Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8, Deadline 1

Application by EPL 001 Limited for an Order Granting Development Consent for Stonestreet Green Solar

Written Representation prepared by Aldington & Bonnington Parish Council, 10 December 2024

1. This document comprises the express views of Aldington and Bonnington Parish Council (ABPC) with regard to the above application. ABPC recognises that climate change as a consequence of the burning of fossil fuels poses a clear and present threat to the future health and wellbeing of our planet. We agree that the UK should be investing in, and supporting renewable energy, however we do not support this particular application as we consider that, on balance, the identifiable concerns outweigh the potential 'clean energy' benefit of this project.
2. Consequently, ABPC, as the local representative body of residents of Aldington and Bonnington parishes, objects to the proposal to construct and operate a solar power station in Aldington. The remainder of this document outlines our key concerns.

Background on Aldington and Bonnington

3. Aldington and Bonnington parishes are located in the district of Ashford in the county of Kent. The village of Aldington lies between Ashford and Hythe, being eight miles to the east of Ashford and seven miles to the west of Hythe. Adjacent villages include Bonnington to the south, Smeeth to the north, Bilsington to the south-west, and Mersham to the west, with Court-at-Street and Lympne to the east.
4. Aldington village centre is formed along Roman Road and includes a village hall, primary school, post office store, a pub, a butcher and a small fire station. The village is home to the Poulton Wood Local Nature Reserve and has several other ancient woodlands. Separate from the main village, in Church Lane is St. Martin's Church, one of the most historic buildings in the neighbourhood area and the centre of the Church Lane Conservation Area.
5. From a landscape perspective, the southern part of the parishes falls within the Kent Downs National Landscape, with all the remainder lying within the setting of the National Landscape, which surrounds it on three sides. The northern part of the area lies within a number of defined Landscape Character Areas including Aldington Ridge, Romney Marsh and the East Stour Valley.
6. Historically, important routes run through Aldington, north-west to Ashford and west-east along the hills flanking the north of Romney Marsh, giving the area a very long history that development over the years has variously exposed. A collection of Mesolithic flints (c. 10,000 – 4,000 BC) including scrapers, blades and points is known from Knoll Farm. Prehistoric pits and a hearth were also found at HMP Aldington in 2000. Several examples of Bronze Age and Iron Age metalwork have been found and it is almost certain that other prehistoric sites lie undiscovered in the area. There have been numerous Roman discoveries in the area as Aldington lies close Portus Lemanis, the Roman fort and port at Lympne, and was on the main route connecting the area with the iron producing areas of the Weald but also the Roman road connecting Portus Lemanis with north Kent.

Consideration of the Aldington and Bonnington Neighbourhood Plan

7. The Aldington and Bonnington Neighbourhood Plan (ABNP) was developed in collaboration with the local residents of the parishes and 'made' in 2024. It forms part of the Local Development Framework and provides an important reflection of the views and aspirations of the community. Its content should be considered carefully in relation to this Application. It is disappointing to note that there is little, if any, reference to this document within the Application. The ABNP is uploaded to the portal.

Additional site visits

8. We would recommend additional site visits at the following locations:

    - From the northern end of Station Road approaching the parish – both from the location of View 1 of the ABNP and also from slightly further north along the road, the most significant view being on the sharp bend where the primary access is proposed.
    - From Roman Road and Public Right of Way (PROW) AE449, northwards – this coincides with Views 6a and 6b of the ABNP.
    - From the access point at Goldwell Lane to Fields 20, 21 and 22. This takes in the view from Goldwell Lane towards St Martin's Church (and vice versa) - this coincides with Views 2a and 2b – ideally to be undertaken at around peak school drop off and pick up time (i.e. 3pm).
    - From Calleywell Lane and PROW AE446 looking to the northwest – this coincides with View 8 of the ABNP.
    - From Bank Road and PROWs AE370, AE377 and AE445, northwards through the hedgerow along Bank Road – this coincides with View 10 of the ABNP.

9. Reasoning: These are all locations that have been identified by the community as offering locally significant views and which are expressed as such in Policy AB4 of the ABNP.

The generating capacity of the site must be balanced against potential negative impacts

10. The Application Site covers an area of approximately 192 ha (approximately 474 acres) and is predominantly in agricultural use for arable crops and grazing.

11. The Project generating capacity, assuming 655W panels and the illustrative design, is cited as circa 144 MW (APP-039 para 15.6.13).

12. Throughout the Application, and re-emphasised at the Hearings, the Applicant regularly voices that due to the 'critical national priority' status applied by Government to low-carbon infrastructure, the overall size and footprint of the site should be considered as a given and not be questioned due the fact that it can contribute to energy generation. This is an incorrect approach. National Policy Statement EN-1 positively endorses the need to ensure that schemes must be suited to their proposed locations and requires applicants to avoid, reduce, mitigate or compensate any adverse impacts of their projects (for example, on the environment) "so far as possible", stating that:

    "Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed

energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function" (para 5.10.26).

13. As a principle of the Examination, therefore, we respectfully urge the Inspector to bear in mind that it is the community of our Parishes that will live with the scheme for a generation. Opportunities to mitigate the inevitable impacts of the scheme – which could include reducing the overall footprint of the site, even if it impacts overall energy output – should be carefully considered and not be ruled out. In fact, the house of Commons Library Research Briefing, "Planning for Solar Farms", states that *"as solar technology becomes more efficient, the size of a solar farm capable of generating 50 MW might decrease"* (p.14). The Applicant themselves acknowledge that by the time of construction, it is highly likely that higher wattage panels will be readily available.

Consideration of alternative sites

14. The Applicant discounts a significantly reduced scale proposal to the Project as a reasonable alternative stating that it would not be capable of delivering the same generation capacity as the current proposals and would therefore not meet the Project requirements (APP-029, para 5.5.4). What is not considered at all, however, is a slightly reduced scale proposal and we consider this an oversight. A smaller-scale proposal could yield similar outputs (noting that by the time of construction, it is highly likely that higher wattage panels will be readily available), with reduced impacts to the landscape and local community. We respectfully urge the Inspector to require such a scenario to be fully explored.

15. In terms of location, the Applicant states that two parcels of potentially developable land north and south of the M20 have been discounted for the following reason: *"not of a sufficient scale to deliver the Project requirements and are subject to third party arrangements and therefore they were not commercially viable"* (APP-029, Table 5.1). We contest this. The spaces are considerable in size and should have been fully considered, notably as a substitute for Fields 20, 21 and 22, which will have the most significant negative impact on the local community. Alternative sites in the vicinity have been actively put forward to Ashford Borough Council through their most recent Call for Sites. For instance, HELAA/LP41/246 (Parcels south of M20) is an 8.88ha site that has been submitted with a proposed use for Biodiversity Net Gain, Energy Generation, Other (Potential for battery storage). We do not consider that third party arrangements would be insurmountable to pursue. Such alternative sites are located closer to the substation and within a significantly less obtrusive part of the landscape. Such sites should be fully explored.

Impact on local heritage and archaeology

16. There are a number of designated heritage assets in the proposed footprint of the site and, in view of the history of the area, there is potential for significant below-ground deposits. This should be fully explored prior to any works being carried out.

17. A Heritage Assessment in relation to the proposed development has been commissioned by ABPC and is included in Appendix A. An assessment of LiDAR data in relation to the proposed development was also prepared on behalf of ABPC and this is included in Appendix B.

18. A notable designated heritage asset in the parish is the Church of St Martin, a Grade I listed building dating to the 11th century and located to the east of Aldington village at the end of Footpath AE474 in the conservation area. This is the primary place of worship for many parishioners and also regularly hosts events, celebrations and community activities, including with local school children. It has been a core feature of the community for many generations and is accessed via the footpath, which has been used for many centuries. Kent Heritage maps show it marked on official maps dating from the 1870s.

19. The Applicant states that the Zone of Theoretical Visibility (ZTV) between the Church (at ground level) and the land within the Site will not be possible. The Applicant considers that the experience of the church from within its immediate churchyard setting would not be affected. Furthermore, the experience of the church within its medieval manorial setting, which is expressed by the physical relationship with nearby Court Lodge Farmhouse and outbuildings, Parsonage Farmhouse and Church Farmhouse would also be conserved.

20. In fact, the Church is visible from the western part of Footpath AE474 and from Goldwell Lane itself. The view from this location to the Church (*Figure 1*) is identified in the ABNP as a Locally Significant View, where the "church is clearly visible on the horizon". This was a view specifically identified as significant by the community and is included within ABNP Policy AB4 (Locally Significant Views).

Figure 1: View 2a: Looking towards St Martin's Church along PROW AE474

21. Indeed, site allocation Policies S51 and S52 of the Ashford Local Plan acknowledge the importance of this view, with policies including the following clause, requiring development proposals to

    "Be designed and laid out in such a way as to conserve the mature hedgerow along the road frontage, if possible, retain gaps in the built frontage to preserve views and vistas through the site to the heritage assets and also consider the wider landscape settings, the topography of the site and Greensand Ridge location."

22. From the higher St. Martin's Church end of PROW AE474, a panoramic view across open fields takes in Aldington to the west and benefits from the landscape rising in the far distance to extend across to Mersham in the north-west and include the Kent Downs National Landscape on the northern horizon (*Figure 2*).

Figure 2: View 2b: Looking towards Aldington

23. The introduction of solar panels in this field (the PV panels will have a maximum height of 3.5m Above Ground Level ('AGL') and will be mounted with a minimum clearance of 0.8m AGL) will clearly be visible. Passage along Footpath AE474 to and from the Church will also be greatly compromised in terms of enjoyment. This will be from a visual perspective, but also due to the fact that this Footpath coincides with the main traffic entry point identified to access Fields 20, 21 and 22.

24. The impacts on this important heritage asset, a focal Church in the community, and the historic Footpath used to reach it, could be mitigated by removing Fields 20, 21 and 22 from the overall scheme. This would mitigate a significant community impact, while not necessarily impacting the overall energy generation (in light of anticipated advances in technology). Alternatively, we would question why the entry point is not moved further north, to avoid this Footpath altogether. A location further north would also negate the need for additional traffic to be traveling the majority of the way along Goldwell Lane which, at the southern end, is closest to the school and residential properties.

25. This would align with NPD-EN1, which states that *"The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible: enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected"* (para 5.9.13).

Landscape and visual impact

26. At Appendix C, we attach a report prepared for the Parish Council by local residents in a response to the Landscape and Visual Impact Assessment (LVIA).

27. The proposed site is within the setting of the Kent Downs National Landscape, the boundary of which is only approximately 220m from the southern boundary of Field 20. This setting should be taken into consideration, as expressed in the Kent National Landscape (AONB) Unit's "Setting Position Statement":

    "The setting of the Kent Downs AONB does not have a geographical border. In most cases, the setting comprises land outside the AONB which is visible from the AONB and from which the AONB can be seen. The setting may be wider however, for example when affected by features such as noise and light. In some cases, the setting area will be compact and close to the AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change. However, the setting area maybe substantial for example where there is a

contrast in topography between higher and lower ground. Setting can also affect views within the AONB, such as where other landscapes are visible constituting part of the view however it may be difficult to distinguish between differences in landscape character. Similarly, development in the setting could detract from associated views within the AONB, for example polytunnels could be visible from a distance within the AONB, affecting the integrity of internal views of the AONB landscape." (p.5)

28. The Setting Position Statement provides examples of adverse impacts on the setting of the Kent Downs National Landscape including:

    i. development which would have a significant impact on views in or out of the AONB;

    ii. loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impact including dust, vibration and reduction in air quality;

    iii. introduction of abrupt change of landscape character;

    iv. loss or harm to heritage assets and natural landscape, particularly if these are contiguous with the AONB;

    v. development giving rise to significantly increased traffic flows to and from the AONB, resulting in erosion of the character of rural roads and lanes; and

    vi. increased recreational pressure as a result of development in close proximity to the AONB.

29. All of these points are relevant in relation to this Application.

30. The footprint of the site covers the following Landscape Character Areas (*Figure 3)*: Aldington Ridge, Romney Marsh, Old Romney Shoreline Wooded Farmland, East Stour Valley and Royal Military Marshlands.

31. Aldington Ridge is defined in the Ashford Landscape Character Assessment (2005) as comprising large open arable fields, traversed by Bank Road (along the ridgeline) – a Roman Road with high hedges and localised tree cover – offering extensive views north to Mersham, west and north-west to Ashford and the North Downs and south to Dungeness. Landscape sensitivity here is graded as High in terms of sense of place, landform and visibility. Management principles include conserving these views and planting additional hedgerows.

32. Romney Marsh, which encompasses much of Fields 20, 21 and 22, in considered one of England's most distinctive and unique landscapes. Much of this area lies below sea level and the landscape comprises wide fields, endless skies, meandering ditches, isolated farms and villages. It has been identified as a biodiversity opportunity area by the Kent Nature Partnership. The majority of this landscape is within Fields 20 and 21 and would be taken over to industrialised panels.

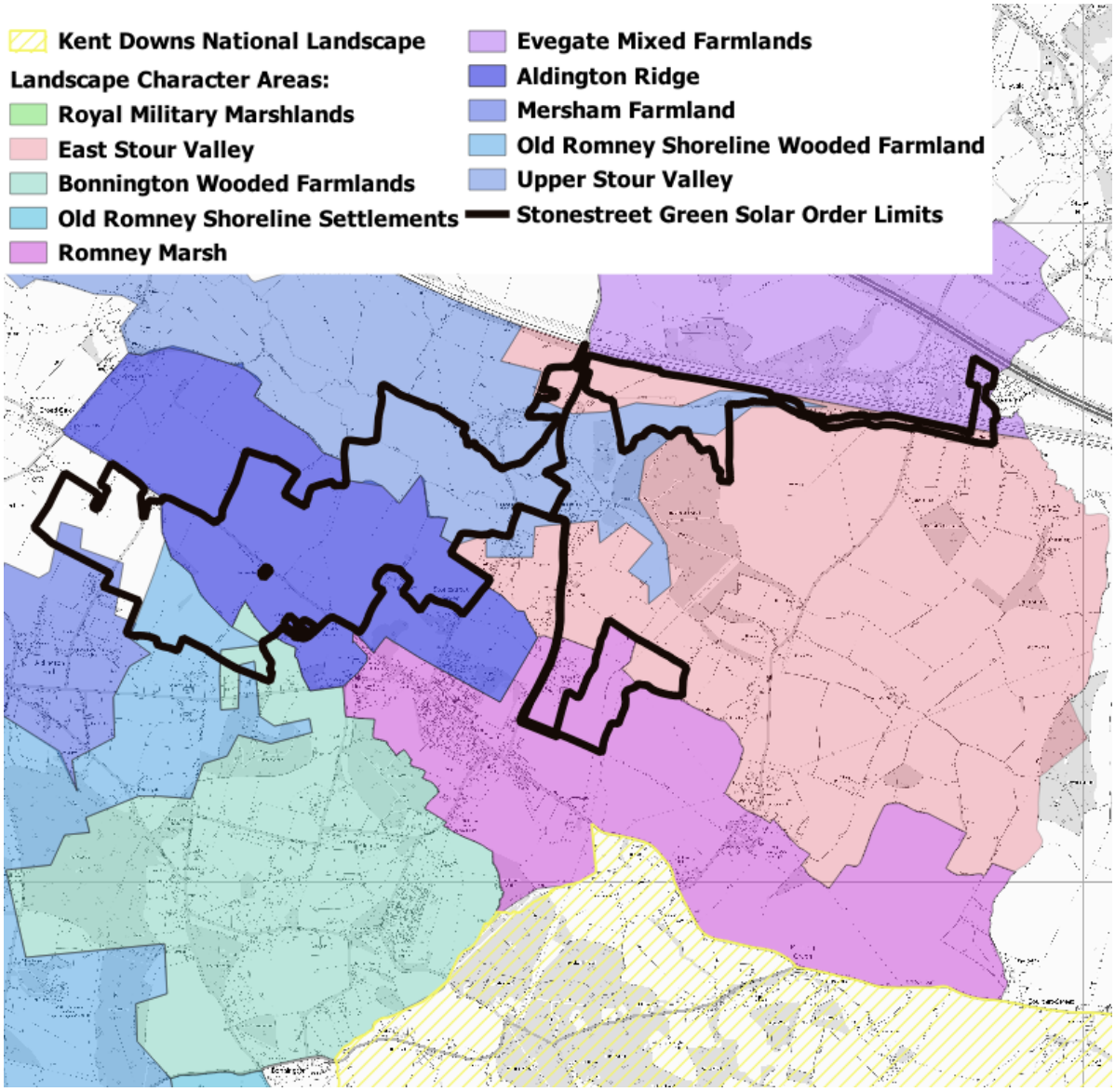

Figure 3: Landscape Character Areas in Aldington

33. Within this rural undulating landscape and as part of the ABNP, the Parish Council worked closely with the community to identify a series of viewpoints that are particularly important from a local perspective. These are identified in ABNP Policy AB4. Whilst it is true to say that the Site is not visible in its entirety from any one location, its scale means that the following locally significant long-distance views will be impacted by the Application:

34. View 1 From Station Road (*Figure 4)*: a panorama across the East Stour Valley up towards Aldington Ridgeline - this view in fact is visible along Station Road as you exit the A20, beyond the parish boundary. From this approach, the undulating landscape provides sweeping and expansive views of rolling fields and woodland leading up to the Aldington Ridgeline and round towards Mersham in the north-west. The view continues during the descent into the valley. At the Aldington entry sign, the view remains open and expansive, with buildings at Bank Farm (Bank Road) visible on the horizon.

35. This view is even more expansive when viewed from further north along Station Road. This is the location of a key gateway into the parish and villages and experience and will be severely compromised visually.

Figure 4: View 1 Looking up towards Aldington Ridgeline from Station Road

36. Views 2a and 2b: From Goldwell Lane towards St Martin's Church along PROW AE474 and the reverse have been detailed earlier in this submission.

37. Views 6a and 6b (*Figure 5)*: From Roman Road and PROW AE449, from Roman Road, in the centre of Aldington, Reynolds Playing Field and Quarry Field provides an expansive open viewpoint at the highest point of Aldington Ridge (View 6a). Enjoyed from the garden of The Walnut Tree public house, this is very much a village view: mature trees edge the 'village green' and fill the middle ground; the children's play area is visible in the foreground; and there are views of the Kent Downs National Landscape in the distance across gently rising farmland. This more distant view is best appreciated from PROW AE449, which runs down the field beyond Reynolds Playing Field and Quarry Wood (View 6b).

Figure 5: Views 6a (Looking north-north-east across Reynolds Playing Field towards the Kent Downs National Landscape) and 6b (Looking north-east across Reynolds Playing Field towards the village hall and tennis courts)

38. View 8 is from Calleywell Lane and PROW AE446 looking to the northwest. The field entrance at the Roman Road end of Calleywell Lane and PROW AE446 that traverses the field provide expansive and long-distance views. These range northwards and north-westwards over open

farmland and wooded copses in the valley of the East Stour towards the neighbouring village of Mersham, including the Norman church of St John. Ashford is in the far distance.

39. Finally View 10 is from Bank Road and PROWs AE370, AE377 and AE445, northwards. Gaps in the hedgerow along Bank Road, and all three footpaths to the north, provide a cluster of extensive views across the East Stour Valley up to the Kent Downs National Landscape, which lines the northern horizon. The sweeping open landscape rolls gently away from the ridgeline providing a view that extends from beyond Mersham, to the north-west, right across towards Aldington Reservoir and Church Lane to the north-east.

40. Some of these views (6, 8 and 10) are from the core of Aldington settlement, in contrast to the Applicant's assertion (APP-032, para 8.13.8).

41. The visual impacts on users of the PRoWs within /adjacent to proposed solar PV areas (which is relevant notably to Views 2a and 2b from FP AE474) are considered by the Applicant to be temporary and moderately adverse (APP-032, Table 8.12). We disagree with this assessment, as many impacted Footpaths are located wholly within the scheme perimeter and will inevitably be more than moderately impacted. Screening will be difficult as it in itself would impact the overall viewpoint and rurality of these ancient routeways.

42. The Applicant states that the Site is also partially within an area proposed to be designated as a Dark Sky Zone (APP-032, para 8.13.4). In fact, the ABNP includes a policy relating to Dark Skies (Policy AB5), which relates to the entire parish and therefore the entirety of this site within the parish. All lighting, for instance security lighting, should adhere to Dark Skies policy. This is particularly important in the context of both biodiversity and general enjoyment by the community of the dark skies.

Environmental designations, landscape features and biodiversity

43. Fields 28 and 29 directly border Backhouse Wood, which is designated as ancient woodland and is also a Local Wildlife Site. NPS-EN1 states that national planning policy expects plans to identify and map Local Wildlife Sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks (Para 5.4.13). The Applicant often omits these designations on the maps, for instance the Illustrative Landscape Drawings Doc Ref 2.7.

44. The Mid Kent Greensand and Gault Biodiversity Opportunity Area (identified by the Kent Nature Partnership) falls across much of the northern part of the site. It is defined by thin, sandy soils supporting lowland heathland and acid grassland. It is a distinctive landscape, which supports specific wildlife and vegetation and needs to be protected to thrive. It does not appear to have been considered in the Application.

45. In addition to these sites, the ABNP (p.22-25) details areas of importance in the parish for flora and fauna that should be conserved, enhanced and, where possible, better connected (*Figure 6)*. These have been identified in consultation with the community and with the support of a local ecologist. Many of these features are located within the proposed site footprint, including trees, woods, ponds and hedgerows, as well as the Ashford Green Corridor that extends into the parish from the northwest, forming part of a wider network of green (and blue) infrastructure. The features are not identified in the Application (for instance APP-051 biodiversity Figures 9.1-9.11).

It is concerning that some of these features may be removed - and lost - as part of the Application.

46. National policy states that Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases (NPS-EN1, para 5.4.32) and should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon (NPS-EN1, Para 5.4.33). We are therefore concerned about the extent to which the DCO, as currently worded, would effectively give carte blanche to remove or partially remove (including roots) natural features, both within the site boundary and encroaching onto it (APP-015, Article 8, p.12, and APP-011 Article 45, p.33), often without the need for any license. This will make it very challenging to monitor and enforce. The positioning of panels and associated infrastructure should be such that it adapts to existing features, which themselves might help to mitigate against the visual intrusion of the scheme.

47. As noted in NPS-EN1, where green infrastructure is affected, the imposition of requirements should be considered to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact.

48. It is unclear why the area proposed by the Applicant for biodiversity improvements has been placed adjacent to Fields 20, 21 and 22, as opposed to within one or more of the areas already identified strategically as a biodiversity opportunity areas, where positive ecological impacts could be optimised.

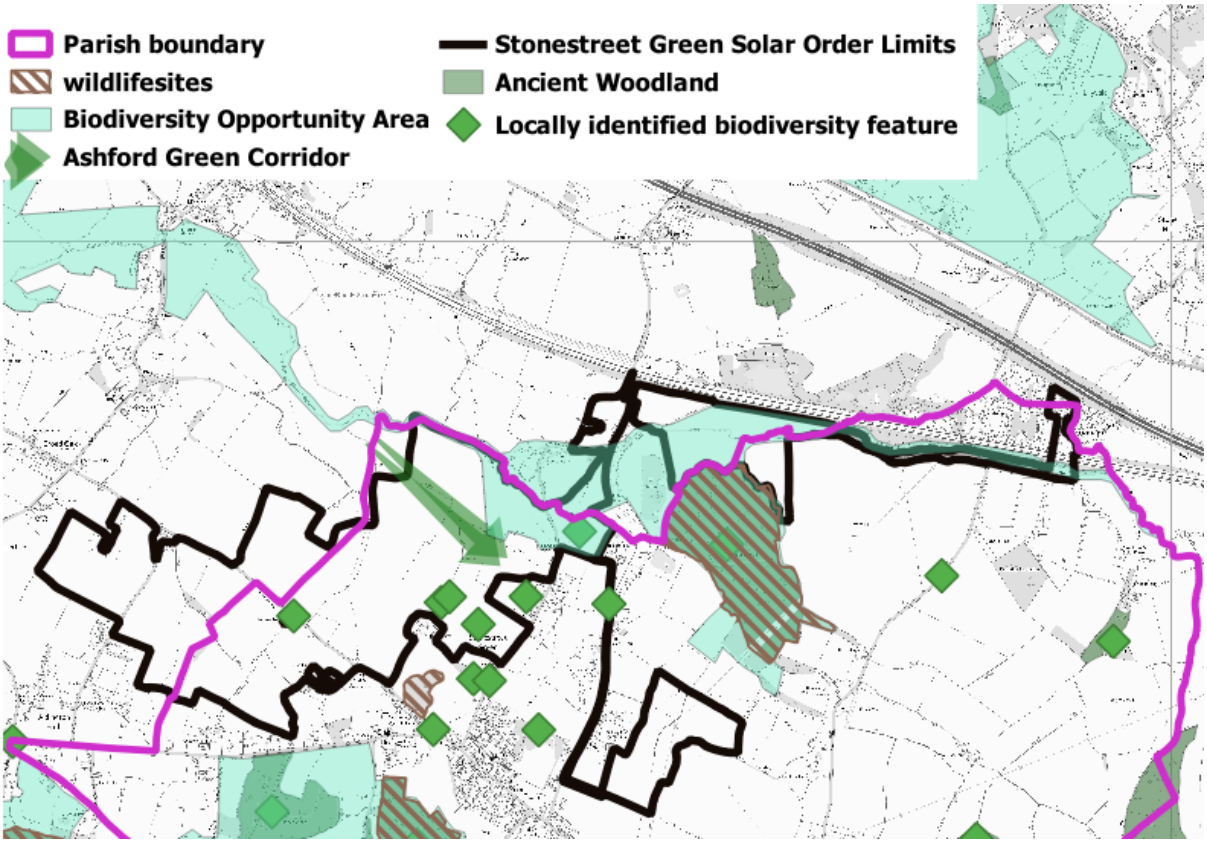

Figure 6: Environmental designations, landscape features and biodiversity

Transport and traffic Impacts

49. The area is severely impacted by increased traffic during any disruption to the M20 or A20, which are nationally strategic routes due to their port connections. The A20/M20 motorway and corridor borders Aldington village to the north, providing highway connections to Maidstone to the north-west, and Folkestone, Dover and the Channel Tunnel to the east. The neighbouring village of Mersham is adjacent to the new Inland Border Facility at M20 Junction 10a, created following Brexit. The facility has introduced heavy goods vehicle traffic to local roads and brought development scheduled in the Ashford Local Plan 2030 into reality far sooner than anticipated and in a very different format.

50. There are numerous transport issues that are relevant here.

51. *Figure 7* shows an aerial view of Smeeth Crossroads illustrating the ghost island on the approach from Junction 10a, the nominated entry point to the entire site. This island is 50m long, however the demarcation line at the end is halfway across Station Road, effectively meaning that traffic looking to exit Station Road onto Church Road will be unable to do so if a lorry is sitting waiting to turn into Station Road. For those seeking to turn right to go towards Folkestone, it will be a blind bend.

52. The Application states that three lorries can fit on to the ghost island without impeding the carriageway. If the lorries are 16.5m (APP-037, para 13.7.41) as quoted this would be a total length of 49.5m with no gap between them therefore there would be a need for the rear lorry to impede the highway.

Figure 7: Smeeth Crossroads (source: Google Earth)

53. No swept path analysis has been provided for the crossroads to ascertain if a 16.5m lorry can exit Station Road without the need to utilise the coast bound lane. We respectfully urge the Inspector to require this.

54. The Application also states that Otterpool Park has been scoped out of the Application as the plans for this development show all traffic will utilise J11 of the M20 and not the A20 towards

Ashford (APP-037, para 13.4.74). We strongly question this omission, particularly in light of the fact that the M20 is regularly severely compromised as a result of Operation Brock.

55. Whilst strategic development at Sellindge has been considered as part of the cumulative impact, the Applicant suggests that this is near built. In fact, this is not quite correct; the current build comprised the first phase of two phases of 250 dwellings, the second stage comprises a further 350 dwellings which has not yet taken place (it is to take place at the at masterplan stage). This should therefore be factored into the cumulative impacts.

56. *Figure 8* is a screenshot taken to show the view of traffic exiting Station Road looking towards Folkestone. Traffic on this stretch is subject to the national speed limit of 60mph. Beyond the traffic island, the road drops away as the crossroad is on the brow of the hill. This significantly impacts visibility for large vehicles exiting Station Road, giving oncoming traffic little chance to slow down.

Figure 8: Screenshot at exit from Station Road turning towards Folkestone (source: Google Earth)

57. At Issue Specific Hearing 2 (Traffic and Construction), the Applicant responded to a question about increased traffic due to closure of M20 and A20. They suggested that the effect of any closures would last only a couple of hours at most. We contest this point.

58. *Tables 1* and 2 contain information derived from data obtained from the Parish Council Speed Indicator Device. This records traffic in one direction and is helpful in demonstrating the effect of issues on the surrounding road network as SatNav users are diverted away from localised hotspots. It should be noted that each location is a different date as the device rotates between four posts.

59. It is a reasonable assumption that these traffic flows reflect movement into the parish from the junction of Station Road and the A20, as the device reads traffic entering the Village.

Table 1: Traffic Speed data, Aldington and Bonnington Parish Council

Goldwell Lane				
Day	No of days	Increased flow in excess of 3 hours	% of days	Hourly count in excess of 100 vehicles
Monday	51	6	12	8
Tuesday	54	13	24	7
Wednesday	51	6	12	13
Thursday	53	10	19	10
Friday	59	14	24	33
Saturday	59	17	29	6
Peak number of vehicles per hour 728 average of 12 per minute				
Calleywell Lane				
Monday	64	12	19	54
Tuesday	71	13	18	46
Wednesday	59	14	24	34
Thursday	66	17	26	58
Friday	71	24	33	67
Saturday	67	8	12	21
Peak number of vehicles per hour 804 average of 13 per minute				

Table 2: Traffic Speed data, Aldington and Bonnington Parish Council

Roman Road from Calleywell Lane				
Day	No of days	Increased flow in excess of 3 hours	% of days	Hourly count in excess of 150 vehicles
Monday	44	22	50	24
Tuesday	49	12	24	48
Wednesday	44	6	14	44
Thursday	41	10	24	44
Friday	47	10	21	55
Saturday	47	13	28	20
Peak number of vehicles per hour 803 average of 13 per minute				
Roman Road from Goldwell Lane				
Day	No of days	Increased flow in excess of 3 hours	% of days	Hourly count in excess of 150 vehicles
Monday	48	9	19	26
Tuesday	54	4	7	11
Wednesday	50	10	13	18
Thursday	50	10	13	31
Friday	59	8	14	37
Saturday	59	12	20	48
Peak number of vehicles per hour 831 average of 14 per minute				

Note: A higher count for the hourly figure of 150 has been used as there are other roads that feed into Roman Road.

60. A further concern of the Parish is the width of Station Road, which will need to accommodate numerous and large vehicles, some oversized. There are sections of this road with no central markings (for instance as shown in *Figure 9,* taken just before the proposed entry point A). This will inevitably lead to some road widening, which will have an irreparable impact on the rural lanes in the parish, which are characteristic of this part of Kent.

Figure 9: Narrowness of Station Road (source: Google Earth)

61. The Parish Council is particularly concerned about the impact of traffic and construction on Goldwell Lane, the route to the second proposed access point where it coincides with footpath AE 474. This is a one of the main routes into the village (the school end of the village). The lane here is narrow, rural and frequently used by non-car users, such as cyclists and horseriders (*Figure 10)*; the lack of bridleways in the parish means that such users must use the roads to get around. There are also no pavements here.

Figure 10: Horse riders and cyclists are frequent users of Goldwell Lane (source: Google Earth)

62. Almost the entire length of Goldwell Lane (from the northern bend down to Roman Road) will be impacted. This stretch is approximately 1.13km in length, of which approximately 937m will coincide with construction traffic. Only the southern end will be outside the footprint, a stretch measuring just 200m. This is of great concern to residents as it is a core village route. This lane is also the subject of a community aspiration in the ABNP, endorsed by Kent County Council; the development of an attractive, safe circular route connecting with Calleywell Lane for all road users. The presence of construction traffic would not enable this (ABNP Appendix D).

63. The Application shows Works (No. 20) on Goldwell Lane, presumably for the cable connection to be installed (APP-011 Streets, Rights of Way and Access Plans). There is no mention in the documentation as to the width of trench that needs to be dug the lengthy of Goldwell Lane and the implication to road users and more importantly the businesses and residents that reside on this stretch. Article 11 of the draft DCO appears not only to enable, among other things, the undertaker to break up streets, but also to give permission to divert all traffic away during the undertaking of works with a requirement only to provide pedestrian access to those premises. There is no consideration for car users or indeed pedestrians, cyclists or horseriders. Only temporary measures are required to be reverted back to their original state. Permanent alterations – including road widths, surfacing, reduction of footpaths etc. – do not need to be reinstated (APP-011, Article 12). This needs to be reconsidered as it could detrimentally impact the character of the village and wider parish in the longer term.

64. The Parish Council considers that these three 'outlying' fields, 20, 21 and 22 should be removed from the scheme as they potentially impose some of the greatest negative impacts on the community and day-to-day life.

65. As noted previously, if Fields 20, 21 and 22 must be included, which we strongly query, why is the access not provide further north, perhaps to coincide with footpath AE 475? This would negate the need for construction traffic at the more residential end of this lane. It would also help to protect Footpath AE 474 which, as expressed previously, is a much treasured and used route to access the church, from industrialisation, light pollution and general obstruction.

66. On public rights of way more generally, the Parish Council remains disappointed that the Applicant has not actively worked with the community to explore how the overall network could be improved in the places most helpful to local people. Some of these aspirations are set out in Appendix D of the ABNP and include, for instance, the desire for a route connecting Aldington village to Mersham through the East Stour Valley utilising the Ashford Green corridor. Despite such suggestions being raised via the Community Liaison Panel, the Applicant has chosen alternative minor route additions that have not been endorsed by the community.

67. Any new PRoWs should be required to be delivered as bridleways. In addition, Article 18 clause (g) (APP-011) should only apply to a stated list of PRoWs.

Design of the site

68. NPS-EN1 para 4.7.5 states that to ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. We query why a site of this size, in this location, should not have followed this advice. In particular, the Design Council

can be asked to provide a design review for nationally significant infrastructure projects and applicants are encouraged to use this service (para 4.7.8). ABNP Policy AB10 provides detail on design considerations but is not quoted at all in the documentation, notably APP-029.

69. In terms of design and layout, it is unclear why a south-facing arrangement of panels has been selected for the entire site, where for example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread more evenly throughout the day. A denser arrangement could allow for a reduction in the overall footprint, in particular in the most visually sensitive areas, which would be of significant benefit to the community.

Lack of local economic benefit

70. NPS-EN1 states that one benefit that projects such as this can bring is the creation of jobs (para 4.1.5). The proposal is projected to have little, if any, direct positive economic impact on the local economy. In terms of jobs, whilst the proposal would be expected to generate employment opportunities during the construction phase, the Applicant states that it is not possible to make a quantitative assessment of this cumulative level of employment. (APP-036, para 12.10.1). The Applicant states that during the peak activity, of the 199 on-site workers envisaged, at least 75% of these will be minibussed in and out from Ashford town centre and railway station points (APP-037, para 13.4.87), which implies they are unlikely to be local people, nor are they likely to contribute to the local economy.

71. There are no projections for increased spend with local business, development of a supporting business ecosystem etc.

Agricultural Land

72. The updated NPS EN-3 states that, although the suitability of a site should not be mainly determined by land type, solar farms should be sited on previously developed and non-agricultural land “where possible”. Though it is “likely” that some agricultural land will need to be used for solar farms “at this scale”. The statement also recommends that developers should try using poorer-quality instead of higher-quality agricultural land and avoid the use of best and most versatile (BMV) land “where possible”.

73. As shown in *Figure 11*, the land in much of this area ranges from Grade 3 (Good to Moderate) to Grade 2 (Very Good), with notable pockets of Grade 2 along Goldwell Lane.

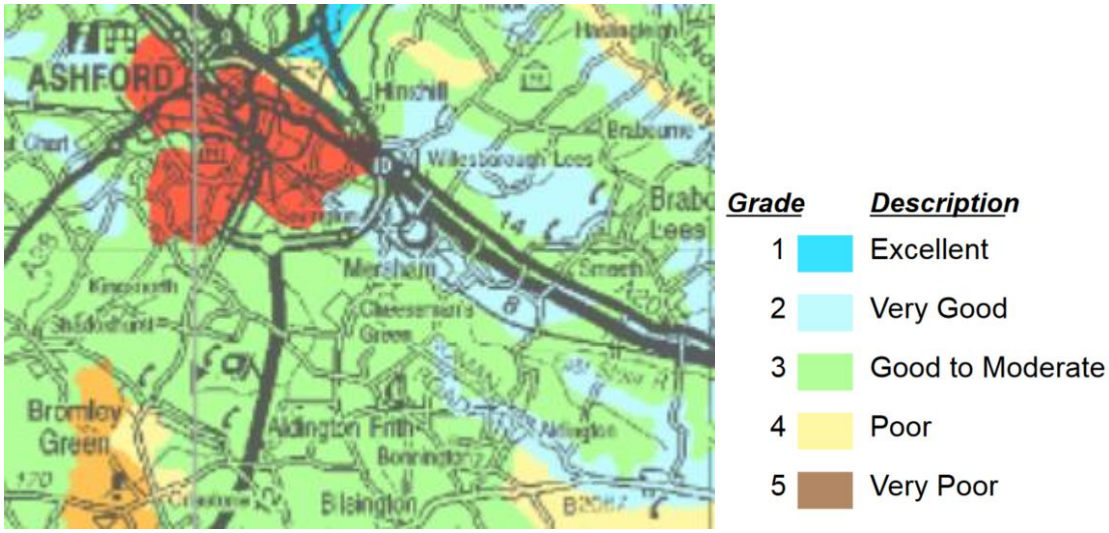

Figure 11: Figure 11: London & Southeast Region 250k ALC

Battery storage

74. Whilst the Parish Council support the idea of energy generated not going to waste, we remain concerned about the visual impact of the sheer number of battery storage facilities to be included in the proposal.

Consultation with the community

75. In the interests of securing sustainable development, NPS EN-1 strongly encourages early engagement with the community (para 4.1.19). Whilst a Community Liaison Panel (CLP) was established during the Pre-Application stage, the outcomes of this have been rather meagre. For example, the CLP contributed suggestions about potential footpath / bridleway improvements that could be made as a positive contribution to the Application (building on Appendix D: Potential Improvements to the Public Rights of Way in the ABNP), but these have been largely ignored.

76. The Examination process has been challenging for the local community to take part in. Whilst members of the public have access online to information, not all members of the community feel comfortable doing this. Approximately 20% of those living in Aldington parish are aged 70 years and over and not all are comfortable with online access.

77. Only one copy of only a handful of the wide suite of documents pertaining to the Application has been made available to the Parish Council in hard copy, with maps at a readable scale only supplied after a specific request at the Open Floor Hearing 1, too late for those wishing to register as an Interested Party. This has made it very difficult for the local community to get a true sense of the scale and nature of the proposal. Incidentally, even at A3 size, map keys are too small to read, footpath numbering is omitted from some figures and road names and other landscape features are often hard to place.

78. The hearings themselves have taken place in Ashford, despite the Parish Council offering the centrally located Village Hall, which has the needed facilities to host the sessions. With few buses serving the Ashford International Hotel, it has been challenging for residents to attend. Again,

whilst remote attendance has been possible, not all residents are comfortable with this technology.

79. As a result, local participation in the process has been severely impacted. This only serves to imply that the views of local residents are not considered as important as others.

80. If the Applicant secures planning permission, the Parish Council is concerned that the site, with planning permission, may be sold on. This could lead to a new owner taking forward the application with little or no contact with the community whatsoever. We would request that a clause is included in the DCO to require the ultimate undertaker to actively engage with the community throughout the construction, delivery and decommissioning of the site.

81. Should the DCO for Stonestreet Green Solar be granted, the Applicant has proposed the setting up of a Community Grant. As the representative of the most significantly affected parishes, ABPC would welcome further discussion to understand exactly how the proposed community grant will be managed, from when it will commence and over what period.