

**From:** [REDACTED]  
**To:** [Cleve Hill Solar Park](#)  
**Subject:** Written Representation  
**Date:** 11 November 2019 20:59:38  
**Attachments:** [REDACTED]

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Please find attached my additional written representation for deadline 7.

Kind regards

Brian Jefferys

[REDACTED]

# Graveney's Environmental Access Route



## Improvements for cyclists at Cleve Hill Solar Park

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### Introduction

Further to my previous representation, I have been working hard to develop the idea of an open access route for cyclists through the proposed solar park. I have also been canvassing local opinion and working with other organisations who are also supportive of this idea. This representation provides further information regarding the vision and also brings together support for the project from other parties.

Whilst I do not want this solar park to be built in this very special area of the North Kent coast for many reasons, I also want to ensure there is a benefit for the local communities should it go ahead. I see this as something that the developers should, and could easily, include in their plans. There is a multitude of policy which supports this access route, and safety should be at the forefront of the developer's intentions. This is one way of ensuring our local cyclists and families are kept safe and healthy both during construction and in perpetuity.

I am pleased to hear that the developer has reacted positively to this idea and is hopefully taking it seriously. In an e-mail to Alastair Gould, Green Party member for Boughton & Courtenay and Tim Valentine, Green Party member for Boughton & Courtenay and Cabinet Member for Environment, Hugh Brennan made the following comments directly in relation to this subject and in response to an e-mail I had sent to a number of interested parties;

*"We remain very open to further suggestions or new interest in ideas for local enhancements that we may be able to include in our plans such as cycle paths or other local recreational amenities we could provide"*

***Hugh Brennan, Managing Director, For and on behalf of Cleve Hill Solar Park Ltd.***

I am hopeful that the developer will be in contact with me to discuss this further, although this has not yet happened despite me sending e-mails on the subject directly to them. I understand that they will be responding formally to my submission via the Examination process.

I would expect that these additional requirements, once agreed, would be set out by the planning inspectorate to ensure the developer is held accountable for such implementation.

Whilst this representation concentrates on the cycle access route, I still maintain that the developer should be made to fund a walkway along Head Hill Road and Seasalter Road between the villages of Goodnestone and through Graveney for safety reasons, particularly given there is a school on the

route which will be heavily used by construction traffic. I covered this in my first representation in detail.

## The policy case for supporting cyclists is clear

In the Environment Statement the developer points out (section 14.1.4 Policy Context) that the Development must consider policy from national to local level. With regard to cyclists, the developer's own assessment of the relevant policies clearly shows that alongside pedestrians cyclists must be a key consideration.

### National Planning Policy Framework

The National Planning Policy Framework states that developers should make cyclists a priority.

Paragraph 110 of the NPPF states applications for development should:

- 'Give priority to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services and appropriate facilities that encourage public transport use;
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter and respond to local character and design standards;'

*(Environmental Statement, Chapter 14, para 47, page 14-28)*

### Kent County Council

Kent County Council Fourth Local Transport Plan - Growth without Gridlock 2016 – 2031 includes five outcome policies for transport including:

Outcome 3: Safer travel Policy: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.

*(Environmental Statement, Chapter 14, para 53, page 14-29)*

Kent County Council's Countryside and Coastal Improvements Plan includes cyclists alongside pedestrians and equestrians:

62. The Countryside and Coastal Improvements Plan sets out KCC's ambitions to improve accessibility for pedestrians, cyclists and equestrians to the Kent countryside. This includes a range of objectives and aims relating the following vision

- To help the Kent economy to grow
- To tackle disadvantage
- To put the citizen in control

*(Environmental Statement, Chapter 14, para 62, page 14-31)*

The recently published Kent County Council's Rights of Way Improvement Plan 2018 – 2028 focuses on Public Rights of Way (PROW) and highlights how cycling is a key component of this:

The PROW network is required to evolve not to only withstand the pressures from increased use but also to provide a high quality facility to encourage a modal shift to walking and cycling; in this way the PROW network is a key contributor to getting people out of their cars to take on more active travel for everyday journeys and for recreation and leisure.

*(See [ROWIP](#) page 6)*

Other relevant points in the plan include:

In March 2018 the National Institute for Health and Care Excellence (NICE) published new guidance relating to the importance of physical activity in the local environment and how the PROW and cycle network and public open space can help facilitate active lifestyles.

*(See [ROWIP](#) page 13)*

In line with previous Sustrans research, we found that use of cycle path / tracks was higher amongst males (33%) when compared to females (22%). Sustrans have identified the need to provide cycle paths / tracks separated from traffic to get more women cycling.

*(See [ROWIP](#) page 14)*

### Swale Borough Council

The Swale Local Plan (July 2017) - Bearing Fruits 2031 sets out the vision and overall development strategy for the surrounding area and how it will be achieved for the period from 2014-2031. This covers policies for sustainable transport which include:

6. Achieve alternative access to all services through promoting access to sustainable forms of transport particularly bus, cycling and rail transport and improving interchange between them from the earliest stages of development;

7. Provide integrated walking and cycling routes to link existing and new communities with local services and facilities, public transport and the Green Grid network;

*(Environmental Statement, Chapter 14, para 56, page 14-30)*

In Chapter 13 the developer's Environmental Statement considers the Tourism Economy and points out that alongside walking, cycling is one of the main tourist activities in and around the Recreation Core Study Area. It goes on to suggest that renewable energy installations could have a positive effect on tourism:

the positive effects of renewable energy infrastructure on the tourism economy through eco-tourism both within the UK and internationally as well as examples of new attractions built around renewable energy infrastructure such as the Wunsiedler Way in Germany. Consultations with residents in areas that have seen significant wind farm development in Wales (Neath Port Talbot and Rhondda Cynon Taff) suggest that businesses and residents

see potential for using renewable energy developments to market the local area as a centres for renewable energy, working them into local Destination Management Plans.

*(Environmental Statement, Chapter 13, para 193, page 13-33)*

However, if the development is built in a way which restricts access to potential tourists (who both walk and cycle) then this opportunity will have been sadly designed out of the scheme.

## Existing support for cyclists is a key element of the local area

As the developer's Environmental Statement points out, the area is rich in provision for cycle routes, footpaths and is part of the proposed England Coast Path:

National Cycle Network (NCN) Route 1, from Dover to Shetland, passes the outskirts of the site and would have direct visibility of the Development from some locations. Public footpaths cross the Development at three locations. One passes from Nagden northwards towards the sea wall, another crosses south-west to northeast across the south eastern part of the Development and then further to the north it crosses the existing access road to Cleve Hill Substation close to the junction with Seasalter Road. The Saxon Shore Way is a popular coastal walk that runs from west of the Development to Whitstable, running around the western and northern perimeter of the Development site, and this will be part of the England Coast Path, if approved by the Secretary of State.

*(Environmental Statement, Chapter 13, para 90, page 13-18)*

The Non-Motorised User Survey (NMU) examined various locations within the area and the results are shown in Chapter 14 of the Environment Statement page 14-42. The location that is relevant to cyclists is 'Link 4 – Seasalter Rd (NCN Route 1). This showed that cyclists are by the far the largest group of users with 150 out of the 166 recorded activities being cyclists.

The National Cycle Network Route 1 is already a vibrant and well used route. Sustrans describes Route 1 as:

one of the National Cycle Network's star routes: a long distance challenge that connects Dover in the south of England to the Shetland Islands to the northeast of Scotland. This epic cycle journey will appeal to anyone looking to stretch their legs, test their limits and see the beautiful scenery of the British Isles.

The whole of Route 1 is stunning, from the fantastic views of the famous White Cliffs of Dover to the wild mountain scenery of Scotland.

Along the way, you'll get the chance to experience some of the UK's cultural and natural highlights. These include the Sutton Hoo Anglo-Saxon burial ground, the Norfolk Broads wetlands and Canterbury Cathedral.

Route 1 hugs the east coast for much of its length, offering you fantastic views of dramatic coastline and castles.

<https://www.sustrans.org.uk/find-a-route-on-the-national-cycle-network/route-1/>

## Supporting the local community and improving cycle routes

As the description above of The National Cycle Network Route 1 highlights, the route hugs the east coast for much of its length, but at Cleve Hill there is a missed opportunity. Currently the route follows the sea wall from Faversham in a north-easterly direction, but then at Nagden it heads south-east inland along Sandbanks Road and Seasalter Road.

### A new cycle route

A better option would be for the route to continue northwards from Nagden, crossing through the proposed development site until it hits the coast, and then to progress eastwards along the sea wall towards Seasalter. Alongside this an additional route through the southerly part of the development and then northwards towards the seawall would provide extra options for cyclists.

As I previously pointed out in my first Written Submission:

This is an opportunity to divert that cycle path using existing farm tracks so that an off road route can be created from Faversham to Seasalter. A network of paths and tracks could provide an asset to the local area and encourage families from both Faversham and Seasalter as well as from further afield to visit the area, in line with local policy to support tourism.

Opening up the land to such uses will be invaluable and will encourage wildlife exploration, fitness, tourism and wellbeing. It is an opportunity that should not be missed.

And with one of the big issues locally being the effect on the local roads of the through traffic during construction and potentially ongoing, this is an opportunity to keep our cyclists safe without them needing to use that main road (which is currently part of the national cycle infrastructure).

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010085/EN010085-000671-Brian%20Jefferys%20-%20Deadline%20%20Submission%20-%20WR.pdf>

The Written Submission also made proposals to use the existing commonly used farm tracks as the basis for a new cycle route: “an access route which has been used for many, many years by locals, walkers and cyclists”.

The proposal would be to:

upgrade the existing farm access track including this section. There are already farm tracks and paths throughout the site and the layout of the solar panels lends itself to have trackways throughout as there are batches of panels with spaces in between.

...

This gives a variety of different circular routes for people of all abilities. Swale Borough Council is currently undertaking a review into cycle access throughout the borough and this could be a way of vastly improving the cycle network and making it safer, at zero cost to the council and ultimately the taxpayer. It is also important to make sure that it is accessible to

all including the disabled and therefore the gates need to be suitable for this group as well as cyclists and walkers.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010085/EN010085-000671-Brian%20Jefferys%20-%20Deadline%20%20Submission%20-%20WR.pdf>

Appendix A shows the proposed routes.

Examples of the type of cycle path infrastructure that could be implemented at Cleve Hill include:



<https://www.sustrans.org.uk/our-blog/news/2019/july/new-walking-and-cycling-route-opens-between-kingston-and-merton/>





<https://www.guardian-series.co.uk/news/15563825.lee-valley-regional-park-green-spaces-win-top-honours-at-london-in-bloom-awards/>



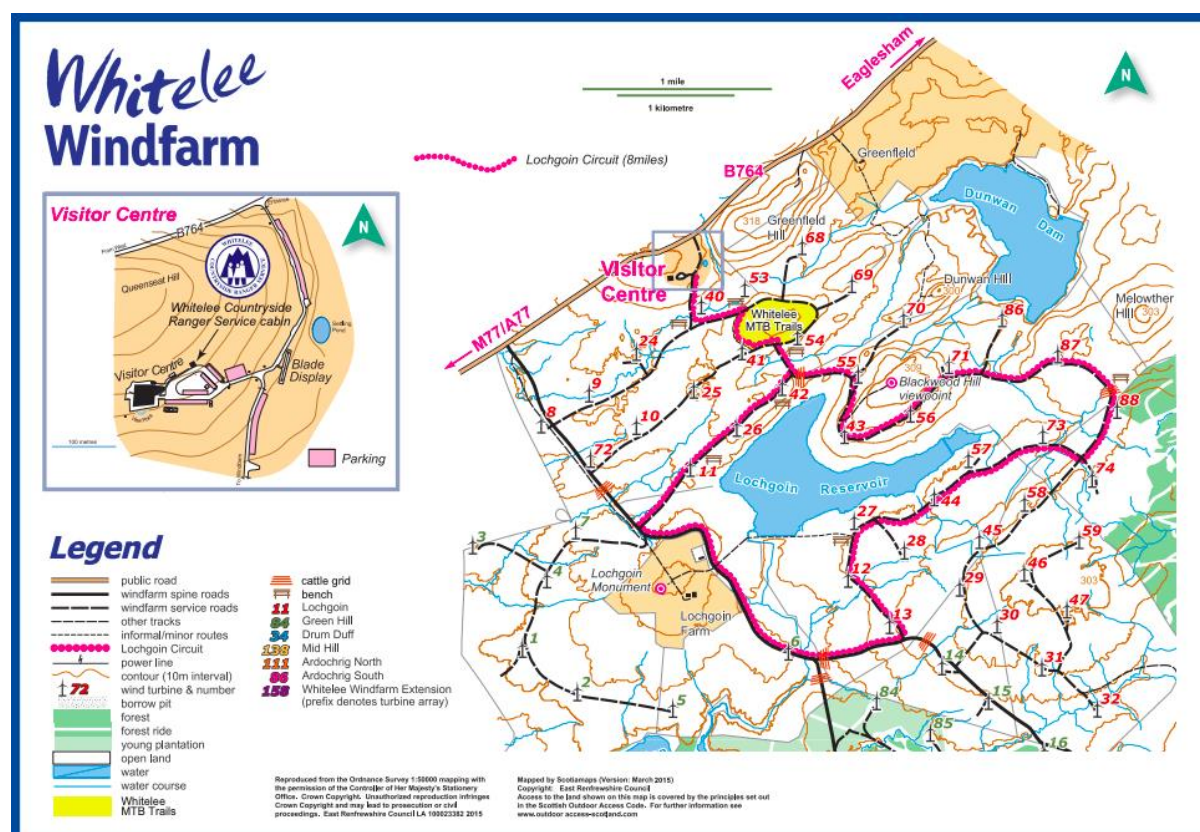
<https://www.transportxtra.com/publications/local-transport-today/news/60938/new-cycle-path-links-rspb-sanctuaries-in-west-sussex/>



## Support for the proposal

There is widespread support for this proposal. Not only does it comply with the national and regional policies above, but it would provide support for the community that the developer themselves were keen to promote with their original idea of a community orchard.

Consultation feedback with the local community showed that the idea of a community orchard per se was not understood and not widely supported. However, cycle routes are a much clearer and easier to support idea. Whitelee windfarm, a large renewable energy development in Scotland, has shown how the local community can be supported with clear and well designed provision for walkers and cyclists.



[https://www.whiteleewindfarm.co.uk/userfiles/file/Whitelee\\_Map.pdf](https://www.whiteleewindfarm.co.uk/userfiles/file/Whitelee_Map.pdf)

Whitelee Windfarm shows that developers who install infrastructure on greenfield sites can and should be sensitive to the impact of this and provide proper mitigation that will support and even enhance human use of the site.

## Supporters

### British Cycling



Whitelee Windfarm was highlighted as an example of good practice by Nick Chamberlin, Policy Manager of British Cycling. He points out that questions should be asked such as:

1. How has this development been incorporated into the Local Cycling and Walking infrastructure Plan as well as the Rights of Way Improvement Plan?

2. What are the plans for public access to this site?
3. What plans are already incorporated into the planning application for improvements to the locality for local residents and visitors as part of this development?

In further correspondence, Nick reinforced his support for this proposal:

"Thank you Brian for all your hard work and effort on behalf of your community.

British Cycling fully support your proposals and were this solar farm to be granted planning permission and go ahead without the enhancements to public access that you propose it would be a huge missed opportunity and almost impossible to retrofit a solution.

Developments of this scale should be forced to think much harder about the benefits to the local community and access that can be enjoyed by a whole family is crucial. Shared routes that are appropriate for cycling provide equitable access that means more people benefit. This is especially important if the local community are hostile to the development and permission for it goes ahead despite their concerns.

I hope that the decision makers locally and in national government will give due thought to Brian's proposal and ensure that if this development goes ahead, generations to come benefit not just from clean energy but also from improved access to a beautiful coastal area."

In addition, Luke Anderson – Cycling Delivery Manager, South East, has been working with colleagues in other organisations who have pledged their support for the project:

"I met with some partnership colleagues from KCC today, and those from the Highways and Active Travel teams were well aware of your work and fully support the project. I'm due to meet with Swale council in the next fortnight, so I'll make sure it's on the Agenda there too."

[Alistair Gould, Boughton and Courtenay Green Party Councillor, Swale Borough Council](#)

Alistair has said:

"I am very keen to promote cycle routes from villages in Boughton and Courtenay to Faversham and Canterbury, and would welcome suggestions.

I was at a meeting today about the climate emergency, and significantly improving the cycling network is very much part of that discussion as well, and I hope that we can bring forward initiatives in the not -too distant future."

In addition Alistair has written to reinforce his support for the cycle improvements should the solar park go ahead:

"Thank you for your proposal, I think it is well argued and presented , and am willing to support it, with the obvious reservation that I would not want the solar

park to go ahead, but if it does, I agree there should be as much benefit to the local community as possible. It would be even better if we could have those off-road routes over open countryside.”

#### Sustrans

Simon Pratt – Head of Network Development, England South, has given his support for the cycle route:



“I agree that Route 1 between Faversham and Seasalter could be improved and your proposals fit very well with our ambitions to increase the proportion of traffic-free route on the NCN.

Sustrans is therefore very happy to support your proposals and I would ask you to keep us posted on developments.”

#### Spokes

Matthew Banbury wrote a letter of support on behalf of the SPOKES East Kent Cycling Campaign Committee:



# SPOKES

3 Hawk Close  
Whitstable  
Kent CT5 4DS



Web: [www.spokeseastkent.org.uk](http://www.spokeseastkent.org.uk) Email: [planning@spokeseastkent.org.uk](mailto:planning@spokeseastkent.org.uk) Twitter: @spokeseastkent

## Letter of Support for Proposed: Graveney's Environmental Access Route

Dear Brian,

We discussed your proposal at a recent committee meeting.

SPOKES is interested in the improved provision for every day cycling for transport. A measure we use for suitability or routes is to ask would you allow your eleven-year-old son or daughter to cycle a route on their own. We do not think that the road from Seasalter to Graveney would pass this test, we agree with your assessment that it is too dangerous for family cycling. Many will have observed that route is very popular with road cyclists, but experienced adults riding for sport, although good to see, is not what SPOKES is campaigning for. We want to see routes that are suitable for a wider range of ages and abilities so that cycling can be seen as an attractive and safe alternative to the car.

The most interesting aspect of your proposed scheme to SPOKES is that it would significantly contribute to connecting Whitstable to Graveney and Faversham via a motor traffic free route. It would be complimentary to the Whitstable to Seasalter route proposed in the Canterbury City Council Canterbury District Transport Strategy 2014-31. Although even if that were not to go ahead, the scheme proposed by you would solve what is currently the most dangerous part of the current route that a person on a bike would take between Faversham and Whitstable.

SPOKES fully support your proposed scheme as presented in the document titled: 'Graveney's Environmental Access Route'.

Yours sincerely,

Matthew Banbury

On behalf of SPOKES East Kent Cycle Campaign

### SPOKES OBJECTIVES

1. To encourage cycling and publicise its benefits for the community and for individuals.
2. To ensure that local authority and government policies actively encourage cycling and make full provision for it as part of an overall transport strategy through which all members of the public can enjoy cheap, safe and environmentally sound travel for work and leisure.

SPOKES East Kent is affiliated to the Cyclists' Touring Club and CycleNation.

### Rosie Duffield MP for Canterbury, Whitstable and Villages

Via her office, Rosie has said:

“As you may be aware Rosie has been campaigning strongly for better walking and cycling facilities in Canterbury and Whitstable. This would help tackle the climate emergency as well as promote better public health, improved air quality and reduced traffic congestion.

Rosie supports in outline the proposals you make for the cycling and walking network which crosses the boundary between the Faversham and Canterbury and Whitstable constituencies. As nearly all the Cleve Hill site and your home address are both in the Faversham constituency this is, in accordance with Parliamentary convention, a matter in the first place for your local MP Helen Whately. However Rosie has a proper interest as part of the proposed new network is in her constituency. She would like to note at this early stage that it will be important to link your proposals to improvements to the cycle route from Seasalter to Whitstable. At the moment this route follows the road which carries heavy volumes of traffic. There is a plan for a new cycle route from Seasalter to Whitstable in the Canterbury District Transport Strategy but no date for implementation nor any allocated funds. But this part of the route would become more popular if there is increased cycle use to the west.

Rosie wishes you every success with your proposals and would be grateful if you would keep her office informed about future developments, particularly the response from the developers of the solar park.”

### In Conclusion

I have been overwhelmed by the level of support for the cycle path from organisations, and individuals. It makes such good sense for the developers to support this scheme, giving something back and also keeping people safe on what is described as the most dangerous part of the route between Faversham and Whitstable.

This is in my back yard and myself, my family and the nearby communities will have to live with this for 40 years and therefore it is so important that. This is a unique situation where it is possible to do something great. I am passionate about this and will not stop campaigning and want to be involved in seeing this through as the scheme evolves once the developers are on board.

A legacy which gives communities access to the countryside and keeps them safe is something that the planning inspectorate must enforce through the decision making process. Let's make this happen.



## Appendix A – the proposed new Graveney Environmental Cycle Route

