

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Subject: Cleve Hill Solar Farm proposal - objection
Date: 13 November 2019 17:11:44
Attachments: [REDACTED]

To the National Inspectorate (with attachment)

As a local resident who uses and values the countryside between Whitstable and Faversham I oppose the granting of a Development Consent Order for the installation of the huge solar photovoltaic array, battery storage and infrastructure proposed by Cleve Hill Solar Park.

Such an industrial development is completely inappropriate for this site and would devastate the area. Five times bigger than anything else built or planned in the UK this proposal includes panels facing east to west and installed like a lid over Graveney Marshes. This design is likely to increase impacts on, and significantly reduce the opportunities for, wildlife.

To that end I attach a species list compiled from confirmed sightings of wildlife on and close to the proposed site. A total of 394 species:

Bird species - 188 species of which 39 are on the RSPB Red List, 66 are on the Amber List, 21 are rare migrants

Mammal species - 25 species of which 2 are on the ICUN Red List, 9 of which are protected species

Reptile species - 3 species

Fish species - 2 species of which the European eel is on the ICUN Red List as critically endangered

Amphibian species - 4 species

Invertebrate species - 172 many of which 11 are nationally scarce notable species and 1 of which is nationally rare (red data book category 3, Falk, 1991)

The area proposed for this array is entirely the wrong place: bordered by a Site of Special Scientific Interest, Special Protection Area and Ramsar site. Much of it is within the Natural England-designated Greater Thames Estuary Natural Area and Character Area, and is noted as an Area of Greatest Habitat Opportunity and a Biodiversity Opportunity Area. It adjoins the Kent Wildlife Trust reserves. The land which would be covered by this development is functionally linked to protected areas and its removal from the ecosystem would be a devastating loss of contiguous habitat, with direct impact also on habitats within the actual development site.

My other objections include:

- Unproven battery technology with serious concerns about their safety including, in the case of fire the release of
Hydrofluoric gases,
- Loss of vital carbon sink,
- Loss of vital biodiversity, and
- Concerns about flood risk management.

I support the development of solar and renewable forms of energy but not on the

destructive scale of this sort of commercial enterprise. I request that permission be refused.

Regards

Elaine Shoobridge

Elaine Shoobridge

[REDACTED]

Local resident

GRAVENEY MARSHES

Wildlife recorded 1980s - present

Dated 10 November 2019

Overall the 394 species have been recorded on or over the site.

BIRD SPECIES

188 species



RSPB red list x 39



RSPB amber list x 66

R

Rare migrant x 21

*

Species recorded only in the Swale tidal/intertidal habitats x 43

- **Aquatic Warbler** R
- **Arctic Skua***
- **Arctic Tern***
- **Avocet***
- Barn Owl
- **Bar-tailed Godwit***
- Bearded Tit
- Bee-eater R
- **Bewick's Swan**
- **Bittern** R
- Blackcap
- Black Brant R
- **Black Redstart**
- Black Tern*
- Blackbird
- **Black-headed Gull**
- **Black-tailed Godwit**
- Black-winged Stilt* R
- Blue tit
- Blyth's Pipit
- Bonaparte's Gull*R
- Brambling
- **Brent goose**
- Buzzard
- Canada Goose
- Carrion Crow
- Cettis Warbler
- Chaffinch
- Chiffchaff
- Collared Dove
- **Common Gull**

- **Common Sandpiper***
- **Common Scoter***
- **Common Snipe**
- **Common Swift**
- **Common Tern**
- **Coot**
- Cormorant*
- **Corn Bunting**
- **Cuckoo**
- **Curlew**
- **Dark-bellied Brent Goose**
- **Dartford Warbler**
- Desert Wheatear **R**
- **Dunlin**
- **Dunnock**
- Egyptian Goose* **R**
- **Eider***
- Feral pigeon
- **Fieldfare**
- **Fulmar***
- **Gadwall**
- **Gannet***
- Garden Warbler
- **Glaucous Gull*****R**
- Golden Plover
- **Goldeneye***
- Goldfinch
- **Grasshopper Warbler**
- **Great Black-backed Gull***
- Great Crested Grebe*
- **Great Northern Diver***
- **Great Skua***
- Great Spotted Woodpecker
- Great tit
- Great White Egret
- **Green Sandpiper**
- Green Woodpecker
- Greenfinch
- **Greenshank**
- Grey Heron
- **Grey Plover***
- **Grey Wagtail**
- Greylag Goose
- **Guillemot***
- **Hen Harrier**
- **Herring Gull***
- Hobby

- **Honey Buzzard** [R](#)
- Hooded Crow
- **House Martin**
- **House Sparrow**
- **Iceland Gull*** [R](#)
- Jackdaw
- Jay
- **Kestrel**
- **Kingfisher**
- **Kittiwake***
- **Knot***
- **Lapwing**
- **Lesser Black-backed Gull**
- **Linnet**
- Little Auk* [R](#)
- Little Egret
- Little Grebe
- Little Gull*
- Little Owl
- **Little Tern**
- **Long-tailed Duck***[R](#)
- Long-tailed magpie
- Long-tailed Skua*[R](#)
- Long-tailed Tit
- Magpie
- **Mallard**
- **Manx Shearwater***[R](#)
- **Marsh Harrier**
- **Meadow Pipit**
- **Mediterranean Gull**
- **Merlin**
- **Mistle Thrush**
- **Montagu's Harrier** [R](#)
- Moorhen
- **Mute Swan**
- **Osprey**
- **Oystercatcher**
- Paddyfield Warbler [R](#)
- Pale bellied Brent Goose [R](#)
- Peregrine Falcon
- Pied Wagtail
- Pheasant
- **Pink-footed Goose**
- **Pintail**
- **Pochard**
- Pomarine Skua*
- **Purple Sandpiper**

- Raven
- Red Kite
- **Red-backed Shrike**
- Red-breasted Merganser*
- **Red-necked Grebe**
- Red Kite
- Red-legged partridge
- **Redshank**
- Red-throated Diver*
- **Redwing**
- **Reed Bunting**
- Reed Warbler
- **Ringed Plover***
- Robin
- Rock Pipit
- Rook
- Rough-legged Buzzard **R**
- **Ruff**
- Sabine's Gull***R**
- Sand Martin
- **Sanderling***
- **Sandwich Tern***
- Sedge Warbler
- **Shelduck**
- **Shorelark**
- **Short-eared Owl**
- **Shoveler**
- Siskin
- **Skylark**
- **Slavonian Grebe***
- Snipe
- **Snow bunting**
- **Song Thrush**
- Sooty Shearwater***R**
- Sparrowhawk
- **Spoonbill***
- **Starling**
- **Stock Dove**
- Stonechat
- Swallow
- **Swift**
- Tawny Owl
- **Teal**
- **Tree Pipit**
- Tree sparrow
- Tufted Duck
- **Turnstone***

- **Turtle Dove**
- **Velvet Scoter***
- Water Rail
- Wheatear
- **Whimbrel**
- **Whinchat**
- Whitethroat
- White Wagtail
- **White-fronted Goose**
- **Wigeon**
- **Willow Warbler**
- Wood Pigeon
- Woodcock
- Wren
- **Yellow Wagtail**
- **Yellowhammer**

Sources



Kent Ornithological Society records

Rare Bird Alert

AECOM Ecology: Cleve Farm - Breeding Bird Survey Report 2014 and 2015. Dated December 2015.

MAMMAL SPECIES

25 species

-  ICUN Red List (International Union for the Conservation of Nature) x 2
-  Protected species x 9

- Bank vole
- Brown hare
- Brown rat
- **Brown long-eared bat***
- **Common pipistrelle bat***
- Common shrew
- Field vole
- Fox
- **Harvest mouse** (Near threatened)
- **Hazel door mouse* 1**
- **Hedgehog** (Vulnerable)
- Leisler's bat*
- Mole
- **Myotis bat***
- **Nathusius' pipistrelle bat***

- **Noctule bat***
- Pygmy shrew
- Rabbit
- Red fox
- **Serotine bat***
- **Soprano pipistrelle bat***
- Stoat
- **Water vole***
- Weasel
- Wood mouse

The site offers foraging and commuting habitat used by at least nine species of bat. It is considered that the site overall provides an important foraging resource within the wider area, utilised by bats commuting into the site from offsite roosting locations.

1 – CPRE Deadline 3 Submission – A further statement on biodiversity. Published 2 August 2019

*Dormice are afforded full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Schedule 2 of the Conservation (Natural Habitats &c) Regulations, 1994, making the hazel dormouse a European Protected Species.

*Water voles (*Arvicola amphibius*) are protected under the Wildlife and Countryside Act 1981.

Sources

Mammal Atlas

AECOM Ecology: Cleve Farm - Bat Survey Report 2015. Dated December 2016.

AECOM Ecology: Cleve Farm – Water Vole Survey Report. Dated January 2016.

AECOM Ecology: Cleve Farm – Badger Survey Report. Dated October 2015.

1 – CPRE Deadline 3 Submission – A further statement on biodiversity. Published 2 August 2019

REPTILE SPECIES

3 species

- Grass snake*
- Common lizard*
- Slow worm*

*Protected under the Wildlife and Countryside Act 1981

Sources

AECOM Ecology: Cleve Farm - Reptile Survey Report. Dated January 2016.

FISH SPECIES

2 species

 ICUN Red List (International Union for the Conservation of Nature) x 1

- **European Eel (Critically endangered)***
- Ten-spined Stickleback

The European Eel is a UK Biodiversity Action Plan Priority Species, is on the list of threatened and/or declining species and habitats under the OSPAR Convention, and is a species of principal importance for the purpose of biodiversity conservation under the Natural Environment and Rural Communities Act 2006.

Sources

ICUN See <https://www.iucnredlist.org/species/60344/45833138> for details.

See EC Council Regulation No 1100/2007 of 18 September 2007 establishing measures for the recovery of the stock of European eel.

<https://www.ospar.org/work-areas/bdc/species-habitats/list-of-threatened-declining-species-habitats>

<https://webarchive.nationalarchives.gov.uk/20140605093420/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

AMPHIBIAN SPECIES

4 species

Marsh frog
Smooth newt
Common frog
Common toad

A European protected species afforded full protection under the Wildlife and Countryside Act (198) and the Conservation of Habitats and Species Regulations (2010).

Sources

AECOM Ecology: Cleve Farm – Amphibian Survey Report 2015. Dated December 2015.

INVERTEBRATE SPECIES

172 species

Coleoptera (beetles) 83
Dermaptera (earwigs) 1
Diptera (flies) 23
Hemiptera (bugs) 31
Hymenoptera (bees, wasps etc.) 6
Lepidoptera (butterflies & moths) 14
Odontata (dragonflies) 3
Orthoptera (grasshoppers etc.) 4
Aranaea (spiders) 3
Opiliones (harvestmen) 1
Isopoda (woodlice) 2
Mollusca (snails) 1

Including scarce and unusual water invertebrates:



Nationally rare (red data book) species x 1

Nationally scarce (notable) species x 11

- **Horsefly *Atylotus latistriatus*** (Brauer), a large grey horsefly (family Tabanidae). Status: nationally rare (red data book category 3, Falk, 1991).
- **Water beetle *Agabus* conspersus**,
- **Water beetle *Agabus* Rhantus frontalis**
- **Water beetle *Agabus* Ochthebius marinus**
- **Bombardier beetle *Brachinus crepitans***
- ***Drymus pilicornis* (Mulsant)** a small dark ground bug (family Lygaeidae)
- **Ground beetle *Harpalus ardosiacus***
- ***Reptalus* (formerly *Oliarus*) *panzeri* Low**, a small brown plant hopper (family Cixiidae).

- **Harpalus ardosiacus Luts.**, a medium-sized dark blue ground beetle (family Carabidae)
- **Hygrotus parallelogrammus Ahrens**, a small black and orange water beetle (family Dytiscidae)
- **x Ilybius subaeneus Erichson**, a medium-sized dark water beetle (family Dytiscidae)
- **Peltodytes caesus Duftschmid**, a small pale water beetle (family Haliplidae)
- Planthopper Reptalus panzer
- Bumblebee Bombus muscorum
- Red malachite beetle Anthocomus rufus
- Lacebug Dictyla convergens
- Weevil Hypera pollux
- Picture-winged fly Paroxyna plantaginis
- Planthopper Pentastridius leporinus
- Ground beetle Dyschirius salinus
- Predatory fly Machaerium maritimae.
- Dragon fly Anisoptera
- Damsel fly Zygoptera
- Boatmen bugs Corixa affinis

Sources

Richard A. Jones FRES, FLS; AECOM Ecology: Cleve Farm – Preliminary Invertebre Survey Report 2015. Dated December 2015.