

Stonestreet Green Solar

Environmental Statement

Volume 4: Appendices

Chapter 5: Alternatives and Design Evolution

Appendix 5.1: Relevant Responses to Consultation

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APFP Regulation 5(2)(a)

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Appendix 5.1: Relevant Responses to Consultation

- 1.1.1 Tables 5A.1, 5.A2 and 5.A3 of this Appendix summarise the comments raised by consultees in response to the 2022 Non Statutory Consultation, 2022 Statutory Consultation and 2023 Statutory Consultation respectively of relevance to the site selection and alternatives and explains how they have been addressed in this ES.
- 1.1.2 No additional comments relevant to alternatives were raised in the Scoping Opinion (**ES Volume 4, Appendix 1.1: EIA Scoping Report (Doc Ref. 5.4)**) or made in relation to the 2023 and 2024 Targeted Consultations.

Table 5A.1: Summary of 2022 Non Statutory Consultation Responses – Site Selection and Alternatives

Consultee	Summary of Comments	Response
Community Feedback	The land is not appropriate and should be protected for future generations and not used on this industrial scale for profit. It would be a blight on the land, which is not good for people who live in the surrounding areas wellbeing, visitors, or future generations.	<p>The alternative sites considered for the Project including the site requirements are set out in ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2).</p> <p>A description of the Applicant's process for selecting the Site and the main reasons for the option chosen with regard to these influencing factors is described in ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4).</p>
	We consider the likely scale and location between two rural villages to be an infringement on both Aldington and Mersham with parts that are on a hillside and will be visible from the lower lying countryside to the South.	<p>The need for large-scale solar projects is set out in the Planning Statement (Doc Ref. 7.6) and is established in National Policy Statement ('NPS') EN-1. A significant reduction to the scale of the proposal is not considered to be a reasonable alternative. Further details on this are set out in ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2).</p> <p>Details of the assessment of landscape and visual effects are set out in ES Volume 2,</p>

Consultee	Summary of Comments	Response
		Chapter 8: Landscape and Views (Doc Ref. 5.2).
	A better extension of the existing proposal would be the land surrounding the Sellindge Converter Station which will handle the power output.	The land between the A20 and M20 was considered, but it does not have sufficient available land to meet the Project requirements as set out in ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2) .
	Totally against solar panels, the provision of energy is important but it must be directed to places where it will do least harm to the growing of crops, enjoyment of our fields. Energy supply is needed but growing of food is even more important.	<p>ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref 5.2) sets out the site selection process for the Site which carefully considered minimising BMV land included in the Order limits. The Applicant's site selection has avoided the use of BMV where possible.</p> <p>The Soils and Agricultural Land Report at ES Volume 4, Appendix 16.2 (Doc Ref. 5.4) and ES Volume 2, Chapter 16: Other Topics (Doc Ref. 5.2) provide information and assessment of effects to agricultural land and soils.</p>

Table 5A.2: Summary of 2022 Statutory Consultation Responses – Site Selection and Alternatives

Consultee	Summary of Comments	Response
Natural England	During the life of the proposed development it is likely that there will be a reduction in agricultural production over the whole development area. Consideration should be given to whether this is an effective use of land	The Applicant has a grid connection agreement to connect to Sellindge Substation for up to 99.9MW. The Site is located close to the Sellindge Substation, which ensures that the grid connection is feasible. There are no brownfield sites or areas of non-agricultural land of sufficient scale in the area of search (5km from the point of connection ('POC') to the grid) that are able to meet this need. Large areas of other land within 5km of the POC are provisionally classified by Natural England as Grade 2. ES Volume 4,

Consultee	Summary of Comments	Response
	<p>in line with planning practice guidance which encourages the siting of large scale solar farms on previously developed and non-agricultural land.</p>	<p>Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4) provides further details on the site selection influencing factors.</p> <p>NPS EN-3 notes that the scale of solar needed in the UK means that it is likely that applicants' developments will use some agricultural land (paragraph 2.10.31). The Project has sought to maximise the use of poorer quality agricultural land. ES Volume 4, Appendix 16.1: Soils and Agricultural Land Report (Doc. Ref. 5.4) confirms that 38.64 ha of the Order limits is BMV agricultural land (Grade 2: approx. 1% and Subgrade 3a: approx. 19%). The BMV agricultural land within the Site (38.64ha) represents 0.12% of all BMV agricultural land in ABC, with 55.2% of the agricultural area in ABC being of BMV quality.</p> <p>NPS EN-3 states that the Government is supportive of solar that is co-located with other functions, for example agriculture, onshore wind generation, or storage, to maximise the efficiency of land use (paragraph 2.10.10). The Project includes a BESS on-Site, which seeks to maximise the use of the land.</p> <p>ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4) provides further details on the site selection influencing factors.</p>
<p>Aldington Parish Council</p>	<p>There is no evidence presented that any alternative sites have been considered.</p>	<p>ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4) provides further details on the site selection influencing factors. Section 5.7 of ES Volume 2: Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2) describes how alternatives sites raised during consultation were considered and discounted by the Applicant. This information supplements Volume 2, Chapter 4: Alternatives and Design Evolution of the PEIR and PEIR Addendum and responds to feedback received at 2022</p>

Consultee	Summary of Comments	Response
		Non-Statutory Consultation, 2022 and 2023 Statutory Consultation as summarised within this Appendix.
Community Feedback	Alternative sites could include land between the A20 and M20, which would also offer proximity to the Sellindge Converter Station but is flat and impacts fewer residential properties, therefore more appropriate.	Two parcels of land have been examined to the north and south of the M20, north of the Site (identified in ES Volume 3, Figure 5.1: Potentially Developable Land Locations and Cumulative Schemes (Doc Ref. 5.3) as 'Potentially Developable Land 1' and 'Potentially Developable Land 2'). These sites are not of a sufficient scale to deliver the Project requirements and are subject to third party arrangements and therefore they were not commercially viable. Potentially Developable Land 1 is north of the M20 motorway and as such would also involve technical challenges associated with cables having to cross the M20 carriageway. A significant part of Potentially Developable Land 2 is also subject to three planning applications: Pivot Power Battery Storage (cumulative scheme ID No. 3, Ref: PA/2022/2544); EDF's East Stour Solar Farm (cumulative scheme ID No. 9, Ref: 2200668AS); and Walsh Power's Synchronous Condenser Project (cumulative scheme ID No. 4, Ref: PA/2022/2950), as set out in ES Volume 4, Appendix 6.1: List of Cumulative Schemes (Doc Ref. 5.4) .
Community Feedback	This development should not be located on farmland and BMV land should be protected for farming uses.	See the response above to Natural England's comment within this table. The majority of the Site is not BMV and the location of the Project has sought to minimise the impact on BMV agricultural land. ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4) sets out why the Site was chosen for the Project and how agricultural land was considered.
Community Feedback	The grid connection should not be used as a determining	NPS EN-3 notes that to maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs,

Consultee	Summary of Comments	Response
	factor in the site selection process.	<p>applicants may choose a site based on nearby available grid export capacity (paragraph 2.10.25). There is a recognised shortage of grid connection capacity on the UK network. If Government ambitions for deployment of renewable generation are to be achieved, renewable projects need to be located where there is available grid capacity.</p> <p>ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4) sets out further details of the site selection process.</p>
Community Feedback	Development in this location will result in the loss of jobs due to the change in village character.	<p>ES Volume 2: Chapter 11: Socio-economics (Doc Ref. 5.2) provides an assessment of the socio-economic effects of the Project. The assessment concludes that the Project would not result in the loss of jobs or significant adverse effects on the local economy.</p>
Community Feedback	The site is not suitable because the elevated nature of the land will worsen the visual impact when compared to a flat site.	<p>The Project is located on land that is not subject to any national or international landscape designations. The existing developed vegetation and hedgerows reduce potential visual effects. The Project also proposes new hedgerow and tree planting to reduce potential landscape and visual effects.</p> <p>ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2) assesses the landscape and visual effects of the Project and takes account of the topography of the Site.</p>
Community Feedback	There is no requirement for solar farm capacity in the area, and the use of agricultural land for solar farm development goes against official guidance.	<p>NPS EN-1 confirms that <i>“The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent.”</i> (Paragraph 3.2.6).</p> <p>NPS EN-1 provides explicit and specific policy support for low carbon generation and</p>

Consultee	Summary of Comments	Response
		<p>associated infrastructure confirming that <i>“there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure”</i> (Paragraph 3.3.62 and 4.2.4).</p> <p>NPS EN-3 notes that the scale of solar needed in the UK means that it is likely that applicants' developments will use some agricultural land (paragraph 2.10.31). There are no brownfield sites of sufficient scale to meet this need in the search area. The Project has sought to maximise the use of poorer quality agricultural land, with approximately 80% of the Site having been assessed as being Grade 3b or non-agricultural land (i.e. not BMV). The Project has also included on-Site energy storage, which seeks to maximise the use of the land.</p> <p>Planning Statement, Appendix 2: Site Sequential and Exception Test Report (Doc Ref: 7.6) sets out the sequential testing undertaken for site selection for the Site. An assessment of the Project against national planning policy is provided in the Planning Statement (Doc. Ref. 7.6) that accompanies the DCO Application.</p>
Community Feedback	<p>Undulating sites should not be used for solar farms. This is outlined in the national policy guidelines, which has not been considered by the Applicant.</p>	<p>It is likely that this feedback is referring to Government guidance titled 'Renewable and low carbon energy'¹ published on 18 June 2015. Paragraph 13 of that guidance states <i>“The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.”</i></p> <p>For NSIPs, the relevant factors influencing site selection are set out in paragraphs 2.10.18-2.10.48 of NPS EN-3. A description of how these factors influenced selection of the Site is provided in ES Volume 4, Appendix 5.2: Site Selection Influencing</p>

Consultee	Summary of Comments	Response
		<p>Factors (Doc Ref. 5.4). The Project has been informed by a landscape and visual impact assessment and is considered to be sensitively planned. Extensive screening has been incorporated into the landscape proposals through the enhancement of existing boundaries and planting of new hedgerows.</p>

Table 5A.3: Summary of 2023 Statutory Consultation Responses – Site Selection and Alternatives

Consultee	Summary of Comment	Response
<p>Ashford Borough Council</p>	<p>There has been no fundamental change to the Project since 2022 Statutory Consultation and so the revised application does not address the Council’s previously stated concern regarding minimising the impacts to an acceptable level for the rural location.</p>	<p>ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc, Ref. 5.2) sets out the key changes to the Project since the 2022 Consultation Scheme. The Design Approach Document (Doc Ref. 7.4) explains the approach taken and the decisions made to arrive at the final scheme.</p> <p>Appendix G-4 of the Consultation Report (Doc Ref. 6.2) provides further details on this matter.</p>
<p>Community Feedback</p>	<p>The location of the Project is inappropriate. Solar panels should be located on roofs of houses and commercial development such as the Inland Border Facility lorry park at Sevington, on motorways and in existing brownfield or industrial areas.</p>	<p>ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4) sets out the Project requirements, selection process and influencing factors in identifying the Site for the Project.</p> <p>The Applicant undertook sequential testing of the Site to ensure its suitability. A sequential search was undertaken and is reported in the Planning Statement, Appendix 2: Site Sequential and Exception Test Report (Doc Ref. 7.6). This assessment confirmed that there are no brownfield sites of sufficient scale in the area of search that are able to meet the Project requirements. Use of the</p>

Consultee	Summary of Comment	Response
		<p>land between the A20 and M20 was raised by consultees as a suitable alternative. However this area is not of sufficient scale to meet the Project requirements. ES Volume 2, Chapter 5: Alternatives and Design Evolution, Section 5.6 (Doc Ref. 5.2) provides further detail on why these sites were not suitable.</p>
Community Feedback	<p>The site was selected based on the landowner and this is not acceptable when there are other sites available. Costs or land ownership should not be a deciding factor in the site selection process.</p>	<p>Land availability was a consideration in the site selection process as set out in ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4). A description of the site selection influencing factors is provided within ES Volume 2, Chapter 5: Alternatives and Design Evolution, Section 5.6 (Doc Ref. 5.4). However, land availability was not the deciding factor in selection of the Site. No other alternative sites have been identified in the Planning Statement, Appendix 2: Site Sequential and Exception Test Report (Doc Ref. 7.6) as being capable of meeting the Project requirements.</p>
Community Feedback	<p>The proposed land is primarily north facing, undulating land which is probably not the most efficient for reaping solar energy and creates a significant visual impact as the site is approached from all directions.</p>	<p>The factors influencing site selection are set out in section 2.3 and paragraphs 2.10.18 to 2.10.48 of NPS EN-3. ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4) provides further details on the site selection influencing factors. The topography of the Site is not considered to be a constraint to the solar energy generating capacity or efficiency of the Project.</p> <p>ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2) does identify a limited number of significant visual impacts, although these are mitigated through design and landscape proposals where possible.</p>

References

¹ Department for Levelling Up, Housing and Communities & Ministry of Housing, Communities and Local Government (2018). Guidance: Renewable and Low Carbon Energy. Accessed 2nd August 2023: <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>.