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Dear Sir

**Planning Act 2008–Section 88 and The Infrastructure Planning (Examination Procedure) Rules 2010–Rule 6**

**Application by Cleve Hill Solar Park Limited for an Order Granting Development Consent for the Cleve Hill Solar Park Project**

This letter summarises the views of Faversham Town Council (FTC) with regard to the above application. Faversham is a town of 20 000 inhabitants lying 2km South-West of the proposed development. FTC recognise that climate change as a consequence of the burning of fossil fuels poses a clear and present threat to the future health and wellbeing of our planet. We agree that the UK should be investing in, and supporting renewable energy.

**FTC, as the elected representative body of Faversham residents, object to the proposal to construct and operate a solar power station on Graveney marshes** as we consider that, on balance, the identifiable concerns outweigh the potential ‘clean energy’ benefit of this project.

Our key concerns are summarised below

**1. The Size and Adverse Visual Impact**

- We understand the site is planned to cover an area of approximately 890 acres (365 hectares). This is 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, dwarf the communities which border it.
- 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.
- It is our view that this facility would fundamentally and detrimentally change the appearance of this locality from the moment its construction begins. This will adversely impact upon the public’s perception and enjoyment of the unique character of this place.

**2. The increased flood risk**

- Faversham is low lying and consequently at risk from flooding and rising sea levels. This is always apparent when there is a spring tide.
- The applicants of the Solar Park will have the responsibility for maintaining of the sea wall that forms a large proportion of its northern boundary. The presence of this sea wall acts to increase the flood risk at Faversham.

**3. The detrimental impact of construction and site access**

- Construction is planned to take place over a 2-year period. All of the equipment, materials and plant will have to be brought in by large vehicles from the M2 via junction 7 which is already over capacity at peak times of the day.
- The subsidiary roads leading to the site will struggle to accommodate large vehicles. We understand there is expected to be around 80 construction vehicle movements (one every 6 minutes) per working day. This will inevitably have a detrimental impact on the quality of life for resident and the children attending the village school on the route.
- The road to the site also forms part of Sustrans National Route 1. This an extremely popular route for cyclists and no consideration has been given to this.

#### **4. Concern over battery safety**

- Faversham Town Council is extremely concerned about the scale of the 'mega battery' proposed for the site. We understand that it has now increased in size from 350 to 700 MWh, nearly doubled. That now makes the Cleve Hill mega-battery site five times the size of the World's largest Lithium-ion (Li-ion) battery currently in service at Hornsdale Power Reserve in South Australia. This flies in the face of safety warnings from around the world.
- There is a recognised fire risk associated with Li-ion batteries and we are very concerned that neither the operator or the Kent Fire and Rescue Service are suitably equipped or experienced to deal with a large fire at the site should one occur.
- Li-ion batteries when alight give off toxic gases. With prevailing winds that would give the village and village school of Graveney, 6 minutes and Faversham 9 minutes to evacuate if a disastrous fire were to happen. The council have doubts whether or not our Rescue and Health Service would be able to cope.
- The Faversham Town Council insists that independent expert advice is sought.

#### **5. Detrimental Impact on Wildlife**

- The proposed site is immediately adjacent to The Swale which is a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) 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.
- Rare birds and other species which use the surrounding protected areas also use the nearby land including the site itself as habitat. There is a high likelihood of long-term negative effects on Dark-bellied Brent Geese and Breeding Marsh Harriers. The nearby SPA boasts a population of 24 pairs of the latter, representing at least 15% of the breeding population in Great Britain.
- We believe that over reliance is placed on the suggested 40-hectare habitat management area north of the Cleve Hill substation. The plan assumes 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.

**6. The potential value of the site as a coastal salt marsh**

- There may be an opportunity in the future to return Graveney marshes to a coastal salt marsh. This opportunity would be lost should the proposed development proceed.
- Restoring Graveney Marshes to a salt marsh would not only benefit Faversham by reducing its flood risk in Faversham, the site by increasing its biodiversity, but also the wider environment by acting as a 'carbon sink.'

**7. The lack of any substantial benefit to local communities**

- Faversham has a vibrant community who have worked hard over the last few decades to attract both visitors and new residents. A key part of the attraction is the built environment of the town itself but of course this is only enhanced by the semi-rural setting of the town.
- Faversham is bounded by an area of outstanding natural beauty to the south, the Swale Estuary to the north and characterful fruit farms and marshland both east and west.
- The placing of such a vast Solar Power Station so close to Faversham will inevitably, change perceptions of the area and affect its attractiveness as a place to live, work and spend time.
- FTC works alongside local civic groups seek to promote our town based on its rich natural and built heritage. We fear this development will thwart of efforts to the eventual detriment of the almost 20,000 people who live and work here.
- This proposal is projected to have no direct positive economic impact on the local economy. There are no projections for increases in local employment, spend with local business, development of a supporting business ecosystem etc.
- The only benefit (of any kind) that Cleve Hill Solar Park can identify for the local area is their obligatory business rates payments to Swale Borough Council. We consider to be a poor value exchange in light of the concerns we have described in this response.

**Faversham Town Council, acting in the best interests of the residents of Faversham, are opposed to the granting of permission for the development of the Cleve Hill Power Station.**