

Notes from Week 2 of Hearings

Open Floor Hearings 22 July 2019

Alan Stewart (Chair, Graveney & Goodnestone Parish Council) – Strong objection to the application. Local perspective – settlements pre-date Domesday book. Visitors come because of characteristics. Residents live there because of characteristics. Disrespectful attitude by the applicants to the villagers. Heritage assets are integral to the character of village. The church is more than a heritage asset, it is medieval and largely unchanged. Its distinct character is largely due to its setting. Solar panels will change this. The applicant's heritage report conflicts with Historic England. The village previously suffered disruption and damage by London Array. There has been no credible management plan presented for the traffic and HGVs.

Lut Stewart (GREAT) – Concerns from village re quality of life should development be approved. Previously asked for Equality Impact Assessment to be completed but this hadn't been done until now. Refers to 'relevant receptors' which actually relate to the villagers of Graveney, which is rude. To complete assessment it is necessary to know the villagers, which hasn't been done. High numbers of retirees in village and many live alongside main road. There will be an impact to the school. Villagers have come to this area because they know it is quiet, with access to nature which promotes wellbeing. The development will change the character. This situation compares to robbery – i.e. the applicant has stolen some of your possessions yet thinks you should be thankful that they left you with something. The cost of development is simply too high for the villagers.

Sir David Melville (Faversham Society) – Particularly concerned about the energy storage system. There are known hazards associated with batteries and little track record. There are no National Policy Statements on this technology and very little guidance. Researched insurance companies – Allianz Research – which shows this technology is susceptible to thermal runaway which has resulted in some serious fires in the last few years. A number of examples were quoted in America where serious fires had occurred but the exact causes are not fully known or understood at the moment, e.g. 2012 Hawaii Wind Farm, damage of \$10-30m. Once thermal runaway starts it is very difficult to stop. There are knowledge gaps with no fire management data etc.

Ann Salmon (Faversham Labour Branch) – Graveney Marshes is a medieval landscape with archaeology that hasn't been investigated, e.g. remains of WW2 plane. Traffic / construction and spine road all lead to increased danger of crossing / walking along the roads.

Tom King (Graveney resident) – Concerned about the impact the construction traffic will have on the village of Graveney should the development go ahead. Described country lane with no footpath for the majority of its length and no facility for walkers or cyclists to get off road if needed. Route is only available diversion when problems or roadworks on A299 which then causes gridlock through village. Explained need to pull over if meeting a large vehicle coming from the opposite direction and suggested that applicant's idea about creating passing places is not viable. GREAT commissioned its own 2 week traffic survey to validate volumes following concerns from villagers. Obtained raw data from applicant and compared that to GREAT's volumes – average daily volumes for total traffic and HGVs were broadly similar. However, unable to establish how numbers included in application document were arrived at, e.g. it suggested 199 HGVs on Headhill Road when raw data showed a much lower number. Challenged numbers and expressed concerns about over-inflation of HGV numbers would dilute impact of construction traffic. Also concerned that these numbers were used by Kent Highways in their impact assessment. Applicants had also included a reduction of farm traffic if development went ahead which showed a completed lack of understanding of village life.

Asked examiners to ensure they referred to the raw data for their reviews rather than the spurious numbers included in application.

Marie King (Graveney resident) – Had originally planned to voice concerns about applicant's experience to build and operate a development of this size and type but this was mostly covered by the examiners at the Need hearing. However, a comment in Wirsol's press release on 25 January 2016 about a plant in Scandinavia included "...the photovoltaic plant is also the first project, since Wirsol's fresh start in the year 2013, for which the project planners have obtained secure financial backing...". There was no reference to this 'fresh start' on Wirsol's website but Wikipedia states "Between October 2013 and January 2014, several subsidiaries of the company initiated insolvency proceedings." Asked for full details to be provided and assurances to be given that this situation would not be repeated.

Prof. John Ellis (Whitstable beach front resident) – Concerned about flood defences. In 1953 flood Whitstable saw record high tide of 4.1m. Record also seen in 2013. Normal sea levels are increasing and emergencies seen in 2013 are now becoming the norm. Environment Agency's policy changed from building high flood defences to managed retreat. No idea where additional land will be found if managed retreat delayed. Applicants should endow fund for 40 year life of project before installation.

Bob Gomes (Graveney resident) – Local breeding marsh harrier population – UK's rarest breeding bird – just 361 total pairs in 2016 – and rarer than golden eagle. South East ranks high with 36 pairs, the majority of which are in the Swale SPA. Not possible to mitigate. Observation on flight line data – no data showing what contribution arable land used for feeding. Food resource will diminish when solar panels installed. Skylarks will all but disappear from the area. Marsh harriers have been seen crossing the Swale carrying prey from one side to the other. This site is critical to success of their populations and they are very susceptible to disturbance – dykes and arable land are used as alternative nesting sites which will be removed by the development. How will the construction be able to protect marsh harriers, a Schedule 1 bird?

Jan Pritchard (Whitstable resident) – Has been in Whitstable for 50 years. Strongly in favour of zero carbon but strongly opposed to industrial development of site. 50 singing male skylarks were recorded in 2016. Barn owls nest in several sites adjacent to the site and forage on arable land. More people approach along Saxon Shore Way from Whitstable. It provides tranquillity and spiritual refreshment. There are better alternative sites.

Prof. Ros Coward (Whitstable beach front resident) – Threat to valued local amenity. Huge impact on Graveney and wider area. "Beautiful, atmospheric, wildlife full Graveney marshes". Coastal areas have vital role to play in natural climate change protection. Tranquil area – constitutes a jewel in the crown of the Saxon Shore Way and provides long term physical and mental wellbeing benefits. Recommended a book – Carol Donaldson "On the Marshes". This will all be replaced by an industrial landscape. Asked if the Inspectorate had any way of measuring grief and distress this will bring? Will the loss of wellbeing be assessed?

Dr Bruno Erasin (local resident) – Identified quite a significant risk from the batteries. Very little information has been provided. Toxicity from fires – hydrogen fluoride released. Taking quantitative data and a dispersal model – undertook simulations using different wind speeds and weather conditions. Shows increased exposure limit to properties close to batteries and shows battery storage site should be at least 15km away from population.

Richard Knox-Johnston (CPRE Kent) – Had been talking to someone who had retired from the National Grid and the ability of batteries to provide power and for how long. Nothing has been documented in application. In Wales the best that was shown was 2000MW for 6 hours. We need information from the applicants. It would be very wrong to go ahead with battery storage with limited experience and scientific evidence. It is a recipe for disaster with pollutant air from fire as well as the fire itself. The Environment Agency still have an obligation to repair the sea wall if there is any damage.

Issue specific hearing – Landscape 23 July 2019

- Policy and guidance – Application methodology GLVIA 3 and LI technical notes. Thorough understanding of site, landscape settings and visual receptors, e.g. footpaths, residential properties, landscape designations. Field work undertaken. Applicant understands magnitude of change likely to receptors and their significance – includes judgement and experience.
- ExA questioned different methodology for photo montages – some cropped, some at larger / smaller scale, difference in scale from baseline photography. Asked why they had been produced at different sizes. Applicant responded that they understood they had been produced per guidelines. CPRE stated they should all be at same scale. ExA asked for this to be done.
- Visual impact assessment – large proportion of work done on site was professional judgement! ExA asked for cross-sections and drawings for the sensitive areas, e.g. around Shipwrights Arms, from bench to enjoy view along Saxon Shore Way, section from Sayes Court, to demonstrate leeway on protection of views.
- Canterbury City Council undertaking independent landscape review to be submitted by deadline 3.
- No-one has a right to a view but no property should have over bearing effects. It is about the habitability of a property.
- RVAA guidance doesn't stipulate specifically to solar.
- Settings assessed in a 'balanced way' – setting definition in landscape and heritage are different.
- Applicant said they had assessed at 'worst case scenario'.
- ExA asked why 2 properties assessed as not significant for a public view as these are residential property so assessment should be different. Applicant took this away to look at.
- Height of bund is 5.316m. Battery height will not exceed this.
- Additional issue specific hearing for battery storage requested.
- Glint & glare – effects on dwellings found as moderate – not considered significant which means mitigation only has to be considered. Applicant doesn't feel mitigation needed for dwellings. Generally mitigation is to screen out panels.
- CPRE raised point about not being many trees in area currently which may be due to soil and other conditions – establishment may be difficult. Also using native trees which lose their leaves in winter means that screening will be ineffective.
- Any residents who feel their issues have not been addressed are to be brought to this forum.
- 13 August – meeting with Canterbury City Council, KCC, Swale Borough Council and applicant to discuss impacts.
- Lighting in solar park – PIR – triggered by motion. Parameters will be set so that they are not set off by small mammals. No lighting applied along fencing area, only around transformer area.
- Dark sky area – screening from night time glow? Focus of lighting is pointed down.

- David Pollock – operates barge in Faversham. Heritage Harbour Group – maritime centre. Unchanged views and landscape for 100's of years. Unlike a lot of other parts of the Swale and Medway which are largely industrialised.
- Ian Wild – Ramblers – Saxon Shore Way will become a national path. You don't get the inland views from other areas like you do here. Applicant stated that if MEASS is brought forward the landscape will change and the Saxon Shore Way will disappear. Ian Wild confirmed realignment of the coastal path is already in the plans. The footpath is well used and contributing to health and welfare of those using it.
- David Melville (Faversham Society) – Church's setting will be harmed by development. Applicant accepts they have not met requirements to protect this heritage asset. Need to balance between harm and need! Need for this development has not been clearly established.

Accompanied Site Visit – 24 July 2019

The site visit was hosted by the applicant who provided buses to ferry the attendees around the various sites. Around 10 members of the public attended along with Graham Thomas of SBC and were accompanied by the Examiners, David Rose and Andrew Mahon together with two members of the National Inspectorate case team. Mike Bird and Simon McCarthy from the applicant team also attended. The sites visited included:

- Views of the proposed energy storage site from beside the London Array substation
- Views of the proposed location for the new access road from the current London Array access road
- Views from the perimeter of the London Array site across the broad development area
- Views from the rear of the Graveney church and the church tower across the proposed site
- Views from Broom Street, The Old Vicarage and Sparrow Court
- Views from Warm House
- Views from Nagden Cottages and from the coastal footpath alongside the Barn

This gave attendees an excellent opportunity to point out important aspects of the expected impacts from the development to the examiners and to learn more about the proposed development. One example was the map provided by the applicant showed 240 CCTV cameras around the perimeter of the development, something we will be challenging.

Issue Specific Hearing - Biodiversity and Nature Conservation Matters 25 July 2019

- Graveney is lucky to have their own bird expert in the form of Bob Gomes. Bob has a degree in Zoology and worked with the RSPB for over 20 years. He eloquently explained his vast knowledge of the Marsh Harrier, Brent Geese, Golden Plover and Lapwing. He questioned the mitigation measures for these birds and outlined how they really behave in nature and what their foraging habitats are. This is rather different to the mathematical calculations the developers used, e.g. to allocate areas and planting for the Brent Geese.
- Vicky Ellis (CPRE) - delved deeper into the well-being of other marsh animals, including small mammals and questioned, for instance, the developers' approach to the protection of the Dormouse.
- There is a group of organisations that meet on a regular basis to discuss and agree common ground and these include the developers, RSPB, Kent Wildlife Trust and Natural England. So far there is not a common statement that organisations have signed up to and it is hoped

that those truly representing wildlife continue to question the adequacy of the mitigation for the sake of nature.