Hill Solar Park Ltd recognises consultation to be a vital stage in the development of our proposals, and this will be undertaken in accordance with section 47 of the Planning Act 2008.

We want to listen to your views and work with you to develop our proposals for the Solar Park. This will allow us to develop our plans responsibly and in a manner that supports local community interests.

2. About Us

Cleve Hill Solar Park Ltd is a joint venture between two solar industry specialists – Hive Energy Ltd and WIRSOL Energy Ltd.

Founded in 2010, Hive Energy has established itself as the second largest developer of solar parks in the UK, responsible for the installation of 300 MW of capacity across the country and providing enough clean electricity for over 100,000 homes.

Wirsol Energy is a highly experienced solar park developer, constructor and operator across both the UK and Australia. Combining the installation of world-class components and the implementation of rigorous operation and maintenance processes, Wirsol have both built and operate 24 solar parks across the UK. Their success has been underpinned by the formation of long-lasting relationships with local communities and investors.

3. Cleve Hill Solar Park

The proposals for the Solar Park include:

- A solar array, which will provide electricity to the national grid to power UK homes
- An anticipated potential output from the solar array of over 50 megawatts (MW)
- Electrical connection infrastructure, where capacity is available at the Cleve Hill onshore substation
- The potential for an energy storage solution
- Land for ecological mitigation, with particular consideration to bird species

The development will be sited on approximately 360 ha (890 acres) of land on the north Kent coast, approximately 2 km northeast of Faversham and 5 km west of Whitstable, ME13 9EE.

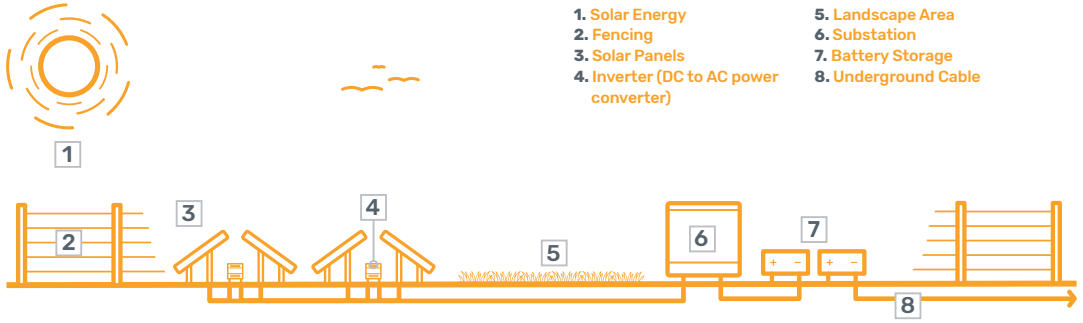


Figure not to scale and for indicative purposes only.

Electricity generated by the solar array is expected to be transferred through an on-site substation to the national grid via the existing London Array Cleve Hill Substation, which is located immediately adjacent to the site.

Benefits of the Solar Park:

- **A new mix of energy generation is needed to keep the lights on in the UK. It is important for clean technologies to help replace lost capacity while reducing carbon emissions.**
- **Solar energy is free, natural and a never-ending resource.**
- **Subsidies no longer play any role in solar development and so the Cleve Hill Solar Park will not receive any government funding.**

Figure 1: Components of a typical solar farm

1. Solar Energy
2. Fencing
3. Solar Panels
4. Inverter (DC to AC power converter)
5. Landscape Area
6. Substation
7. Battery Storage
8. Underground Cable

4. The Planning Process

Due to its proposed generation capacity being over 50 MW, the Solar Park will be classified as a Nationally Significant Energy Project (NSIP). Therefore, in order for the development to be authorised, Cleve Hill Solar Park Ltd must make an application to the Secretary of State for Business, Energy and Industrial Strategy (BEIS) for a Development Consent Order (DCO). This application will be examined by the Planning Inspectorate (PINS), the agency responsible for managing the examination process for NSIPs, who will make a recommendation to the Secretary of State (SoS).

Once PINS has received the DCO application, they will consider whether to accept the application for examination. To be accepted, we must satisfy PINS that our pre-application consultation, both with statutory consultees (such as the local planning authorities and Natural England) and local communities, has been undertaken.

To help demonstrate this to PINS, we will submit a Consultation Report alongside the DCO application, outlining how the consultation process has been carried out in accordance with the Planning Act 2008. This report will contain details of the consultation methodology and the feedback submitted in response to the consultation. Explanation will also be provided as to how your feedback has influenced our proposals.

Following PINS' examination, which will include considering valid representations made by stakeholders, there will be a determination of the application by the SoS. If the application is approved, the DCO will be granted to authorise the construction and operation of the Solar Park.

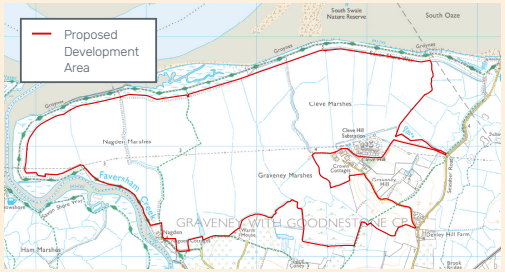
5. What Will We Consult On?

Cleve Hill Solar Park Ltd will be seeking feedback on all aspects of our plans for the Solar Park. This will involve asking local community members to give us their views about our proposals. For example, we will be seeking feedback to help develop our proposals regarding issues such as, but not limited to:

- **Short term and temporary impacts during construction,** such as upon wildlife and local residents.
- **Long term operational impacts,** such as upon wildlife, landscape and views.
- **Benefits,** such as contributing towards low carbon energy production and providing security of energy supply.

The parameters of the Solar Park, known as the Project Envelope, will be discussed at community consultation events. These include the size, scale and construction methodologies of the project. More information will become available regarding these aspects as our proposals develop.

Figure 2: Proposed Solar Park site



Reproduced from Ordnance Survey digital map data.

6. Who Will We Consult?

This consultation is open to anyone who may be interested or in any way feel impacted by our proposals to develop the Solar Park. Our communication channels (detailed later in this SoCC) can be used by interested parties or individuals to get in touch with us to find out more information and comment on our proposals.

Cleve Hill Solar Park Ltd has also spoken to the local planning authorities for the site and surrounding communities to better understand the area and help us to proactively engage with local stakeholders. This community mapping of the local area has informed a consultation area to guide our future engagement.

Core Consultation Zone

A core consultation zone has been agreed. This zone centres on the proposed development site and extends outwards to include the nearest villages of Graveney, Goodnestone, Harty (Sheppey) and Oare, as well as the built-up area of Faversham and the majority of Seasalter. Properties within the core consultation zone will directly receive our consultation materials, such as leaflets and newsletters.

Wider Consultation Area

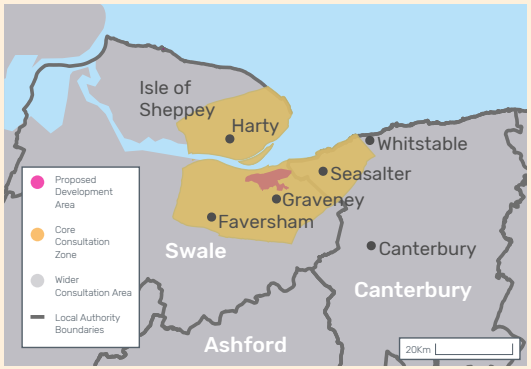
Cleve Hill Solar Park Ltd recognises that there may be some interested individuals or parties that do not live within the agreed core consultation zone. We are committed to ensuring that these people are still aware of the Solar Park proposals and their opportunities to get involved. Means such as media advertising will be used to notify residents within the wider local area of our consultation. Informative consultation materials will also be available to view and collect from identified community access points outside of our core consultation zone.

We will be visiting areas within the consultation zone throughout the development of the proposals to meet with communities, provide information and listen to feedback on the proposals.

Throughout the development of our proposals for the Solar Park, we will continue to work with local planning authorities to identify any relevant community groups, business organisations and area committees who should be consulted. As well as the community consultation, we will be discussing the project with a range of statutory consultees, including:

- Owners, tenants and occupiers of the land included within the DCO application
- Environmental groups, including: Natural England, Environment Agency, Kent Wildlife Trust etc.
- Interest groups and organisations
- Local Authorities and Parish Councils

Figure 3: Consultation zone



7. Environmental Information

Cleve Hill Solar Park Ltd will undertake an Environmental Impact Assessment (EIA) for the Solar Park. The methodology and scope of the EIA will be agreed with the relevant regulatory and environmental bodies, the SoS, and your local planning authority.

The following reports will be consulted on as part of the EIA process and as the DCO application is prepared:

Scoping Report – The Scoping Report will present the Project Envelope, and will be informed by desk-based research on the proposed development site's existing environment. The Report will describe the processes we will undertake to assess any potential impacts to this existing environment. Feedback on this document from the local planning authorities and statutory consultees will result in a Scoping Opinion. A copy of the Scoping Report and Scoping Opinion will be made available for public inspection.

Preliminary Environmental Information Report (PEIR) – The PEIR will build upon the findings from the previous scoping documents and the feedback received through consultation. It will incorporate findings of the surveys and environmental assessments that have been carried out. This will enable consultees to develop an informed view of the potential impacts the Solar Park may have on the local environment. In our second phase of consultation, we will be seeking feedback on the findings of the PEIR.

Environmental Statement (ES) – The ES will advance the content of the PEIR and continue to incorporate the responses from the consultation and results of the surveys undertaken. It will also describe any changes to the project and any mitigation measures that need to be implemented. The ES will form part of the DCO application for submission. Copies of these reports will be made available as we conduct the public consultation.

CLEVE HILL SOLAR PARK

PROPOSED SOLAR PHOTOVOLTAIC ARRAY
Statement of Community Consultation
OCTOBER 2017

Published in accordance with
Section 47(6) of the Planning Act 2008

Contact us

Our consultation team are on hand to take your questions and register your comments on the proposals for Cleve Hill Solar Park.

You can get in touch by:

Writing to us at:
Freepost: Cleve Hill Solar

Emailing us at:
info@clevehillsolar.com

Calling our Freephone information line:
0800 328 2850

Visiting our website at:
www.clevehillsolar.com

8. Public Consultation

The consultation process for the Solar Park will be held over two phases.

Phase One Public Consultation

Phase One of the public consultation is proposed to begin in Autumn 2017 and will last for at least 28 days. This non-statutory consultation phase will formally introduce community members to our proposals for the Solar Park. We will seek to gather local knowledge to help develop and refine our proposals.

Phase One consultation will include a round of community consultation events, which are open to all interested members of the public. Attendees will have the opportunity to view informative materials on the project, discuss the proposals with members of the team and provide their feedback on the proposals. Details of the first round of events are below.

Phase Two Public Consultation

Phase Two of our public consultation is proposed to take place in Spring 2018 and run for at least 28 days. This statutory consultation, in accordance with Section 47 of the Planning Act, will allow us to update you on our project plans, including how the feedback we received in Phase One has influenced our proposals for the Solar Park . At this stage, we will also be able to consult on our PEIR, as described in Section 7 of this document. More specific details of Phase Two consultation will be publicised through the appropriate channels listed in Section 10.

Ongoing Consultation

Any interested parties are welcome to get in touch with us ahead of the consultation process formally opening. Our contact details are listed at the end of this SoCC. From now until our application is submitted, we will consider the feedback and comments we receive on an ongoing basis, and incorporate within our proposals where possible.

You will also have the opportunity to formally comment on our proposals for the Solar Park when the DCO application is submitted to PINS. Guidance on the process can be found on the PINS website at:

http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice

Consultation Reporting

As part of our consultation process, we will publish a Consultation Report that:

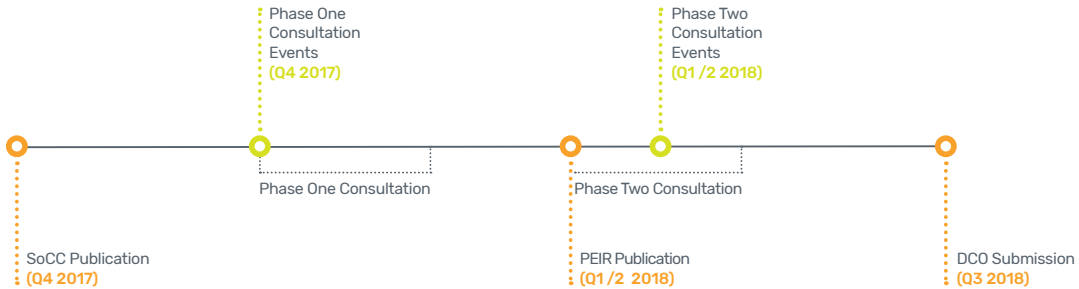
- Describes our consultation process
- Explains how we have satisfied and adhered to legal requirements
- Details how we have worked with your local planning authorities to ensure our consultation is suitable for your area
- Provides a summary of the feedback and consultation responses we have received
- Responds to the feedback we have received, including explaining how it has influenced our proposals

Phase One Event Details

We would like to host our Phase One community consultation events during the following period:
27/11/2017 – 08/12/2017

We are planning on holding events in Graveney, Seasalter and Faversham. To your knowledge, are there any dates or locations that we should prioritise or avoid?

9. Consultation Timeline



10. How Will We Consult?

Face-to-Face

Consultation events will be held, offering you the opportunity to discuss our proposals with us and provide your feedback.

Stakeholder meetings and briefing sessions may be arranged with your local Parish councils and with key local stakeholder groups.

Literature

Stakeholder briefing packs will be provided to elected members at the start of the consultation to introduce the scheme and inform them of how their constituents will be engaged with during the process.

Consultation leaflets will be distributed to all properties within the core consultation zone and will be available at key locations in the wider consultation zone. Leaflets will provide information on the proposals and details of how the local community can have their say.

Newsletters will be available online and regularly distributed within the core consultation zone to update residents on the plans and proposals.

Open Communication

A Freephone information line is available for interested parties to call to ask questions and provide feedback: **0800 328 2850**

A project email address is also open for questions and comments: **info@clevehillsolar.com**

Publicly Available Information

A dedicated project website is live for you to find out more information and provide your feedback: **www.clevehillsolar.com**

Local media publications will publish adverts to inform local communities of our consultation.

Local Authority Contacts

Hard copies of this document and our future consultation leaflets will be available to you at the following council offices:

Swale Borough Council
- Swale House East Street, Sittingbourne, Kent ME10 3HT
- High Street, Sheerness, Kent ME12 1NL
- Alexander Centre, Preston Street, Faversham, Kent ME13 8NY

Kent County Council
County Hall, Maidstone, Kent, ME14 1XQ

Canterbury City Council
Military Road, Canterbury, Kent, CT1 1YW

Please advise us of your preferred council office address.

All graphics for illustrative purposes only

Consultation Report

Appendix 9: Section 47, Duty to Consult Local Community – Final Statement of Community Consultation (09 November 2017)

1. Introduction

Cleve Hill Solar Park Ltd is intending to develop land on the north Kent coast as a solar farm development to be known as Cleve Hill Solar Park (the "Solar Park"). Cleve Hill Solar Park Ltd would welcome your views about our proposals for the Solar Park.

This document, known as a Statement of Community Consultation ("SoCC"), outlines the opportunities available for you to engage throughout the process. It also explains how Cleve Hill Solar Park Ltd intends to consult with you, the local community, during the development of the Solar Park. Cleve Hill Solar Park Ltd recognises consultation to be a vital stage in the development of our proposals, and this will be undertaken in accordance with section 47 of the Planning Act 2008.

We want to listen to your views and work with you to develop our proposals for the Solar Park. This will allow us to develop our plans responsibly and in a manner that supports local community interests.

2. About Us

Cleve Hill Solar Park Ltd is a joint venture between two solar industry specialists – Hive Energy Ltd and WIRSOL Energy Ltd.

Founded in 2010, Hive Energy has established itself as the second largest developer of solar parks in the UK, responsible for the installation of 300 megawatts (MW) of capacity across the country and providing enough clean electricity for over 100,000 homes.

Wirsol Energy is a highly experienced solar park developer, constructor and operator across both the UK and Australia. Combining the installation of world-class components and the implementation of rigorous operation and maintenance processes, Wirsol have both built and operate 24 solar parks across the UK. Their success has been underpinned by the formation of long-lasting relationships with local communities and investors.

3. Cleve Hill Solar Park

The proposals for the Solar Park include:

- A solar array, which will provide electricity to the national grid to power UK homes
- An anticipated potential output from the solar array of over 50 MW
- Electrical connection infrastructure, where capacity is available at the existing Cleve Hill onshore substation
- The potential for an energy storage solution
- Land for ecological mitigation, with particular consideration to bird species

The development will be sited on approximately 360 ha (890 acres) of land on the north Kent coast, approximately 2 km northeast of Faversham and 5 km west of Whitstable, ME13 9EE.

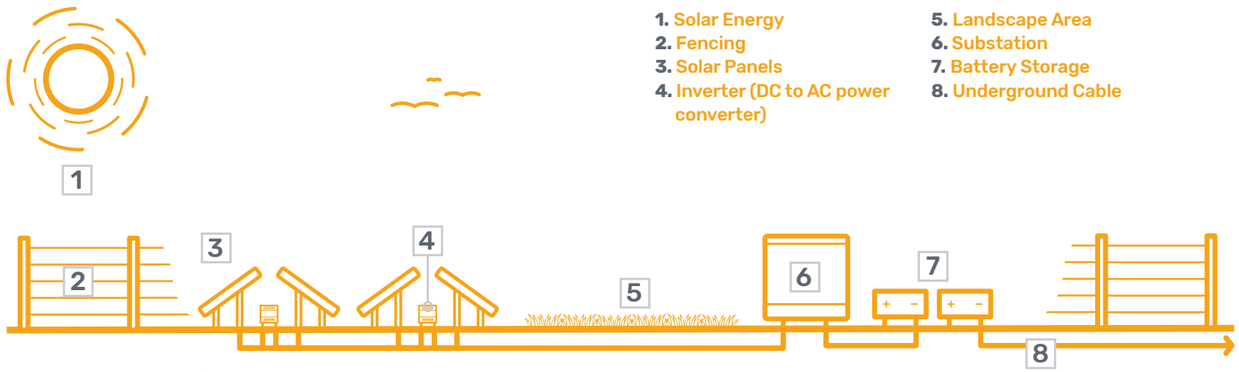


Figure not to scale and for indicative purposes only.

Electricity generated by the solar array is expected to be transferred through an on-site substation to the national grid via the existing London Array Cleve Hill Substation, which is located immediately adjacent to the site.

Benefits of the Solar Park:

- **A new mix of energy generation is needed to keep the lights on in the UK. It is important for clean technologies to help replace lost capacity while reducing carbon emissions.**
- **Solar energy is free, natural and a never-ending resource.**
- **Subsidies no longer play any role in solar development and so the Cleve Hill Solar Park will not receive any government funding.**

Figure 1: Components of a typical solar farm

1. Solar Energy
2. Fencing
3. Solar Panels
4. Inverter (DC to AC power converter)
5. Landscape Area
6. Substation
7. Battery Storage
8. Underground Cable

4. The Planning Process

Due to its proposed generation capacity being over 50 MW, the Solar Park will be classified as a Nationally Significant Energy Project (NSIP). Therefore, in order for the development to be authorised, Cleve Hill Solar Park Ltd must make an application to the Secretary of State for Business, Energy and Industrial Strategy (BEIS) for a Development Consent Order (DCO). This application will be examined by the Planning Inspectorate (PINS), the agency responsible for managing the examination process for NSIPs, who will make a recommendation to the Secretary of State (SoS).

Once PINS has received the DCO application, they will consider whether to accept the application for examination. To be accepted, we must satisfy PINS that our pre-application consultation, both with statutory consultees (such as the local planning authorities and Natural England) and local communities, has been undertaken.

To help demonstrate this to PINS, we will submit a Consultation Report alongside the DCO application, outlining how the consultation process has been carried out in accordance with the Planning Act 2008. This report will contain details of the consultation methodology and the feedback submitted in response to the consultation. Explanation will also be provided as to how your feedback has influenced our proposals.

Following PINS' examination, which will include considering valid representations made by stakeholders, there will be a determination of the application by the SoS. If the application is approved, the DCO will be granted to authorise the construction and operation of the Solar Park.

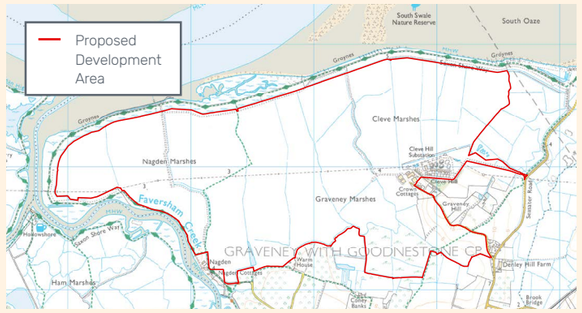
5. What Will We Consult On?

Cleve Hill Solar Park Ltd will be seeking feedback on all aspects of our plans for the Solar Park. This will involve asking local community members to give us their views about our proposals. For example, we will be seeking feedback to help develop our proposals regarding issues such as, but not limited to:

- **Short term and temporary impacts during construction,** such as upon wildlife and local residents.
- **Long term operational impacts,** such as upon wildlife, landscape and views.
- **Benefits,** such as contributing towards low carbon energy production and providing security of energy supply.

The parameters of the Solar Park, known as the Project Envelope, will be discussed at community consultation events. These include the size, scale and construction methodologies of the project. More information will become available regarding these aspects as our proposals develop.

Figure 2: Proposed Solar Park site



Reproduced from Ordnance Survey digital map data.

6. Who Will We Consult?

This consultation is open to anyone who may be interested or in any way feel impacted by our proposals to develop the Solar Park. Our communication channels (detailed later in this SoCC) can be used by interested parties or individuals to get in touch with us to find out more information and comment on our proposals.

Cleve Hill Solar Park Ltd has also spoken to the local planning authorities for the site and surrounding communities to better understand the area and help us to proactively engage with local stakeholders. This community mapping of the local area has informed a consultation area to guide our future engagement.

Core Consultation Zone

A core consultation zone has been agreed. This zone centres on the proposed development site and extends outwards to include the nearest villages of Graveney, Goodnestone, Harty (Sheppey) and Oare, as well as the built-up area of Faversham and the majority of Seasalter. Properties within the core consultation zone will directly receive our consultation materials, such as leaflets and newsletters.

Wider Consultation Area

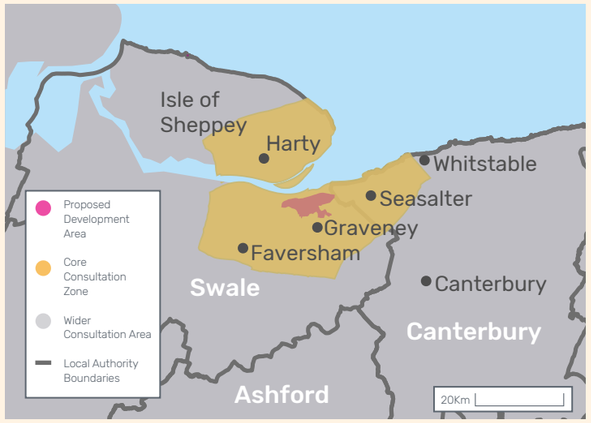
Cleve Hill Solar Park Ltd recognises that there may be some interested individuals or parties that do not live within the agreed core consultation zone. We are committed to ensuring that these people are still aware of the Solar Park proposals and their opportunities to get involved. Means such as media advertising will be used to notify residents within the wider local area of our consultation. Informative consultation materials will also be available to view and collect from identified community access points outside of our core consultation zone.

We will be visiting areas within the consultation zone throughout the development of the proposals to meet with communities, provide information and listen to feedback on the proposals.

Throughout the development of our proposals for the Solar Park, we will continue to work with local planning authorities to identify any relevant community groups, business organisations and area committees who should be consulted. As well as the community consultation, we will be discussing the project with a range of statutory consultees, including:

- Owners, tenants and occupiers of the land included within the DCO application
- Environmental groups, including: Natural England, Environment Agency, Kent Wildlife Trust etc.
- Interest groups and organisations
- Local authorities and parish councils

Figure 3: Consultation zone



7. Environmental Information

Cleve Hill Solar Park Ltd will undertake an Environmental Impact Assessment (EIA) for the Solar Park. The methodology and scope of the EIA will be agreed with the relevant regulatory and environmental bodies, the SoS, and your local planning authority.

The following reports (listed below) will be consulted on as part of the EIA process and as the DCO application is prepared:

Scoping Report – The Scoping Report will present the Project Envelope, and will be informed by desk-based research on the proposed development site's existing environment. The report will describe the processes we will undertake to assess any potential impacts to this existing environment. Feedback on this document from the local planning authorities and statutory consultees will result in a Scoping Opinion. A copy of the Scoping Report and Scoping Opinion will be made available for public inspection.

Preliminary Environmental Information Report (PEIR) - The PEIR will build upon the findings from the previous scoping documents and the feedback received through consultation. It will incorporate findings of the surveys and environmental assessments that have been carried out. This will enable consultees to develop an informed view of the potential impacts the Solar Park may have on the local environment. In our second phase of consultation, we will be seeking feedback on the findings of the PEIR.

Environmental Statement (ES) – The ES will advance the content of the PEIR and continue to incorporate the responses from the consultation and results of the surveys undertaken. It will also describe any changes to the project and any mitigation measures that need to be implemented. The ES will form part of the DCO application for submission. Copies of these reports will be made available as we conduct the public consultation.

www.clevehillsolar.com

CLEVE HILL SOLAR PARK

CLEVE HILL SOLAR PARK

PROPOSED SOLAR PHOTOVOLTAIC ARRAY
Statement of Community Consultation
NOVEMBER 2017

Published in accordance with
Section 47(6) of the Planning Act 2008

Contact us

Our consultation team are on hand to take your questions and register your comments on the proposals for Cleve Hill Solar Park.

You can get in touch by:

Writing to us at:
Freepost: Cleve Hill Solar

Emailing us at:
info@clevehillsolar.com

Calling our Freephone information line:
0800 328 2850

Visiting our website at:
www.clevehillsolar.com

Should you require this document in large print, audio or braille then please contact us at the details provided.

8. Public Consultation

The consultation process for the Solar Park will be held over two phases.

Phase One Public Consultation

Phase One of the public consultation is proposed to begin in Autumn 2017 and will last for at least 28 days. This non-statutory consultation phase will formally introduce community members to our proposals for the Solar Park. We will seek to gather local knowledge to help develop and refine our proposals.

Phase One consultation will include a round of community consultation events, which are open to all interested members of the public. Attendees will have the opportunity to view informative materials on the project, discuss the proposals with members of the team and provide their feedback on the proposals. Details of the first round of events are below.

Phase Two Public Consultation

Phase Two of our public consultation is proposed to take place in Spring 2018 and run for at least 28 days. This statutory consultation, in accordance with Section 47 of the Planning Act, will allow us to update you on our project plans, including how the feedback we received in Phase One has influenced our proposals for the Solar Park . At this stage, we will also be able to consult on our PEIR, as described in Section 7 of this document. More specific details of Phase Two consultation will be publicised through the appropriate channels listed in Section 10.

Ongoing Consultation

Any interested parties are welcome to get in touch with us ahead of the consultation process formally opening. Our contact details are listed at the end of this SoCC. From now until our application is submitted, we will consider the feedback and comments we receive on an ongoing basis, and incorporate within our proposals where possible.

You will also have the opportunity to formally comment on our proposals for the Solar Park when the DCO application is submitted to PINS. Guidance on the process can be found on the PINS website at:

http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice

Consultation Reporting

As part of our consultation process, we will publish a Consultation Report that:

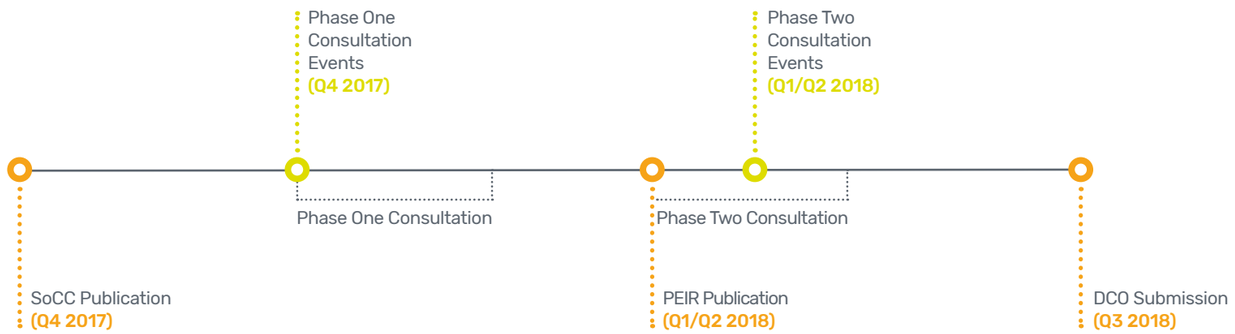
- Describes our consultation process
- Explains how we have satisfied and adhered to legal requirements
- Details how we have worked with your local planning authorities to ensure our consultation is suitable for your area
- Provides a summary of the feedback and consultation responses we have received
- Responds to the feedback we have received, including explaining how it has influenced our proposals

Phase One Event Details

We will be hosting our Phase One community consultation events on the following dates:

- **Tuesday 5 December from 5pm to 8pm,** at Sheppey Evangelical Church, Warden Bay Road, Leysdown ME12 4NA
- **Wednesday 6 December from 11:30am to 7:30pm,** at Faversham Assembly Rooms, 66 Preston St, Faversham ME13 8PG
- **Thursday 7 December from 1.30pm to 8pm,** at Graveney Village Hall, Graveney, Faversham ME13 9DN
- **Friday 8 December from 12.30pm to 4.30pm,** at Seasalter Christian Centre, Faversham Road, Whitstable, Kent, CT5 4AX

9. Consultation Timeline



10. How Will We Consult?

Face-to-Face

Consultation events will be held, offering you the opportunity to discuss our proposals with us and provide your feedback.

Stakeholder meetings and briefing sessions may be arranged with your local Parish councils and with key local stakeholder groups.

Literature

Stakeholder briefing packs will be provided to elected members at the start of the consultation to introduce the scheme and inform them of how their constituents will be engaged with during the process.

Consultation leaflets will be distributed to all properties within the core consultation zone and will be available at key locations in the wider consultation zone. Leaflets will provide information on the proposals and details of how the local community can have their say.

Newsletters will be available online and regularly distributed within the core consultation zone to update residents on the plans and proposals.

Open Communication

A Freephone information line is available for interested parties to call to ask questions and provide feedback: **0800 328 2850**

A project email address is also open for questions and comments: **info@clevehillsolar.com**

Publicly Available Information

A dedicated project website is live for you to find out more information and provide your feedback: **www.clevehillsolar.com**

Local media publications will publish adverts to inform local communities of our consultation.

Local Authority Contacts

Hard copies of this document and our future consultation leaflets will be available to you at the following public buildings and libraries:

- Faversham Library, Newton Road, Faversham, Kent, ME13 8DY
- Boughton-under-Blean Library, Village Hall, Bull Lane, Boughton-under-Blean, Faversham, Kent ME13 9AH
- Teynham Library, 131 London Road Teynham, Sittingbourne Kent ME9 9QJ
- Sheppey Gateway, 38-42 High Street, Sheerness, Kent, ME12 1NL
- Swale Borough Council, Alexander Centre, Faversham ME13 8NY
- Swale Borough Council, Swale House, East St, Sittingbourne, ME10 3HT
- Kent County Council, County Hall, Maidstone, Kent, ME14 1XQ
- Canterbury City Council, Military Road, Canterbury, CT1 1YW

All graphics for illustrative purposes only

Consultation Report

Appendix 10: Section 47 Statement of Community Consultation Advertisements

Ebiquity - ePublisher

Kent Messenger 10 Nov 2017 (Fri)

Section	Main S
Edition	Main E
Page	17
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Account	Cleve Hill Solar Park Limited (342051)

CLEVE HILL
SOLAR PARK

Statement of Community Consultation published in accordance with Section 47 (6) of the Planning Act 2008

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The development will be sited on approximately 360 ha (890 acres) of land on the north Kent coast, approximately 2 km northeast of Faversham and 5 km west of Whitstable, ME13 9EE.

Due to its proposed generation capacity being over 50 MW, the Solar Park will be classified as a Nationally Significant Infrastructure Project (NSIP). Cleve Hill Solar Park Ltd must make an application to the Secretary of State for Business, Energy and Industrial Strategy (BEIS) for a Development Consent Order (DCO) under the Planning Act (2008).

The consultation process

We have prepared a Statement of Community Consultation (SoCC) that explains how local communities will be consulted. The consultation process is designed to provide information about the project and provide the opportunity for local communities to provide feedback and inform the development of it.

This advertisement provides notice of the publication of the SoCC. A first phase of consultation will be held during November and December 2017. During this time we will host a series of community consultation events, which are open to all interested members of the public. Attendees will have the opportunity to view informative materials, discuss the proposals with members of the team and provide their feedback.

The SoCC and other consultation documents are available to review from 9 November 2017 in hard copy at the public inspection locations listed below, or alternatively can be viewed on our project website: **www.clevehillsolar.com**

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Freepost: Cleve Hill Solar

Consultation Report

Appendix 11: Stakeholder Briefing Pack (Autumn 2017)

CLEVE HILL SOLAR PARK

Introducing Our Proposals and Consultation Programme

Autumn 2017

www.clevehillsolar.com

CLEVE HILL
SOLAR PARK

1. Introduction

Cleve Hill Solar Park Ltd is presenting its proposals for a solar park by the north Kent coast.

The Cleve Hill Solar Park would generate renewable power through photovoltaic panels, providing clean power to homes across Kent.

This briefing pack has been produced to let you know who we are, what we are proposing to develop, and how you can influence our plans. If you would like to discuss any of this in further detail, you can get in touch with us using the contact details at the end of this document.

Who We Are

Cleve Hill Solar Park Ltd is a joint venture formed by two solar industry specialists – Hive Energy Ltd and Wirsol Energy Ltd.

Founded in 2010, Hive Energy has established itself as the second largest developer of solar parks in the UK, responsible for the installation of 300 Megawatts (MW) of capacity across the country and providing enough clean electricity for over 100,000 homes.

Wirsol is a highly experienced solar park developer, constructor and operator across the UK and Australia. Combining the installation of world-class components and the implementation of rigorous operation and maintenance processes, Wirsol have both built and operate 24 solar parks across the UK. Their success has been underpinned by the formation of long-lasting relationships with local communities and investors.

Saxon Shore Way

Isle Of Sheppey

Aerial View of Cleve Hill with Proposed Red Line Boundary for the Cleve Hill Solar Park

2. Why Solar Power?

The UK has THREE energy priorities:

1. Keeping the lights on by ensuring security of supply through more local energy generation.
2. Switching to a low carbon energy future.
3. Keeping prices low for customers.

Solar power is cost-effective

A quarter of the UK's generating capacity is due to close by 2018, largely due to the closure of many of the UK's power plants. A new mix of energy generation is needed to keep the lights on. Solar parks have for many years been eligible for public subsidies. That subsidy was ultimately paid for by the tax payer and consumer. However, solar developers, like Hive Energy and Wirsol Energy, have been successful in driving down the costs of construction and maintenance, such that the costs of photovoltaic solar power have dropped significantly. Solar power is now one of the most cost-effective sources of electricity generation in the UK. The Government has decided that subsidies should no longer play any role in solar development, which is good news for the consumer. **This means that the Cleve Hill Solar Park does not require government funding.** Across the UK cheap electricity from solar farms could put £425m back into consumers' pockets through reduced energy bills by 2030.[1] Energy from the sun is a free and natural resource. The operating costs of solar farms are very low in comparison.

Solar power can be stored

The UK Government wants smart and clean technologies that are home grown and low cost. This project could have a generating capacity in excess of 350MW. **This is enough clean electricity to power around 110,000 UK homes annually.**[2]

The technology is now available to install a battery storage option, **storing the sun's power** and distributing it to the grid when it's needed the most. Such technologies, enabling a more flexible power system, are estimated by the National Infrastructure Commission to save consumers up to £8bn a year by 2030. Furthermore, given the UK's underlying strengths in science and energy technology, this project could showcase the UK as a global leader in battery technology.

Solar power production is renewable and does not emit CO_2

The UK has ambitious climate change targets, and needs to significantly increase its renewable energy capacity in order to achieve the goal of reducing carbon emissions.[3] In addition, the UK has to address the gap between energy demand and generation caused by the decommissioning of old and polluting power stations which now need to be replaced.

Renewable technologies, such as solar, are required to reduce and manage the levels of carbon that are being emitted into the atmosphere. **It is estimated that for every 5MW installed, a solar farm will power 1,515 homes for a year and save 2,150 tonnes of CO_2.**[4]

Solar farms are also considered to be one of the most environmentally-friendly ways of generating power. They produce practically no noise or waste, require minimal maintenance and represent a reversible land use.

Solar power means big business for UK industry, and more jobs

Technological innovation contributes heavily to our low carbon future. The growing renewables sector is predicted to deliver up to **half a million jobs by 2020**.[5] Currently, the British solar industry is made up of over 2,000 Small and Medium Enterprises, supporting 16,000 jobs.[6] In addition to this, 62% of the capital and operational costs of large-scale solar accrue to the UK, which is higher than for other technologies.[7]

Solar power is a safe form of electricity generation and has environmental benefits

There are minimal, if any, hazards associated with solar parks. Solar photovoltaic panels do not pose a risk of explosion, chemical leaks or toxic fumes, unlike other sources of energy generation.

More favourable land management practices across solar farms are resulting in greater plant diversity on solar farms. Greater botanical diversity leads to an overall increase in species diversity including butterflies and bumblebees.[8] The presence of these species is particularly important for birds of conservation concern.

Solar Panels

[1] Solar Trade Association 2017.

[2] Based on Solar Trade Association's statistic: It is estimated that for every 5MW installed, a solar farm will power 1,515 homes for a year.

[3] The 2008 Climate Change Act established the world's first legally binding climate change target. Following the Act, the UK aims to reduce greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050 (UK Government).

[4] Based on an average annual consumption of 3,300 kWh of electricity for a house (Solar Trade Association).

[5] DECC 2011.

[6] CEBR 2014.

[7] Solar Trade Association 2015.

[8] Hannah Montag, Dr Guy Parker and Tom Clarkson: The Effects of Solar Farms on Local Biodiversity: A Comparative Study (2016).

3. Cleve Hill Solar Park

We are proposing to develop the Cleve Hill Solar Park on the north Kent coast. The project could have a generating capacity exceeding 350MW. This would be enough to power approximately 110,000 homes a year,[9] roughly the equivalent number of households for the Swale and Canterbury Districts combined.[10]

The land will continue to provide space for key bird species as well as enhancing biodiversity through land management practices. There is also the potential for an energy storage solution to be incorporated on site, which would store excess solar power for when we next need it.

The proposed development site is on an area of approximately 890 acres (360 hectares) of agricultural land mostly classified as Grade 3b (moderate/poor). The site is located on the north Kent coast, roughly 1 mile northeast of Faversham, 3 miles west of Whitstable and situated closest to the village of Graveney, ME13 9EE.

Cleve Hill Solar Park would require electrical connection infrastructure and a substation, which we intend to connect to the existing National Grid substation. Adjoining the site is a large 150/400kV electricity substation, which serves the London Array offshore wind farm beyond the mouth of the Thames Estuary to the north. Eight 400kV pylons and power lines currently cross the site.

Public rights of way run across the site, and to the north and west boundaries of the site lies the Saxon Shore Way. Our proposals seek to co-exist with the existing environment and we do not propose to permanently close these pathways.

The vision for the scheme

Our ambition is to deliver a scheme that helps to address national and local objectives, whilst supporting the neighbouring community.

We are committed to generating more renewable energy. We firmly believe that the communities involved should benefit from hosting this renewable energy generation and we will strive to be a good neighbour. To make this happen, we will work with local communities to ensure that our proposals represent an inclusive and holistic scheme.

Our primary objective is to deliver renewable energy generation in a way that respects the interests of local neighbours. Throughout the consultation process for the project we will be inviting ideas from local stakeholders on area improvements, such as enhanced access and facilities for bird watchers or upgrading existing rights of way.

Components of a typical solar farm

1. **Solar Energy**
2. **Fencing**
3. **Solar Panels**
4. **Inverter (DC to AC power converter)**
5. **Landscape Area**
6. **Substation**
7. **Battery Storage**
8. **Underground Cable**

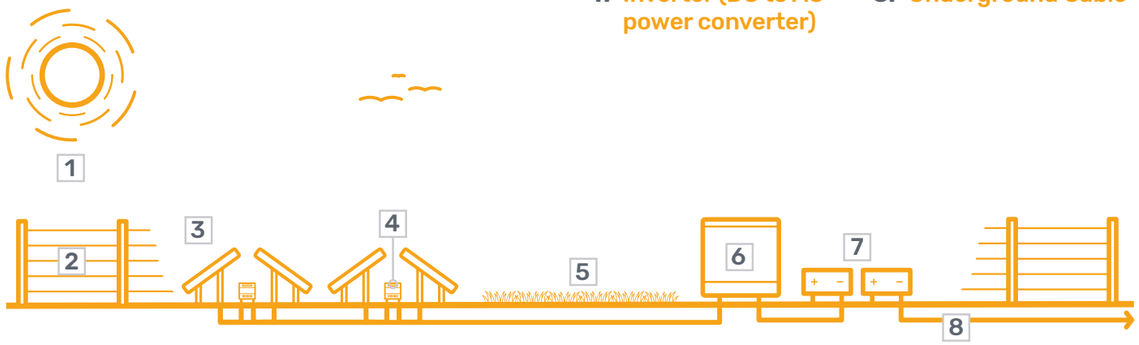


Figure not to scale and for indicative purposes only.

[9] Based on Solar Trade Associations statistic: It is estimated that for every 5MW installed, a solar farm will power 1,515 homes for a year.

[10] Based on 2011 Census information for households with residents in Swale (55,585) and Canterbury (60,771).

Key Benefits of Cleve Hill Solar Park

This project is **non-subsidised** so will not receive government funding.

£1,081,334 revenue per annum will be generated for Kent and Swale Councils.*

Cleve Hill Solar Park could save **150,500** tonnes of CO_2,** equivalent to **29,400** cars.***

Dedicated mitigation areas for **bird species** including: Lapwing, Brent Goose, Golden Plover and Marsh Harrier.

Option for onsite **battery** storage technology.

Cleve Hill Solar Park's capacity should exceed **350MW.**

Cleve Hill Solar Park has the potential to power **110,000 UK homes.**

* Based on 2015 1.3 ROC calculation (£6450 x 350MW) x (0.479), new calculations will come into effect in 2022.

** Based on Solar Trade Association's statistic: It is estimated that for every 5MW installed, a solar farm will save 2,150 tonnes of CO_2.

*** You Sustain (2017), www.yousustain.com.

4. Proposed Site Layout

We have been conducting bird surveys since 2014. There are a number of bird species in the area using more than one habitat. Some feed in the mudflats at low tide and then move up to roost on the saltmarsh or on fields inland of the sea wall.

The Saxon Shore Way long distance walking route runs around the western and northern perimeters of the site.

During the breeding season (April to September) bird species including Marsh Harrier, Little Tern and Lapwing, can be spotted.

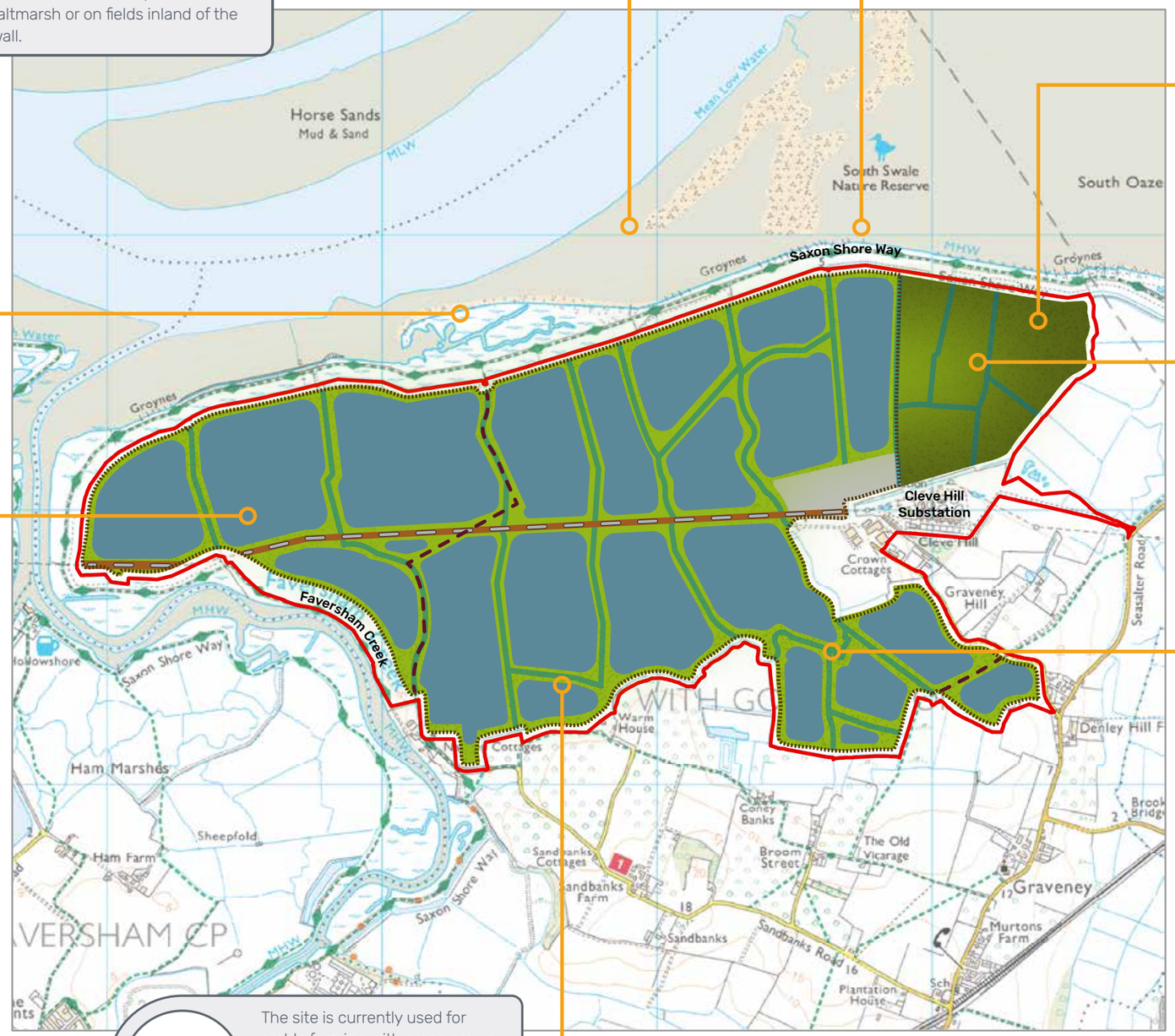
The site is defended from tidal flooding by the sea wall and coastal flood defences.

During the wintering period (September to April) bird species including Golden Plover, Lapwing and Geese, can be spotted.

Ecology surveys for protected species including great crested newts, water voles, bats and badgers have been undertaken in and around the site area.

Intersecting the fields are drainage ditches.

The site is currently used for arable farming with crops grown such as wheat and beans. However, the site is classified as low or poor grade agricultural quality (Grade 3b).



Key

- Site area boundary
- Indicative area for ground mounted solar panels
- Deer fence
- Substation and battery storage area
- Public Right of Way
- Internal access trackway
- Overhead power lines and pylons
- Habitat mitigation area
- Drainage ditches

5. The Local Environment

We have been undertaking bird surveys and getting to know the local environment since 2014.

Through our work we have built up a detailed understanding of the site, as well as neighbouring sites of ecological importance, including the Swale National Nature Reserve and Swale Protected Area. We are keen for our development to support and contribute to the biodiversity of the area and are committed to delivering a nationally significant renewable energy project that respects the local environment.

The proposed site is used by birds, as well as other wildlife. With this in mind, we are undertaking several studies and working with environmental experts to create dedicated areas within the site for a number of species. We consider this to be an opportunity to enhance the wider environment and we propose to set aside areas of the park specifically for wildlife and biodiversity improvements.

Golden Plover

Brent Goose

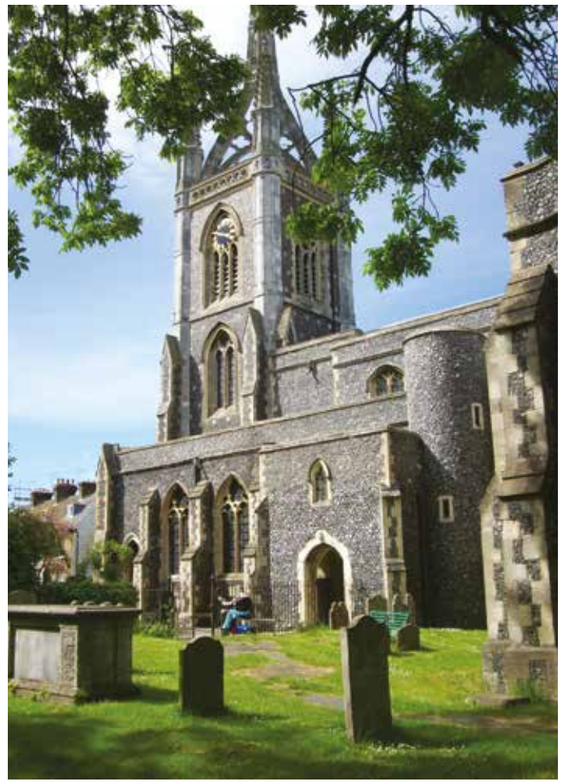
As part of the Environmental Impact Assessment process we will be consulting with a wide range of statutory environmental groups including Natural England and the Environment Agency as well as local groups such as the Kent Wildlife Trust.

As part of the planning process we will be undertaking extensive public consultation to receive feedback to our proposals and understand issues of local importance.

We want to ensure co-existence and harmony between the Cleve Hill Solar Park and its environment. We will be setting aside areas of the park specifically for wildlife and land management.

Marsh Harrier

Lapwing



Saint Mary in Trinity, Faversham

Reed-Filled Ditch, Seasalter

6. The Development Process

Cleve Hill Solar Park is a Nationally Significant Infrastructure Project (NSIP) as it is proposed to have a generating capacity exceeding 50MW. We will be applying for a Development Consent Order (DCO) through the Planning Inspectorate (PINS). The application will be determined by the Secretary of State for Business, Energy and Industrial Strategy.

A DCO application is planned to be submitted in summer 2018. Prior to this we will be commencing an extensive series of public and statutory consultations on our plans for the scheme.

Public consultation

Currently our proposals for Cleve Hill Solar Park are at an early stage and much work is required to refine the proposals following consultee feedback. We are committed to undertaking clear and comprehensive public consultation before we submit our application. We value local knowledge and we are confident that this consultation process will result in a strong set of proposals that respects the neighbouring community while generating clean energy.

Our public consultation programme will start in autumn 2017 and will continue throughout the development phase of the project up until application submission. Our team are dedicated to working with communities throughout the development of the scheme and beyond should the scheme be granted permission. A key aspect to our process is to ensure people receive useful information and that they are able to comment and provide feedback. We believe in an iterative approach to engaging communities and plan on presenting and refining our proposals across two phases of consultation, as outlined in our Statement of Community Consultation (SoCC). Throughout the process, we will report on the feedback that we have received, and how this has helped to shape our proposals.

Meetings and events

We are planning to hold two rounds of public events at locations across our consultation area, including Graveney, Faversham and Seasalter. These events will give a direct opportunity for people to view our plans and discuss them with members of the team. Our first round of events are proposed for winter 2017. Our second round of events will take place in spring 2018.

We will meet regularly with the Graveney and Goodnestone Parish Council and key local stakeholder groups to share updates and receive feedback on the proposals.

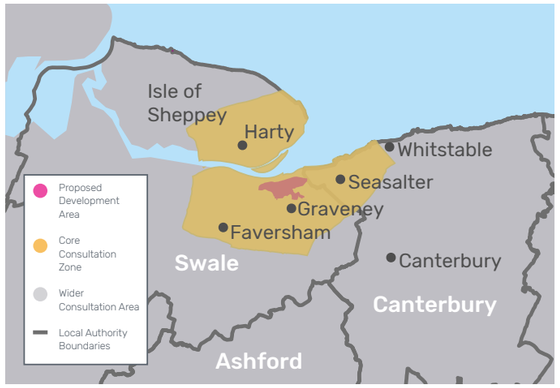
Solar Panels

Literature

Stakeholder briefing packs will be provided to councillors at the start of the consultation to introduce the scheme and inform them how their constituents will be engaged with during the process.

Consultation leaflets will be distributed to all properties within our core consultation zone and will be available at key locations in our wider consultation zone. Leaflets will provide information on the proposals and details of how the local community can have their say.

Newsletters will be distributed on a quarterly basis to update all properties in the core consultation zone on the plans and proposals. Copies of these newsletters will be available on our project website.



Consultation Map

Communication channels

A Freephone information line is available for interested parties to call to ask questions and provide feedback. Please call us on 0800 328 2850.

A project email address is also open for questions and comments. Please email us at info@clevehillsolar.com.

Publicly available information

A dedicated project website will be avaliable to find out more information and provide your feedback. Please visit us at: www.clevehillsolar.com.

Local media publications will publish adverts to inform local communities of our consultation.

Our Statement of Community Consultation

Detailed information regarding the consultation process can be found in our SoCC, which is available to download from our website. Hard copies of the SoCC will also be made available at community access points.

Environmental Impact Assessment

In parallel to the public consultation we will be undertaking extensive environmental surveys and studies and consulting with a range of statutory stakeholders.

Scoping Report
A Scoping Report will be submitted to the Planning Inspectorate. This will present the development proposals and will describe how we will assess any potential impacts to the existing environment. The feedback that Cleve Hill Solar Park Ltd receives on this document from the local planning authorities and statutory consultees will result in a Scoping Opinion from PINS, which will be made publicly available.

Preliminary Environmental Information Report (PEIR)
The PEIR will build upon the findings from the earlier scoping documents, as well as the feedback received through consultation. It will incorporate the findings of the surveys and environmental assessments that have been carried out. This will enable consultees to develop an informed view of the potential impacts the Cleve Hill Solar Park may have on the local environment. In our second phase of consultation, we will be seeking feedback on the findings of the PEIR.

Environmental Statement (ES)
The ES will advance the content of the PEIR and will incorporate the responses from the consultation and results of the surveys undertaken. It will also describe any changes to the project and any mitigation measures proposed to be implemented. The ES will form part of the DCO application for submission.

Copies of these reports will be made available as we conduct the public consultation.

Our plans will also need to include a methodology for construction. We are aware of the sensitivities around the previous construction of the Cleve Hill Substation. Our team is already working on a range of proposal options on how to best access the site in a way that minimises disturbance. Options and ideas will be presented to consultees and environmental authorities as our proposals develop to understand the best approach chosen for our final proposals.

Beach at Seasalter

Whitstable Beach

DCO application

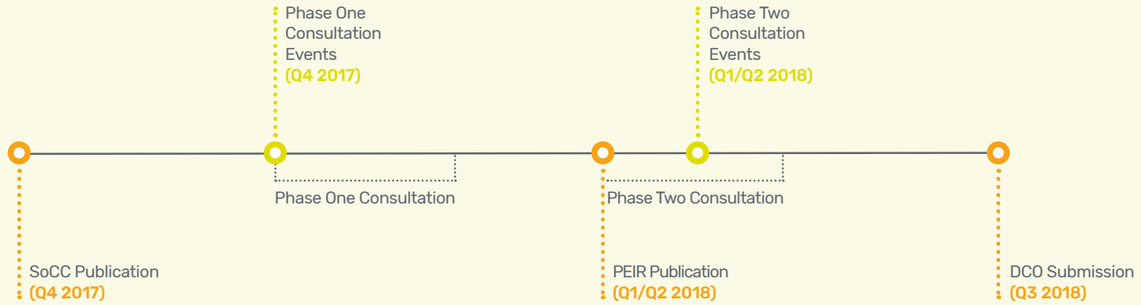
Once PINS has received the DCO application they will consider whether to accept the application for examination. To be accepted, we must satisfy PINS that our pre-application consultation, both with statutory consultees (such as the local planning authorities and Natural England) and local communities, has been undertaken.

To help demonstrate this to PINS, we will submit a Consultation Report alongside the DCO application, outlining how the consultation process has been carried out in accordance with the Planning Act 2008. This report will contain details of the consultation methodology and the feedback submitted in response to the consultation. Explanations will also be provided as to how feedback has influenced our proposals.

If the application is accepted, it will enter a six month examination period. During the examination, either a single inspector, or a panel of inspectors appointed by PINS, will evaluate the application and ask questions of us as the developer, and of statutory consultees. The inspector(s) will also consider the representations of all stakeholders who have made valid representations.

Following PINS' examination, there will be a determination of the application by the Secretary of State. If the application is approved, the DCO will be granted and given authorisation to begin construction and operation of Cleve Hill Solar Park.

Consultation timeline



Saxon Shore Way

Whitstable Beach

7. Contact Us

Please don't hesitate to get in touch if you would like to find out more information about Cleve Hill Solar Park and our associated consultation programme.

You can contact our Community Relations Team and find out more by using the details below.

All images, graphics and maps in this document are for illustrative purposes only

CLEVE HILL
SOLAR PARK

Write to us at:
Freepost: Cleve Hill Solar

Email us at:
info@clevehillsolar.com

Call our Freephone information line:
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Visit our website at:
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Consultation Report

Appendix 12: Publicity of Phase One Section 47 Community Consultation Events

CLEVE HILL
SOLAR PARK

Cleve Hill Solar Park Ltd is proposing to develop the Cleve Hill Solar Park on the north Kent coast.

Our first round of community consultation events will be an opportunity to view our very early stage proposals and provide your views. We would encourage anyone with an interest in these proposals to come along.

Phase one community consultation events

- **Tuesday 5 December from 5pm to 8pm,** at Sheppey Evangelical Church, Warden Bay Road, Leysdown, ME12 4NA
- **Wednesday 6 December from 11.30am to 7.30pm,** at Faversham Assembly Rooms, 66 Preston St, Faversham, ME13 8PG
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Kentish Gazette 23 November 2017 (Thursday)
Section: Main S, Edition: Main E, Page: 33
Published by Kent Messenger

MEMORIAL CAROL SERVICE

3.00 p.m. SUNDAY 3rd DECEMBER, 2017
ST. MARTIN'S CHURCH, HERNE

Christmas can be a very difficult time for those who are missing someone they love, especially when they are facing Christmas without them.

Christmas is also a time of celebration, which is not easy for those who have been bereaved, even when the loss occurred some time ago.

Once again, in order to remember and honour those whom we loved who have died, we will be holding our annual Memorial Carol Service at St. Martin's Church, Herne.

You will be able to hang stars on the Christmas tree in memory of your loved ones and to celebrate their lives.

This service is open to anyone who wishes to attend.

There will be refreshments provided after the service.

Enquiries to A. Welch & Sons Funeral Services Ltd,
94 Station Road, Herne Bay, Kent, CT6 5QB.
Tel: 01227 374995

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POWERED by ebiquity

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MEDIA RELEASE – UNDER STRICT EMBARGO UNTIL 00:01 ON THURSDAY 9 NOVEMBER 2017

CONSULTATION TO COMMENCE ON NEW SOLAR PARK ON NORTH KENT COAST

Early stage proposals have been unveiled for the Cleve Hill Solar Park on the north Kent coast, as the team behind the proposals look to commence their consultation process with stakeholders and local communities.

The proposals for the Cleve Hill Solar Park are being brought forward by Cleve Hill Solar Park Ltd, a joint venture formed by two solar industry specialists – Hive Energy Ltd and Wirsol Energy Ltd.

The proposed development site is located on the north Kent coast roughly one mile northeast of Faversham and three miles west of Whitstable, and closest to the village of Graveney, within the district of Swale.

The project could have a generating capacity exceeding 350 megawatts (MW), which would be enough to power approximately 110,000 homes a year, roughly equivalent to the number of households in the Swale and Canterbury districts combined. If built the project will provide over £1million of income per year for Swale and Kent to invest in local services.

Cleve Hill Solar Park requires electrical connection infrastructure and a substation, which is planned to connect in to the existing National Grid substation at Cleve Hill.

Due to its proposed generation capacity being over 50 MW, the Cleve Hill Solar Park will be classified as a Nationally Significant Infrastructure Project (NSIP). This means Cleve Hill Solar Park Ltd will make an application to the Secretary of State for Business, Energy and Industrial Strategy (BEIS) for a Development Consent Order (DCO). The application will be the first solar development submitted as a NSIP scheme.

Cleve Hill Solar Park Ltd has prepared a Statement of Community Consultation which explains how local communities will be consulted throughout the planning process. A first phase of community consultation will commence later this month and a series of community consultation events will be held at the start of December. These events will provide an opportunity for people to view information materials, discuss the proposals with members of the team and provide their feedback.

A second phase of consultation will follow early next year, with submission of the DCO application scheduled for later in 2018.

Hugh Brennan of Hive Energy, said:

“The Cleve Hill Solar Park is a pioneering scheme, including the potential for new technologies like battery storage. Our ambition is to deliver the first non-subsidised renewables project of this scale, delivering low cost, clean, home-grown energy to power UK households.

We are still at the very early stages of developing our proposals, which is why we want to start talking now with local communities to understand their views and listen to their ideas. I would encourage anyone with an interest in our plans to come along to meet us at one of our upcoming consultation events to find out more.”

More information about the proposals and details of the consultation events can be found on the project website: www.clevehillsolar.com *[the website will be live by Thursday morning]*

END

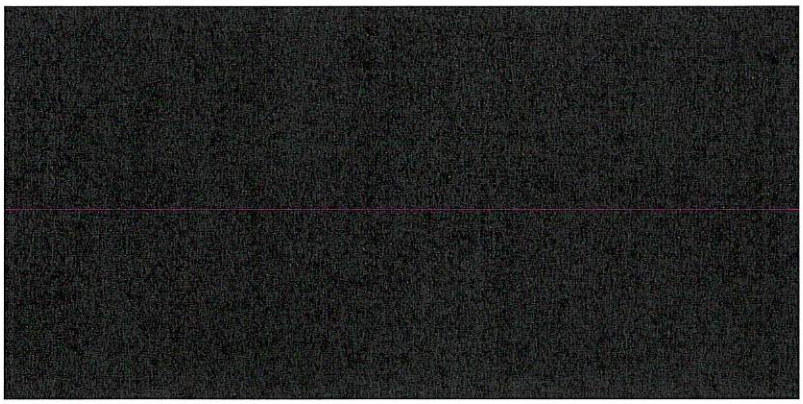
2017 ©

Notes to editors:

Founded in 2010, Hive Energy has established itself as the second largest developer of solar parks in the UK, responsible for the installation of 300 Megawatts (MW) of capacity across the country and providing enough clean electricity for over 100,000 homes.

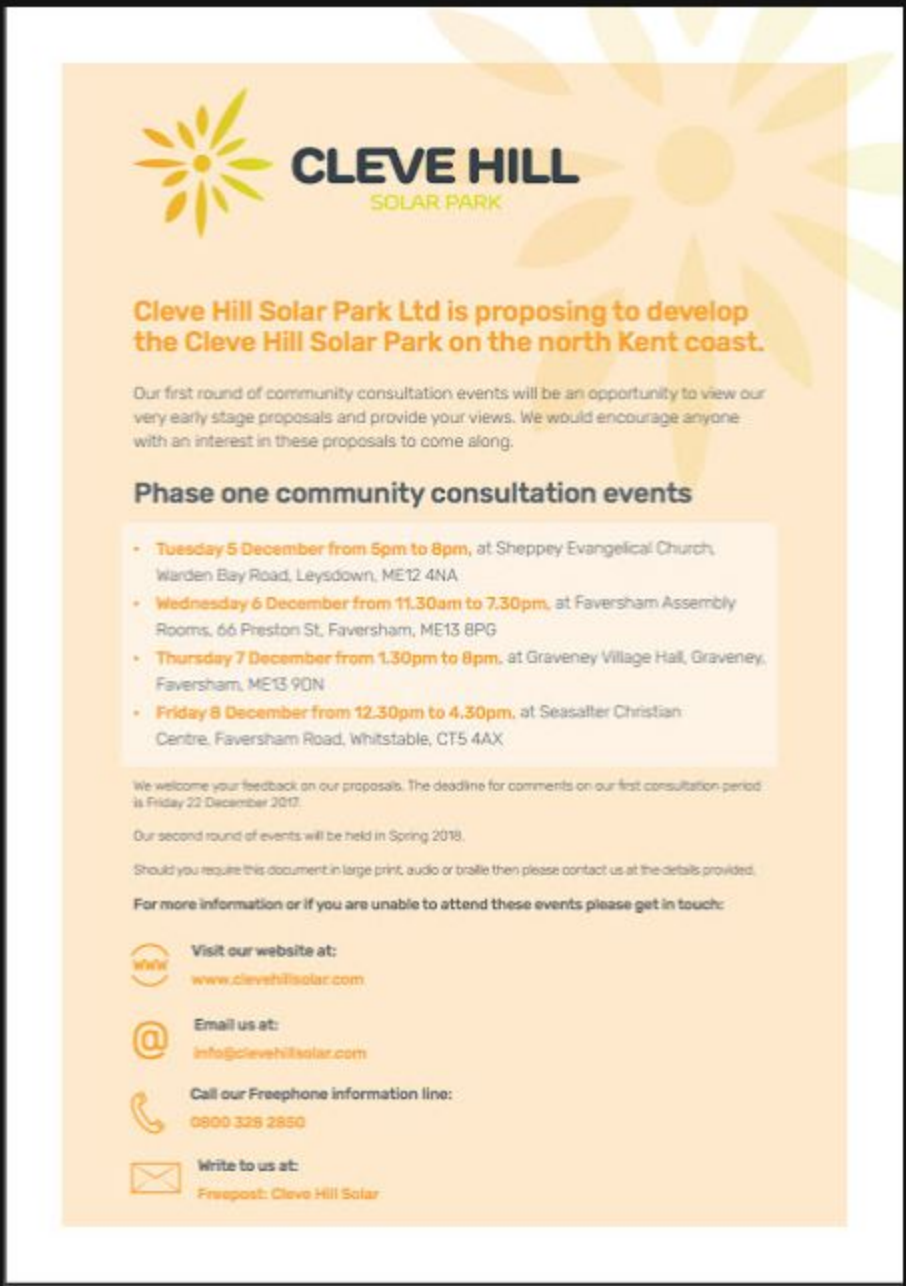
Wirsol is a highly experienced solar park developer, constructor and operator across the UK and Australia. Combining the installation of world-class components and the implementation of rigorous operation and maintenance processes, Wirsol have both built and operate 24 solar parks across the UK. Their success has been underpinned by the formation of long-lasting relationships with local communities and investors.

For further information please contact:



2017 ©

Archived Wednesday 6th December 2017 - CLEVE HILL SOLAR PARK COMMUNITY CONSULTATION - at The Assembly Rooms



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Our second round of events will be held in Spring 2018.

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(PiF: This is not a music event and not an event usually to feature on PiF but Cleve Hill asked for it to be included and given the importance of this proposed project it would feel wrong to refuse the request.)

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Playing In Faversham
Like This Page · 5 December

Wednesday 6th December 2017 - CLEVE HILL SOLAR PARK COMMUNITY CONSULTATION - at The Assembly Rooms

(PiF: This is not a music event and not an event usually to feature on PiF but Cleve Hill asked for it to be included and given the importance of this proposed project it would feel wrong to refuse the request.)

Like · Comment · Share

4 · Top comments

[redacted]

[redacted] Write a comment...

Suggested Pages · See All

Sportsmansbets
445 people like this.

Like

Consultation Report

Appendix 13: Phase One Section 47 Community Consultation Leaflet (November 2017)

CLEVE HILL SOLAR PARK

Community Consultation Leaflet

November 2017

www.clevehillsolar.com

CLEVE HILL
SOLAR PARK

1. Introducing Our Proposals

We are proposing to develop the Cleve Hill Solar Park on the north Kent coast. The Cleve Hill Solar Park would generate renewable power through photovoltaic solar panels, providing clean power to homes across Kent.

The site is located roughly 1 mile northeast of Faversham, 3 miles west of Whitstable and situated closest to the village of Graveney.

The project could have a generating capacity exceeding 350 Megawatts (MW). This would be enough to power approximately 110,000 homes a year, roughly the equivalent number of households for the Swale and Canterbury districts combined.

About us

Cleve Hill Solar Park Ltd is a joint venture formed by two solar industry specialists – Hive Energy Ltd and Wirsol Energy Ltd. Both are highly experienced solar park developers with a strong track record in the UK.

HIVE ENERGY

WIRSOL
THE BRAND BELONGING TO WIRCON GROUP

Components of a typical solar farm

1. Solar Energy
2. Fencing
3. Solar Panels
4. Inverter (DC to AC power converter)
5. Landscape Area
6. Substation
7. Battery Storage
8. Underground Cable

Figure not to scale and for indicative purposes only.

2. Our Vision for the Scheme

Our ambition is to deliver a scheme that helps to address national and local electricity needs by generating an affordable and renewable source of clean energy. We are committed to generating more clean renewable energy. We make a promise to our neighbours to build long-term and meaningful relationships and to always operate in a transparent and respectful way.

A quarter of the UK's generating capacity is due to close by 2018 so a new mix of electricity generation is needed to keep the lights on. With the UK's climate change ambitions being amongst the highest in Europe, we will need to significantly increase our renewable energy growth without jeopardising electricity supply, or increasing costs for consumers.

The proposed Cleve Hill Solar Park is a pioneering scheme, which would provide home grown renewable energy and would not require government subsidies. If built the project would also bring over £1 million of income a year to Kent and Swale Councils, enabling reinvestment in local services.

Cleve Hill Solar Park Ltd is also proposing to use battery storage technologies, which would store any excess power and distribute it to the national grid when it's needed the most.

We will work with people in the local area to ensure that our proposals represent an inclusive and holistic scheme. Throughout the consultation process for the project we will be inviting ideas and feedback from communities and stakeholders.

This project is **non-subsidised** so will not receive government funding.

Over **£1,000,000** income per annum will be generated for Kent and Swale Councils.

Dedicated mitigation areas for **bird species** including: Lapwing, Brent Goose, Golden Plover and Marsh Harrier.

Cleve Hill Solar Park has the potential to power **110,000 UK homes**.

3. Proposed Site Layout

We have been conducting bird surveys since 2014. There are a number of bird species in the area using more than one habitat. Some feed in the mudflats at low tide and then move up to roost on the saltmarsh or on fields inland of the sea wall.

The Saxon Shore Way long distance walking route runs around the western and northern perimeters of the site.

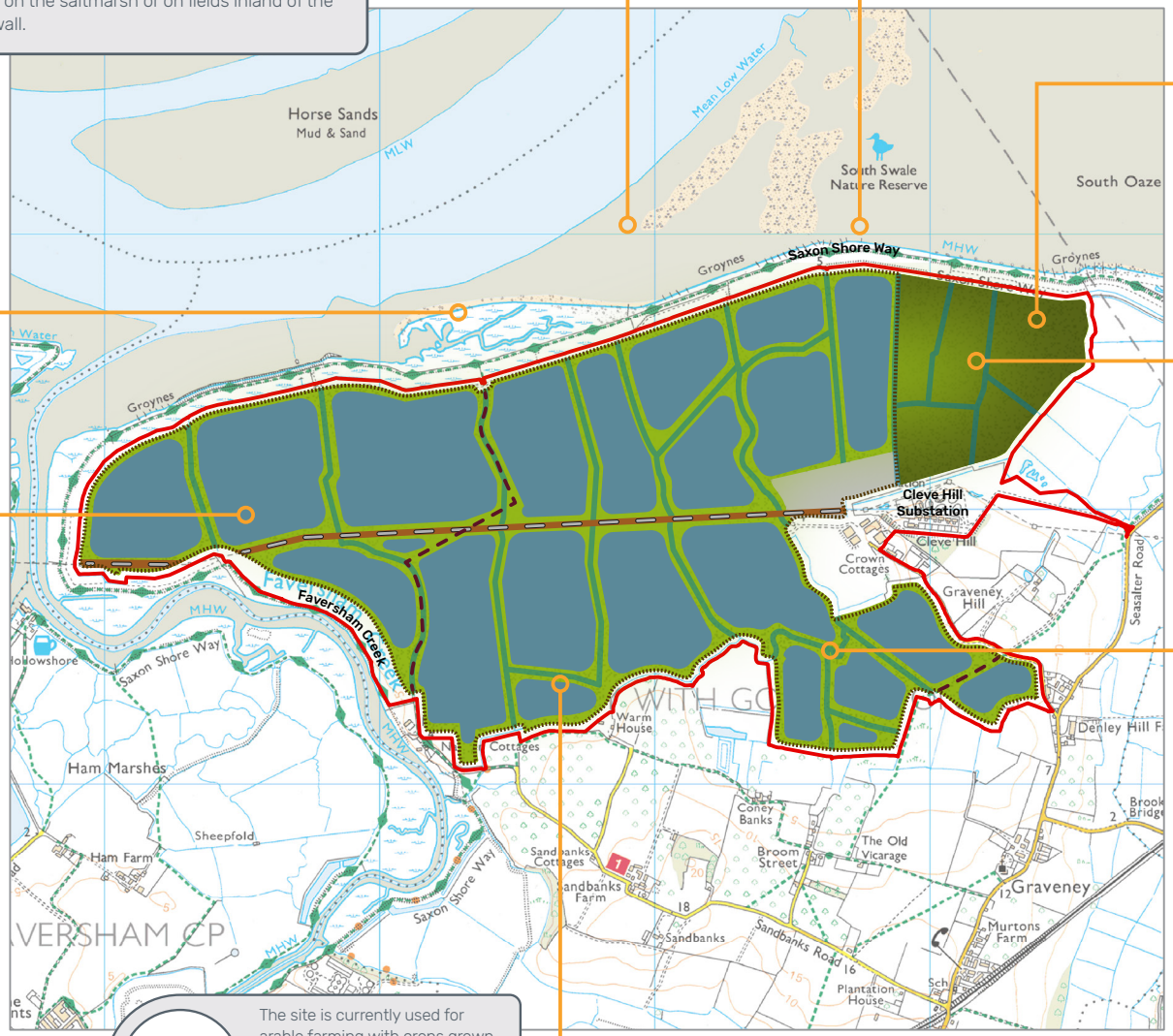
During the breeding season (April to September) bird species including Marsh Harrier, Little Tern and Lapwing, can be spotted.

The site is defended from tidal flooding by the sea wall and coastal flood defences.

During the wintering period (September to April) bird species including Golden Plover, Lapwing and Geese, can be spotted.

Ecology surveys for protected species including great crested newts, water voles, bats and badgers have been undertaken in and around the site area.

Intersecting the fields are drainage ditches.



The site is currently used for arable farming with crops grown such as wheat and beans. However, the site is classified as low or poor grade agricultural quality (Grade 3b).

Key

- Site area boundary
- Deer fence
- Substation and battery storage area
- Public Right of Way
- Internal access trackway
- Overhead power lines and pylons
- Habitat mitigation area
- Drainage ditches
- Indicative area for ground mounted solar panels

4. Our Consultation Process

Cleve Hill Solar Park is a Nationally Significant Infrastructure Project (NSIP) as it is proposed to have a generating capacity exceeding 50MW. We will be applying for a Development Consent Order (DCO) through the Planning Inspectorate (PINS). The application will be determined by the Secretary of State for Business, Energy and Industrial Strategy.

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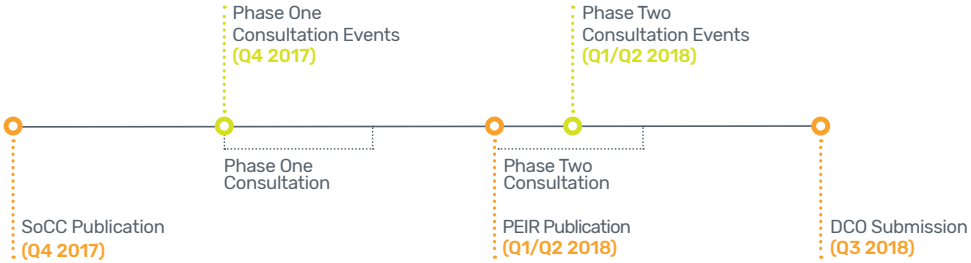
Consultation timeline



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Throughout the process we will be engaging with communities and plan on presenting and refining our proposals across two formal phases of consultation, as outlined in our Statement of Community Consultation (SoCC), which can be accessed on our website or in a range of community locations. Throughout the process, we will report on the feedback that you have provided, and how this has helped to shape our proposals.

Aerial View of Cleve Hill with Proposed Red Line Boundary for the Cleve Hill Solar Park

5. Consultation Events

We are planning to hold two rounds of public events held at locations across our consultation area. These events will be a direct opportunity for you to view our plans and discuss them with members of the project team.

Our first round of events will be an opportunity to view our very early stage proposals and provide your views. We would encourage anyone with an interest in these proposals to come along.

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Solar Panels

Reed-Filled Ditch, Seasalter

6. Contact Us

Please don't hesitate to get in touch if you would like to find out more information about Cleve Hill Solar Park and our associated consultation programme.

You can contact our Community Relations Team and find out more by using the details below.

All images, graphics and maps in this document are for illustrative purposes only.
For all sources please visit our website.

CLEVE HILL
SOLAR PARK

Write to us at:
Freepost: Cleve Hill Solar

Email us at:
info@clevehillsolar.com

Call our Freephone information line:
0800 328 2850

Visit our website at:
www.clevehillsolar.com

CLEVE HILL
SOLAR PARK

20 November 2017

Dear Sir/Madam,

RE: Proposals for the Cleve Hill Solar Park on the north Kent coast.

I would like to take this opportunity on behalf of Cleve Hill Solar Park Ltd to write to you to introduce our early stage proposals for a solar park on the north Kent coast. The development is proposed to be sited on approximately 360 ha (890 acres) of land approximately 2km northeast of Faversham and 5km west of Whitstable at Cleve Hill, Graveney.

I have enclosed a copy of our community consultation leaflet which introduces our early stage proposals and consultation activities. Throughout the development of the proposals we want to hear from you and welcome you to our public exhibition events. These events will provide you with the opportunity to view our proposals and ask any questions to the project team.

The events will be held on:

- 5 December from 5pm to 8pm, at Sheppey Evangelical Church, Warden Bay Road, Leysdown, ME12 4NA
- 6 December from 11am to 9pm, at Faversham Assembly Rooms, 66 Preston St, Faversham, ME13 8PG
- 7 December from 1.30pm to 8pm, at Graveney Village Hall, Graveney, Faversham, ME13 9DN
- 8 December from 12.30pm to 4.30pm, at Seasalter Christian Centre, Faversham Road, Whitstable, CT5 4AX

If you have any questions or queries about our proposals, please do not hesitate to contact us by using the details provided.

Yours sincerely,

[redacted]

Hugh Brennan
Managing Director Hive Energy
For and on behalf of Cleve Hill Solar Park Ltd.

XXX
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XXX

07 November 2017

Dear XX Neighbour,

R.e. Proposals for the Cleve Hill Solar Park on the north Kent coast.

I would like to take this opportunity to write to you on behalf of Cleve Hill Solar Park Ltd. Following a meeting recently held with your Parish Council about our early stage plans for a solar park proposed to be sited on approximately 360 ha (890 acres) of land at Cleve Hill, Graveney.

As a near neighbour to the site we would like to arrange a meeting with you to begin discussing our plans at this early stage. For your information, I have enclosed a copy of our project brochure, which outlines initial project details.

As part of our engagement we have sought the opinion of the local authorities to inform us on how best we should consult and engage with local communities. From this we produced a Statement of Community Consultation (SoCC) which outlines how we will engage with local people throughout the planning process. To date we have engaged with Swale Borough Council, Kent County Council and Canterbury City Council on our SoCC. The SoCC will be available to view in the local area and our project website from 9th November.

There will be the opportunity for members of the local community to view plans and ask questions about the proposals at our public exhibitions. These will be held on:

- 5 December from 5pm to 8pm, at Sheppey Evangelical Church, Warden Bay Road, Leysdown ME12 4NA
- 6 December from 11am to 9pm, at Faversham Assembly Rooms, 66 Preston St, Faversham ME13 8PG
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- 8 December from 12.30pm to 4.30pm, at Seasalter Christian Centre, Faversham Road, Whitstable, Kent, CT5 4AX

As a near neighbour we would like the opportunity to meet with you before these public drop-in sessions take place, so that we can hear your views about the proposed scheme.

If you would like to arrange a meeting our team would like to hear from you. They will be able

to answer any questions or queries you may have about our proposals. Please get in touch with them at the details below.

Yours sincerely,

Hugh Brennan
Managing Director Hive Energy
For and on behalf of Cleve Hill Solar Park Ltd.

07 November 2017

R.e. Proposals for the Cleve Hill Solar Park on the north Kent coast.

I would like to take this opportunity on behalf of Cleve Hill Solar Park Ltd to write to you to introduce our early stage proposals for a solar park on the north Kent coast. The development is proposed to be sited on approximately 360 ha (890 acres) of land approximately 2km northeast of Faversham and 5km west of Whitstable at Cleve Hill, Graveney.

Due to its proposed generation capacity being over 50MW, the solar park will be classified as a Nationally Significant Infrastructure Project (NSIP). This means that Cleve Hill Solar Park Ltd are preparing a Development Consent Order (DCO), which will be submitted to the Planning Inspectorate (PINS) and finally determined by the Secretary of State for Business Energy Innovation and Skills (BEIS).

The project has the potential to generate clean, renewable energy for approximately 110,000 homes a year, which is approximately the number of households in the Swale and Canterbury Districts combined. Furthermore, as subsidies no longer play any role in solar development, the Cleve Hill Solar Park will not receive any government funding.

Proposals for the project are currently at an early stage. To date we have engaged with Swale Borough Council, Kent County Council and Canterbury City Council on our Statement of Community Consultation (SoCC), which will be available to view in the local area from 9 November. As part of this engagement we have sought their opinion on how best to consult and engage with local communities. From 9th November, the SoCC will be available to view on our website: www.clevehillsolar.com.

For members of the local community, there will be the opportunity to view plans and ask questions about the proposals at a public exhibition. These will be held on:

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A further round of consultation events will be held in Spring 2018.

I have enclosed a stakeholder briefing pack with this letter for your information. We understand how important it is to be informed of project and consultation updates should you also receive enquiries from local residents and community members. Throughout the development of the Cleve Hill Solar Park we will ensure you receive copies of our consultee information and notices of our events.

Our project team would be happy to meet with you at any stage throughout the consultation for the project.

In the meantime, if you have any questions or queries about our proposals, please do not hesitate to contact me or a member of the team by using the details provided below.

Yours sincerely,

[redacted]

Hugh Brennan
Managing Director Hive Energy
For and on behalf of Cleve Hill Solar Park Ltd.

XXX
XXX
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XXX

07 November 2017

Dear XX MP,

R.e. Proposals for the Cleve Hill Solar Park on the north Kent coast.

I would like to take this opportunity on behalf of Cleve Hill Solar Park Ltd to write to you to introduce our early stage proposals for a solar park on the north Kent coast. The development is proposed to be sited on approximately 360 ha (890 acres) of land approximately 2km northeast of Faversham and 5km west of Whitstable at Cleve Hill, Graveney.

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A further round of consultation events will be held in Spring 2018.

I have enclosed a stakeholder briefing pack with this letter for your information, which we are sending to key stakeholders and nearest neighbours. As [MP for XX], we understand how

important it is for you to be informed of the latest project and consultation updates. Throughout the development of the Cleve Hill Solar Farm we will ensure you receive copies of our latest information and notices of our events.

Our project team would welcome meeting you ahead of our first phase of consultation events in December 2017. A member of our team will be in contact with your office shortly to request a meeting should you be available.

In the meantime, if you have any questions or queries about our proposals, please do not hesitate to contact me or a member of the team by using the details provided below.

Yours sincerely,

[redacted]

Hugh Brennan
Managing Director Hive Energy
For and on behalf of Cleve Hill Solar Park Ltd.

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@clevehillsolar