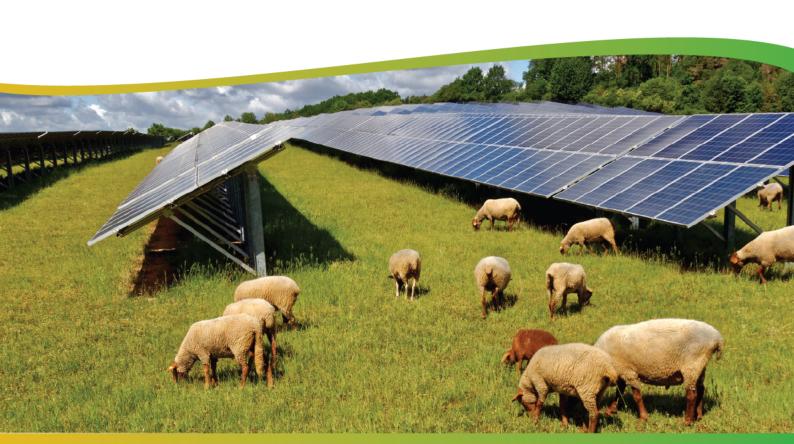


Consultation Report, Appendix G: 2023 Statutory Consultation Materials and Consultation Responses Appendix G-1: 2023 Statutory Consultation Information Pack, Part 3

PINS Ref: EN010135 Doc Ref. 6.2 Version 1 June 2024

APFP Regulation 5(2)(q)
Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Stonestreet Green Solar Project Consultation Report Appendices



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1. PEIR Addendum, Volume 1: Non-Technical Summary



PEIR Addendum

[Planning Inspectorate Reference EN010135]

Volume 1: Non-Technical Summary

June 2023





Preface

This Preliminary Environmental Information Report ('PEIR') Addendum Non-Technical Summary ('NTS') has been prepared by Quod, on behalf of EPL 001 Limited (the 'Applicant') in support of statutory pre-application consultation being undertaken in respect of a proposed application for a Development Consent Order to be made pursuant to the Planning Act 2008 for the Stonestreet Green Solar project ('Proposed Development').

This NTS forms Volume 1 of the PEIR Addendum. The Main Text is provided in Volume 2 and the Technical Appendices in Volume 3, which collectively comprise the PEIR Addendum. The PEIR Addendum updates, and is intended to be read in conjunction with, the PEIR that was prepared to inform the statutory consultation which took place between 25 October and 29 November 2022.

The PEIR Addendum forms part of a suite of documents supporting statutory pre-application consultation and publicity for the Proposed Development under Sections 42, 47 and 48 of the Planning Act 2008. The statutory consultation runs from **9:00am on 12 June 2023 until 11:59pm on 17 July 2023**.

During this period, the PEIR, PEIR Addendum and other consultation documents are available to view free of charge on the Applicant's website www.stonestreetgreensolar.co.uk under the tab labelled 'Consultation' then 'Statutory Consultation (Summer 2023)' and may be inspected at the following locations:

- Ashford Borough Council Offices, Civic Centre, Tannery Lane, Ashford TN23 1PL (Monday to Friday: 9am to 4pm; Saturday and Sunday: closed)
- Folkestone and Hythe Council Offices, Civic Centre, Castle Hill Avenue, Folkestone, Kent CT20 2QY (Monday to Friday: 10am to 4pm; Saturday and Sunday: closed)
- **Kent County Council**, County Hall, Maidstone, Kent ME14 1XQ (Monday to Friday: 8am to 5pm; Saturday and Sunday: closed) by appointment only
- Ashford Library, Ashford Gateway Plus, Church Road, Ashford, Kent, TN23 1AS
- New Romney Library, 82 High Street, New Romney, TN28 8AU
- Lyminge Library, Station Road, Lyminge, Folkestone, Kent CT18 8HS
- Hythe Library, 1 Stade Street, Hythe, Kent CT21 6BQ

Information on the opening hours for the libraries listed above can be viewed on Kent County Council's website at: https://www.kent.gov.uk/leisure-and-community/libraries/visiting-a-library.



A full set of consultation documents can be provided on a USB memory stick upon request free of charge. Hard copies of the consultation documents can be obtained upon request at a cost of £500 per copy. Requests for large print, audio or braille versions of the documents will be considered on a case-by-case basis and appropriate charges may apply. Requests for documents should be made to the Applicant by telephone on 08081 698335 (free of charge) or by email at info@stonestreetgreensolar.co.uk. Reasonable postage charges may apply.

Any person may respond to the consultation. Comments must be received by the Applicant by **no later than 11:59pm on 17 July 2023.**

When providing your comments please include your name and address, or if you would prefer your comments to be anonymous your postcode only, and confirm the nature of your interest in the Proposed Development. Please submit any comments by:

- Completing an online feedback form on the project website at www.stonestreetgreensolar.co.uk/consultation
- Completing a hard copy feedback form (available at the local information events, the aforementioned library and council office locations and upon request to the Applicant using the contact details below) and either handing it to the project team at the local information event or submitting it by post (free of charge; no stamp required) to FREEPOST Stonestreet Green Solar.
- Submitting comments by email to <u>info@stonestreetgreensolar.co.uk</u>, by post (free of charge; no stamp required) to FREEPOST Stonestreet Green Solar or by telephone (free of charge) at 08081 698335.



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1 Introduction

1.1 Background

- 1.1.1 This document provides a non-technical summary ('NTS') of a Preliminary Environmental Information Report ('PEIR') and PEIR Addendum that have been prepared on behalf of EPL 001 Limited¹ (the 'Applicant') for the proposed Stonestreet Green Solar project. This NTS updates and replaces the NTS which accompanied the PEIR prepared in October 2022 as part of statutory preapplication consultation that took place between 25 October and 29 November 2022 ('2022 Statutory Consultation').
- 1.1.2 The Applicant is planning to submit an application (the 'Application') for a Development Consent Order² ('DCO') from the Secretary of State for Energy Security and Net Zero for the construction, operation and maintenance, and decommissioning of ground-mounted solar photovoltaic ('PV') arrays with a total capacity exceeding 50 megawatts ('MW'), and on-site energy storage, together with associated infrastructure and an underground cable connection to the existing National Grid Substation at Sellindge (hereafter referred to as the 'Proposed Development'). The Proposed Development is known as 'Stonestreet Green Solar' and is proposed on land located to the north and west of the village of Aldington, Kent (referred to as the 'Site').

1.2 Preface

- 1.2.1 **Chapter 1: Introduction** of the PEIR provides an introduction to the environmental impact assessment ('EIA') process, the purpose of the PEIR, the Proposed Development, the Applicant, the structure of the PEIR, the consenting process and the policy context.
- 1.2.2 The PEIR Addendum updates, and is intended to be read in conjunction with, the PEIR. **Chapter 1: Introduction** of the PEIR Addendum (which should be read together with the **PEIR Chapter 1: Introduction**) provides an introduction to the PEIR Addendum (Part A) and explains the key changes to the Proposed Development since the 2022 Statutory Consultation (Part B).

1.3 The Site and the Proposed Development

1.3.1 The Site extends to approximately 200 hectares ('ha') (approximately 495 acres) approximately 6.5km to the south-east of Ashford Town Centre and approximately 13.7km to the west of Folkestone Town Centre, in the county of Kent. The Site comprises land to the north and west of the village of Aldington, currently used mainly for arable cropping and grazing. The majority of the Site falls within the

¹ Company name: EPL 001 Limited; company number: 12444050; registered office address: 2nd Floor, Regis House, 45 King William Street, London, United Kingdom, EC4R 9AN; registered in England and Wales

² Development Consent Order is the means of obtaining permission to construct and maintain developments categorised as Nationally Significant Infrastructure Projects which are large scale projects defined by the Planning Act 2008.



administrative area of Ashford Borough Council ('ABC'), with the north-eastern part of the Site located within the administrative area of Folkestone and Hythe District Council ('FHDC'). The whole Site is within the administrative area of Kent County Council ('KCC'). The extent of the land required to construct, operate and decommission the Proposed Development will be defined in the Application as 'Order limits'.

- 1.3.2 The Site location is shown on **Figure 1.1** and the indicative Site boundary (referred to as the 'preferred Order limits') is shown on **Figure 3.1** of this NTS.
- 1.3.3 The Site will include solar PV areas (arrays) and energy storage infrastructure, which will connect to a substation (the 'Project Substation'). The Project Substation will connect to an existing National Grid substation at Sellindge (the 'Selllindge Substation') via underground cables which will be sited in a grid connection route. A description of the physical characteristics of the Proposed Development and the land-use requirements during the construction, operational, and decommissioning phases is presented in **Section 3: The Site and Proposed Development Description** of this NTS.

1.4 The Applicant

1.4.1 EPL 001 Limited is a wholly owned subsidiary of Evolution Power Limited. Evolution Power Limited is a UK-based independent solar developer established to develop affordable and sustainable renewable energy projects that will help the UK meet its legally binding 2050 net zero emissions target.

1.5 Preliminary Environmental Information and Purpose of the NTS

- 1.5.1 The planning process for a DCO application requires the applicant to undertake a statutory consultation process before submission of the application. As part of this consultation, for EIA development, applicants are required to publish Preliminary Environmental Information ('PEI').
- 1.5.2 A PEI report (PEIR) is a document that sets out preliminary information on the likely significant environmental effects of a proposed scheme to allow statutory bodies, the local community and the general public, consulted as part of the statutory consultation process, to come to an informed view on the proposals. An Environmental Statement ('ES') must then accompany the DCO application and report the findings of the EIA process.
- 1.5.3 A PEIR formed part of statutory consultation on the Proposed Development which took place over five weeks in autumn 2022 (the '2022 Statutory Consultation'). The PEIR contains the initial findings of the assessment of the likely significant environmental effects resulting from the construction, operation and maintenance, and decommissioning phases of the Proposed Development, including measures necessary to mitigate any potential significant adverse environmental effects.
- 1.5.4 The Applicant has carefully considered consultation responses to the 2022 Statutory Consultation and made changes to the Proposed Development in light of those responses, as well as in response to further studies and surveys, ongoing environmental assessments and technical design work. **Section 1.6** of this NTS



summarises the key changes that have been made to the scheme presented in the 2022 Statutory Consultation. The Applicant has chosen to undertake further consultation on the updated scheme proposals and PEI between 12 June and 17 July 2023 ('2023 Statutory Consultation'). A PEIR Addendum has therefore been prepared and forms part of the 2023 Statutory Consultation. The PEIR, PEIR Addendum and other consultation documents can be found on the Applicant's website www.stonestreetgreensolar.co.uk under the tab labelled 'Consultation' then 'Statutory Consultation (Summer 2023)'.

- 1.5.5 The information contained within the PEIR and PEIR Addendum is preliminary, reflecting the design of the proposals to date which are not yet final. When the assessments are finalised in the ES, because further certainty and information will be available, the significance of the effects as identified in the PEIR and PEIR Addendum may be revised. However, the Applicant considers that the PEIR and PEIR Addendum provide sufficient information for consultation bodies and the public to develop an informed view of the likely significant environmental effects of the Proposed Development.
- 1.5.6 This document is an NTS and forms Volume 1 of the PEIR Addendum. The purpose of this NTS is to provide a summary of the PEIR and PEIR Addendum in non-technical language.
- 1.5.7 Volume 2 provides the Main Text and Figures and Volume 3 provides Technical Appendices to the PEIR and PEIR Addendum. The PEIR Addendum provides some new and updated information and is to be read together with the PEIR. Collectively, the PEIR and PEIR Addendum form the PEI for the Proposed Development.
- 1.5.8 This document has been compiled by Quod and a team of specialist consultants. Quod is a registrant EIA Quality Mark scheme run by the Institute of Environmental Management and Assessment ('IEMA').
- 1.6 Key Changes to the Proposed Development
- 1.6.1 Since the 2022 Statutory Consultation, the proposals have been further refined, paying attention to comments made, as well as to further studies and surveys, continuing environmental surveys and technical design work. A summary of the key changes to the Site extent and indicative scheme included in the 2022 Statutory Consultation is provided below:
 - Preferred Order limits the indicative extent of the Site has increased from approximately 189 ha to approximately 200ha. Small areas of land have been removed from the preferred Order limits as they are not required for the Proposed Development. The preferred Order limits have also been widened to include the additional land which may be required for the Proposed Development including the National Grid Substation at Sellindge, and for the Cable Route Crossing and Alternative Cable Route. Figure 1.2a-d shows the location of changes to the Site boundary (labelled A H).
 - Public Rights of Way and Access a new public rights of way ('PRoW') route
 has been added to Field 19, the length of multiple PRoW routes has been
 shortened with improved connectivity and the PRoW route on Field 12 has been



moved away from the road. These changes have been made in response to consultation feedback.

- Increasing / Enhancing Setbacks from Residential Dwellings changes have been made to the location of PV panels, internal haulage road and landscape proposals in order to further reduce effects and in response to issues raised by consultees. These include Handen Farm, Handen Farm Cottage, Bow Cottage and Becketts Green.
- Design Response to Glint and Glare Effects the alignment of PV panels in fields in the northern part of the Site have been adjusted and hedgerow heights have been increased in certain locations to avoid significant effects on residential properties and the railway.
- Siting of Inverter Stations and Energy Storage Units the siting has been adjusted to avoid areas of potential archaeological remains and acoustic fencing has also been added to avoid significant adverse effects.
- Landscape and Biodiversity Proposals the landscape proposals have been amended in response to consultation feedback and ongoing assessment studies. The illustrative landscape proposals now include an overall increase of around 10,600 plants/trees with a total of around 48,840 trees and shrubs now proposed. Additional lengths of new hedgerow planting with trees are now proposed (an increase of 1.27km and overall total of 5.09km of new hedgerows). Additional areas of new native woodland and woodland planting are now proposed. Other areas have also been included to benefit brown hare, skylark and yellowhammer. These include expansion of meadow areas, skylark nesting plots and new seed-rich field margins for yellowhammer and other farmland birds. The proposed landscape masterplan is shown on Figure 3.5.
- 1.6.2 The extent of the PV panels included in the 2022 Statutory Consultation was approximately 121.72ha. This has been reduced to approximately 119.93ha in the 2023 Statutory Consultation, primarily due to the additional landscaping and further set back of PV panels from properties.



Figure 1.1: Site Location Plan

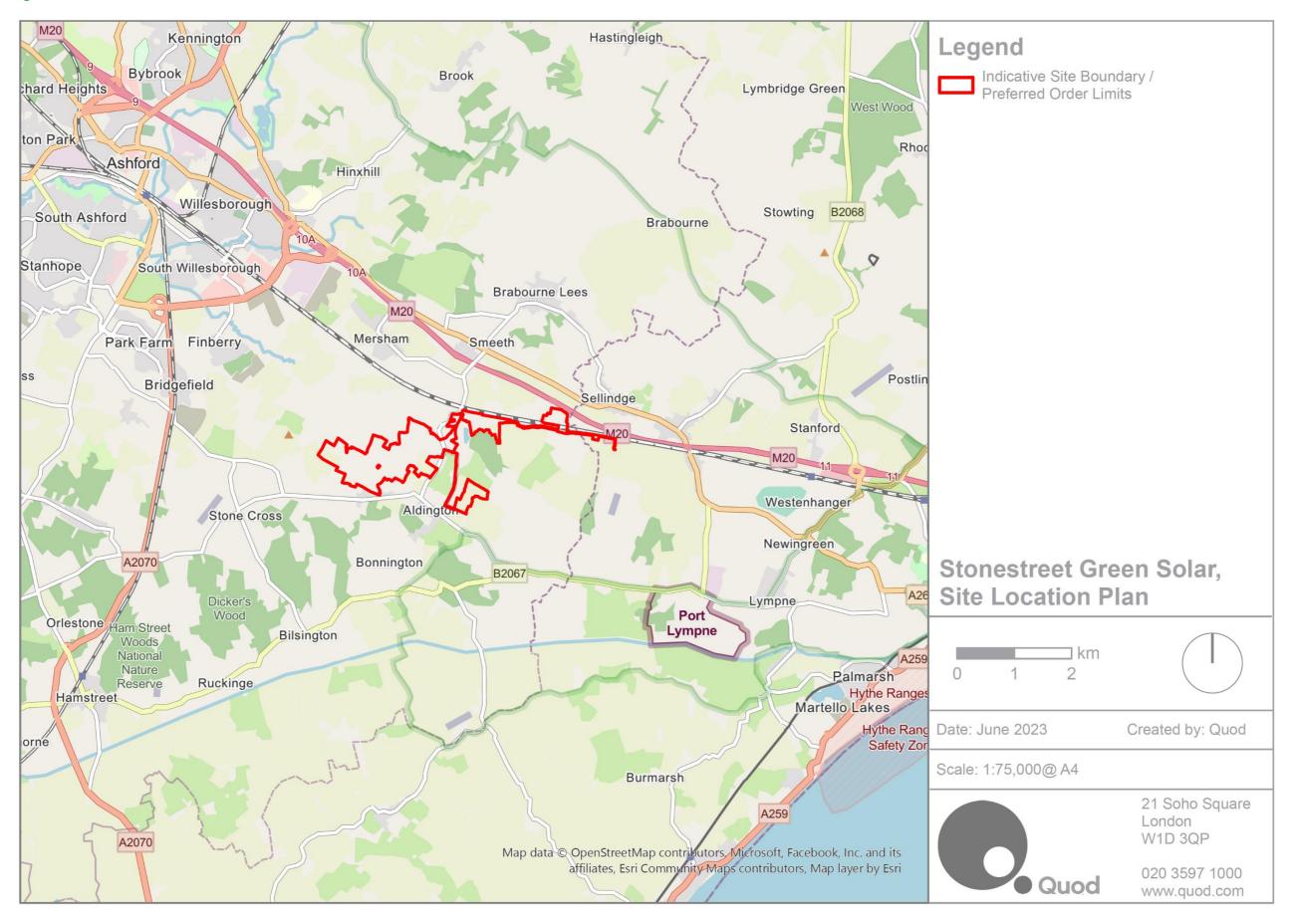




Figure 1.2a: Location of Changes to Preferred Order Limits since the 2022 Statutory Consultation

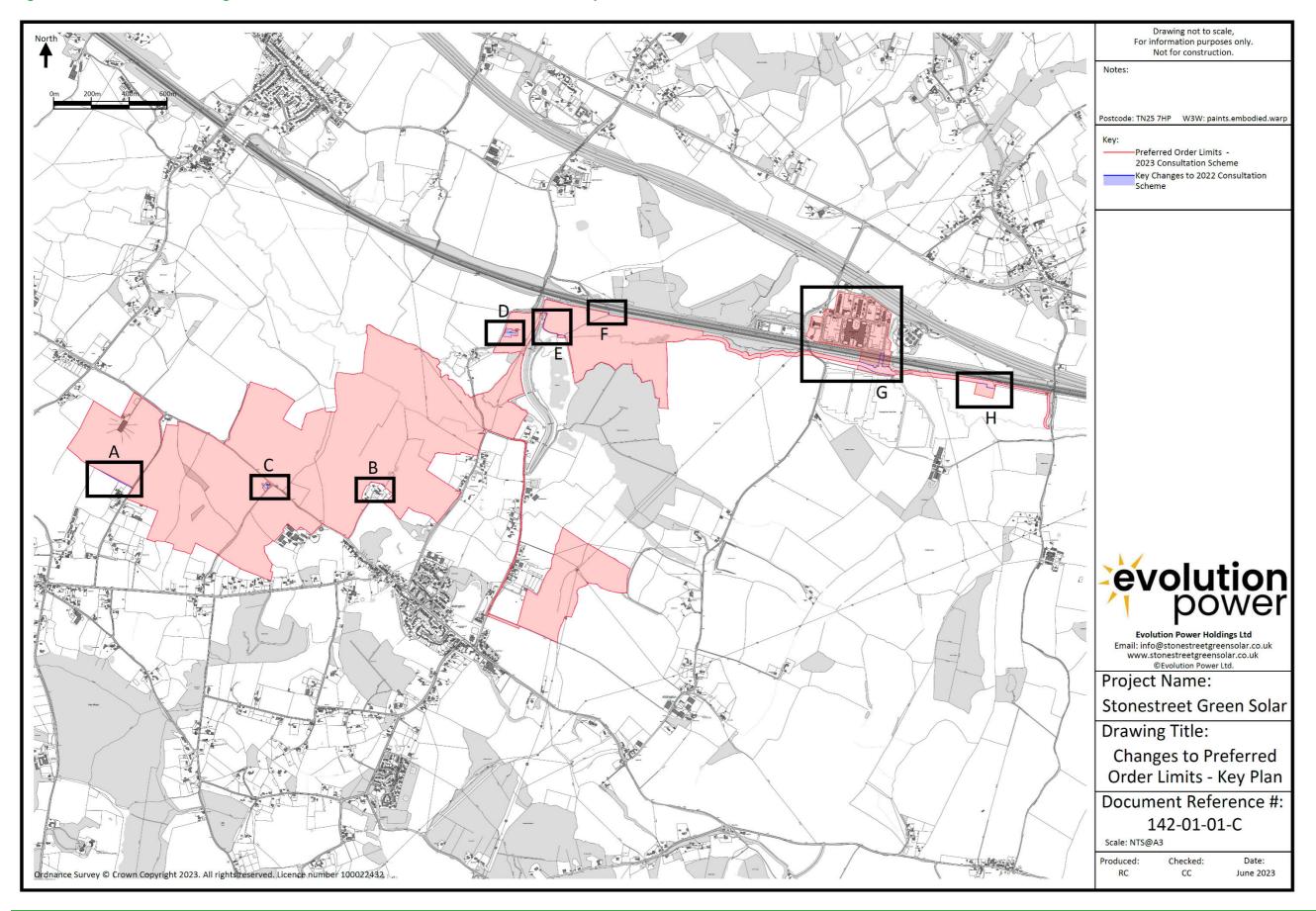




Figure 1.2b: Location of Changes to Preferred Order Limits since the 2022 Statutory Consultation

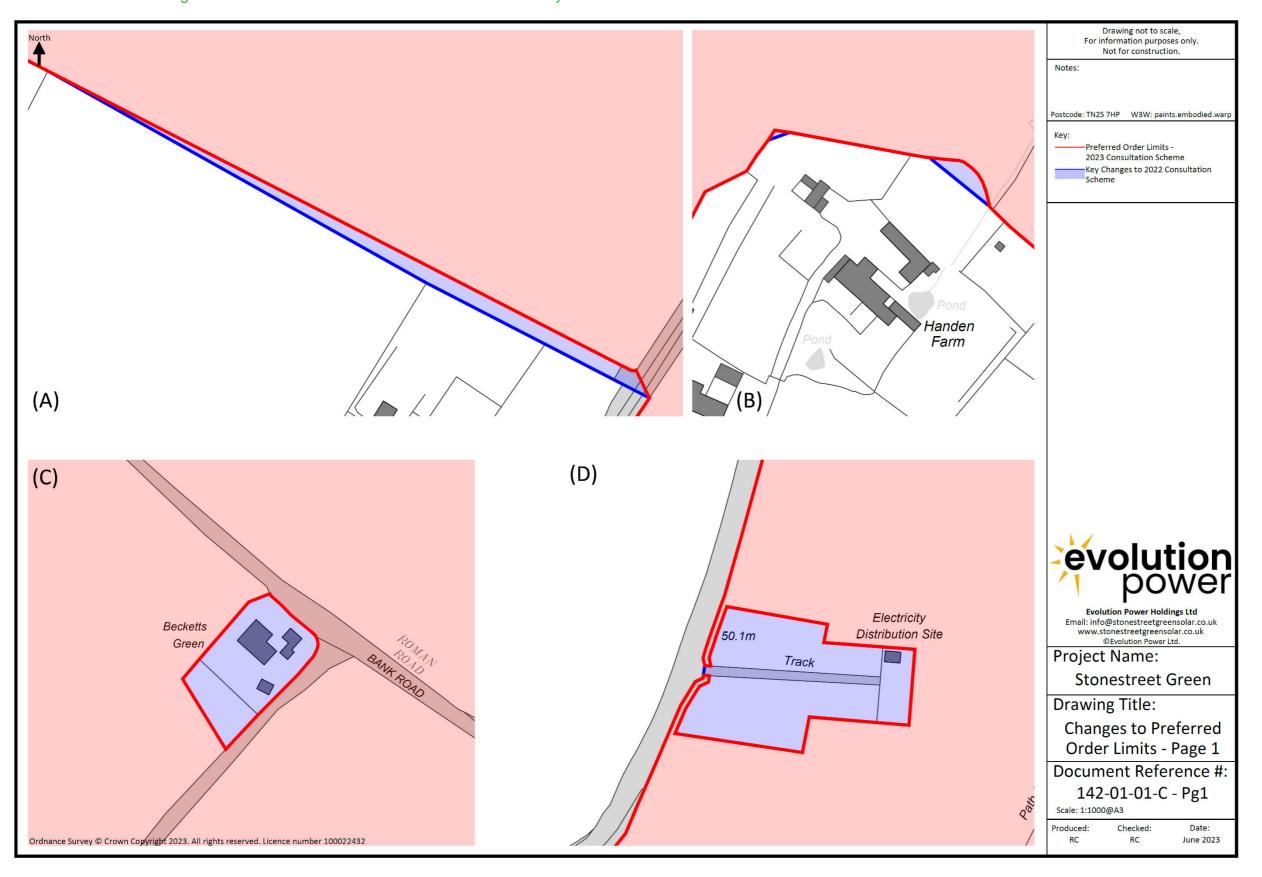




Figure 1.2c: Location of Changes to Preferred Order Limits since the 2022 Statutory Consultation

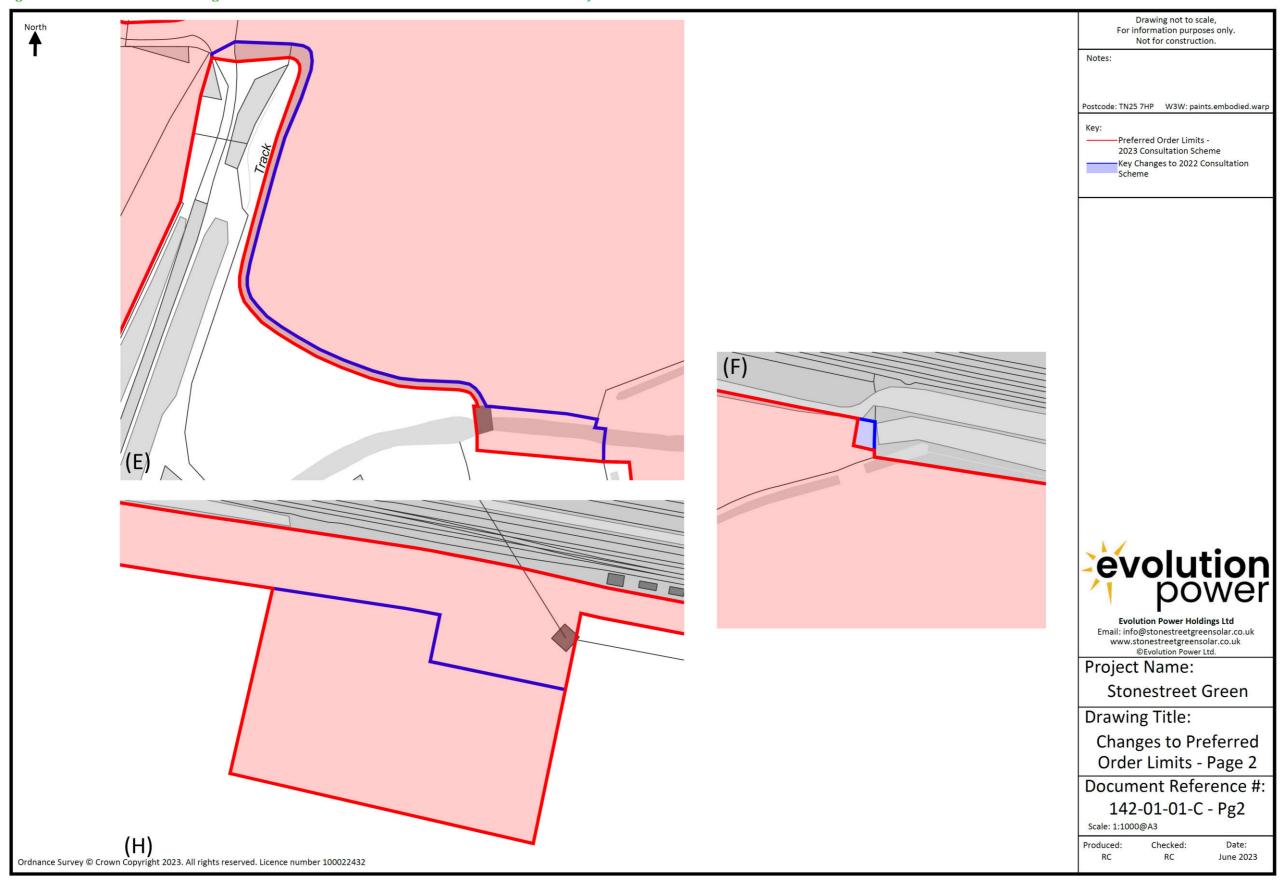
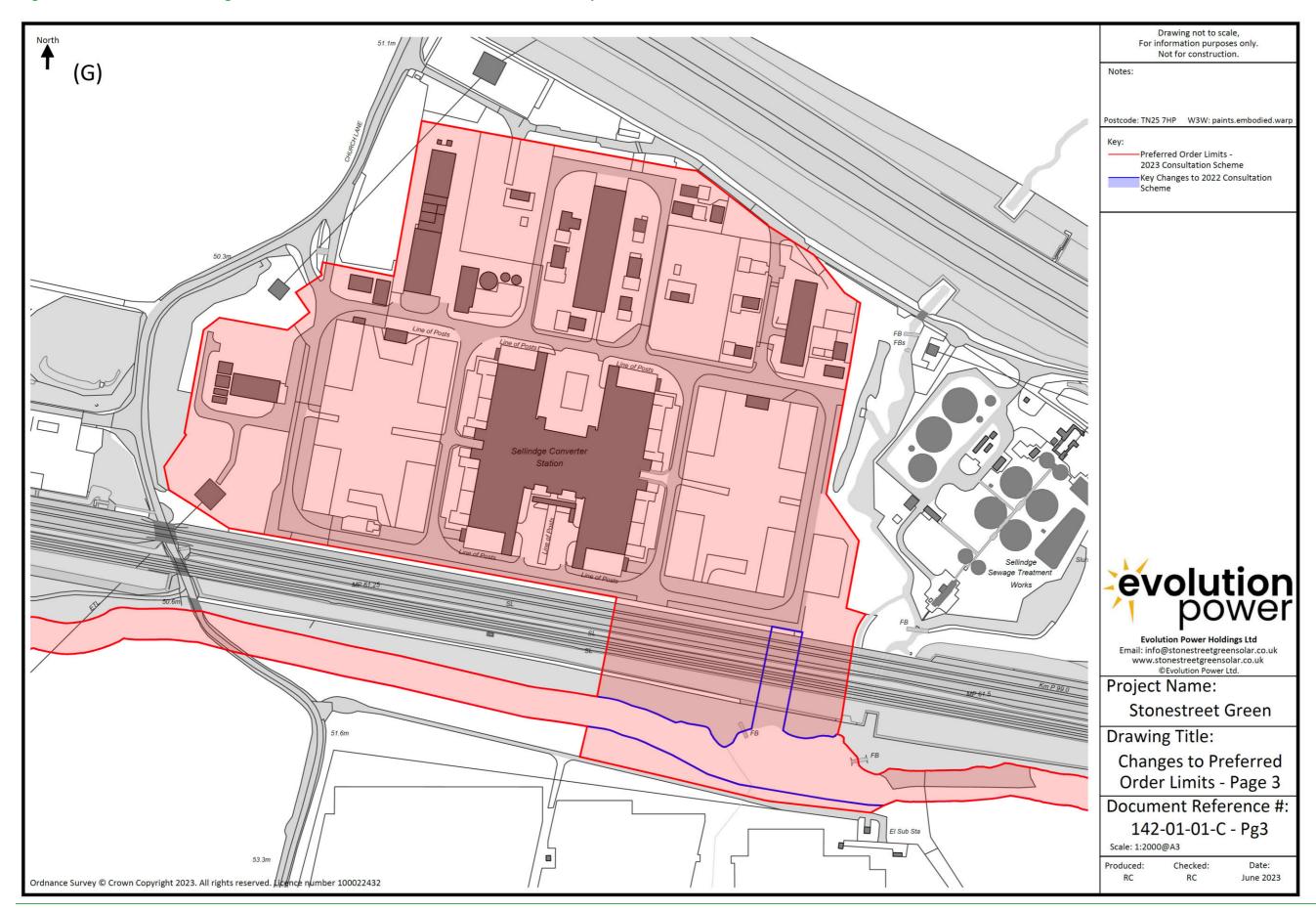




Figure 1.2d: Location of Changes to Preferred Order Limits since the 2022 Statutory Consultation





2 EIA Methodology

2.1 Preface

- 2.1.1 Chapter 2: Environmental Impact Assessment Methodology of the PEIR describes the approach the EIA has taken to assessing impacts associated with the Proposed Development, including the significance criteria against which impacts have been assessed.
- 2.1.2 Chapter 2: EIA Methodology of the PEIR Addendum includes the following updated and new information and should be read in conjunction with the PEIR:
 - Updated assessments of Agricultural Land and Soils, and Minerals.
 - A new assessment of Glint and Glare effects from the solar PV panels.
 - New information on the how the assessment will be approached, including the basis of the assessments, and approach to the assessment of cumulative effects.
- 2.1.3 The EIA Methodology chapter will be updated further in the ES.

2.2 The EIA Process

- 2.2.1 EIA is the process undertaken to identify and evaluate the likely significant effects of a proposed development on the environment and to identify measures to mitigate or manage any significant negative effects. The EIA process should be informed by consultation with consultation bodies, other interested bodies and members of the public. The purpose of identifying significant effects is to ensure decision makers are able to make an informed judgement on the environmental impacts of a proposal.
- 2.2.2 The EIA requirement for the Proposed Development is defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'). The EIA Regulations set out the statutory process and minimum requirements for the environmental information to inform decision making.
- 2.2.3 The PEIR and the PEIR Addendum have been compiled in accordance with the EIA Regulations and advice published by the Planning Inspectorate. The PEIR Addendum builds on the scope and methodology presented within the PEIR which will be adopted in the EIA process.
- 2.2.4 Following the 2023 Statutory Consultation, the PEI will be updated and provided as the ES. The ES will accompany the Application.

2.3 EIA Scoping

2.3.1 The purpose of the EIA scoping process is to determine which topics should be included in the EIA and the level of detail to which they should be assessed.



- 2.3.2 The Applicant submitted an EIA Scoping Report and a request for an EIA Scoping Opinion to the Secretary of State on 19 April 2022. The Scoping Opinion was provided by the Planning Inspectorate on behalf of the Secretary of State on 30 May 2022.
- 2.3.3 The PEIR Volume 1: Chapters 1 to 5 provide an introduction to the proposals, an explanation of the EIA methodology, a description of the Site and the Proposed Development, the alternatives that were considered and an overview of the activities associated with the construction and decommissioning phases of the project. In respect of these chapters:
 - Chapter 1: Introduction of the PEIR has been updated by and should be read in conjunction with Chapter 1: Introduction of the PEIR Addendum.
 - Chapter 2: Environmental Impact Assessment Methodology of the PEIR has been updated by and should be read in conjunction with Chapter 2: EIA Methodology of the PEIR Addendum.
 - Chapter 3: Site and Development Description of the PEIR has been replaced by Chapter 3: Site and Description of the Proposed Development of the PEIR Addendum.
 - Chapter 4: Alternatives and Design Evolution of the PEIR has been replaced by Chapter 4: Alternatives and Design Evolution of the PEIR Addendum.
 - Chapter 5: Construction and Decommissioning Methodology and Programme of the PEIR has been replaced by Chapter 5: Construction and Decommissioning of the PEIR Addendum.
- 2.3.4 The following topic specific chapters and assessments were included in Volume 1 of the PEIR:
 - Chapter 6: Cultural Heritage this has been updated and should be read in conjunction with Chapter 6: Cultural Heritage of the PEIR Addendum;
 - Chapter 7: Landscape and Views this has been updated and should be read in conjunction with Chapter 7: Landscape and Views of the PEIR Addendum;
 - Chapter 8: Biodiversity this has been updated and should be read in conjunction with Chapter 8: Biodiversity of the PEIR Addendum;
 - Chapter 9: Water Environment this has been updated and should be read in conjunction with Chapter 9: Water Environment of the PEIR Addendum;
 - Chapter 10: Land Contamination this has been updated and should be read in conjunction with Chapter 10: Land Contamination of the PEIR Addendum;
 - Chapter 11: Socio-Economics this has been updated and should be read in conjunction with Chapter 11: Socio-Economics of the PEIR Addendum;
 - Chapter 12: Traffic and Access this has been updated and should be read in conjunction with Chapter 12: Traffic and Access of the PEIR Addendum;



- Chapter 13: Noise this has been updated and should be read in conjunction with Chapter 13: Noise of the PEIR Addendum; and
- Chapter 14: Climate Change this has been updated by and should be read in conjunction with Chapter 14: Climate Change of the PEIR Addendum.
- 2.3.5 Human Health, Major Accidents and Disasters and Lighting have also been scoped into the EIA but are addressed within the assessments for the topics set out above, where relevant, rather than as separate topic chapters.
- 2.3.6 The topics scoped out of the EIA, i.e. those environmental aspects where significant effects are not anticipated as a result of the Proposed Development, comprise: Agricultural Land and Soils, Air Quality, Vibration, Electric, Magnetic and Electromagnetic Fields, Telecommunications, Television Reception and Utilities, Wind Microclimate, Daylight, Sunlight and Overshadowing, Glint and Glare, Waste and Materials, and Minerals. Transboundary impacts are also scoped out of the EIA, i.e. significant adverse effects on other countries.
- 2.3.7 Nevertheless, the PEIR Addendum includes assessments relating to Agricultural Land and Soils, Glint and Glare, and Minerals as appendices.
- 2.3.8 Key issues raised in the Scoping Opinion have been considered during the EIA process and an explanation of how they have been responded to will be provided in each technical chapter of the ES.

2.4 Assessment Methodology

- 2.4.1 The assessments in the PEIR, as updated by the PEIR Addendum, identify, describe and assess the likely significant effects of the Proposed Development on the environment during the construction, operation and maintenance, and decommissioning phases of the Proposed Development. The significance of each environmental effect identified is generally determined by two factors:
 - The sensitivity, importance or value of the environment (such as people or wildlife);
 and
 - The actual change taking place to the environment (i.e. the size or severity of change taking place).
- 2.4.2 To aid comparison between environmental topics and understanding of the PEIR and PEIR Addendum findings, standard terms are used wherever possible to describe the significance of effects (i.e. 'major', 'moderate', 'minor' and 'negligible'). Effects are also described as being adverse or beneficial. Typically, effects that are considered to be negligible or minor are judged to be 'not significant', whereas those that are moderate or major are 'significant'.
- 2.4.3 Environmental effects are evaluated using published standards and guidance, although some topics use bespoke criteria. Where it has not been possible to quantify effects (for example using modelling or calculations), qualitative assessments are made based on



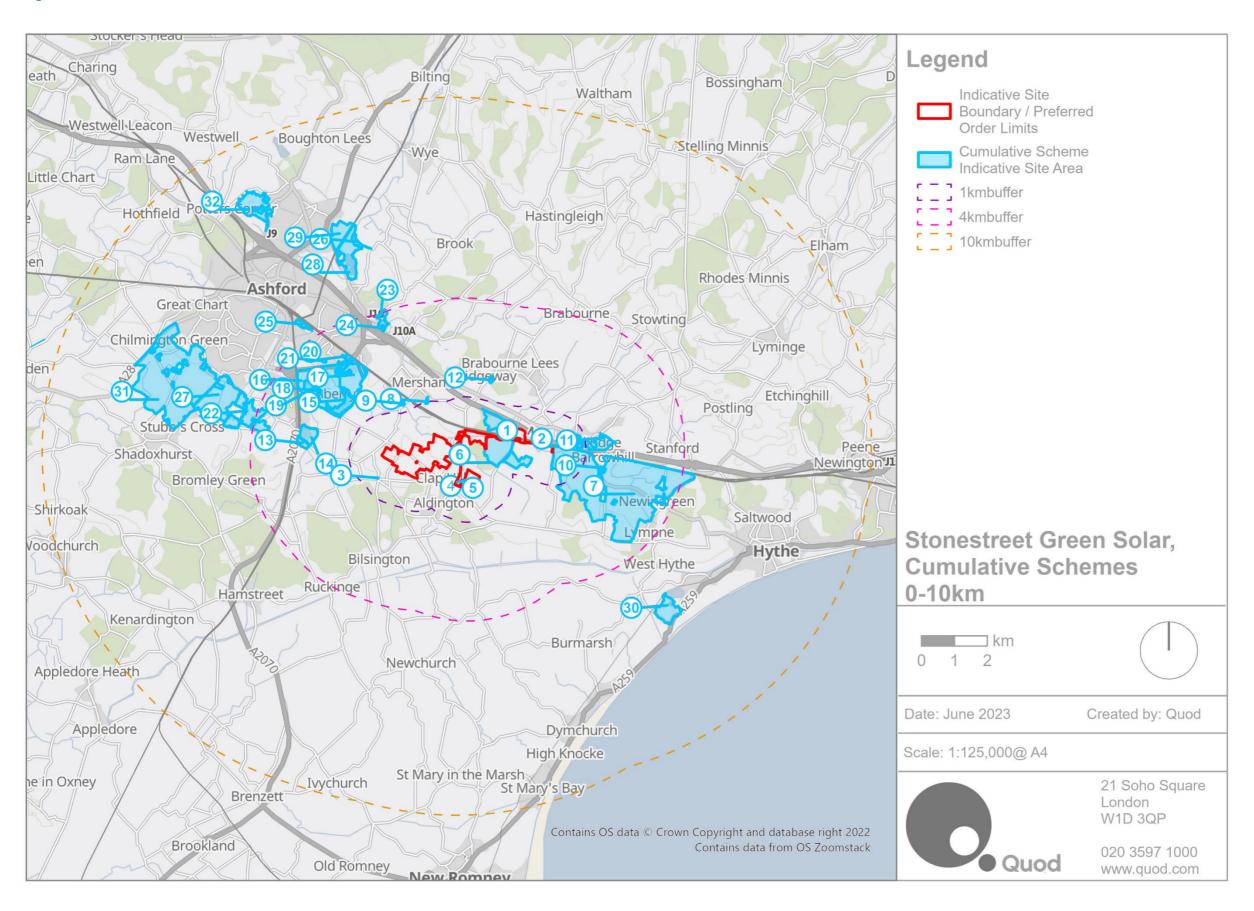
- available knowledge and professional judgement. Where uncertainty exists, this has been noted in the chapter.
- 2.4.4 Where the EIA predicts significant adverse effects, the PEIR and PEIR Addendum consider whether there are further mitigation measures which could avoid or reduce the effect, or reduce the likelihood of it happening. The use of any such mitigation will be secured through the DCO, should it be granted. The Proposed Development has been designed to avoid or reduce significant adverse environmental effects through the use of 'embedded mitigation measures'. This means that they are included within the design of the project or management plans, such as the Construction Environmental Management Plan ('CEMP'). These measures will be taken into account as part of the EIA and the assessment of the Proposed Development.

2.5 Cumulative Effects

- 2.5.1 The PEIR considers the potential for likely significant cumulative effects on the environment resulting from the Proposed Development combined with adjacent proposals for the East Stour Solar Farm. Since publication of the PEIR, an updated list of cumulative schemes has been prepared in line with advice from the Planning Inspectorate. This updated listed is included in Chapter 2: EIA Methodology of the PEIR Addendum and will be subject to further assessment in the ES, although no new or different likely significant cumulative effects have been identified in the PEIR Addendum to those identified in the PEIR. A plan showing the cumulative schemes that will be considered in the ES is provided as **Figure 2.1**.
- 2.5.2 Chapter 15: Cumulative Effects of the PEIR Addendum, which updates and should be read in conjunction with Chapter 15: Cumulative Effects of the PEIR, provides a preliminary assessment of effect interactions of the Proposed Development which will be updated in the ES based on the final assessments.



Figure 2.1: Cumulative Scheme Plan





3 The Site and Description of the Proposed Development

3.1 Introduction

- 3.1.1 Chapter 3: Site and Development Description of the PEIR has been replaced by Chapter3: Site and Description of the Proposed Development of the PEIR Addendum which includes:
 - New and updated information on the Site and its surroundings; and
 - New and updated information on the Proposed Development, including preliminary design principles, landscape proposals, figures and appendices.

3.2 The Site Location and Description

- 3.2.1 The majority of the Site is located within the administrative area of ABC in the county of Kent. A small part of the Site, associated with the Alternative Cable Route (see below for an explanation) is located within the administrative area of FHDC. The whole Site is within the administrative area of KCC. The Site covers an area of approximately 200ha (approximately 495 acres) and comprises mainly agricultural fields with hedgerows and tree belts. The Site also includes the existing Sellindge Substation.
- 3.2.2 **Figure 3.1** shows the Site location and extent of the current preferred Order limits. The final Order limits will be set out in the Application. **Figure 3.2** shows numbers for individual land parcels ('Fields') and other areas within the Site, including:
 - 'Solar PV Areas' areas where PV panels and associated infrastructure will be located (Fields numbered 1 to 29);
 - 'Preferred Cable Route' export of electricity from the Proposed Development via underground cables to the UK Power Networks ('UKPN') part of the existing Sellindge Substation;
 - 'Alternative Cable Route' export of electricity via underground cables to the existing Sellindge Substation via an existing 132kV tower; and
 - 'Cable Route Crossing' use of an existing cable duct under the railway or using drilling methods to achieve the grid connection via the Preferred Cable Route.
- 3.2.3 For ease of reference, the areas of the Site are subsequently referred to as follows:
 - The South Western Cluster (Fields 1 to 9).
 - The Central Cluster (Fields 10 to 19 and 23 to 25).
 - The South Eastern Cluster (Fields 20 to 22).



- The Northern Cluster (Fields 26 to 29).
- 3.2.4 The Preferred Cable Route and the Alternative Cable Route are alternative options, i.e. the Proposed Development will connect via one route or the other.
- 3.2.5 The East Stour River forms part of the northern boundary of the Site and also flows through part of the Site. The Aldington Flood Storage Area forms part of the Northern Cluster and the associated flood embankment is located adjacent to the Site boundary. A small number of agricultural buildings are located in the western part of the Site. The Sellindge Substation is also located within the Site.
- 3.2.6 There are no residential properties within the Site. Nearby residential dwellings include the village of Aldington which lies to the south and east of the Site and Stonestreet Green located adjacent to the east of the Site. A small number of residential properties are located close to the Site boundary.
- 3.2.7 The High Speed 1/Channel Tunnel Rail Link ('HS1') and part of the Kent Route railway line is within 100m of the Site's northern boundary (at its closest point). The M20 motorway carriageway is approximately 45m north of the HS1 railway.
- 3.2.8 A smaller-scale solar farm development, known as 'Partridge Farm', is located to the east of the Northern Cluster.
- 3.2.9 Vehicular access to the Site can be gained via the M20 motorway onto the A20 Hythe Road located to the north of the Site. Station Road / Calleywell Lane runs north south centrally through the Site. Bank Road / Roman Road bisects the central and western parts of the Site. There is a network of PRoW and Byways which cross the Site linking local villages.

3.3 Environmental Sensitivities

- 3.3.1 **Figure 3.3** shows designated sites and features in the vicinity of the Site. The Site is not subject to any national or local designations for landscape value. The closest designated landscape is the Kent Downs Area of Outstanding Natural Beauty ('AONB') which is 340m south at its nearest point.
- 3.3.2 There are no statutory designated heritage features within the Site such as Scheduled Monuments or Listed buildings. Designated heritage assets within 1km of the Site include a Scheduled Monument, two Grade I Listed buildings, six Grade II* Listed buildings, 69 Grade II Listed buildings and two Conservation Areas and fiver further Protected Military Remains sites. The Site includes areas of Archaeological Potential defined by the ABC Local Plan (adopted 2019)³ as well as a Protected Military Remains crash site of an aircraft from World War II.
- 3.3.3 The Site is not subject to any designations for nature conservation. There are two sites of national importance for ecological interest within 2km of the Site: Hatch Park Site of Special Scientific Interest ('SSSI') and Gibbin's Brook SSSI. Poulton Wood Local Nature Reserve ('LNR') is approximately 340m south east of the Site at its closest point.

³ Ashford Borough Council (2019) – Ashford Local Plan 2030. Adopted February 2019



- Backhouse Wood Local Wildlife Site (ancient woodland) is located immediately adjacent to the Northern Cluster.
- 3.3.4 The East Stour River flows in an east to west direction within, and adjacent to, the northern part of the Site. The majority of the Site is Flood Zone 1 (low probability of flooding). Some of the northern parts of the Site are within Flood Zone 2 (medium probability of flooding') and Flood Zone 3 (high probability of flooding'). Parts of the Site are also at risk of surface water flooding.
- 3.3.5 The Northern Cluster forms part of the Aldington Flood Storage Area and the associated flood defence embankment is adjacent to the north eastern part of the Site (east of Field 28).



Figure 3.1: Site location and extent of the current preferred Order limits

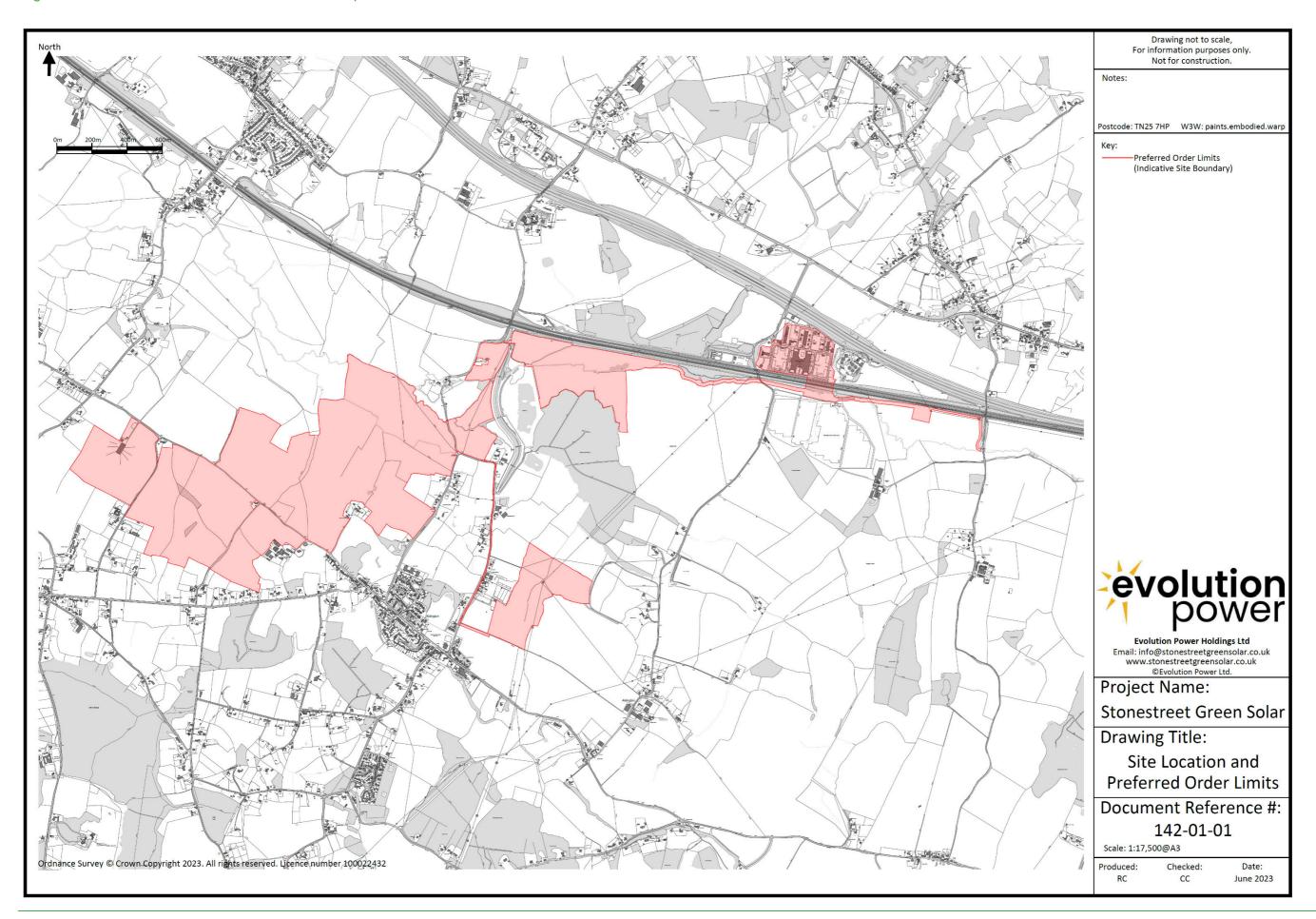




Figure 3.2: Field Boundaries Plan and Site Areas

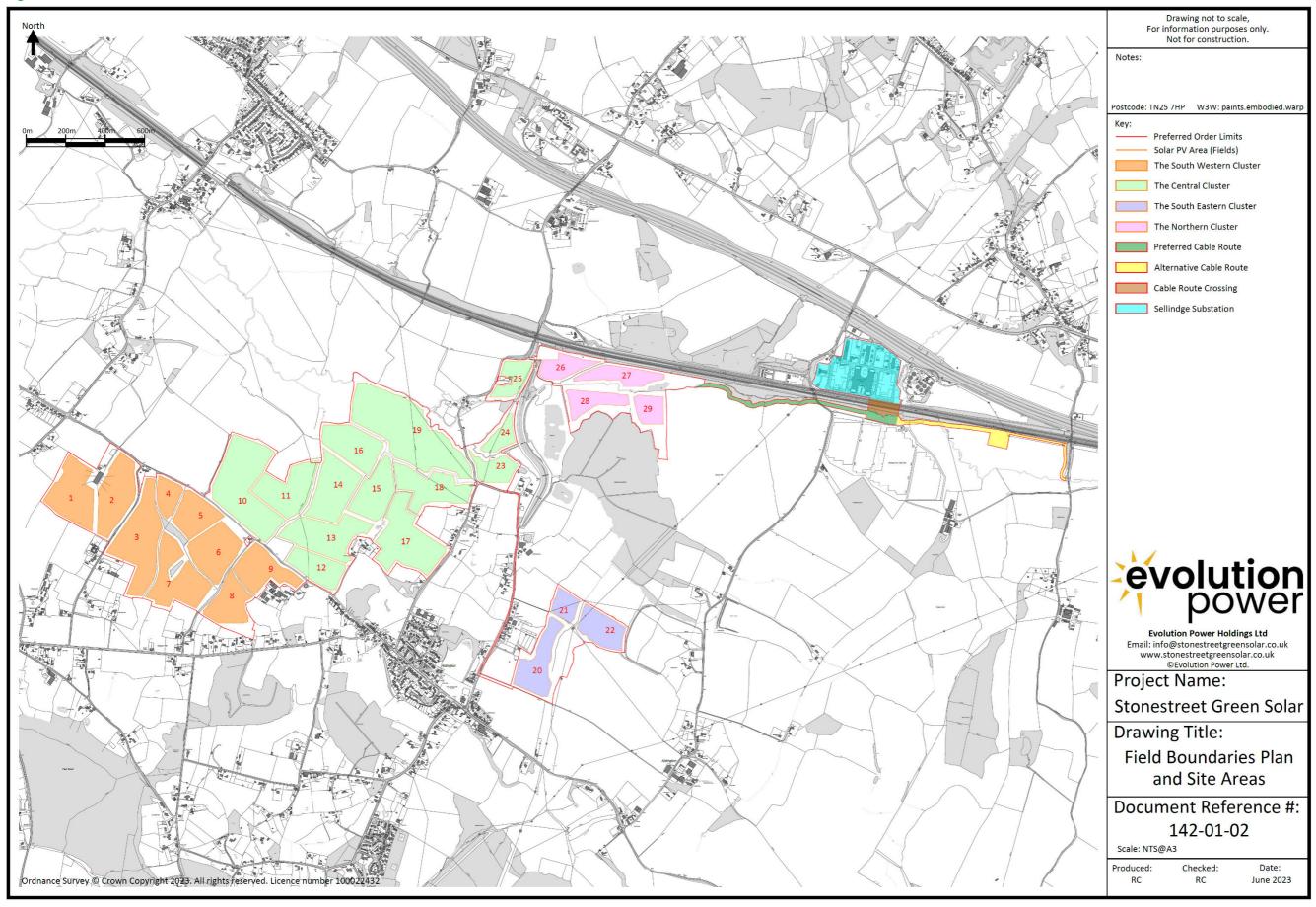
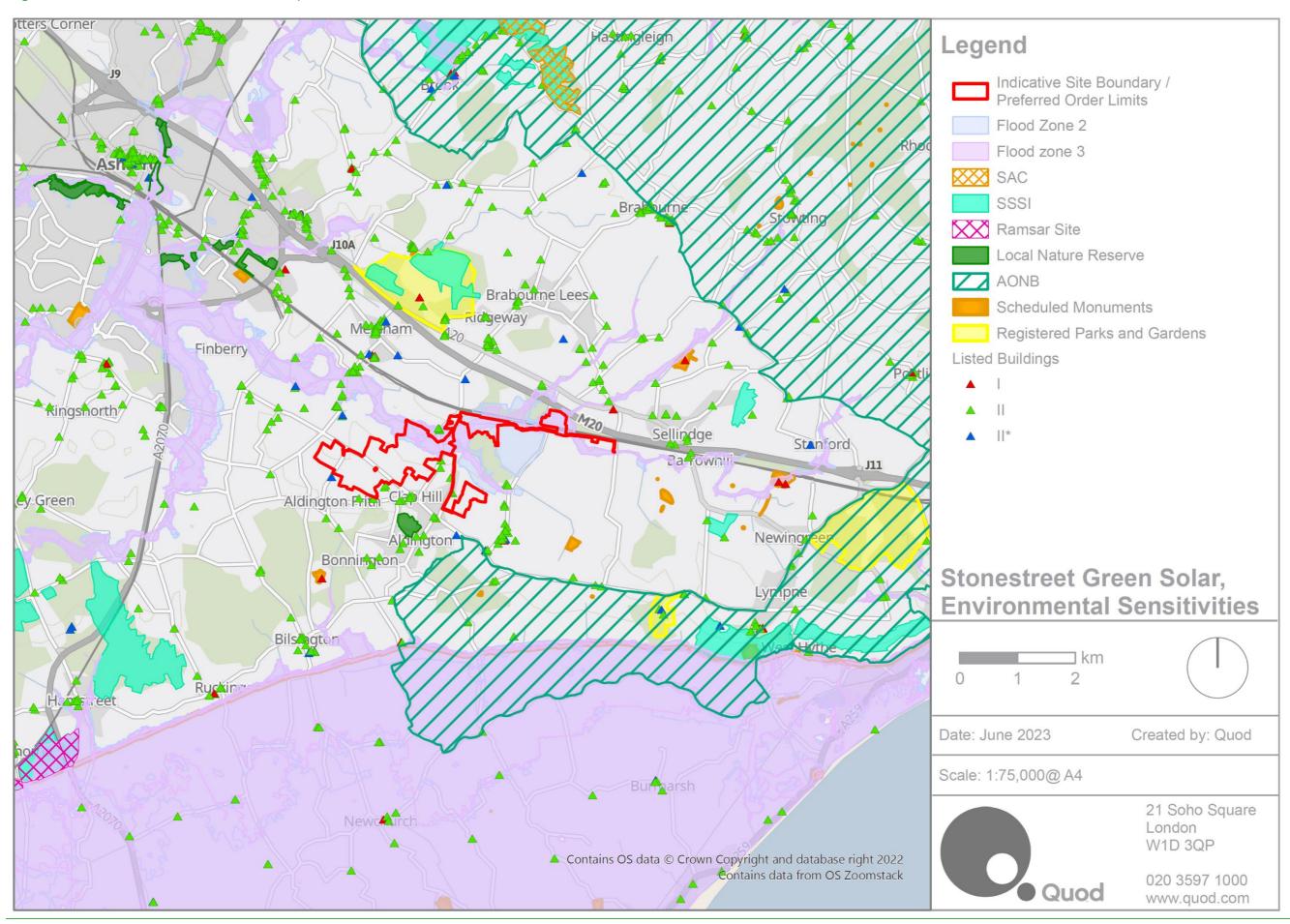




Figure 3.3: Environmental Sensitivities Map





3.4 The Proposed Development

- 3.4.1 The Proposed Development comprises a renewable energy generating project with solar PV panels and on-site energy storage (battery) and other infrastructure. The PV panels will be ground-mounted and will convert the sun's energy into electricity for storage on-site. The project will have a total generating capacity over 50MW and will connect via an underground cable to the existing National Grid Substation at Sellindge. The Applicant has an agreed grid connection for the Proposed Development that will allow the export and import of up to 99.9MWe of electricity at any time. The Proposed Development will have an operational lifespan of up to 40 years.
- 3.4.2 The Proposed Development will consist of the key components and infrastructure described below and shown on **Figure 3.4**. The Application will define design parameters and principles within which the Proposed Development must be constructed, operated and decommissioned. This is to ensure that the likely significant environmental effects of the Proposed Development are no worse than those assessed in the EIA and that the effects of the Proposed Development have been properly assessed.
 - Solar PV Areas the PV panels will be located within the Solar PV Areas as shown on Figure 3.4 within Fields 1 29. The exact locations of PV panels has not yet been determined and will only be decided at the detailed design stage. Solar PV panels are expected to be fixed to a metal frame mounting structure. Panels will be installed as 'fixed' and will not move once installed. The maximum height of the highest part of the solar PV panels will be 3.2m above ground level.
 - Inverter Stations these comprise an inverter, a transformer and switchgear. Inverters convert the electricity collected by the PV panels into a form that can be exported to the national grid. Transformers control the voltage before it reaches the Project Substation. Switchgear include a combination of electrical switches, fuses and circuit breakers to control, protect, and isolate electrical equipment. The Inverter Stations will either be enclosed in a single container (up to 2.5m (width) by 2.9m (height) x 6.1m (depth)), or the components will be sited together in close proximity (without being enclosed together in a container).
 - Energy Storage Units these areas will include associated infrastructure inverters, transformers, switchgear, and energy storage units. Energy Storage Units are designed to provide grid balancing services to the electricity grid. They will achieve by allowing excess electricity generated from the PV stored and dispatched when required. The Energy Storage containers will be up to 4.5m in height.
 - Connecting Cabling on-site cables and grid connection cabling will have a maximum voltage of 132 kilovolts.
 - Project Substation a new substation for the Proposed Development will be located in Field 25 in the north of the Site in a fenced compound of up to 3.6ha in area including high voltage switchgear and control equipment. The maximum height of buildings within the Project Substation will be 6.5m above ground level. The Project Substation will include a project owned substation, and a UKPN adopted substation, high voltage switchgear and control equipment, the main project transformer, connection



- equipment, a telecoms mast (approximately 15m in height), access tracks, welfare facilities, storage containers, parking and security fencing.
- Intermediate Substations –intermediate substations (approximately 8m (length) x 3.4m (height) x 4m (width)) will be located within Fields 3, 15, 20 and 26.
- Preferred Cable Route the Applicant's preferred cable route for the grid connection is to connect directly into the Sellindge Substation located in the north-east of the Site.
- Cable Route Crossing enables export of electricity from the Proposed Development via the Preferred Cable Route to the UKPN part of the Sellindge Substation. This will either use an existing cable duct under HS1, or a new duct will be formed through a drilling method beneath HS1 adjacent to the existing cable duct.
- Alternative Cable Route in the event the Preferred Cable Route is not possible, electrical output would be exported from the Proposed Development via underground cables to an existing 132kV tower on the south side of HS1, which then connects to the UKPN part of the Sellindge Substation.
- Boundary fencing and security measures, including closed circuit television and operational emergency lighting.
- Drainage.
- Access tracks.
- Landscape proposals and biodiversity enhancements the Proposed Development will provide new habitat creation and enhanced areas within the Site (see Figure 3.5) including:
 - Enhancement and reinforcement of around 11.42km of existing hedgerows though planting.
 - Around 5km of new hedgerows.
 - Around 1.8ha of new native woodland, 0.6ha of damp/wet woodland and 0.9ha of new scrub/woodland edge planting.
 - Planting of wetland trees (circa 160), orchard trees (circa 260 trees) and hedgerow trees (circa 50).
 - Around 138ha of existing agricultural land will be seeded and made available for grazing. Grassland and field margins will be managed for wildlife, including brown hare and farmland birds including skylark and yellowhammer.
 - Around 1.5ha of new native wildlife meadow.
 - Around 9ha of new wetland meadow with habitat ponds and wet areas.



- 3.4.3 During the construction phase, several temporary construction compounds will be required as well as temporary access tracks to allow access to land within the Site, as set out in Section 5 of this NTS.
- 3.4.4 The proposed operational period for the Proposed Development is 40 years. During the operational phase, the activities on-Site will be minimal and are expected to amount to limited maintenance and servicing activities. Management plans will be in place for operational period of the project to manage the landscape, ecology, PRoW and other operational aspects.



Figure 3.4: Indicative Proposed Development Layout

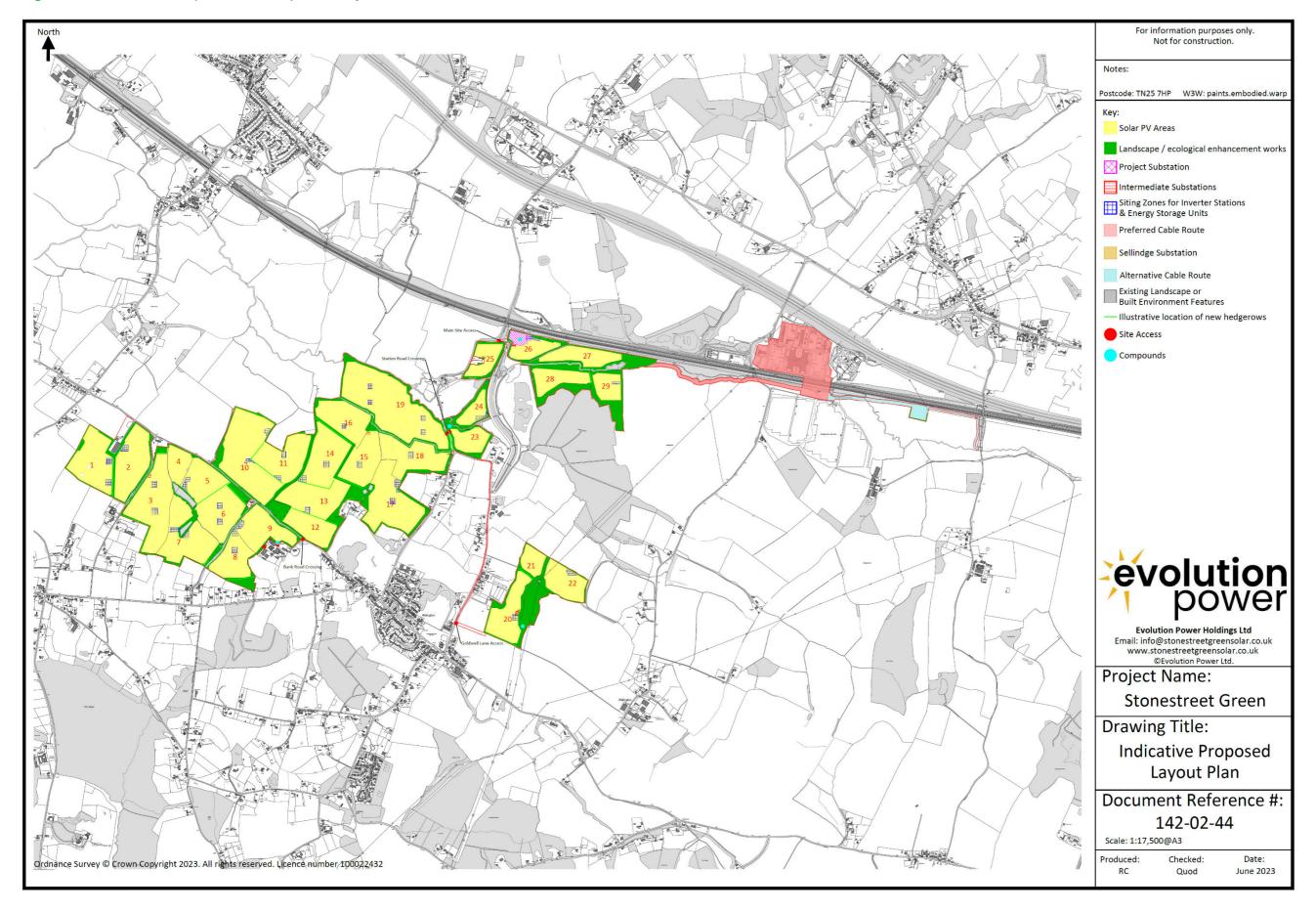
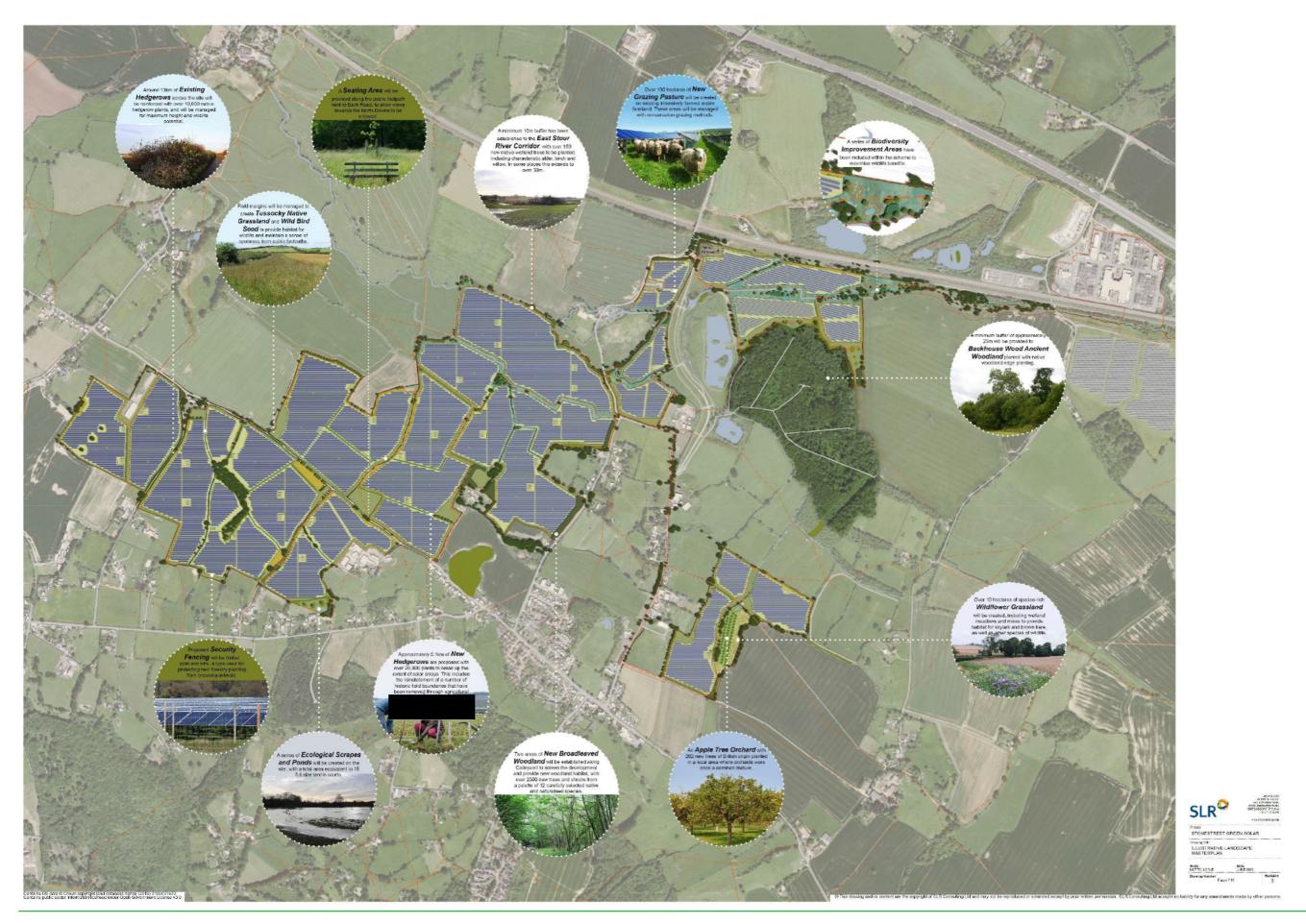




Figure 3.5: Illustrative Landscape Masterplan





4 Alternatives and Design Evolution

4.1 Introduction

- 4.1.1 Chapter 4: Alternatives and Design Evolution of the PEIR Addendum replaces Chapter 4: Alternatives and Design Evolution of the PEIR and presents an overview of the justification for selecting the Site, how the design has evolved since EIA scoping, and the reasonable alternatives studied by the Applicant.
- 4.1.2 Under the EIA Regulations, the Applicant must provide a description in the ES of the reasonable alternatives that have been studied by the Applicant that are relevant to the Proposed Development and indicate the main reasons for selecting the Proposed Development.

4.2 Project Requirements and Site Selection

- 4.2.1 The Site was identified by the Applicant. The Applicant's requirements for the Proposed Development which were relevant to the site selection process are as follows:
 - A single, large-scale solar scheme which makes a significant contribution to the UK's urgent requirements for renewable energy capacity and onshore energy security capable of exporting to the national grid up to 99.9MWe of electricity that enables the full utilisation of the available capacity at Sellindge Substation;
 - Sufficient land for solar panels, supporting infrastructure, landscaping and biodiversity to ensure the project can be delivered with minimal local and environmental impacts;
 - A viable connection to the UKPN distribution network in close proximity; and
 - The ability to host a battery storage system within the Site area to maximise the energy generated and exported and provide further resilience to the electricity network.
- 4.2.2 The south east of England was identified by the Applicant as a suitable area for the Proposed Development as it receives higher levels of sunlight relative to other parts of the UK and has high levels of local demand for electricity.
- 4.2.3 A range of technical, environmental and economic factors are considered when investigating and assessing any potential site for large scale ground-mounted solar PV development. Key factors for consideration include solar irradiation levels (light energy from the sun); proximity to an available connection to the electricity grid, topography, field size / shading, access to the site for construction and commercial agreements with landowners. Environmental and social factors are also important such as proximity of a site to residential dwellings; Agricultural Land Classification (ALC) and land type; accessibility; PRoW network; landscape; ecological and



- geological designations; visual amenity; flood risk; cultural heritage; and availability of land.
- 4.2.4 However, the key commercial requirement for a solar project is the ability to export the electricity generated. This can either be to the national grid infrastructure or to a local energy user. The location near to an available grid connection at Sellindge Substation is a key advantage of this Site.
- 4.2.5 Following an analysis of the above, the Applicant concluded that the Site represented a suitable area for solar and energy storage development, and that there was not another identifiable area that provided a better alternative site that could connect to the Sellindge Substation.
- 4.2.6 In the 2022 Statutory Consultation Responses, two specific areas of land were raised by consultees as possible alternative sites between the M20 and the Site and industrial areas in Ashford. These have been considered by the Applicant but are not suitable alternatives which would meet the project requirements.
- 4.3 Development Design and Consultation Stages
- 4.3.1 The Applicant has undertaken a number of consultation stages in relation to the Proposed Development as follows:
 - 2022 Non-Statutory Consultation A round of non-statutory consultation on the initial proposals in March to April 2022.
 - EIA Scoping Consultation The EIA Scoping Report was submitted to the Planning Inspectorate on 20 April 2022 in support of a request for a scoping opinion. Prior to adopting the Scoping Opinion (on behalf of the Secretary of State) on 30 May 2022, the Planning Inspectorate carried out consultation with consultation bodies in accordance with the EIA Regulations and took the consultation comments into account in the preparation of the opinion.
 - 2022 Statutory Consultation A round of statutory consultation was carried out by the Applicant on updated proposals in October to November 2022. This was accompanied by the PEIR that was published in support of that consultation and included an illustrative site layout and site boundary.
 - 2023 Statutory Consultation (current) A further round of statutory consultation is currently being undertaken by the Applicant on the updated proposals.
- 4.3.2 The Proposed Development design has evolved through an iterative process and will continue to do so following the 2023 Statutory Consultation. The design has been informed by ongoing assessments of environmental effects and mitigation measures, planning policy, engineering and design considerations as well as consultation responses and engagement with stakeholders.



4.4 The 'Do Nothing' Alternative

4.4.1 If the Proposed Development did not go ahead, the Site would likely remain in agricultural use. The beneficial and adverse effects outlined in the PEIR, as updated by the PEIR Addendum, relating to the Proposed Development would not occur. This would also mean that the Proposed Development would not contribute to the UK's urgent need for renewable energy generation or storage required to meet its stated policy goal of net zero by 2050. As a result, the 'do nothing' alternative is not considered to be a reasonable alternative and is not considered in detail.

4.5 Alternative Site Extent

4.5.1 The extent of the preferred Order limits has evolved during the design process and has been informed by consultation feedback, engineering, technical design and environmental considerations and land ownership constraints. A number of parcels were considered and then discounted due primarily to land availability and environmental effects. The current Site boundary has been amended to ensure it includes the land required for development and excludes land that is not required (see Section 1 of this NTS).

Solar Generating Station – Design Evolution and Alternative Layouts

- 4.5.2 The extent and layout of the solar PV panel areas within the Site boundary has also evolved in several locations due to technical design considerations and to reduce environmental effects. Key factors that have influenced the layout are highlighted below:
 - Proximity to residential properties The layout of the Solar PV Areas has evolved to ensure that infrastructure is set back from residential properties where possible and that effects are minimised through landscape planting and other mitigation.
 - Landscape and views The layout of the PV panels and proposed landscaping strategy has been informed by landscape and visual impact analysis and has been designed to be sympathetic to the area, contribute positively to the landscape character and quality of the area and to mitigate adverse landscape and visual effects. New hedges have been added to the layout, along the lines of historic hedgerows, breaking up the visual impact of the larger fields. Fields and panels have also been removed from the Site layout to reduce the impact on visually sensitive receptors.
 - Biodiversity, trees and woodland The layout of the PV panels and other infrastructure has been designed to minimise adverse impacts on biodiversity and maximise enhancements where possible. The layout of the Solar PV Areas has been designed to ensure appropriate setbacks from woodland, veteran trees and badger setts. Area of PV panels have been removed from the layout during the design process and replaced with biodiversity and landscaping planting.



- Site access The main construction compound, Project Substation, site offices, control room and welfare area location has been selected in the north-east of the Site so that construction traffic avoids local settlements, which will minimise disruption and safety risks.
- PRoW The layout of the PV panels within the Proposed Development has been designed to minimise the impacts on the PRoW network, where possible, by minimising the number and length of PRoW diversions and delivers improvements to the existing PRoW network with increased connectivity with new routes. Changes made to the design from initial design drawing include amending the Proposed Development layout and PRoW corridors to provide a cohesive PRoW network within the Site and create new routes.
- Other The extent of PV panels, siting of infrastructure and heights of PV panels have been adjusted in response to areas of flood risk. New hedgerows are proposed along the routes of historic hedgerows to restore these features and areas of archaeological value avoided. Landscape proposals have also been amended to mitigate glint and glare effects from the PV panels.

4.6 Alternative Technologies

4.6.1 In light of the nature of the area surrounding the Sellindge grid connection and the current national policy provisions for renewable energy technologies, it is considered that ground-mounted solar PV, together with energy storage, represents the most appropriate technology for deployment at the Site. Alternative technology for solar farms is rapidly evolving and, as such, the Application will include some flexibility to allow the Proposed Development to respond to advances in technology in the future.

4.7 Alternative Substation Locations

4.7.1 An alternative location for the Project Substation was initially identified in the eastern part of the Site adjacent to the East Stour River (i.e. adjacent to the north eastern corner of Field 27). This location would deliver the shortest possible high voltage grid connection cable between the Project Substation and the Sellindge Substation. However, it was discounted as the location is it is at higher risk of flooding than the proposed location. The alternative location is also less accessible and would require additional construction, land take and associated environmental effects.

4.8 Alternative Grid Connections and Cable Routes

4.8.1 In order to connect the Proposed Development to the national grid, high voltage cable routing is required from Sellindge Substation to the Project Substation (adjacent to Field 25). Using Goldwell Lane for the cable connection needed to connect the South Eastern Cluster was chosen to be the preferable option as it will result in lower environmental effects (mainly ecology and archaeology) compared to trenching cables across the farmland. Installing cables on Goldwell Lane will give rise to minor traffic disruption during the installation, however this will be temporary



effects and can be effectively managed through a CEMP and Construction Traffic Management Plan ('CTMP').

4.9 Alternative Drainage Strategy

4.9.1 The use of a combination of surface water attenuation ponds and drainage was chosen by the Applicant as the chosen option for the drainage strategy. Widespread use of swales⁴ was considered as an alternative option, however, this was discounted as tale up a lot of space which would reduce the overall generating capacity of the project. and require more maintenance. Surface water drainage ponds will provide greater biodiversity value than just the use of swales.

⁴ Swales are shallow, broad and vegetated channels designed to store and/or convey runoff and remove pollutants.



5 Construction and Decommissioning

5.1 Introduction

5.1.1 Chapter 5: Construction and Decommissioning Methodology and Programme of the PEIR has been **replaced** by Chapter 5: Construction and Decommissioning of the PEIR Addendum which includes new and updated information on the expected construction and decommissioning programme, methods and activities.

5.2 Construction Programme

5.2.1 The construction phase for the Proposed Development is estimated to be approximately 12 months. Subject to consent being granted, construction is anticipated to commence not earlier than the first quarter of 2025 and be complete by the first quarter of 2026. Construction activities are likely to take place continuously over the 12-month period, although at different levels of intensity across the Site.

5.3 Construction Activities

- 5.3.1 The main activities during the construction phase will include the following:
 - Site preparation and civil engineering works ground clearance (where needed), installation of temporary security and safety equipment, installation of fencing and gates, construction of the access points, internal haulage road and construction compounds / laydown areas, PRoW diversions.
 - Installation of Solar PV Panels and Cabling installation of the mounting structures (steel legs will be driven into ground using pile driver machinery) and PV panels, trenching and connecting cabling, construction of foundations for Inverter Stations and Energy Storage Units, and their installation.
 - Construction of Project Substation and Grid Connection Project Substation building activities including ground clearance and foundation pouring, cable groundworks between the Project Substation and Sellindge Substation and electrical works to connect the Proposed Development.
 - Installation of Electric Cabling Installation and connection of communications cabling and equipment to link PV panels, Inverter Stations, Energy Storage Units and the Project Substation. This will involve a section of electrical cabling being installed on Goldwell Lane.
- 5.3.2 Underground cables for the Proposed Development will be installed using cable trenches or Horizontal Directional Drilling (a minimal impact trenchless method of installing underground utilities using drilling). Horizontal Directional Drilling methods will be used for cable crossings beneath the East Stour River within the Site.



5.3.3 The construction phase will also include the reinstatement and creation of habitat to mitigate impacts and provide enhancement opportunities.

5.4 Site Access and Traffic

- 5.4.1 Vehicles will arrive at the Site during the construction and decommissioning phases of the Proposed Development from the north and will not be routed through Aldington or surrounding villages. Vehicles will travel from Junction 10a of the M20 motorway, along A20 Hythe Road and Station Road before turning left into the Site via an existing access. They will then report to the main construction compound which will be located at Field 25 (also where the Project Substation will be located) as shown on **Figure 5.1**.
- 5.4.2 All deliveries will be unloaded within the main construction compound. Plant and equipment will then be moved on an internal haulage road as shown on **Figure 5.1.** The internal haulage road largely avoids the use of other local roads. It will be formed from temporary sheeting and will be removed after use.
- 5.4.3 Where possible, deliveries to the Site will be timed to avoid Heavy Goods Vehicle ('HGV') movements during the traditional morning and afternoon traffic peak times (08:00-09:00 and 17:00-18:00).

5.5 Construction Hours of Work and Workers

- 5.5.1 Core working hours will run from 8am until 6pm Monday to Friday and 8am to 1pm on Saturdays. Start-up and shut-down works will be undertaken before and after normal working hours (i.e. 07:00 to 08:00 18:00 to 19:00 standard weekday hours and 07:00 to 08:00 13:00 to 14:00 standard Saturday hours). During winter months, some temporary lighting may be required.
- 5.5.2 The Applicant expects that there will be a peak of 199 construction jobs, with an average of 130 workers on the Site.

5.6 Construction Management

- 5.6.1 An Outline CTMP will be submitted with the Application. This document will set out the methods that will be used to regulate the delivery of materials and movement of construction personnel to the Site during the construction phase. An Outline CEMP will also be submitted with the Application. The CEMP will work in parallel with the CTMP and will detail the environmental requirements relevant to the construction phase in order to ensure good construction practices and reduce the risk of accidents or potential for adverse, avoidable effects on the environment. Measures will also be in place to protect users of PRoWs during the construction phase.
- 5.6.2 The final, detailed CEMP and CTMP will be prepared following the grant of the DCO and submitted to ABC (and FHDC, if required) for approval prior to construction work starting on the Site. This will be secured through appropriately worded DCO requirements.



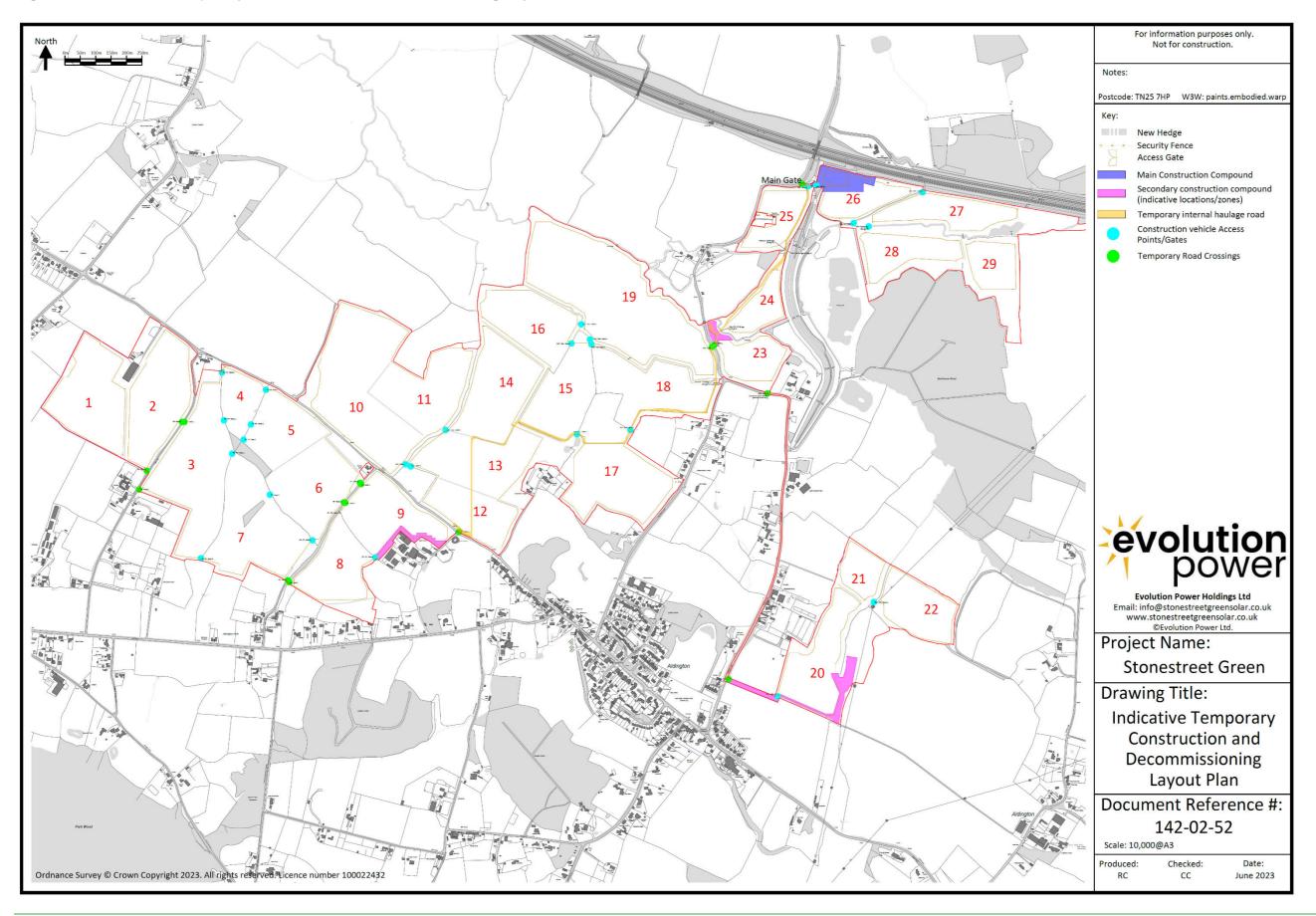
5.6.3 Where possible, deliveries to the Site will be timed to avoid HGV movements during the traditional morning and afternoon traffic peak times, 08:00-09:00 and 17:00-18:00.

5.7 Decommissioning

- 5.7.1 Following cessation of energy production at the Site, all PV modules, mounting structures, cabling, and equipment will be removed and recycled or disposed of in accordance with good practice and market conditions available at that time.
- 5.7.2 An Outline Decommissioning Environmental Management Plan ('DEMP') and Outline Decommissioning Traffic Management Plan ('DTMP') will be submitted with the Application. Similar to the CEMP, the DEMP will detail the environmental requirements relevant to the decommissioning phase in order to ensure good working practices and reduce the risk of accidents or potential for adverse, avoidable, effects on the environment. Similar to the CTMP, the DTMP will include measures to minimise decommissioning traffic and mitigate temporary disruption effects of decommissioning traffic on road users, the local community and environment.
- 5.7.3 The final, detailed DEMP and DTMP will be submitted to ABC (and FHDC, if required) for approval prior to decommissioning starting on the Site. This will be secured through appropriately worded DCO requirements.
- 5.7.4 The decommissioning of the Proposed Development is anticipated to take approximately 12 months. As with the construction phase, one or more temporary compounds will be required, as well as temporary access tracks. Again, as with construction, it is expected that the compounds will be located within the Site adjacent to entrances. All compounds and temporary access tracks will be removed once decommissioning is complete.
- 5.7.5 An Outline Rights of Way and Access Strategy, Outline Ecological Mitigation and Enhancement Strategy, and Outline Landscape and Ecological Management Plan ('LEMP') will be submitted with the Application, which will include measures relevant to the construction and decommissioning phases of the project.



Figure 5.1: Indicative Temporary Construction and Decommissioning Layout Plan





6 Cultural Heritage

6.1 Preface

- 6.1.1 The PEIR Addendum Chapter 6: Cultural Heritage should be read together with the PEIR Chapter 6: Cultural Heritage. It includes:
 - Some updated baseline information (geophysical survey and monitoring of ground investigation); and
 - An amended assessment approach following review of relevant consultation responses that will be taken forward in the ES.
- 6.1.2 The chapter is supported by a new Appendix including a geophysical survey report and results of archaeological monitoring of ground investigation. The significance of residual effects presented in PEIR have not changed.

- 6.2.1 Baseline information on the historic and archaeological background of the Site was established through consultation with the Kent Historic Environment Record (HER), Historic England datasets, a site walkover survey, and a review of published available information including archives, online resources and historic mapping. The results, sectioned into archaeological time periods and with a focus on legally protected features, identified one designated asset (i.e. a statutory protected feature) and 26 non-designated assets within the Site. The designated asset comprises the crash site of the Messerschmitt Bf109E- 4 (identified as Protected Military Remains) and is located close to the southern boundary of the Site within Field 17. With regard to the likelihood for as yet unknown archaeology on the Site, the research undertaken to inform the PEIR identified the potential for palaeolithic and early medieval remains on-site as low to negligible; the potential for prehistoric remains, and iron age, Romano-British remains as moderate; and the potential for Medieval, Post-Medieval, and Modern remains as moderate to high.
- 6.2.2 Within 1km of the Site, there is one Scheduled Monument, two Grade I listed buildings, six Grade II* listed buildings, 69 Grade II listed buildings, two conservation areas and five further Protected Military Remains sites. Stonelees a Grade II* listed building located approximately 65m to the south of the Site, is shown on **Figure 6.1**.







6.3 Assessment

- 6.3.1 The assessment determined the potential for the Proposed Development to impact physically upon buried archaeological remains within the Site and to indirectly impact upon the significance of designated heritage assets within the vicinity of the Site through introducing change within their setting and identified a number of potential adverse effects.
- 6.3.2 Prior to the consideration of mitigation, during construction, direct effects on known and unknown archaeology are, anticipated to be slight adverse; direct effects from change to the historic landscape character of the area are anticipated to be slight adverse, and direct effects from the reinstatement of hedgerows along historic boundaries (informed by desk based research) would be slight adverse. These effects are not considered significant in EIA terms.
- 6.3.3 Prior to the mitigation, during the operational phase, effects on the setting of the Grade II* listed Stoneless and on the Grade II Listed Bank farmhouse, would be moderate and slight adverse respectively. Impacts would arise from changes to the setting of the assets which have been deemed to adversely affect an understanding or appreciation of their special interest. Anticipated residual effects would not be



- significant (based on professional judgement) proposed hedgerows will help screen views.
- 6.3.4 Prior to the consideration of mitigation, during decommissioning, effects on the same buildings would be neutral, and effects from the reinstatement of the historic landscape character of the area to its original agricultural use would be of slight beneficial (not significant) in EIA terms.

6.4 Mitigation

- 6.4.1 Mitigation during construction will include a programme of archaeological works (if found to be necessary) the approach to which will be presented within an Archaeological Management Strategy ('AMS') to be submitted as part of the Application. The AMS will be developed in discussion with KCC's Senior Archaeological Advisor. This will be delivered through a DCO requirement.
- 6.4.2 Other construction mitigation comprises the use of native species for the reinstatement of hedgerows along historic boundaries and the reinforcement of existing historic hedgerow boundaries.
- 6.4.3 Operational mitigation comprises the management of proposed planting of hedgerows to screen views and remove the potential for glint from the solar panels. No additional mitigation is required during decommissioning.

6.5 Residual Effects

6.5.1 After the mitigation has been implemented, construction phase effects are considered slight adverse to slight beneficial. Operational effects are considered slight adverse and decommissioning effects are neutral to slight beneficial from reinstatement of historic landscape character. None of these residual effects is considered to be a significant EIA effect on heritage assets.



7 Landscape and Views

7.1 Preface

- 7.1.1 The PEIR Addendum Chapter 7: Landscape and Views should be read in conjunction with the PEIR Chapter 7: Landscape and Views. The chapter provides:
 - New figures and amended figures, including landscape strategy drawings; and,
 - Amended information on embedded mitigation.
- 7.1.2 A new Appendix is provided which provides an updated list of viewpoints that will be taken forward for assessment. The significance of residual effects presented in PEIR have not changed.

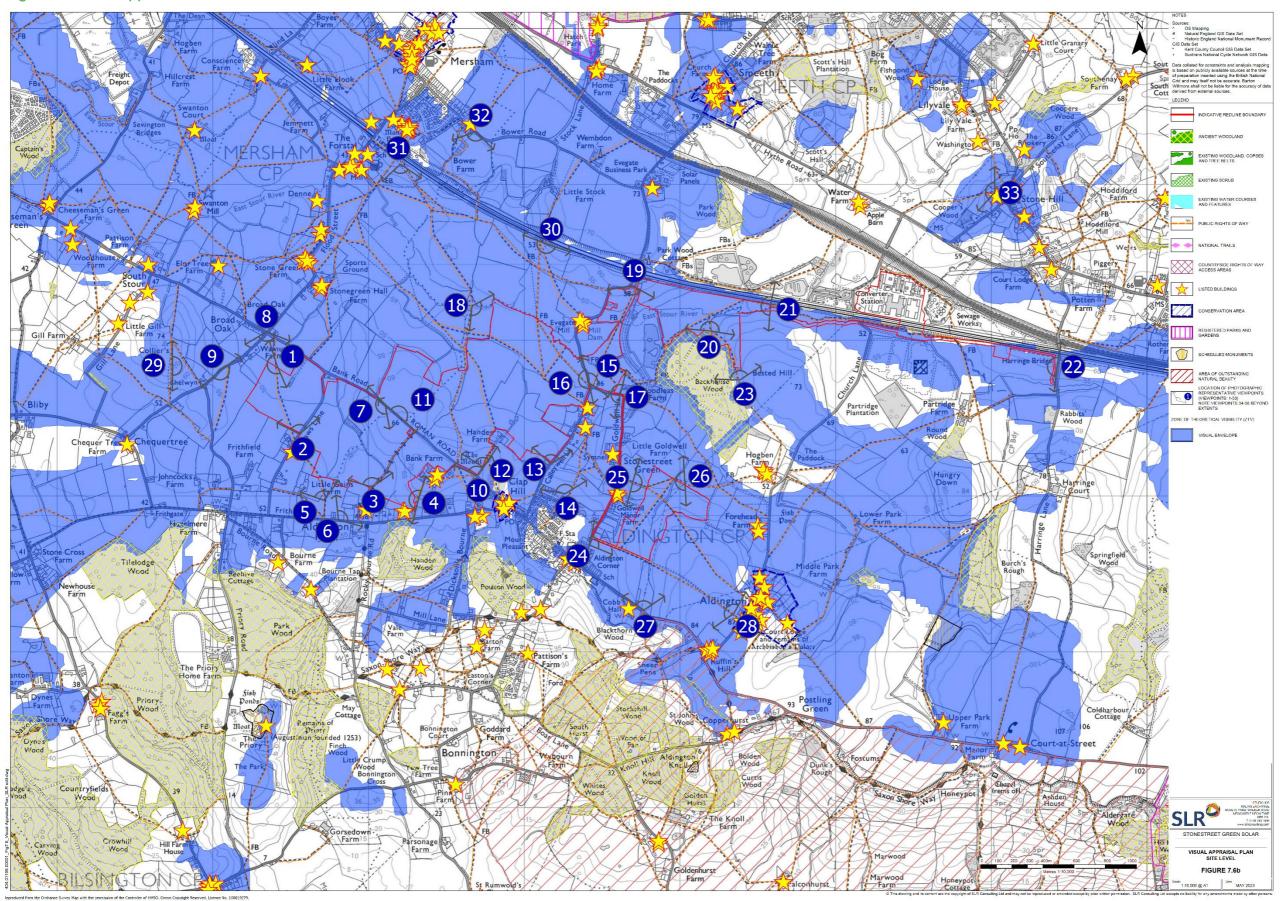
- 7.2.1 In order to establish the baseline conditions with regard to the landscape and potential visual effects, desktop studies and field surveys were undertaken. These identified that there are no areas on the Site designated (in legal or policy terms) as protected landscape. However, the Site is within the setting of the Kent Downs AONB, and there are conservation areas⁵ and several listed buildings within the Site's immediate context. Backhouse Wood Local Wildlife Site, an ancient woodland⁶, is adjacent to the Site (see **Figure 7.1**). In terms of the nature of the landscape, the Site comprises an extensive area of mixed farmland delineated by hedgerows and occasional tree cover and sub-divided by country roads with sporadic clusters of houses.
- 7.2.2 The landform varies from gently undulating to rolling, with the Site broadly occupying the East Stour River valley and the Aldington Ridgeline. Fields are often large scale. In visual terms, the Site is visible in open views from the extensive network of PRoWs that run across it, albeit these views are always partial. There are also close-range views of the Site from a limited number of residential properties that lie adjacent. However, there are no views from the cores of local settlements, including the two conservation areas in Aldington. Visibility of the Site diminishes rapidly to the south, east and west, due to a combination of landform and vegetation, with some exceptions.

 $^{^{\}rm 5}$ An area of special architectural or historic interest protected under the Planning (Listed Buildings and Conservation Areas) Act 1990

⁶ Ancient woodlands are woods that have existed since at least AD 1600 and have developed irreplaceable, complex ecosystems



Figure 7.1: Site Appraisal Plan





7.3 Assessment

- 7.3.1 Assessment of the likely significant landscape and visual effects of the Proposed Development has been undertaken for the construction phase, Years 1 and 15 of the operational phase, and the decommissioning phase.
- 7.3.2 Embedded mitigation to minimise significant adverse effects has been considered as part of the design of the Proposed Development and includes measures such as appropriate planting. Taking that into account, the effects during construction and decommissioning will only relate to visual receptors and are considered to be of moderate adverse significance. Operational effects on features of the landscape and landscape character would be of moderate adverse significance and effects on visual receptors would be of major-moderate to moderate adverse significance. All identified effects are considered significant in EIA terms, prior to the implementation of additional mitigation measures.

7.4 Mitigation

- 7.4.1 Best practice measures will be undertaken during the construction and decommissioning phases and will include an Outline CEMP and Outline DEMP as discussed in Section 5 of this NTS, which will include protecting existing vegetation on the Site, limiting hours of work on the Site, ensuring that all unloading/loading of materials and equipment is undertaken within the Site boundary, and cleaning construction and decommissioning vehicles regularly to limit noise, dust and dirt levels.
- 7.4.2 Operational phase mitigation comprises the maintenance and management of the comprehensive landscape strategy, which will be outlined in a LEMP, and secured by a DCO requirement.

7.5 Residual Effects

- 7.5.1 Following mitigation, residual effects during construction and decommissioning will remain moderate adverse and significant, although these effects will be temporary and short term.
- 7.5.2 Residual effects on landscape features during the Proposed Development's operational phase are considered to be moderate to neutral beneficial, following the maturation of planting. There will be a moderate to minor adverse effect on landscape character and visual receptors. These are still considered significant EIA effects.



8 Biodiversity

8.1 Preface

- 8.1.1 The PEIR Addendum Chapter 8: Biodiversity should be read in conjunction with the PEIR Chapter 8: Biodiversity. The chapter provides:
 - New detailed based ecological survey reports (as a new Appendix);
 - Updated / new information on embedded mitigation measures to be included within the Proposed Development design; and
 - Updated information on baseline, effects and impacts for species that were either awaiting completion or analysis of ecological surveys at time the PEIR was prepared.

- 8.2.1 The Site supports a range of important ecological features that are broadly similar to the wider area of arable farmland within this part of Ashford Borough. The most important ecological features present are the adjacent Backhouse Wood ancient woodland (which is also a Local Wildlife Site ('LWS')) (see **Figure 8.2),** the East Stour River (habitat of principal importance) and the on-Site yellowhammer⁷ bird population.
- 8.2.2 Three statutory designated sites of international ecological importance are located within 10km of the Site (see **Figure 8.1.** N.B. the Site Boundary will be updated with the final Order Limits in the ES). These are the Wye and Crundale Downs Special Area of Conservation ('SAC'), Dungeness, Romney Marsh and Rye Bay Ramsar and Special Protection Area ('SPA'), and the Folkestone to Etchinghill Escarpment SAC. There are two nationally important statutory designated site within 2km of the Site, the Hatch Park Site of Special Scientific Interest ('SSSI') and Gibbin's Brook SSSI, and one statutory designated site of local importance within 2km, the Poulton Wood Local Nature Reserve ('LNR').
- 8.2.3 The Stodmarsh SPA, SAC, Ramsar and SSSI site is located approximately 24km from the Site. It is sensitive to nutrient-related ecological effects arising from new development and is connected to the Site via the Stour River catchments.

⁷ Yellowhammer are a farmland bird species which nest on or close to the ground in ditch vegetation, at the base of hedgerows and field margins.



Figure 8.1: Locations of Statutory Designated Sites

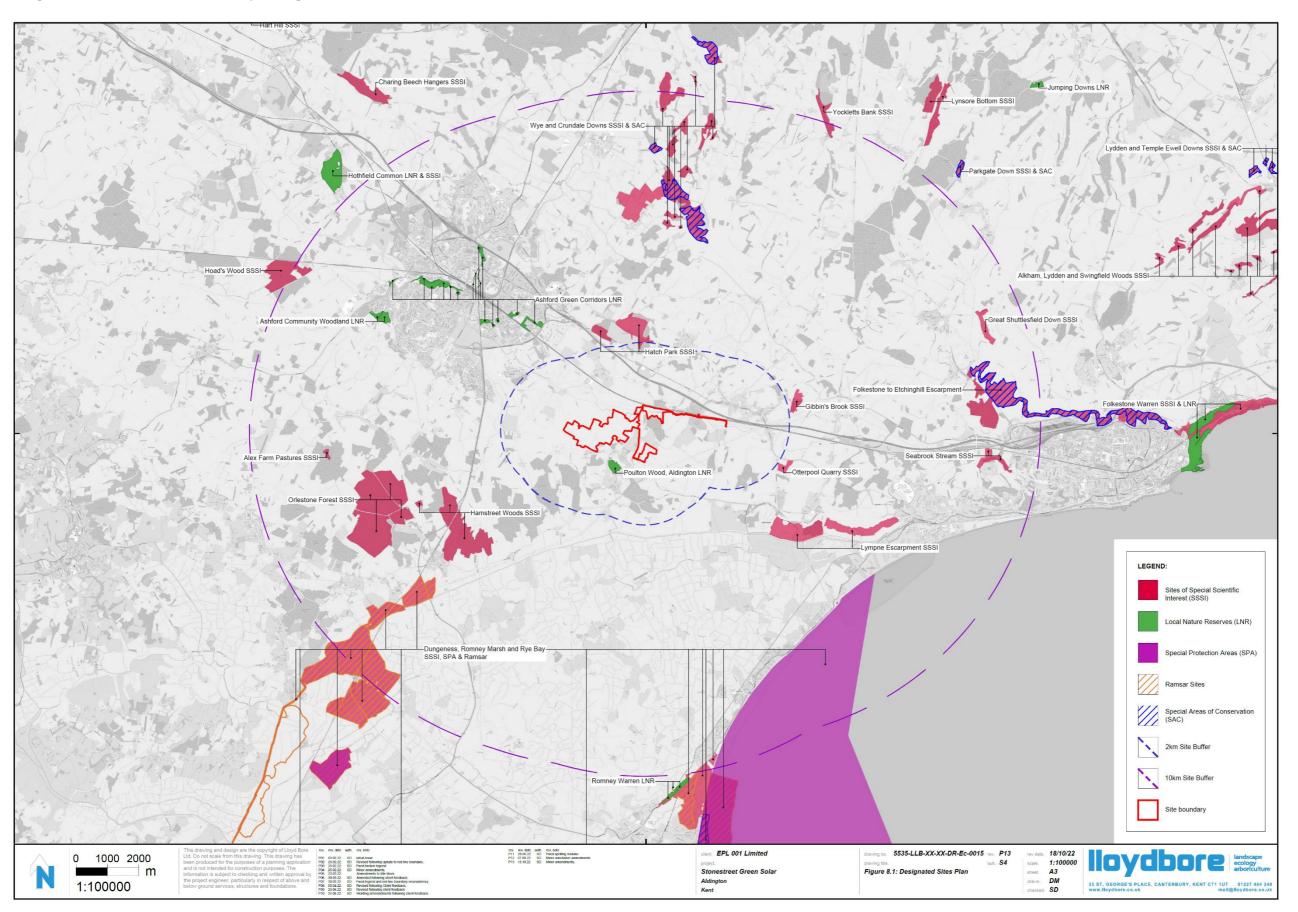
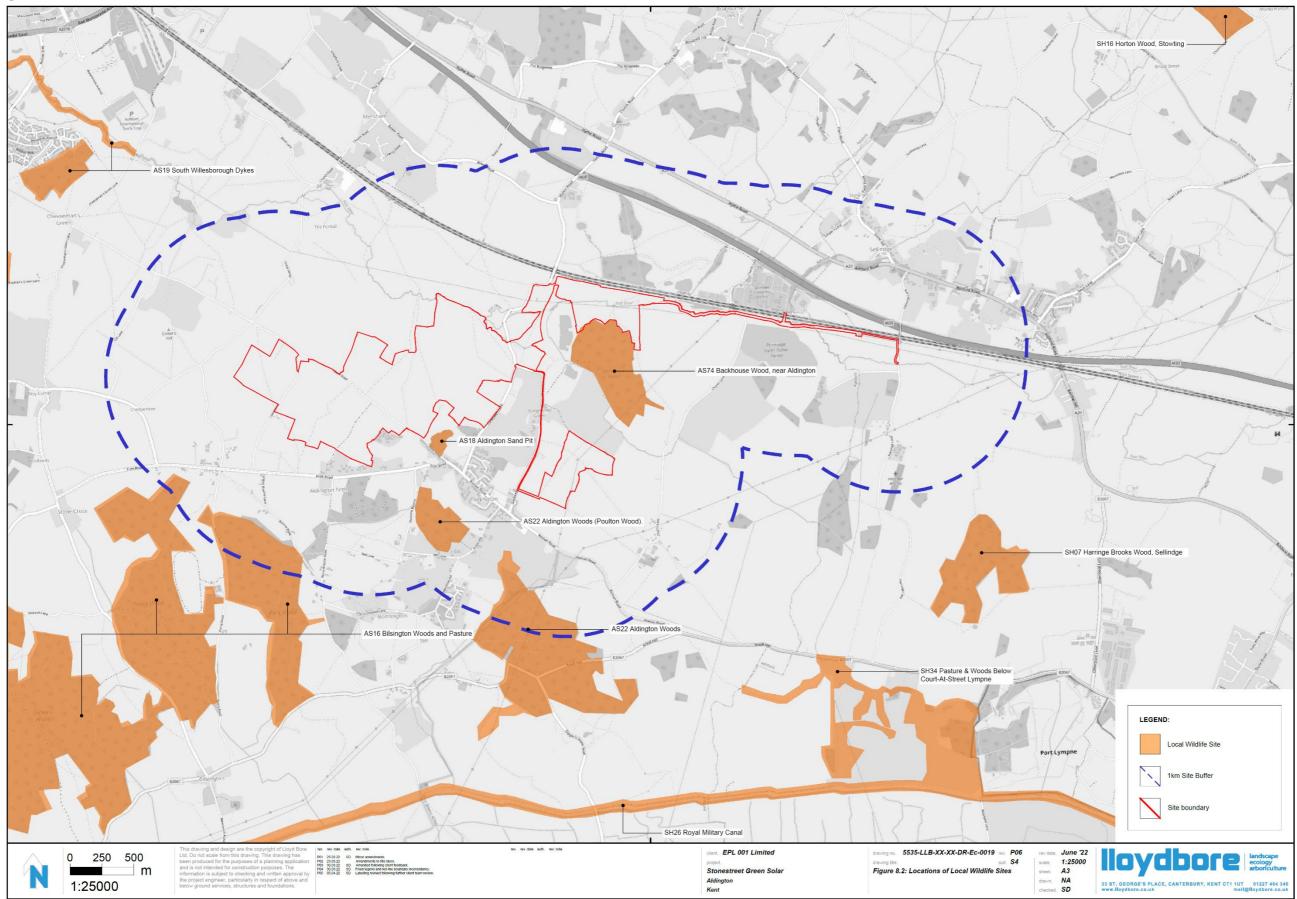




Figure 8.2: Locations of Local Wildlife Sites





8.3 Assessment

- 8.3.1 Prior to additional mitigation, a construction stage adverse effect of international significance on the Stodmarsh site is identified resulting from nutrient enrichment. Pre-mitigation adverse effects of county significance are identified due to the risk (in the absence of mitigation) of indirect damage to veteran trees and harm to the otter population. All other construction stage effects, including on species such as badgers, great crested newts, and hazel dormouse, skylark and brown hare are assessed to be of local adverse or negligible significance. Construction and decommissioning stage effects on notable plants, fungi and invertebrates are assessed as negligible.
- 8.3.2 During operation, anticipated effects also include an adverse effect of international significance on the Stodmarsh site resulting from nutrient enrichment, prior to the implementation of additional mitigation measures. There are also adverse effects of county significance anticipated due to the sustained depletion of local food and habitat resources for yellowhammers, as well as due to harm and disturbance for otters, and the damage of their habitat. Other effects, including on other species such as wintering birds, harvest mouse, skylark, brown hare and bats, range from local beneficial to local adverse to negligible.
- 8.3.3 Similar to the construction phase, prior to the implementation of additional mitigation measures, anticipated decommissioning effects include adverse effects of international significance on the Stodmarsh site, and adverse effects of county significance due to veteran tree damage and harm to otters.
- 8.3.4 Effects on yellowhammer during construction and decommissioning were reported in the PEIR as county adverse (significant), however this has been revised to local adverse (significant) during construction and decommissioning. Effects on yellowhammer during operation will remain local adverse (significant), although the Proposed Development does now include additional foraging and nesting areas.

8.4 Mitigation

- 8.4.1 Construction and decommissioning phase mitigation includes the transporting of foul water to a location beyond the Stour River catchment, and the implementation of protection and pollution prevention measures outlined in a CEMP and DEMP to avoid any impact on the Stodmarsh site. No veteran trees are proposed to be removed and suitable protection zones will be set up around veteran trees that are to be retained, the adjacent Backhouse Wood LWS ancient woodland, and the East Stour River within which no construction activities will be undertaken. Further measures include the implementation of ecological 'watching briefs' (including to mitigate impacts on otter habitats), closure of badger setts (if required), translocation of animals if needed and the retention and enhancement of habitats. Adherence to good practice lighting guidelines during construction is also proposed.
- 8.4.2 Operational phase mitigation also includes transporting of foul water to a location beyond the Stour River Catchment (if required to avoid impacts on the Stodmarsh



- site). New habitats will also be created adjacent to Backhouse Wood LWS and the East Stour River. Other existing habitats will be enhanced within the Site and appropriate habitat management and monitoring will be the design, implementation and monitoring of appropriate habitat management. Other measures include the use of mammal gates / gaps under fences, following good practice lighting guidelines and enhancement of foraging (bird crop strips, grassland enhancement and set aside areas free of panels) and nesting / shelter (hedgerow creation and enhancement) for yellowhammer, skylark and brown hare.
- 8.4.3 Decommissioning phase mitigation, such as measures to prevent and control the spread of invasive species during works, and following good practice lighting quidelines, will be included in the Outline DEMP.

8.5 Residual Effects

- 8.5.1 There would be local (significant) adverse effect from the loss of habitat for yellowhammer, skylark and brown hare and disturbance of brown hare during construction. All other construction stage effects are not considered significant or are yet to be confirmed (at the ES stage).
- 8.5.2 Operational residual effects include local (significant) beneficial effects on the Backhouse Wood LWS and ancient woodland, notable river habitats, ponds and hedgerows, invertebrate species, the habitat expansion and enhancement for great crested newt, common toad, reptiles, breeding birds (including yellowhammer), wintering birds (including yellowhammer), hazel dormouse, badger, otter, bats, hedgehog, harvest mouse and brown hare. There would be a local (significant) adverse effect arising from the sustained depletion of yellowhammer food and habitat, and a local adverse effect on the elevated predation risk on skylarks. All other effects would be not significant.
- 8.5.3 Residual effects during decommissioning are either negligible adverse and not significant, or to be confirmed in the ES, following surveys and assessments.



9 Water Environment

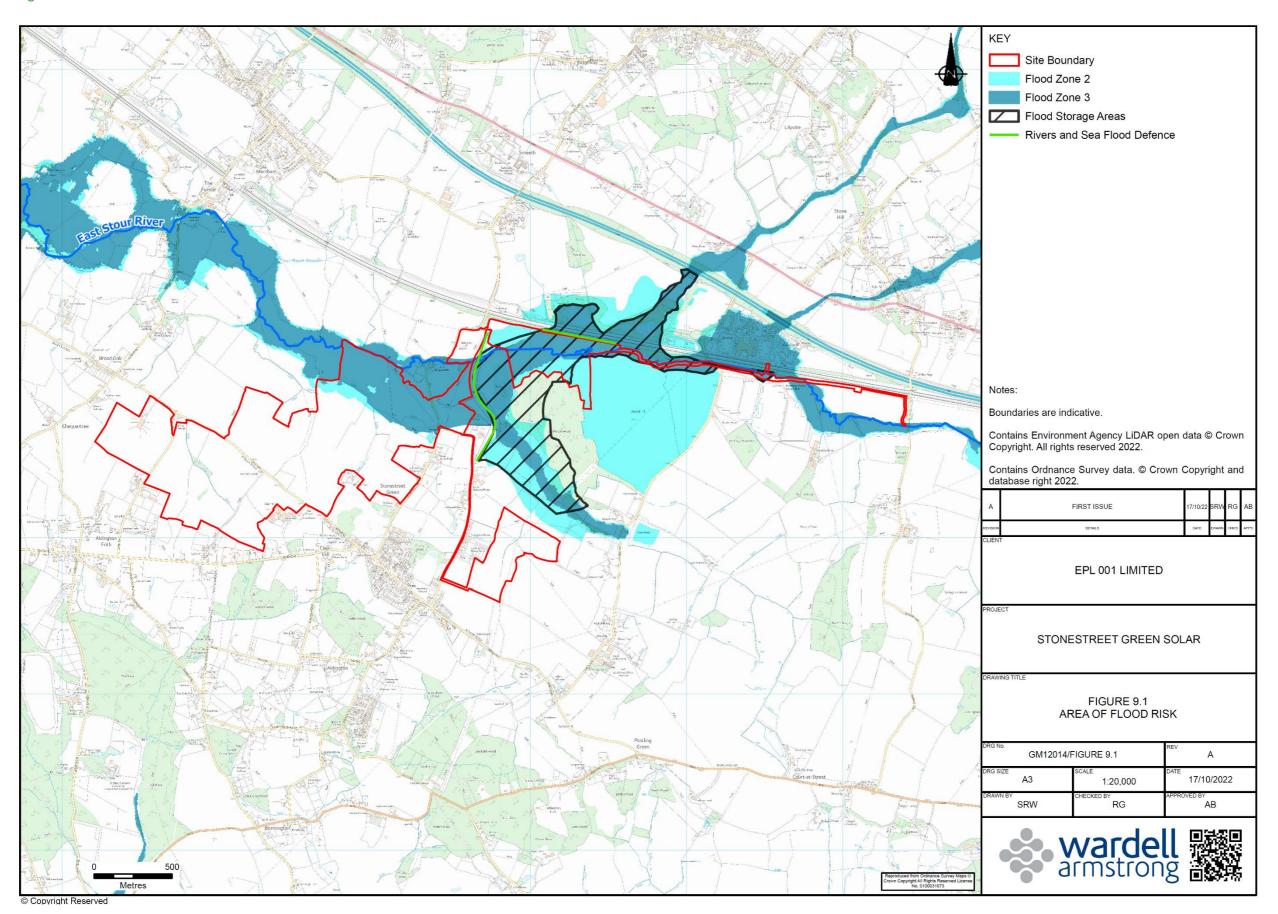
9.1 Preface

- 9.1.1 The PEIR Addendum Chapter 9: Water Environment should be read in conjunction with the PEIR Chapter 9: Water Environment. The chapter provides:
 - New and updated figures;
 - Updated walkover survey information (as Appendix 9.4) which provides additional information; and
 - Additional information on watercourse setbacks, and watercourse crossings, the approach to the drainage strategy and Flood Risk Assessment.
- 9.1.2 This chapter is supported by new appendices providing the results of an updated walkover survey and indicative watercourse and flood storage embankment setbacks.
- 9.1.3 The significance of residual effects reported in the PEIR are unchanged.

- 9.2.1 The Site lies within East Stour River and Romney Marsh between Appledore and West Hythe surface water catchments. However, the majority (99%) of the Site is within the East Stour River surface water catchment. There are a number of water features (lakes, ponds, watercourse and ditches) associated with these two surface water catchments. The majority of the bedrock beneath the Site is not considered to be an aquifer (not a groundwater resource). There are areas of the Site which are underlain by principal aquifer. There are no water abstractions or private water supplies within 2km of the Site. The Poulton Wood LNR and the Stodmarsh site are ecological sites which are sensitive to water-related effects from the Proposed Development.
- 9.2.2 The assessment of the water environment on the Site included consideration of the existing watercourses, risks of flooding and current drainage patterns. A review of the baseline conditions identified the East Stour River, within and adjacent to the Site's northern boundary, which joins the Great Stour River 8km downstream of the Site; a number of unnamed ditches and ponds across the Site; and off-Site lakes and streams.-The majority of the Site is located within Flood Zone 1 (i.e. land with a 'low' probability of flooding from rivers), whilst land in the northern parts of the Site is classified as in Flood Zones 2 or 3 (i.e. land having 'medium' and 'high' probabilities, respectively, of flooding from rivers) (see **Figure 9.1** N.B. the Site Boundary will be updated with the final Order Limits in the ES).



Figure 9.1: Areas of Flood Risk*





9.3 Assessment

9.3.1 Potential effects on the water environment are those which may change the existing drainage patterns, and those which could cause pollution and a degradation in water quality. Mitigation incorporated into the design of the Proposed Development has included standoff distances between proposed works and the East Stour River, ponds, lakes, and drains. Prior to the implementation of additional mitigation, during the construction, operational and decommissioning phases, degradation of water quality affecting surface or groundwater receptors was identified as resulting in moderate adverse effects (which are significant). Changes in the drainage regime were considered likely to be negligible neutral, resulting in effects that are not significant.

9.4 Mitigation

- 9.4.1 Additional mitigation measures during construction will include adherence to the CEMP, which will put in place good working practices, such as minimising disruption to the natural flow regime of watercourses and drains within the Proposed Development's layout, sediment capture, secure storing of all fuels, oils and polluting substances, and pollution incident response plans.
- 9.4.2 Operational mitigation includes a surface water drainage regime for the Proposed Development that accounts for a climate change uplift. The drainage proposals would ensure the existing greenfield (pre-development) rate of surface water runoff discharged to the adjacent watercourses is maintained and, in the long-term can take into account climatic changes. In addition, due to the potential for pollution from maintenance activities, there will be a requirement for vehicles and plant to carry a spill kit⁸.
- 9.4.3 A DEMP will be prepared in accordance with the Outline DEMP that will be secured through a DCO requirement. It is expected that the contents of the DEMP would be similar to those set out in the CEMP.
- 9.4.4 Mitigation measures, such as the avoidance of hydrologically sensitive areas and flood zones where possible, have been incorporated into the design of the Proposed Development. The key principles of the water related components of the outline CEMP for the Proposed Development include the careful design and control of sediment and potential pollutants. The outline CEMP will draw upon good industry guidance and best practice measures. The assessment has assumed the implementation of good industry guidance and best practice measures, such as pollution prevention plan and sediment management measures, would avoid the likelihood of potentially significant effects occurring.

⁸ A kit designed to mop up large amounts of spillages or leaks



9.5 Residual Effects

9.5.1 Following additional mitigation measures, during construction, operation and decommissioning, residual effects on the water environment would be negligible with regard to the drainage regime and minor adverse with regard to degradation of water quality affecting receptors. Neither residual effect is considered significant.



10 Land Contamination

10.1 Preface

- 10.1.1 The PEIR Addendum Chapter 10: Land Contamination should be read in conjunction with the PEIR Chapter 10: Land Contamination. The chapter provides:
 - New and updated figures;
 - Updated survey information (as Appendix 10.1 and 10.3) which provides additional information; and
 - Updated Legislation, Policy and Guidance (Appendix 10.2).
- 10.1.2 The PEIR Addendum has involved a review of additional baseline data including a Ground Investigation Report (Appendix 10.4) to assess the likely significant effects of the Proposed Development associated with potential contamination. An updated conceptual model was devised to identify potential sources of contamination, pathways, and receptors; and the significance of contamination impacts which could be associated with the Proposed Development at the Site has been assessed.
- 10.1.3 Consideration has been given to the Site's historical use, as well as the results of the ground investigation. The PEIR Addendum identifies potential contaminationrelated impacts to sensitive receptors including potential risks of contamination to human health (both future site users and construction workers), and groundwater / surface water.
- 10.1.4 Prior to the implementation of mitigation the exposure of workers to contaminated land has been updated from a moderate adverse effect to a minor adverse effect. However, the significance of residual effects have not changed from the PEIR.

- 10.2.1 The Site predominantly comprises agricultural land or pasture with discrete areas of hardstanding located within the north and south-west of the Site. There is also a large agricultural shed, four smaller agricultural sheds and two grain silos in the western part of the Site and the National Grid Sellindge Substation and access track in the north-eastern part of the Site. Historically, surrounding land use has predominantly comprised agricultural land in all directions and has remained largely unchanged. Historical mapping indicates that a sewage treatment works to the north of the Site boundary was first recorded in 1971, and further industrial land is recorded to the north of the Site in 1985.
- 10.2.2 The ground investigation works progressed in February 2023 encountered some made ground materials across the Site to a maximum depth of 0.8m with underlying superficial deposits comprising sand gravel, and clay up to 5m in depth. Bedrock geology was encountered in one exploratory hole, recorded as a partially weathered



limestone at 1.5m below ground level. The bedrock geology in the east and north of the Site have been classified as a 'Secondary A' aquifer⁹. There are no records of active or recent landfill sites within the Site or within 250m, nor are there records of unexploded ordnance on-Site.

10.3 Assessment

10.3.1 Available reports and published information have been reviewed with the aim of identifying the ground conditions within and surrounding the Site. This information has then been used to determine the likely sources of any contamination, the potential pathways for identified contamination, and any receptors that could be significantly affected. The assessment identified that during the construction, operation, and decommissioning phases of the Proposed Development, exposure of workers to contaminated land would be of minor adverse significance, and contaminants from the construction works could result in minor adverse effects on the East Stour River and other relevant watercourses, prior to the implementation of mitigation measures.

10.4 Mitigation

- 10.4.1 Mitigation proposed for the construction phase includes the implementation of a CEMP, dust generation to be minimised by damping down working areas and machinery, and the storage of fuel, oil, and chemicals within a secure bunded area or secondary containment. The CEMP would also include measures related to appropriate working methods and site management in accordance with current best practice and identification of appropriate Personal Protective Equipment, which would be adhered to.
- 10.4.2 There are no proposed additional mitigation measures during the operational and decommissioning phases. However, mitigation measures beneficial to these phases implemented during the construction phase will remain in place.
- 10.4.3 Mitigation during decommissioning will be outlined in the DEMP.

10.5 Residual Effects

10.5.1 Following implementation of additional mitigation measures, effects on human health will be of minor adverse significance (not a significant effect in EIA terms) for all phases of the project (construction, operation and decommissioning). Effects on controlled waters will be minor adverse (not significant) also for all three phases of the Proposed Development.

⁹ Secondary A' aquifers are defined as permeable soil layers capable of holding water.



11 Socio-economics

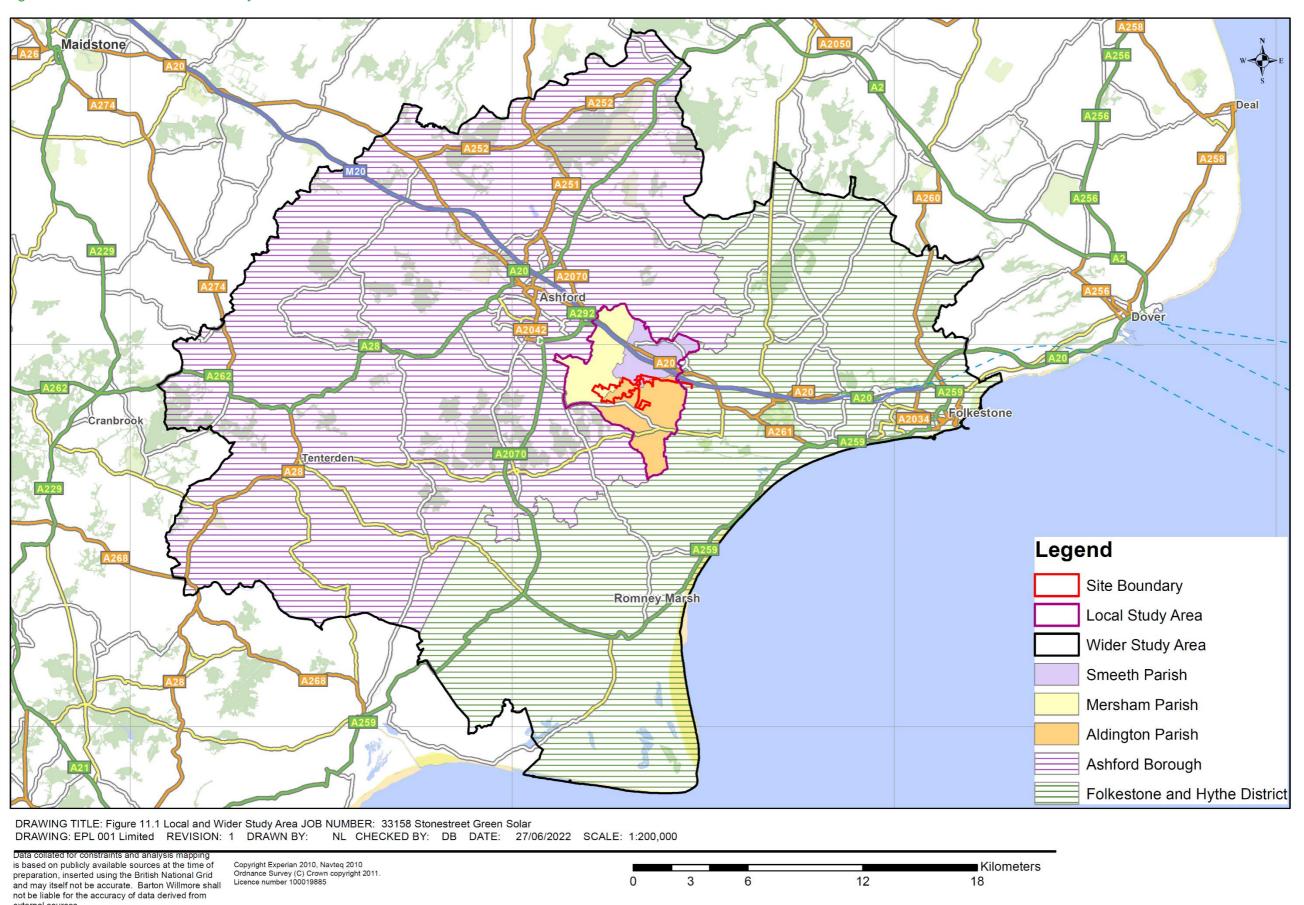
11.1 Preface

- 11.1.1 The PEIR Addendum Chapter 11: Socio-economics should be read in conjunction with the PEIR Chapter 11: Socio-Economics. The chapter provides:
 - Updated figures;
 - New scope and approach related to assessment of effects on PRoWs and access and assessment of effects on agricultural economy and food security, and health and wellbeing; and
 - Updated baseline information relating to headline agricultural economy and updated scope and approach relating to employment, skills and supply chain.
- 11.1.2 This chapter is supported by new appendices relating to Rights of Way and Access.
- 11.1.3 The significance of residual effects presented in the PEIR has not changed, with the exception of effects on rights of way and access which remain not significant, but have been updated from negligible to negligible to minor adverse, for both construction and operational phases.

- 11.2.1 The PEIR focuses on the Proposed Development's effect on the local economy, as well as addressing effects on existing residential amenity, community facilities, tourism and recreational uses.
- 11.2.2 The PEIR identified local and wider study areas based on administrative boundaries and the extent of local features and sensitive receptors such as communities, homes and PRoW network. The Local Study Area (Figure 11.1) in the assessment has been defined as the residential communities of Aldington Parish, Mersham Parish and Smeeth Parish, whereas the Wider Study Area comprises the two local authorities of ABC and FHDC. Effects on Rights of Way and access are considered at a variety of scales to capture effects on individual links as well as how communities use a combination of routes to access community and commercial facilities, and recreation.
- 11.2.3 The Local Study Area has a population of circa 3,700 people, with a younger age profile than the Wider Study Area. However, the Local Study Area has a marginally lower proportion of working age people (57% compared to 58%). The percentage of working age people in the Local Study Area who are economically active is 68%, slightly lower than the wider area and national average of 71%. Residents of the Local Study Area are more skilled than compared to those of the Wider Study Area and the national average.



Figure 11.1: Local and Wider Study Area





11.3 Assessment

- 11.3.1 The construction phase of the Proposed Development will result in the creation of between 130 and 199 direct jobs at peak during the 12 month construction phase, rising to up to 279 including indirect jobs in the supply chain.
- 11.3.2 The construction phase would lead to an estimated contribution of £8.5m to the economy during the 12-month construction phase (a minor beneficial effect, not significant); and workforce expenditure (i.e. the money the construction workforce will spend in the local area) of £885,000 (a moderate beneficial effect, significant).
- 11.3.3 Prior to the implementation of mitigation measures, moderate to negligible adverse (significant to not significant) noise and visual effects on local amenity are anticipated based on the preliminary findings of those assessments, as well as moderate adverse (significant) effects on Rights of Way and Access. The decommissioning phase will generate similar effects to the construction phase.
- 11.3.4 During the operational phase of the Proposed Development, the effects of its contribution towards renewable energy has been preliminarily identified as minor to major beneficial (significant). Similar to the construction and operational phases, prior to the implementation of mitigation measures, moderate to negligible adverse (significant to not significant) noise and visual effects on local amenity are anticipated, as well as moderate adverse (significant) effects on the PRoW network.
- 11.3.5 **Figure 11.2** shows the proposals for the PRoW network which have been updated in response to feedback and further consultation with KCC.

11.4 Mitigation

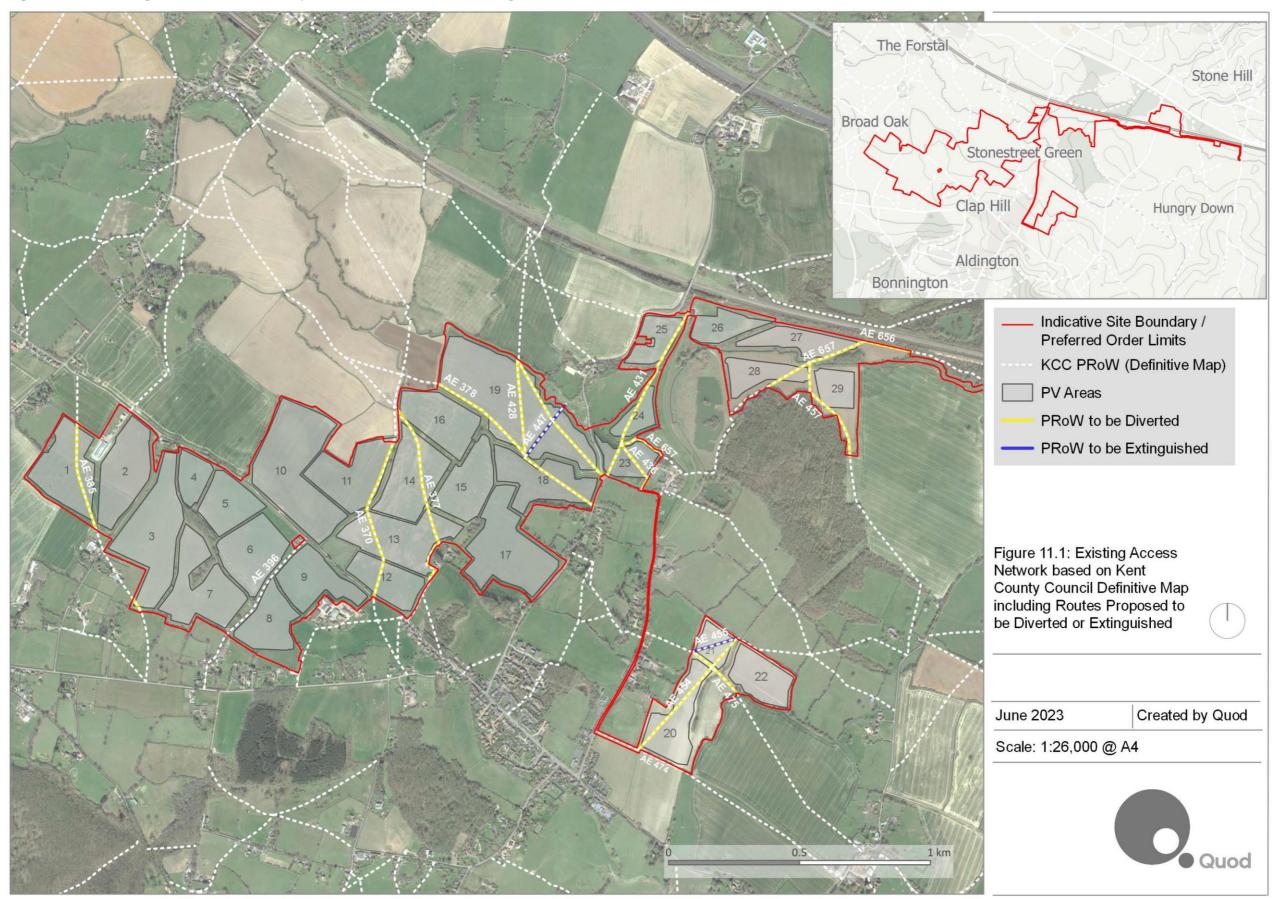
11.4.1 For the construction and decommissioning phases, measures set out in a CTMP/DTMP and CEMP/DEMP will be adhered to. For the operational phase, a LEMP will be implemented to manage the growth of planting proposals and their ongoing maintenance to mitigate visual impacts on local amenity including residential amenity, and the experience of users of rights of way. The Applicant has engaged with KCC to identify areas where improvements can be made as part of the Proposed Development to reduce effects on rights of way and their users.

11.5 Residual Effects

- 11.5.1 There is expected to be a moderate beneficial and significant residual economic effect during construction and decommissioning. All other residual effects during these phases are not likely to be significant.
- 11.5.2 The contribution of the Proposed Development towards renewable energy generation is considered to be minor to major beneficial residual effect (significant). All other residual effects during this phase are not significant.



Figure 11.2: Existing Access Network Proposed to be Diverted or Extinguished





12 Traffic and Access

12.1 Preface

- 12.1.1 The PEIR Addendum Chapter 12: Traffic and Access should be read in conjunction with the PEIR Chapter 12: Traffic and Access. The chapter does not provide any new information to that included in the PEIR.
- 12.1.2 The chapter provides updated figures and updated Appendix 12.5 (access drawings).
- 12.1.3 The significance of residual effects reported in the PEIR are unchanged.

- 12.2.1 The Site is located close to the M20 motorway and A20 Hythe Road, with the proposed main Site access on Station Road (ass shown on Figure 12.1). With the exception of the A20 Hythe Road, the local roads that will be used by construction traffic are relatively lightly trafficked. Heavy Goods Vehicles ('HGV') including agricultural vehicles already use these roads. No fatal accidents occurred in the study area and only three accidents resulted in serious injury. Only one accident involved an HGV.
- 12.2.2 The proposed Site access utilises an existing access, will achieve a safe level of visibility and be able to accommodate the traffic from the Proposed Development. The Site includes several existing access points, some of which are gated, and are used solely by agricultural equipment, except for those which also form public footpaths. Roadside footways are not present in the vicinity of the Site. The Site includes a number of PRoWs as shown in **Figure 11.1.**
- 12.2.3 Traffic surveys were undertaken using automatic traffic counters in June 2022 to inform the assessment and access design.



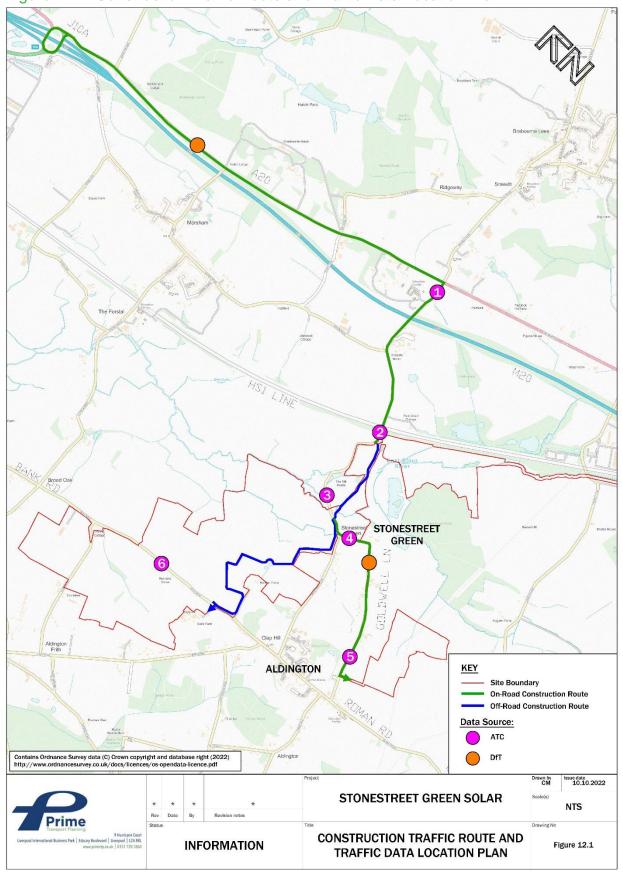


Figure 12.1: Construction Traffic Route and Traffic Data Location Plan



12.3 Assessment

- 12.3.1 The scope of the traffic and access assessment has been limited to construction phase effects. An assessment of effects from operational phase and decommissioning phase traffic has been scoped out of further assessment as significant effects are considered unlikely.
- 12.3.2 The expected routing for construction traffic is shown on **Figure 12.1**: Construction Traffic Route and Data Location Plan, which shows that vehicles travelling in the direction of the Site will exit the M20 motorway at junction 10a, travel south-east along the A20 Hythe Road, then turn right onto Station Road, continuing south and entering the Site via Station Road. Traffic leaving the Site will travel in the reverse direction. No construction traffic will pass through Aldington village.
- 12.3.3 An internal haulage road will be used to avoid HGVs using the local road network as far as possible, as shown in **Figure 12.1** and **Figure 5.1**.
- 12.3.4 Prior to the implementation of mitigation measures, the Proposed Development's construction phase is anticipated to result in negligible to minor adverse (not significant) effects on: severance; driver delay; pedestrian delay and amenity; fear and intimidation; accidents and safety; and hazardous/ dangerous and abnormal loads.

12.4 Mitigation

- 12.4.1 A CTMP will be prepared (and secured by DCO requirement) to ensure construction phase effects are firstly avoided where possible and minimised thereafter. The CTMP will include measures to reduce the impact of construction traffic on the local highway network. These measures include hours of Site operation/access, provision of wheel washing facilities, mini-bus collection/drop- off arrangements and parking strategies for construction workers.
- 12.4.2 Construction traffic will start and end outside of the local network peak hours, minimising impacts in terms of traffic flow volume and highway network capacity.
- 12.4.3 A DTMP will be prepared (and secured by DCO requirement) to ensure decommissioning phase effects are firstly avoided where possible and minimised thereafter. The DTMP will include measures to reduce the impact of decommissioning traffic on the local highway network.
- 12.4.4 The Applicant has engaged with KCC to identify areas where improvements can be made as part of the Proposed Development to offset any impact on existing PRoWs.



12.5 Residual Effects

12.5.1 Following the implementation of mitigation measures, all effects identified in section 12.3 above are expected to be negligible adverse (not significant).



13 Noise

13.1 Preface

- 13.1.1 The PEIR Addendum Chapter 13: Noise should be read in conjunction with the PEIR Chapter 13: Noise. The chapter does not provide any new information to that included in the PEIR, apart from acoustic barriers which have been identified within the description of the Proposed Development.
- 13.1.2 The significance of residual effects reported in the PEIR are unchanged.

13.2 Baseline

13.2.1 The existing noise on the Site comprises local road traffic, rail traffic, aircraft, domestic noise, noise from a nearby school and natural sounds (i.e. birdsong and a breeze). To determine the likely significant noise effects of the Proposed Development, receptors sensitive to noise were investigated. The baseline assessment identified 41 representative Noise Sensitive Receptors ('NSR') within 300m of the boundary of the Site and these NSRs include residential properties, a hotel, and a school. As well as these NSRs, on the PRoWs which cross the Site, the baseline noise level experienced by their users may change as a result of the Proposed Development as they move along their chosen route. These have also been included in the assessment.

13.3 Assessment

- 13.3.1 To undertake an assessment of noise impact from the Proposed Development, a noise survey was undertaken at eight locations around the Site. These locations were agreed with ABC and are considered representative of the noise conditions at the Site, as experienced by the NSRs. Predictions of specific noise levels were made using computer noise modelling. The modelling assumed a typical noise emission from plant and machinery likely to be used during the construction, operation and decommissioning of the Proposed Development.
- 13.3.2 Construction and decommissioning effects on users of PRoWs at the Site have been identified as negligible (not significant). Potentially moderate adverse (significant)/minor adverse/ negligible effects (not significant) from construction and decommissioning traffic noise on the road network and potentially minor adverse/negligible effects (significant to not significant) from on-Site construction and decommissioning noise are also anticipated, prior to the implementation of mitigation measures. Operational effects from plant/machinery noise during daytime and nighttime have been identified as minor adverse to negligible (not significant), prior to the implementation of additional mitigation measures.



13.4 Mitigation

- 13.4.1 Mitigation measures during the construction phase will be related to the management of plant and best working practices, which will form part of the CEMP. Measures will include regular maintenance of machinery to control noise and vibration, Site staff will be made aware of where the nearest NSRs are located and will avoid unnecessary activities, and the occurrence of two noisy operations simultaneously in close proximity to the same NSRs will be avoided as far as possible. Measures will also be included in the CTMP to minimise road traffic in the construction phase.
- 13.4.2 Localised noise mitigation barriers are to be installed at the outset of the development to shield NSRs as far as reasonably possible. During operation, where any plant is seen to develop a fault or otherwise emits non-typical noise, maintenance will be undertaken as soon as reasonably practical. Noise barriers will also be used for operational plant such as the Project Substation, Inverter Stations and Energy Storage Units where required.
- 13.4.3 The DEMP and DTMP for the decommissioning phase will be produced with a view to best practice mitigation measures being implemented throughout the decommissioning process. The measures implemented will be similar to those listed for the construction phase above.

13.5 Residual Effects

- 13.5.1 The transitory nature of the PRoW network will ensure noise impacts during construction and decommissioning on any users are negligible (not significant). Construction and decommissioning traffic noise residual effects resulting from the Proposed Development will be minor adverse or negligible (not significant). Following the implementation of the mitigation measures set out above as part of the CEMP and CTMP, residual effects from construction noise due to on-Site activities will be minor adverse or negligible (not significant). Similarly for the decommissioning phase, noise from on-Site activities would be minor adverse or negligible (not significant), following the implementation of the measures as part of the DEMP and DTMP.
- 13.5.2 Residual effects during operation will be minor adverse or negligible and not significant with mitigation in place.



14 Climate Change

14.1 Preface

- 14.1.1 The PEIR Addendum Chapter 14: Climate Change should be read in conjunction with the PEIR Chapter 14: Climate Change. The chapter provides additional detail on the methodology and scope for assessing the climate change effects associated with the Proposed Development.
- 14.1.2 The significance of residual effects reported in the PEIR are unchanged.

14.2 Introduction

- 14.2.1 'Climate' is generally understood to mean the weather conditions prevailing over a long period of time, and climate change refers to changes in recorded long-term climate trends. The two main approaches that can be taken to determine a project's climate change impact within EIA, and those covered in this assessment, involve identifying:
- The direct and indirect influence of the Proposed Development on climate change (climate change mitigation); and
- The vulnerability of the Proposed Development to climate change (climate change adaptation/ resilience).

14.3 Baseline

- 14.3.1 Regionally, the climate is warm and temperate, with significant rainfall all year round. Within the study area, annual average rainfall is 796.60mm, with the driest month being March and the wettest month being October. The average annual maximum temperature is 14.40°C. August is the warmest month with an average of 21.48°C and January is the coldest month with temperatures averaging 7.85°C.
- 14.3.2 In Ashford Borough, carbon emissions have steadily declined in the period between 2005 and 2019. There has been a downward trend in the contribution of each of the four main sources of emissions¹⁰, with commercial emissions seeing the greatest percentage decrease of 44.3% over the fourteen-year period. Per capita emissions have declined from 7.7 tonnes of carbon dioxide ('CO2') in 2005 to 4.3 tonnes CO2 in 2019.

14.4 Assessment

14.4.1 Carbon emissions arising from project construction vehicle emissions are anticipated to have a minor to moderate adverse effect locally, prior to the

¹⁰ Industry, Commercial, Domestic, and Transport



- implementation of mitigation measures. This is considered significant, in line with best practice guidance on climate change impacts.
- 14.4.2 The generation of electricity from the Proposed Development will displace the generation of fossil fuel electricity generation. A carbon saving of approximately 34,500 tonnes of carbon dioxide equivalent ('CO2e')¹¹per year is predicted, which is a total saving of 1,380,000 tonnes of CO2e over the Proposed Development's lifespan. This is considered to be in keeping with the trajectory to net zero by 2050, resulting in a minor to major beneficial effect (not significant to significant) at the national level.
- 14.4.3 Anticipated effects from climate change adaptation are considered to be no more than minor adverse, which is not significant. The anticipated effects with regard to flood risk and drainage are minor beneficial (not significant), and cloud cover are negligible to minor beneficial (not significant). This is due to flood risk mitigation incorporated into the design of the Proposed Development, and the projection of cloud cover reducing over time, enhancing the productivity of solar panels. Effects on biodiversity and noise are anticipated to be negligible (not significant).
- 14.4.4 Effects due to decommissioning traffic are expected to be minor to moderate adverse and significant. The disturbance of species at the Site would likely reduce the resilience of the Site to adapt to a changing climate, resulting in a minor adverse effect which is not significant.

14.5 Mitigation

- 14.5.1 An outline CEMP and CTMP will be submitted alongside the Application. With respect to minimising the number of vehicle movements and subsequent emissions, the CTMP will provide for measures to consolidate the delivery of materials on-Site, as well as ways to promote the most sustainable methods of construction workers to get to the Site.
- 14.5.2 The LEMP and OMP will include climate resilience mitigation for the operational phase include to details of habitat creation, enhancement and maintenance measures. The surface water drainage management plan for the Proposed Development will also account for the projected increase in annual precipitation.
- 14.5.3 With respect to future impacts on climate resilience and the interface with species and habitats during the decommissioning phase, an outline Ecological Management and Enhancement Strategy will be submitted with the Application. This will include measures such as the monitoring of effects upon important ecological features. A DTMP will be secured by DCO requirement and will provide management procedures to the removal and re-use of materials on-Site.

¹¹ Carbon dioxide equivalent or 'CO2e' means the number of metric tons of carbon dioxide emissions with the same global warming potential as one metric ton of another greenhouse gas.



Residual Effects

- 14.5.4 During the construction and decommissioning phase, no significant adverse effects are expected.
- 14.5.5 With respect to climate resilience, no significant adverse effects are expected. Minor beneficial effects on the Proposed Development due to extreme weather events are anticipated. A minor to major beneficial effect is anticipated with respect to the offset of carbon emissions from renewable energy generation, which is considered significant.



15 Cumulative Effects

15.1 Preface

- 15.1.1 The PEIR Addendum Chapter 15: Cumulative Effects has been prepared by Quod and is intended to be read alongside the PEIR Chapter 15: Cumulative Effects. This Chapter provides the following new information to that included in the PEIR:
 - Methodology for the effect interactions assessment; and
 - A preliminary assessment of the potential for significant effect interactions as a result of the Proposed Development.
- 15.1.2 The PEIR Addendum also provides an updated version of the Cumulative Scheme Plan, see **Figure 2.1** of Section 2 of this NTS.

15.2 Introduction

- 15.2.1 Cumulative effects can be categorised into two types:
 - Effect interactions these occur when two or more different environmental effects from a development (e.g. dust, noise, traffic) act together to produce a different level of effect / impact experienced by a particular receptor (also referred to as 'intra-project effects').
 - Cumulative effects these accrue over time and space from a number of different development activities and projects in geographical proximity to one another, which individually might be non-significant, but when considered together, could create a significant cumulative effect (also referred to as 'inter-project effects').

15.3 Effect Interactions

- 15.3.1 There is no published methodology for determining the significance of effect interactions. Combining effects with respect to one environmental discipline with another has to be qualitative and is necessarily based on judgment. The identification of the significance of the effect interactions will be provided in the final ES based off the final assessments undertaken for the Proposed Development.
- 15.3.2 A preliminary assessment of the potential for significant effect interactions has been undertaken and has identified the following:
 - Construction and Decommissioning No significant effect interactions.
 - Operation and Maintenance No significant effect interactions identified.



15.4 Cumulative Effects with other Projects

- 15.4.1 An EIA must assess the likely significant effects of a development that may arise cumulatively when combined with other relevant development in the area. A list of projects has been identified for the assessment of likely significant cumulative effects on the environment for the purposes of this PEIR Addendum. An adjacent solar farm project, the East Stour Solar Farm, was identified in the PEIR and the cumulative effects were assessed.
- 15.4.2 The significant residual cumulative effects identified in the PEIR are set out below.

Landscape and Views:

- Effects on visual receptors during construction and decommissioning of the Proposed Development (nil and not significant to moderate adverse and significant);
- Effects on landscape character during operation of the Proposed Development (moderate adverse and significant); and
- Effects on visual receptors during operation of the Proposed Development (moderate adverse and significant).

Biodiversity:

- Construction effects of the Proposed Development on yellowhammer: loss of habitat (county adverse and significant).
- Construction effects of the Proposed Development on skylark: loss of habitat (local adverse and significant).
- Operational effects of the Proposed Development on yellowhammer: sustained depletion of local food and habitat resource (county adverse and significant).d
- Operational effects of the Proposed Development on skylark: elevated predation risk (local adverse and significant).

Socio-Economics:

- Construction effects on workforce expenditure (moderate beneficial and significant);
- Operational effects on the contribution towards renewable energy generation (minor beneficial (not significant) to major beneficial (significant)); and
- Decommissioning effects on workforce expenditure (moderate beneficial and significant).



Climate Change:

- Operational effects resulting from the Proposed Development's provision of renewable energy to the grid in combination with the cumulative development (minor beneficial (not significant) to major beneficial (significant)).
- 15.4.3 For chapters not listed, no cumulative effects were identified, however an updated and final assessment for all chapters will be carried out for the full ES. This will be based on the final Proposed Development and where appropriate will consider the cumulative schemes shown on **Figure 2.1**.



16 Summary and Residual Effects

16.1.1 The PEIR Addendum Chapter 16: Summary and Residual Effects has been prepared by Quod and is intended to be read alongside the PEIR Chapter 16: Summary and Residual Effects.

Embedded Mitigation Measures

- 16.1.2 The Proposed Development has been subject to an iterative design process. As this process has progressed, measures have been incorporated into the Proposed Development to avoid, reduce or offset significant environmental effects. These include,
 - The use of management plans during construction, operation and maintenance and decommissioning, to avoid, reduce and manage environmental and amenity effects, including CEMP, DEMP, CTMP, DTMP, EMES, LEMP and RoWAS;
 - Extensive landscape proposals including reinforcement of existing hedgerows and planting of new native hedgerows, new woodland and orchard, wildflower and wetland meadow:
 - Siting of Inverter Stations and Energy Storage Units away from known archaeological potential, where possible. Planting to provide visual screening for heritage assets and planting of hedgerows along historic lines;
 - Use of an internal haulage road, CTMP and DTMP to minimise effects to local road users;
 - Avoiding the use of permanent lighting;
 - Buffer zones to protect areas of ancient woodland and veteran trees;
 - Creation of new habitats for biodiversity and other habitat enhancement measures to benefit wildlife;
 - Long-term management of the Site for biodiversity and wildlife;
 - Use of noise screens/fencing where required to minimise effects;
 - A sensitively designed lighting strategy which avoids permanent lighting during the operational phase; and
 - Measures to ensure that the Proposed Development is resilient to the effects of climate change over its operational lifetime.
- 16.1.3 Full results of significant residual effects will be determined following assessments to be undertaken as part of the ES. However, the Proposed Development is expected to result in the following **significant beneficial effects:**



Construction Phase:

Socio-economic

Effects from local spending by construction workers (moderate beneficial).

Operational Phase:

Landscape and Views

Effects on landscape features (moderate-neutral beneficial).

Biodiversity

- Effects on Backhouse Wood LWS (local beneficial).
- Effects on notable habitat (river and pond) (local beneficial).
- Effects on notable invertebrate groups, great crested newts, toad, reptiles, breeding and wintering birds, dormouse, badger, otter, bat, hedgehog, harvest mouse, brown hare (due to habitat enhancement).

Socio-economic

The contribution that the Proposed Development will make towards renewable energy generation (up to major beneficial (significant)).

Decommissioning Phase:

Socio-economic

- Effects from local spending by construction workers (moderate beneficial).
- 16.1.4 The Proposed Development is expected to result in the **following significant** adverse effects:

Construction Phase

Landscape and Views

Effects on visual receptors during construction (moderate adverse).

Biodiversity

- Effects on yellowhammer and skylark due to loss of habitat (local adverse).
- Effects of construction on habitat loss and disturbance / displacement of brown hare (local adverse).

Operational Phase:

Landscape and Views

Effects on landscape character (moderate-minor adverse); and



Effects on visual receptors (moderate-minor adverse).

Biodiversity

- Effects on yellowhammer from due to changes in local food and habitats (local adverse).
- Effects on skylark from elevated predation risk (local adverse).

Decommissioning Phase:

Landscape and Visual

Effects on visual receptors during decommissioning (moderate adverse).