

84 Roberts Road,
Greatstone,
New Romney,
TN28 8RG

Andrew Gambrill, Case Manager

Canterbury City Council
Military Road
Canterbury
CT1 1YW

9 April 2021

Dear Mr Gambrill,

Importance of conducting an Environmental Impact Assessment (EIA) to appreciate lasting damage of Enso Energy's proposed solar manufacturing plant and battery storage facility on environment, society and governance (ESG) of Hoath, Chislet and wider region of Canterbury.

Application No. CA/21/00812

We write with reference to the letter from Enso Energy dated 29 March 2021 and yours of 6 April.

Enso Energy's letter to Canterbury City Council dated 29 March 2021 contains many misleading statements and factual errors making it essential that an Environmental Impact Assessment is conducted rather than relying on reported inaccuracies.

- The proposed site contains Grade 1 farmland according to the Natural England Regional Agricultural Land Classification Maps as well as grades 2, 3 and 4 cited by Enso. The grade 4 land is the water meadows used for grazing along the Nethergong Penn river and is an important site for wildlife.
- There is no underground cable route currently from the site to Canterbury sub station
- There is currently NO intrusion of man-made features apart from ONE electricity pylon (shown on the map in appendix 1). This is otherwise a completely rural landscape.
- The field network is largely open. Some hedgerows remain but most have been removed
- It is not true to say that "the site is currently accessed via an existing access point from Marley Lane". There are many access points. The Marley Lane gate was until recently a simple farm gate into an arable field but the land owner has recently deposited hardcore inside this gate to make a track for HGVs. Traditionally this is not an entrance to the wider site.

This letter is an immediate urgent response to rebut Enso's claims in order. There needs to be a detailed EIA to consider all aspects of the risks to this community and environment, considering elements beyond the distorted representation by the manufacturing plant's proponents.

Consultation with Hoath and Chislet villagers needs to be thorough and unincumbered by social distancing and gathering impediments.

In the table below, we rebut Enso Energy's claims against the need for an Environmental Statement (ES) in order. We would like to summarise the key points up front.

1. Permission for a 40 year solar energy manufacturing plan cannot be defined as "temporary and fully reversible". It spans two human generations and many management generations. The precedent of decisions made today may have lasting and permanent consequences for environment (including biodiversity) and society (including employment), locally and at large.
 - a. It is extremely probably that solar technology will evolve over 40 years, making the need for material revisiting of this site much greater than the "limited vehicle visits" described in Enso Energy's letter
2. The argument that the proposed location will have no visual, environmental or social impact ("not likely to be perceptible") is wrong and their documentation misleading.
 - a. The proposed site is huge relative to that of the sister villages of Hoath and Chislet which it will bisect.
 - b. It will destroy the currently unincumbered views that stretch from the Northern coast to the Stour valley. It will be painfully visible from the A28 Sturry Road between Canterbury and Margate
 - c. It is surrounded by sensitive areas of protected biodiversity. It is only not protected itself because the passive assumption over centuries has been that arable farming will persist to perpetuity.
 - d. Hoath and Chislet, and many of the associated neighbourhoods in this region, are already suffering building social depreciation with collapsing local amenities, employment challenges, escalating fly tipping, and illegal attempted development. Approving the conversion of this area of beauty and agriculture to an industrial solar plant wasteland will kill this community, with escalating financial consequences that will be borne by local authorities. Employment in this area is supported by farming and with therefore take another hit as acres become permanently fallow.
3. The ultimate intentions of the beneficial owner of this land need to be explored properly. The past year has seen the creation of a controversial "digestible storage unit" for digestate bordering the proposed solar energy manufacturing plant. This was apparently created to serve the fields that are now sought for conversion. The inconsistency or change of plans must be significant for the full due diligence of an ES.
4. Productive arable farmland is of long-term value to the UK at a time when food security is as much a priority as energy. The long-term value proposition of removing this land from the food supply chain needs to be fully considered and balanced with the many other solar plant proposals for Canterbury.
5. Enso Energy's closing request for a rapid turnaround is in clear breach of the pandemic-related restrictions on community consultation. Time must be allowed for physical interaction and discussion with the Hoath, Chislet and wider local Canterbury Communities about this project.

See specific comments below, all of which point to the need for an ES

Assessment of Proposed Development as EIA Development

<u>Characteristics of Development</u>	<u>Assessment</u>	<u>EIA</u>
Size and design of development	<p>The proposed development is huge relative to the size of the sister villages of Chislet and Hoath and drives a visible wedge between the two communities.</p> <p>At nearly 2km wide, the proposed high barrier deer fencing will produce an impassable barrier to wildlife that currently thrives on its ability to migrate locally between fields (hares as an example). The site is not “generally enclosed” but open fields with views to the coast four miles away in the North and beyond the Stour Valley into the South. The site is particularly visible from the A28 Sturry Road between Canterbury and Margate in the Hersden / Upstreet area.</p> <p>Appendix 1 is misleading in its presentation. It fails to show the full extent of the drainage system, which needs full investigation. The drains that are shown are only those that are implicitly supportive of the proposal. Recent experience proves that the current owner of the proposed site and Canterbury City Council do not understand the waterflows in the region. These must be fully investigated.</p> <p>The maps ignores a number of public access footpaths that are currently a mainstay of community activity.</p> <p>The maps emphasise tracks that are to the advantage of the proposal but fail to label the most important access point and road through the property (which is a public right of way).</p>	Yes
Cumulation with other developments	Existing solar sites already encroach into Blean woods and in conjunction with other proposed sites would create vast stretches of the Canterbury countryside visibly covered in panels and related energy buildings.	Yes
Use of natural resources	<p>The capacitor batteries required for solar energy manufacturing plants are amongst the most polluting to create and hazardous to maintain. Such environmental considerations are significant given that the impact of this proposal will last 40 years, if not to perpetuity. There is currently no information about where these will be located, with the risk being extremely high that economic preference will be for them to sit right next to the most vulnerable areas environmentally.</p> <p>The notion of grazing between the solar panels is a fiction. Farmland animals risk damaging sensitive equipment and so will not be tolerated as soon as they can be removed, leaving the proposed sight as shaded fallow for 40 years. There is little to no sign of any grazing wildlife in any of the solar manufacturing fields that have already been built in the Canterbury region.</p>	Yes
Production of waste	The seven month proposed building phase will likely involve the laying of foundations for buildings and extensive fencing which risks irreparable damage to the area and create heavy traffic on minor roads that are already crumbling under the inappropriately heavy traffic related to a recent “digestible storage unit” erected by the current landowner.	Yes

	The original Delegated Report for this digestate unit (CCC Ref CA/19/01430/FC) stated that it was “part and parcel of the same agricultural farming operation” of the proposing agent. The proposed carve out of this unit (with reference to Appendix 1 appended by Enso Energy) from the original Lot 4 at the time of purchase now contradicts this description. The creation of a solar plant on land that was allocated as a direct beneficiary of the digestible storage unit just two years ago requires a more detailed environmental impact study.	
Pollution and nuisances	All energy production produces background noise and “not likely to be perceptible to sensitive receptors above background noise levels” is a qualitative statement that needs to be factually tested against the currently peaceful silence of this rural community.	Yes
Risks to human health	Hollow Street / Marley Lane are single track minor roads. Much of their border with the proposed site is unhedged or thinly hedged. Where hedged, there are dangerous blind corners. Such blind corners would multiply if artificial barriers are created where there are currently none (notably the dogleg at what should be the main entrance to Lot 4 ignored in Appendix 1). These roads are frequented by walkers and cyclists, including children. The risk of a fatal accident during the construction period from a heavy vehicle crushing another road used is huge. There are almost no safe passing points on Hollow Street / Marley Lane adjacent to the proposed site.	Yes
<u>Location of Development</u>	<u>Assessment</u>	<u>EIA</u>
Existing use of land	<p>This is prime agricultural land, described in the 2015 sale process as “exceptional commercial arable farm” by Bletsoe’s, the selling agent (their Ref DHB/CB/16925).</p> <p>Every boundary is with areas of protected natural beauty and ecological importance, including Nethergong Penn. Protected status has been attributed to other land when it has changed hands (witness farmland purchased by previous owners of Clayhanger Hall) precisely to protect it from non-agricultural development.</p> <p>The intentions to repurpose this land were not disclosed by St Nicholas Court Farms Ltd at time of purchase (2015/16) when retrospectively the circumstantial evidence is clear that preparation for repurposing was considered (assuming they remain the current beneficial owner behind Enso Energy).</p> <p>Further clarity is needed about the access points to the proposed site. These are not clear from the letter or Appendix 1. Both imply that the main access point will be the entrance for the new digestate plant. That was nothing more than a small field gate until it was converted on the understanding that this was specifically used for access to the new digestate pit (which seems to sit outside the proposed site, implying the need for a hard boundary between the two properties. The main access point for this whole property was the original road shown west of the proposed entrance point in Appendix 1. This is ignored in the labelling of Appendix 1 but</p>	Yes

	shown clearly on Ordnance Survey maps, marked as a public right of way.	
Relative abundance, quality and regenerative capacity of natural resources in the area	<p>“Harvesting of sunlight” is a euphemism designed to create the false impression that a field of solar panels is the same as arable farmland. That is sophistry. This is a commercial venture to create a solar energy industrial manufacturing plant and it will be seen as such to perpetuity.</p> <p>“Potentially [my emphasis] low intensity sheep grazing” is a fiction that will be dropped the moment animals threaten equipment.</p> <p>“Temporary and fully reversible” is factually incorrect for a 40 year project that converts from traditional to experimental infrastructure and rapidly evolving technology.</p>	Yes
Absorption capacity of the natural environment	<p>Given the open countryside that will be affected, it is not correct that the proposed development can be absorbed well into the landscape.</p> <p>The water table in the region is already disturbed, evidenced by a near constant stream running down the Marley Lane / Hollow Street road from Hoath to Chislet Forstal. Further damage from this construction process seems inevitable. Flooding is already notable elsewhere so the risk of further deterioration without further extensive and potentially damaging drainage action is high. The area has an unusual drainage system whereby water runs through a series of ponds and ditches ultimately to the Nethergong Penn. This includes immediate and proximate passage through a protected pond with verified presence of Great Crested Newts, whose breeding sites and resting places are protected by law. Uncertainty about the pollution effects of run-off from unnatural materials introduced to the region is already an emerging environmental challenge, affecting planning considerations nearby.</p> <p>Much of the run-off drainage system is through open ditches in populated areas and so the evidence must be overwhelming that pollutants are absent.</p> <p>It is factually wrong to state that this development will “sit passively in the landscape”. Background noise levels in the area are zero. The risk of deterioration of this status is high. Wild buzzards nest in the affected region, particularly in the woodland bordering the proposed site. Such birds are dangerously sensitive to noise and physical disruption for their nesting patterns.</p>	Yes
<u>Types and Characteristics of Potential Impact</u>	<u>Assessment</u>	<u>EIA</u>
Magnitude, extent and nature of impacts	<p>A solar energy manufacturing plant has no relation to the ancient biodiversity and community integrity of an area that was bequeathed by St Augustine and consistently produces information of historical and cultural importance, evidence by many local pamphlets over the generations.</p> <p>It is incorrect to label a 40 year project in experimental science as “temporary and fully reversible”</p>	Yes
Transboundary nature of impact	The statement made here by Enso could be applied to any location in the UK and is therefore meaningless. They fail to recognise the	Yes

	valuable greenfield and community nature of the proposed location relative, for example, to the swathes of brownfield opportunities that sit in Kent and the wider UK	
Intensity and complexity of impact	The magnitude of effect will be huge, complex and of lasting uncertain (likely damaging) to the local community and this region of Canterbury more widely. The consequential implications for the collapse of this whole farming region over time are huge.	Yes
Probability of impact	“It is considered”, in contrast to the submission, that the Proposed Development will have a <i>hugely</i> significant impact. This will be fully evidenced by the assessments accompanying the planning rebuttal. In the context of the proposers seeking to bounce the local community during a time of pandemic disruption, fair time needs to be given for the community to consider the proposal (including with physical meetings), arrive at a consensus and respond.	Yes
Duration, frequency and reversibility of impact	40 years when referring to a science that is evolving rapidly and likely to prove existing technology redundant well within that time scope cannot be considered “temporary and fully reversible”. The duration of the impact extends well beyond the typical professional life span of existing management teams of the proposing parties and so covenants of inherited behaviour need to be clearly discussed.	Yes
Cumulation of impact	The list provided by the proposer indicates the compounding nature of the risk of these solar energy manufacturing plants overwhelming local communities as fenced barriers. The list should also be considered with reference to contingent proposals that are also in the pipeline and also likely to emerge over the 40-year building and maintenance period.	Yes
Possibility of reducing impact	As a project driven by the profit motive of one organisation, the balance of probability is extremely high that over the 40 year period consultation will be kept to a minimum with a view to reducing marginal costs to the benefit of the project and detriment to the Hoath, Chislet and wider Canterbury communities. The method by which this proposal has been first presented to the local community is overwhelming evidence for this from the beginning	Yes

Addressing Enso Energy’s closing two bullet points:

- Indicative Criteria and Threshold - In the context of the scale and duration of this proposal, and the manifold ESG risks ignored by Enso Energy that are explained in this letter, 49.9MW and 50MW are statistically equivalent. No responsible authority should waive through a decision on a 0.2% variance, which is subject to measurement inaccuracy in itself.
- Key Issues to Consider - this letter highlights the manifold ESG risks that Enso Energy’s letter has either understated, misrepresented, or ignored.

This letter focuses on environmental issues. We think CCC Planning should also be aware of the heritage issues that must be investigated. The proposed site is historically part of the oldest property in the Chislet / Hoath region. The land encompasses St Augustine's original development of the region from his base at the Abbey. Items of historical and archaeological interest have been discovered over the generations but there has never been a full investigation of the fields that are within the proposed site. It is highly likely that items of historical and archaeological importance for the whole Kent region sit below the immediate layer of cultivated land. Laying fencing foundations and drilling extensive pole structures without full investigation risks irreparably damaging or losing valuable history for Kent and the UK.

We would like you to consider the importance of all of the counter-arguments above. Please inform us of the full due diligence process for this project from here. We are nervous that Enso Energy and its partners are attempting to use their considerable experience in these matters to drive through a locally disastrous project without full public scrutiny.

Whilst the national principle of solar energy facilitation is reasonable, the specifics with regards to this proposed location are overwhelmingly damaging for the environment, heritage, society and employment. The letter from Enso Energy purports to be an ecological solution to a national priority. Full investigation will prove that these proposals will convert prime agricultural land in the heart of the Garden of England into an Industrial Wasteland. Far from harvesting sunlight, this proposal will create a solar desert that will irreparably destroy biodiversity, community and jobs.

Please require a full Environmental Statement and conduct a full Environmental Impact Assessment to considered the long-term, irreversible consequences of Enso Energy's proposal.

Your sincerely,



G Eaton

On behalf of

Chislet Parish Council & Hoath Parish Council

Email (please use for future correspondence): chisletparishcouncil@outlook.com