

Submission ID: 32395

I hereby submit my written representation by uploading a document. As requested, I shall follow up with a brief summary of my full comments but, given the importance of what is being proposed for the lives of residents of Aldington and Mersham for the next 40+ years, I ask that full consideration be given to my detailed comments, as well as to those of all other respondents.

I also ask that a hearing be held at Aldington.

## Submission to Planning Inspectorate regarding Evolution Power's (EPL 001 Ltd's) Stonestreet Green Solar sites application (ref. EN010135)

By Sheila Garrard, Interested Party (ref. 20050316)

9 December 2024

As I am not confident that Evolution Power (EP) will have made available to the Planning Inspectorate my full responses to their two consultations, I reiterate them both below, to form my present submission as an Interested Party. I consider that EP's follow-up to the first consultation failed to respond adequately – or, for the most part to respond at all – to the comments that I and others had made.

I should like to add the following two comments to my present submission:

1. **EP has failed to consult at all on the issue of the scale and proposed siting of the batteries.** I attended a Saturday exhibition at Mersham village hall during the consultation in the summer of 2023 and asked a lady representing EP if she could show me a scale representation of the batteries *in situ*. This important piece of information was nowhere shown on the display panels, among the depictions of wild flowers and sheep. After much rooting through the voluminous files to hand in the room, she was unable to provide me with an answer, and I left dissatisfied. I still have no information from EP in answer to this query.
2. **EP has failed to demonstrate that it has considered other, less visually damaging sites and proper reasons why they are not suitable, but Aldington/Mersham is.** EP claimed, at an earlier meeting for residents at Aldington Village Hall, that for technical reasons their solar site 'had' to be close to the grid and thus that Aldington was ideal. This claim is debunked by the evidence that: Turkey is currently planning to send electricity under the 68-mile channel between it and North Cyprus, to supplement the water that already flows that route; France sends electricity beneath the Channel to the UK at the Sellindge converter station (and vice versa); Norway sends electricity 720km under the North Sea to the UK; Denmark is planning a 1400-km power link with the UK; and Octopus recently announced the development of sourcing Moroccan solar power for the UK. Clearly, the only reason that EP wants to be close to the grid is to maximise its profitability. Given the range of impacts from the application that I highlight in the rest of my submission below, commercial factors should not be a prime consideration in the important choice of an appropriate site.

### Reiteration of my response to EP's first consultation

29 November 2022

I have been resident in Aldington since 1985 and I am appalled at the Stonestreet Green Solar proposals effectively to industrialise the beautiful rural landscape surrounding the village on three sides for at least 40 years. By the time the vast project is due to be decommissioned, there will be tall screening of the project by tree planting and hedges that have been allowed to grow significantly higher than their traditional levels. As a result, a whole new generation, travelling to and from the village via now enclosed lanes, will have no idea that once, behind this screening, there had been natural landscape and beautiful long-distance views between the Aldington Ridge and the Kent Downs AONB and between Aldington and Mersham rural parishes. Add to this the likely contamination of the land from huge blocks of containers placed on concrete bases, metal piles for the panels driven 3m deep into the soil and most of the land in constant shade for 40 years, this will

have become a blighted, brownfield site, ripe only for further development that would not be permitted under the present Local Plan as it would be contrary to Policy HOU5 as being well outside the village confines. The proposals amount to vandalism on the highest scale.

Evolution Power asks whether I support the use of solar energy to generate electricity in the UK. This is irrelevant, as **I object to this proposed project** as set out in detail below.

1. Undulating sites (including projects across valleys seen all around from on high), such as much of the countryside proposed to be taken for this project, are not suitable for solar installations, because of the significantly negative visual impact on those living and moving about within their vicinity. This is important, as the proposed project forms a prominent segment of the setting of the Kent Downs AONB, whether in despoiling the fabulous rural landscape view from Aldington village and the Aldington Ridge towards the Downs or in ruining the beautiful foreground views out from within the AONB itself towards the Aldington Ridge. Similarly the views of the sweeping rural landscape between Aldington village and Mersham village will be ruined for at least two generations. In addition, swathes of the project lie in close proximity to the Clap Hill Conservation Area within the village confines and Grade 1 and II listed and other historical assets.

In support of my objection on this ground, I cite Guidance dated 18 June 2015 from the Dept for Levelling Up, Housing and Communities and the Ministry of Housing, Communities & Local Govt to help local councils in developing policies for renewable and low carbon energy, which states that **'The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes'** and that **'great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset'**.

Where, in the Consultation, is specific and due regard paid to the settings of all the affected heritage assets? The assessment of the impact on cultural heritage is extremely limited, including in terms of the likely Roman and/or Saxon remains under the soil into which the deep piles for the solar panels are going to be driven. Again, vandalism. There should be a requirement for trial archaeological digs by independent experts at locations selected by independent experts, so that this heritage cannot be destroyed and lost forever. At the Consultation meeting in Aldington Village Hall on 8 November, the project's proposers dismissed Grade II listed assets as being rather numerous and therefore not really worthy of consideration. I would contend that the fact that Kent in general and Aldington in particular (53) is blessed with a high number of listed assets only goes to underline how damaging to local amenity an industrialisation of the landscape on the scale proposed will be.

Furthermore, the proposal is contrary to Policy ENV3b of Ashford Borough Council's Local Plan 2030, which states that **'All proposals within or affecting the setting of AONBs will also only be permitted under the following circumstances:** • The location, form, scale, materials and design would conserve and where appropriate enhance or restore the character of the landscape. • The development would enhance the special qualities, distinctive character and tranquility of the AONB. • The development has regard to the relevant AONB management plan and any associated guidance. • The development demonstrates particular regard to those characteristics outlined in Policy ENV3a, proportionate to the high landscape significance of the AONB.'

It has not been explained by the Consultation, and it is impossible to imagine, how so many hectares of solar panels surrounding Aldington on three sides (counting the existing solar project, the live application for the EDF project and this current, megaproject proposal) can possibly 'conserve and where appropriate enhance the special qualities, distinctive character and tranquility of the AONB'. It is worth pointing out that the AONB not only lies to the north of the site, but immediately south of the village ridgeline, too. Aldington thus lies within the embrace of the AONB, and such a dramatic industrialisation of the landscape surrounding Aldington must, inevitably, significantly harm the setting of the AONB.

The proposals are also contrary to Policy ENV10 a) of Ashford Borough Council's Local Plan 2030, which states that **'Planning applications for proposals to generate energy from renewable and low carbon sources will be permitted provided that: a) The development, either individually or cumulatively does not result in significant adverse impacts on the landscape, natural assets or historic assets, having special regard to nationally recognised designations and their setting, such as AONBs, Conservation Areas and Listed Buildings.'**

2. Good grade agricultural land (21% of the site is stated to be Grade 3a and Grade 2) should not be given over to solar installations when the UK is trying to enhance its food security, and industrial sites (e.g. the roofs of all the despatch silos alongside motorways; the local Inland Border Facility at Sevington, where the vast lorry park could have a solar roof – this would also help reduce the enormous light pollution of a Dark Skies Area by the facility), as well as public and residential properties are available and more suitable for this purpose. In support of my objection on this ground, I cite Guidance dated 18 June 2015 from the Dept for Levelling Up, Housing and Communities and the Ministry of Housing, Communities & Local Govt to help local councils in developing policies for renewable and low carbon energy, which states that **'Particular factors a local planning authority will need to consider include: encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land.'**
3. This application amounts to a complete industrialisation, transformation and blighting of a valued rural setting that is crossed by and close to numerous public rights of way (PRoWs). There are proposals to cancel PRoWs and reroute others by much longer, rather than direct, routes. However, walkers will no longer want to walk through or near such an industrial landscape. Given the proposed height of the panels, any walkers who do use the footpaths to be rerouted around the edges of the solar installations will find themselves looking not at, but underneath, a dense sea of adjacent panels. The proposal is contrary to Policy ENV5 of Ashford Borough Council's Local Plan 2030, which states that **'All development in the rural areas of the Borough shall protect and, where possible, enhance the following features: a) Ancient woodland and semi-natural woodland; b) River corridors and tributaries; c) Rural lanes which have a landscape, nature conservation or historic importance; d) Public rights of way; and, e) Other local historic or landscape features that help to distinguish the character of the local area.'**
4. Visualisations provided in the separate EDF solar planning application imply that it will take some 10 years out of the 40-year lifespan of the solar 'farm' for the screening to have a real effect in mitigating the visual impacts in some locations, so even in these parts of the site residents and visitors will suffer from the visual impact for 25% of its life. It can be assumed that the same could be said of the planting and screening proposed by Evolution Power.

In support of my objections, above, I would highlight that there are a number of fatuous and unsubstantiated 'greenwashing' statements about the biodiversity net gain, improvement of habitats, the planting of wildflowers under and around the panels and the grazing of sheep, whereas

the reality will be that only mountain sheep would be able to survive on the slim pickings that the shade cast by up to 3m-high solar panels will provide – and wouldn't they eat any wild flowers that manage to survive the dense shade?!; there is no mention as to how all these promised benefits are going to be maintained and monitored over the 40-year life of the project, or of how the commitments to biodiversity net gain will be respected after the project has speculatively been sold on after a couple of years.

Common themes of feedback from the non-statutory consultation are addressed in the Consultation Booklet. I have the following comments on these, using the headings from the Booklet:

- **Concerns regarding visual impact.**

As I have highlighted in comments above, the major impact of this project will be to spoil long-distance views enjoyed between Mersham and Aldington Ridge and between the Kent Downs and the Aldington Ridge. Screening out (with planting) the proposed industrialisation of the rural landscape caused by the imposition of hectares of solar panels and containers does not mitigate that loss; it merely seeks to hide the visual offence. A further consequence of the plan to screen with trees and tall hedges and trees is that residents will be travelling along roads that have become screened tunnels, with now no view at all. This has already begun to take effect along Bank Road, where the landowner has allowed new, high growth to take place well above the level at which the hedges clearly and traditionally used to be cut back. He is already allowing the long-distance views to be blocked off in anticipation of this project. The proponents of this project state that 'We are undertaking proactive engagement with directly impacted residents'. What they fail to understand is that *all* residents and visitors will be directly impacted upon by the loss of the long-distance rural views.

- **Concerns regarding food security / loss of 'high grade' land.**

The project's proposers state that 20% of their proposed site is Grade 3a and c. 1% Grade 2. According to government policy and guidelines cited above, *none* of this land should be involved in this project to remove it from agricultural use. Furthermore, it was confirmed on 17 Nov. 2022 by the Secretary of State for the Environment, Food and Rural Affairs that Defra is still intending to review land use categories in respect of solar development, i.e. considering whether to include Grade 3b land in the 'best and most versatile' category. Given that this project proposes to blight residents' rural surroundings for two generations, and with some 80% of the project's land said to be Grade 3b or non-agricultural, the project should not be considered for approval until after Defra's review has concluded.

- **Questions regarding energy storage.**

It is proposed that massive containers will stand throughout the site. Several significant large features of the proposed site, which are listed in the key to the map of the proposed site on pp. 10 and 11 of the Consultation Booklet, do not appear to be depicted on the map to which the key relates. Examples of these omissions are the 34 inverters, which, along with an equal number of transformers and switchgear, are going to be distributed across 27 fields (some of which are quite small fields) forming the site in containers measuring *at least* 4.7m in length, 2.9m in height and 2.8m in width based on the expected size of what they will contain. These huge containers are likely each going to be grouped alongside on-site substations of *at least* 8m length, 3.4m height and 4m width as well as DC-DC converters of *at least* 13.75m length, 2.9m height and 3.8m width. These extremely large-footprint blocks are going to stand on concrete foundations or deep piling. None of this massive infrastructure is depicted on the map, let alone to scale. The application needs to show

very clearly where it is intended to site these huge blocks and to give a clear depiction of their scale and impact on visual amenity.

- **Criteria for selecting viewpoints.**

Very few computer-generated images have been produced for the 'key viewpoints' from the 37 viewpoints that have been agreed with Ashford Borough Council. In addition, none of these computer-generated images appears to depict the massive containers discussed above, which it is proposed will stand in 27 of the project's fields. The application should clarify where these are to be placed, and their visual impact.

- **Construction traffic arrangements.**

It is stated in 12.9.2 of the PEIR that 'The local roads are largely lightly trafficked.' This unsubstantiated statement is completely wrong. I ask that the proposers consult the traffic volume records held by the Parish Clerk and amend this assertion.

And 12.9.5 of the PEIR states that 'A limited number of sensitive receptors have been identified, these primarily being listed buildings and a special educational needs school. All sensitive receptors with the exception of the school have minor to moderate sensitivity.' The Consultation does not explain how the assertion that listed buildings have 'minor to moderate sensitivity' has been arrived at. The proposers' cavalier attitude to the parish's listed buildings is at odds with local and national policy.

- **Public access and footpaths.**

It is stated that 'The project will modify some existing Public Rights of Way (PRoW) whilst also introducing new PRoWs to improve connectivity ...'. The Consultation Booklet is silent on the proposal to cancel a number of PRoWs. These proposed cancellations should be highlighted. Furthermore, the modification referred to in reality amounts to replacing the cancelled footpaths, which currently run in straight lines by the shortest route across a field, with a need for footpath users to walk around several sides of the field to get to the same destination. And these field edges will not really be newly created footpaths; they will be the planned 10m-wide setback of the panels from the field edges. Footpath users will be forced off the existing PRoWs to walk around the fields in these set-back areas, contained between a tall hedge and security fencing so that the developers can cram even more panels into the middle of the fields where the rustic footpaths once ran. PRoWs are protected by law. Kent County Council (the relevant authority) summarises the statutory test for confirmation of an order to extinguish or divert a PRoW under the Highways Act 1980 (General Powers) as follows:

- 1) The diversion must be expedient in the interest of the owner, lessee or occupier of the land and/or in the interests of the public
- 2) Neither terminus of the path can be diverted except to a point on the same (or a connected) highway which is substantially as convenient to the public.
- 3) The Secretary of State/KCC is satisfied that the path/way will not be substantially less convenient to the public as a result of the diversion.
- 4) The effect the diversion would have on the public enjoyment of the path as a whole must be considered
- 5) The effects on the other land served by the existing path and the land upon which the new path would run must also be taken into account.

I would contend that the proposed footpath 'modifications' will not be in the interest of the public (1 above), merely that of the developers; the path will undoubtedly be less convenient, given that users will have to walk right round the field edges to get to the same place (3); and for the same reason, the public enjoyment of the path as a whole will be reduced (5).

The project's proposers state that the DCO will encompass any diversion or extinguishment of PRowS. If this Consultation and eventual planning application is going to replace the usual need for advertisement of and consultation on planned closures and diversions of footpaths, then the Consultation documents should contain far more information on the proposals than currently provided.

While 'public enjoyment of the path as a whole' is only considered above by the Highways Act 1980 in the context of applications to divert or extinguish footpaths, the concept is, however, highly valid in the context of the Stonestreet Green Solar project as a whole. Aldington and Mersham are blessed with a rich network of rural footpaths, many of them ancient, which are enjoyed by several local weekly and monthly walking groups, as well as individual walkers and dog walkers. With projected swathes of solar panels filling the landscape across which these paths run, for a length of some 2 miles east to west, all enjoyment of the rural surroundings to the footpaths will be completely lost. Frankly, no-one will want to walk through it. So, not only will agricultural land be lost, but so too will be the opportunity for residents to get/keep fit in the context of the nation's health and obesity crisis.

I will break away from the Consultation Booklet at this point to add here the following comments about footpaths deriving from my reading of the PEIR. Some of the unsubstantiated assertions made in the PEIR regarding footpaths and their use illustrate the complete lack of understanding (or lack of concern?) by the project's proposers about the nature of walking in the countryside, the sources of enjoyment from this activity and the expectations of walkers.

1. The proposed 'River Walk' is another 'greenwashing' concept; in reality, walkers will be rerouted from an ancient rural path and confined to a wide, fenced-in corridor, beside arrays of solar panels and next to a sewer.
2. Numerous assertions are made about use of local footpaths being low, e.g: 12.4.60: 'the local PRow network is relatively lightly used'; 12.6.14: 'not particularly well used', presumably in an attempt to justify cancelling them or moving them. The Consultation does not explain by whose independent assessment the usage is low; or in comparison to what other footpath network. These paths are used for leisure, not commuting; they are not an urban street. I am a member of a local walking group that walks every Tuesday; I also walk independently locally on other days. It is often the case within the parish, and on Kentish footpaths in general, that one can walk all morning and not meet another soul. That does not mean, however, that those paths are not regularly used and much appreciated in their present rural state.

If this project is to go ahead, I request that the proposers consult in detail also with resident walkers, rather than just with a national walking group who have many other concerns, and may not have a locally resident member, and thus less insight into or concern about the enormity of what is being proposed from the point of view of local walkers.

3. The statements in para. 12.5.35 are risible. It is stated that 'The Applicant's proposals focus on user experience and it will agree a minimum width of 10m (versus the 5m requirement), with the aspiration to provide better quality routes than the existing in order to offset any increase in walking distance.' First, since when does KCC require 5-m wide footpaths in the rural landscape? Second, what 'user experience' has been taken into account? Third, in what way does walking in a 10-m wide corridor between hedging and solar panels behind high security fencing offset an increase in walking distance necessitated by frustratingly having to walk right round a field of panels rather than directly across a rural open space? An attendee at the Aldington Consultation Meeting stated, to resounding applause: 'We don't want 10-m wide footpaths! They'll get used by off-road vehicles!'
4. It is stated in 12.6.15 that the so-called 'improvement' to the PRow network 'will be delivered by the Applicant pursuant to the DCO and maintained at its expense for the

operational lifetime of the Proposed Development'. It has not been explained how this commitment will be guaranteed or monitored once the project has been speculatively sold on after a couple of years.

5. The statement in 12.6.16 that 'The above PRoW improvements offer a wider benefit to local PRoW users, and potentially tourists, that would unlikely be in place without the Proposed Development' displays a high level of delusion. The proposers can be assured that walkers will not want to walk through their proposed industrial landscape for pleasure. And Aldington can forget about attracting tourists if the proposers are allowed to wreak their vandalism on the village's existing rural setting.
6. The proposers state in 12.6.13 that 'The resultant PRoW strategy will be fully reported in the ES.' I ask that this strategy be explained in the fullest detail.

Returning now to the Consultation Booklet headings ...

- **Community benefits.**

The project's proposers plan to contribute £40,000 annually for community benefit in supposed mitigation for industrialising our landscape for at least two generations. By the time this is split between the three parishes involved, it will not amount to much for any one community. To put the paucity of this offering into context, the Scottish government requires a contribution of £5K per megawatt produced, for community benefit payments resulting from siting of windfarms: this would translate into £500K per annum. The proposed community benefit is not nearly enough.

The proposers have in at least one previous project acted like speculators, selling the solar project a year or two after it had been completed. At the Aldington consultation meeting they stated that the community fund commitment would be incumbent on any future buyer, but they have not demonstrated how that would be enforced.

Finally, I would like to query some assertions made at the Aldington Consultation meeting. It was stated in explanation of why Aldington and Mersham were chosen (to be surrounded with solar panels on three sides, dwarfing Aldington village and suffering an extreme industrialisation of the rural landscape) that the project had to be close to the Grid to be viable; and that much of the Grid had no capacity, although, luckily for the project's proposers, Sellindge Converter station had just that capacity. The proposers need to explain how it can be that, on 12 May 2022 Octopus Energy Group was able to announce a financial and strategic partnership with Xlinks to deliver renewable energy to the UK from a solar power installation in Morocco via a subsea power cable. It seems to me that the project's proposers are seeking only to maximise their personal profits by minimising the amount of cabling that they have to provide. It is thus clear from the announcement by Octopus that Aldington and Mersham are not the only locations that could have been chosen to secure the nation's energy supply and there is no justification for Evolution Power to ride roughshod over existing policies designed to protect important rural landscapes and good quality agricultural land.

In summary, everything that is wrong with solar 'farms' in general, and indeed with this particular proposal\*, is summed up in the statements and arguments contained within the document, *The Problem with Solar Panels*, produced by CPRE Herts – <https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2021/10/The-Problem-with-Solar-Farms.pdf> – and I cite this document in its entirety as part of my strong objection to the proposed project.

*\*including, but not exclusively, that solar 'farms' are hugely inefficient; proximity to sub-stations [for Aldington, read: converter station] leads to clustering and cumulative effect; the countryside becomes industrialised; there is loss of good agricultural land; land becomes degraded by shadow and*



*rainwater run-off, while biodiversity is damaged, rather than enhanced; and plentiful brownfield and industrial sites are available for panels.*

## **Reiteration of my response to EP's second consultation**

16 July 2023

I am writing in response to Evolution Power's (EP's) summer 2023 statutory consultation.

I find that scant regard has been paid to the points I made in my original consultation response, dated 16 November 2022, and I hereby resubmit it in its entirety as a response to the present consultation. I feel that my time has been hugely impinged upon in these two exercises for very little result. I would highlight in particular the fact that the overwhelming number of responses to the previous consultations regarding concerns over visual impact of the proposed project have been very much downplayed and understated in this updated consultation. This feedback has not been addressed and is generally dismissed, without explanation. The complete loss of fabulous long-distance views between Aldington Ridge and Mersham and between Aldington Ridge and the Kent Downs AONB, as well as the ruining of visual amenity for footpath users among the solar array hardware is consistently dismissed as 'minor adverse to negligible' (e.g. p. 14 of Consultation Booklet.) Says who?! I develop this point further, below, in the course of listing various other areas in which, frankly, 'We said; you didn't'.

### **My comments specific to the summer 2023 statutory consultation:**

1. The front page of the statutory consultation feedback form, as well as p. 7 of the Community Information Leaflet' (CIL) and p. 19 of the Consultation Booklet (CB) state that 'The Applicant may be required to submit copies of the consultation responses to the Planning Inspectorate'. Yet p. 21 of the Consultation Booklet contradicts this in saying 'Any information you include ... will be ...handled and used by (or made available to) the following recipients: ... The Planning Inspectorate ... .' If it is indeed the case that EP does not have to pass the original feedback to the Inspector, then this gives tremendous leeway to EP to put its own favourable spin onto its analysis of feedback comments received.
2. Under the heading, 'What has changed since the last consultation, in the June 2023 CIL, EP lists 'common themes raised in responses', of which the very first listed is: 'support for the principle of new solar energy generation'. This is a highly dishonest and manipulative use of the response to the first question asked on EP's feedback form, akin to having asked whether anyone had anything against motherhood and apple pie. EP have failed to reflect here the 'buts' that followed the general, 'Yes' answer to this question. Undoubtedly these included examples such as 'Yes, but on rooves and brownfield sites' and 'Yes, but not across acres of productive agricultural land'.
3. **Visual impact**  
The CIL further lists 'requests for more information about landscape and visual impact, ecology and local job creation', as one of the 8 common themes of feedback. By merging these three very different topics under a single 'theme', EP downplays and significantly understates the feedback on concerns about negative visual impact highlighted by the analysis of feedback at the back of the 'You said, we did' booklet. And, why has EP interpreted extreme concerns over visual impact merely as 'requests for more information on visual impact'?

According to EP's own analysis of all forms of feedback received from the last consultation shown at the back of the You said, we did booklet, 'visual impact' (and other very related issues, which EP chooses to show separately in the analysis, thereby diminishing the weight of responses relating to visual impact concerns) ranks very highly throughout the questionnaire answers and in other feedback.

From <https://www.evolutionpower.co.uk/> home page:

The company carefully selects sites to **minimise local impact** and looks to target sites where there are opportunities to provide energy to local customers to maximise sustainability, environmental and social outcomes [my emphasis].

The CIL states that 'requests for more information about landscape and visual impact' was one of the common themes raised in the feedback. As mentioned in my point above, EP does not list 'concern about negative visual impact' of the development as a common theme, yet it clearly is, as demonstrated by the analysis of feedback to the last consultation at the back of the CB. And EP gives no further information on this, other than to promise 'additional hedgerow and woodland planting' to screen not just the industrial solar panel landscape, but indeed *all* views.

In the penultimate paragraph of p. 9 of the CB, EP recognises 'the potential for glint from the solar panels'. The planting of hedgerows is not going to mitigate this as seen from the high ground on Aldington Ridge or just south of Mersham church. It will also have an impact on views of and from the Kent Downs AONB, since the proposed site of the solar arrays forms part of the setting of the AONB.

The CB states that the Project 'has been carefully sited ... taking account of nearby receptors'. Some account appears now to be taken of views from nearby houses (Objective 3, CB), but no specific regard has been paid to the loss of views for users of the country lanes and walkers on the network of public rights of way crossing the entire site.

P. 12 of the CB states that 'effects on visual receptors will be of moderate to minor adverse significance'. EP does not explain or demonstrate how this glib and unbelievable conclusion has been reached in the face of the overwhelming opposition to their proposals, from residents using the lanes and walkers using the network of footpaths.

P. 10 of the CB indicates the provision of a seating area on the footpath next to Bank Road 'to allow views towards the North Downs [AONB] to be enjoyed'. Were it not so sad, this would be laughable. The existing beautiful views across the valley at this point will be utterly despoiled by the vast ranks of solar arrays that one will be obliged to look across.

Pp. 16 and 17 of the You said, we did booklet deal with visual impacts by way of planting schemes. This is all about the outside looking in. Nowhere does EP consider the plight of and visual impact on walkers on the many footpaths among this hardware nightmare.

Comment: **visual impact** of the proposal is **major**, whether because of the transformed and industrial sight of thousands of solar arrays covering what had been a rural landscape or because of the 'mitigation' measures that will serve only to hide both the new industrial landscape and the former rural one. EP needs to demonstrate how they reach any conclusion to the contrary other than wishful thinking. Under the proposals, Aldington's lanes will become green-edged tunnels, providing no views whatsoever, and instead of being able to look across large expanses of countryside, footpath walkers will be hemmed into

10-m field edges between rows of trees and/or tall hedges and security fences surrounding swathes of metal.

Interestingly, under the very small Cumulative Effects paragraph, on p. 15 of the CB, EP does, finally, recognise 'significant residual cumulative effects in EIA terms on landscape and views'. So, why is this not reflected elsewhere in all their documentation, instead of being dismissed as insignificant?

4. In what way can EP claim to 'maximise ... social outcomes'? If this makes reference to the proposed social fund, then this is to be shared among at least three parishes: Aldington, Mersham and Sellindge. If shared equally, it would represent very little per head of population annually. Not exactly adequate compensation for the long-term disruption caused to residents by construction and eventual dismantling works, or the reduction in quality of life for walkers and other lovers of the countryside, or the impact on mental health of a completely changed landscape, from a rural one to an industrial one. And I note that p. 8 of the CB states that 'the Applicant will provide a payment of *up to* £40,000 per annum' (my italics). Whose decision will it be how much, if anything, to pay? Surely a precise amount should be made contractual.
5. EP claims that 'best practice measures will be undertaken during the construction and decommissioning'. They do not say how this is going to be monitored or enforced, particularly once the current speculative developers have long since sold the project on.
6. Among all the talk of tree and hedgerow planting, there is no mention of whether failed plantings due to drought or other causes will be rectified through the life of the project, and how this would be monitored or enforced.
7. P. 12 of the CB admits to significant adverse effect on yellowhammer, skylark and brown hare habitat during construction. This is traditional local wildlife. Once these creatures are gone, what makes EP think they will possibly return, even if the adverse effects were fewer during the operational phase (which is not actually stated to be the case for yellowhammer or skylark, and it looks doubtful – p. 12 – also for the brown hare)? Are these losses taken account of when EP vaunts its planned massive biodiversity enhancements?
8. EP has not addressed comments about Flood Field (field 23, which was completely flooded, along with the lane running beside it, for weeks last winter). If this field is covered in solar panels, there will be even less bare soil to absorb rainfall and snowmelt, and even more will run onto the local roads.
9. P. 15 of the CB states that if PV panels cannot be piled into the ground, 'an alternative mounting solution will be used.' No information is given of the impact of this alternative on panel height.
10. On decommissioning (CB, p. 9), EP is not bothering to make a plan, but merely kicking the can down the road for some future owner to deal with. There is thus no clarity for residents on how decommissioning will be controlled or monitored, or whether components can be recycled.
11. The map on p. 22 of the CB is most unhelpful, as it does not show the existing footpaths that will be lost to the proposed diversions within the site. So readers cannot see the increase in distances that needs to be travelled to get across many of these fields via the edges.
- 12. Comments on the You said, we did booklet:**
  - a) P. 9: 'a good portion of the site sits within a "bowl" in the landscape which will aid in screening long range views'. This is an incorrect statement. Most of the bowl lies between the Aldington Ridge and Mersham church, below Bank Farm. How can that

possibly be screened from either viewpoint? Please also see my comment above, re the 'views' to be afforded from the proposed new seating off Bank Road.

- b) P. 17 of You said, we did deals only briefly with PROWs and effectively defers anything detailed on footpaths to the date of the Application, and is not helpful.
- c) P. 18 of You said, we did states that 'there are no views of the Project from the core of local villages. First, how has this 'core' been defined? EP doesn't say. Second, this is disingenuous, people live and move around in a parish, not all and only in the 'core' of the village. And there are certainly plenty of views of the site from surrounding, populated roads in both villages/parishes.
- d) The same section says 'Views of the North Downs and Mersham will not be interrupted by the Project. Yes, we'll be able to see both Mersham and the North Downs, but through and over a sea of hardware, rather than across rolling countryside. That is severe loss of visual amenity.
- e) Cumulative effects on our rural community of the existing solar installation, the EDF proposals and now EP's plans, together with Otterpool Park New Town to the east have not been addressed, other than to say that they are being addressed. This is a matter of fundamental importance for the community and should have been addressed by this stage.

#### **Specific examples of where I said (my feedback of 16 November 2022); but you didn't**

- a) My first paragraph and elsewhere regrets the plan to line village lanes and footpaths with tall trees and hedgerows, thereby creating tunnels, with no views whatsoever. This has been totally ignored and EP is now trumpeting the maximization of hedgerow height in its zeal to improve the area's biodiversity. There are plans (p. 16 You said, we did) to 'manage' all hedgerows to a height of 2.5–3m and hedgerows used for screening to 4.5–5m. A 15ft hedgerow!! These dreadful proposals will utterly alter the current, traditional, open landscape character.  
The developers appear to have zero appreciation of Aldington's rural qualities and are seeking to impose urban scale in country surroundings, with 10m-wide footpaths, tall trees and 15ft hedges.
- b) I noted previously that nowhere was the scale of the container-sized transformers and other associated equipment that are going to be placed together illustrated. That is still very much the case. The presenters at the recent Mersham exhibition admitted that the plotting of locations for these on the site map was NOT to scale. Nor, in all the volume of documents they had with them could they find anything to illustrate this for me.
- c) There are still few computer-generated images from designated viewpoints, and no depiction of the massive containers referenced above.
- d) My comments re the paucity of the community fund were not addressed. And now, it appears that the fund is 'up to £40,000', rather than of a fixed amount.
- e) EP has not addressed the question as to why the vast and virtually empty Sevington Inland Border Facility cannot be roofed with solar panels. Perhaps because questions of cost and greed come into play?
- f) Equally, other than profitability for the developer, EP has not addressed my question as to why Octopus thinks it feasible to transport solar power from Morocco, while EP insists that minimal distance to a grid connection is absolutely necessary.
- g) EP has not addressed my comments regarding impact on the setting of heritage assets.

- h) EP has not addressed my comments re waiting until DEFRA's Land Use Framework is published this year.
- i) EP stated in the last consultation that the local roads are 'lightly trafficked'. I asked them to consult the parish clerk's electronic records, which demonstrate the opposite. There is no evidence that this has been done.
- j) I pointed out that the proposed footpath cancellations were not highlighted; only the diversions are shown. This remains the case (see my comment, above).
- k) I asked that EP consults with local resident walkers, rather than with just a distant national walking organisation that may not know the area so well. This has not been done. They have my contact details.

In short, none of my points over footpaths have been addressed and it's becoming too arduous to relist them. I refer EP back to my original feedback, now submitted as response to the present consultation.