

Aldington and Bonnington Parish Council Written Representation, 10 December 2024

APPENDIX C - INDEPENDENT RESPONSE TO THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT

Evolution Power application to the Secretary of State for consent for the Stonestreet Green Solar Electricity Generation Development, Reference EN010135 (Nationally Significant Infrastructure Project)

Independent Response to the Landscape and Visual Impact Assessment submitted as evidence to the Planning Inspectorate, prepared for Aldington & Bonnington Parish Council

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9 December 2024

Introduction and Summary

This evidence is a response to the Landscape and Visual Impact Assessment (LVIA) submitted by Evolution Power (the Applicant) in support of the application currently under consideration (the Proposed Development). It is prepared primarily from the perspective of the walkers and other outdoors enthusiasts (Receptors) who would experience the visual effects of the development of solar energy generation and storage installations from the public rights of way (PRoW) in the landscape around Aldington. Reference will also be made to the visual effects on Receptors using the local road network, including some walkers, but also cyclists and motorists who wish to enjoy being in a rural setting.

The Applicant significantly understates the landscape and visual impacts that the Proposed Development would have on the local community, and particularly on the above-mentioned categories of Receptors (who are likely to constitute a large proportion of local residents, as well as most leisure visitors to the area). A Summary is attached as Appendix II.

Policy Context

It is noted that, although there is a strong policy drive by the UK Government for development of infrastructure for generating renewable energy, including solar, there is also an increasing policy focus on public health promotion to improve quality of life and reduce demands on the National Health Service.

People are encouraged by medical practitioners to lead a more active lifestyle to tackle obesity, diabetes, mental health issues and many other ill-health conditions. Regular participation in walking, cycling and other outdoor activities has repeatedly been shown to provide significant benefits for both physical and mental health. A good network of attractive footpaths and cycle routes through the countryside, easily accessed from towns and villages, is therefore widely regarded as a desirable contributor to public well-being. It is further recognised as a valuable economic asset by the tourism and leisure sector.

It is also noted that, whilst there is a clear opportunity for national regulations requiring new and existing rooftops to be fitted with solar PV arrays, which is not currently being pursued, there appears to be a lack of coherent national policy on the most appropriate locations for solar energy

installations in the landscape. Individual planning decisions are likely to be driven more by commercial pressures than by national and local development priorities.

The Current Application

The LVIA submitted by the Applicant recognises that there will be significant changes to the landscape resulting from the Proposed Development, but considers (para 8.9.5) that after 15 years the overall effects for the Landscape Character of the site, and the Aldington Ridge, will be a combination of moderate adverse and beneficial (significant) effects, from ‘the presence of built form and the enhancements to the site’s physical features and public access’. The LVIA presents a generally positive impression of the changes as the proposed mitigation planting and landscaping become established.

The visual effects on Receptors are also acknowledged (para 8.7.29): ‘out of a total of 44 of the identified visual receptors, 19 are likely to experience significant visual effects as a result of the Project at year 1’, including users of the PRoW within/adjacent to the site, users of PRoW AE401 Collier’s Hill, people travelling along some local roads, some local residents, and residents in Mersham. However, only those using PRoW within/adjacent to the site with open panoramic views towards the Kent Downs National Landscape are regarded as having *higher sensitivity* to the changes, resulting in a *major-moderate* adverse (significant) effect, and all others would experience no more than a *moderate* adverse (significant) effect [my emphasis]. After 15 years, it is suggested (para 8.9.9) that only 4 of those 19 categories of Receptors would still experience moderate adverse (significant) effects, due to the beneficial effects of the landscaping. These are: users of PRoW within the site; people travelling along Bank Road; users of PRoW AE401 (Collier’s Hill); and users of PRoW AE428.

Completion of an LVIA does involve a great deal of professional judgement in assessing the sensitivity of Receptors (who are, in most cases, people) to the changes resulting from a proposed development. The actual sensitivity of those Receptors is highly subjective, and therefore likely to vary significantly from one individual to another. It is very much affected by the individual Receptor’s sense of what is important to them, in a particular situation.

We would argue that the Applicant has:

- a. misjudged the expectations of people wanting to make the most of their experience of the countryside – in particular, users of the dense network of PRoW throughout the site – and
- b. overstated the benefits of the proposed landscaping and planting to mitigate the landscape and visual impacts of the Proposed Development.

Indeed, in the second round of community consultation carried out in the summer of 2023, the Applicant gave a positive impression of the impact for walkers, arguing on Board 4 of the consultation exhibition panels that one of the benefits of the Proposed Development would be that: ‘It will introduce new public rights of way in the local area to improve connectivity.’ Figure 1, from Board 12 of the exhibition (see Appendix I), illustrates the extensive nature of the changes proposed to the current network of PRoW crossing the site.

Landscape and Visual Impact Assessment from the perspective of outdoor enthusiasts

A group of local residents, centred around Aldington and Mersham, but with participants from a wider area, organises weekly group walks on the local path networks in SE Kent. I am a member of this group. The paths running through the site of the Proposed Development are therefore well known to us, and particular attention was given to these on walks held during summer 2023. This coincided with work that was underway on the then-emerging Neighbourhood Plan for Aldington &

Bonnington. This plan was ‘made’ in 2024, following a period of detailed investigation and public consultation.

For convenience, this independent response to the LVIA will refer to the viewpoints identified in the Neighbourhood Plan, and will also extend to include the PRoW that criss-cross the landscape between these viewpoints. Policy AB4 of the Aldington & Bonnington Neighbourhood Plan is the Protection of Locally Significant Views, and the plan identifies 13 locally significant views.

The commentary here will be based on four of these views (A to D in the table below), covering the northern arc of countryside stretching around Aldington, demonstrating the extensive spread of the landscape that would be affected by the Proposed Development. A further cluster of views (E) has been added to cover paths in lower land in the vicinity of Backhouse Wood and Aldington Reservoir, which are not included in the list of Neighbourhood Plan viewpoints.

Cluster of views	Description of viewpoint in Neighbourhood Plan	Affected PRoW if not already mentioned
A	1 From Station Road: panorama across the East Stour Valley up towards Aldington Ridgeline	Nearby PRoW across the north side of the valley include AE376, AE430, AE428
B	10 From Bank Road and PRoW AE370, AE377 and AE445, northwards	
C	6a, 6b From Roman Road and PRoW AE449, northwards	
D	2a, 2b From Goldwell Lane towards St Martin’s Church along PRoW AE474 and the reverse	Other nearby PRoW include AE454, AE475
E	N.A.	Impacts on other PRoW on lower land to the north, particularly AE657 past Aldington Reservoir
<i>Table 1: viewpoint and PROW clusters used for assessment of visual impact of Proposed Development on Receptors</i>		

Together these viewpoints highlight the scale of the impact that the Proposed Development would have on the landscape to the north and north-west of Aldington, which would be further compounded by the cumulative landscape and visual impacts if the EDF East Stour Solar Farm is allowed to proceed, on appeal.

Considering each of these clusters in turn:

A – represents the views towards Aldington that many residents and visitors to the village currently enjoy as they approach along Station Road from the A20, looking across the valley of the East Stour River with open fields and scattered woodland, stretching up to Aldington Ridge, and westwards towards Mersham. It includes the splendid panoramas that walkers on the footpaths running along the northern slopes of the valley also take in. The Proposed Development would eradicate this rural outlook and replace it with industrial infrastructure on both sides of Station Road as it runs down to Evegate Mill, extending up the southern slope of the valley to Aldington Ridge. It can be readily appreciated that this would remove many of the psychological benefits of a walk across the slopes of the valley, providing little more than a physical workout.

B – covers the views from the opposite direction, northwards and north-westwards across the East Stour Valley toward Mersham and the Kent Downs National Landscape in the distance. These can be enjoyed by those driving, cycling or walking along Bank Road, near Bank Farm, a short distance from Aldington Village, through gaps in the hedging. However, they are most appreciated by those using the footpaths that run down the slope from Bank Road (AE370) and Handen Farm (AE377), which merge down in the valley and continue directly to Mersham. This is an uplifting outlook for many walkers. The Proposed Development would transform the landscape entirely, and also destroy the direct off-road connection between the villages. Walkers would have to take a much longer zig-zag route along field edges, looking up at the undersides of 3.5m-high arrays of solar panels rather than across arable fields stretching into the distance. To suggest that walkers would be only moderately sensitive to the proposed changes is to entirely misunderstand the experience of walking in the countryside.

C – covers a similar outlook to B – in the case of 6b from the field to the north of Reynolds Playing Field, where PRoW AE449 emerges from Quarry Wood and gives splendid views north-west over the East Stour River valley to Mersham before descending to cross a fence into the next field. Walkers will be treated to a rather less glorious view if the Proposed Development proceeds.

D – relates to the views enjoyed by walkers going in both directions on the popular AE474 path linking Goldwell Lane in the modern village with the Church Lane Conservation Area at St Martin’s Church. Its elevated, open situation provides extensive views to the village and the church, as well as towards the East Stour River valley and the Kent Downs. A section of this path runs along the southern edge of the south-westernmost part of the Proposed Development, which would overshadow the path and transform the experience of using it. Users of AE454, which runs north-east from AE474, would find even more significant changes, with the path re-routed into a dip in the hillside, with solar arrays obliterating views on both sides. AE475, running between Church Lane and the lower part of Goldwell Lane, i.e. to the north of AE474, provides even better views over the East Stour River valley and the Kent Downs, as well as Bested Hill. This panorama would be affected significantly by the proximity to the near-distance solar arrays, as well as the more distant ones west of Calleywell Lane.

E – takes into account the potential changes to near-distance views for walkers on the low-lying paths around the northern edge of Backhouse Wood (AE457 and the northern end of AE657), which would come about if the Proposed Development proceeds. Walkers would be hemmed in between the enclosed wood on one side, and the dense arrays of solar panels on the other side, rather than having the open outlook to the north that they currently experience.

All these clusters can be covered in a single scenic 5-mile (8 km) circular walk using PRoW in the area, enjoyment of which would be radically diminished by the Proposed Development.

Cumulative Impact

Receptors of views in clusters D and E would be affected particularly by the cumulative effects on the landscape, if the East Stour Solar Farm proposed by EDF secures approval on appeal. It was rejected in May 2024 by Ashford Borough Council on the basis that it ‘would result in significant adverse individual and cumulative effect on landscape character’. Evolution Power’s Proposed Development would be significantly larger than the one proposed by EDF, and would surely have proportionately greater effects on the character of the landscape around Aldington.

Mitigation Measures

Evolution Power proposes a package of landscaping and planting measures to mitigate the visual impacts of the Proposed Development. These are largely dependent on effective screening of the views of the solar power infrastructure, which would gradually reduce visibility over 15 years and more. This is the basis for the Applicant's contention that the significant visual effects would diminish markedly over that time.

However, this assumes that visual screening of an industrialised landscape is an effective means of reducing the adverse effects, whereas it only does so by aiming to obscure the long-distance views entirely. In reality, the adverse visual impacts will continue, but evolve: instead of a landscape of enticing rural views, residents of Aldington, and visitors to it, will be provided with dark corridors between high hedges, with no views at all. Many hedges appear to have been allowed to grow taller already, in anticipation of the Proposed Development securing approval. This already limits the views from Bank Road northwards across the East Stour River valley.

For those using the PRoW, through the site, if the Proposed Development proceeds, the proposed extensive rerouting will continue to be at best annoying and at worst a deterrent, whilst the vast expanses of 3.5m-high solar panels will still be oppressive, obscuring the more distant rural views behind industrial equipment.

Displacement

Many Receptors (whether drivers, or cyclists, or walkers) may seek out more attractive rural landscapes in other parts of Kent, particularly those who are not local. This would have socio-economic impacts affecting local businesses and the community in Aldington and Mersham. For local people, the need to get in the car and drive elsewhere for an enjoyable experience is likely to diminish the attraction of regular outdoor activity, with adverse impacts on their health and sense of well-being.

Conclusion

The Applicant has sought to simplify the nature of walking in the countryside, the motivations of walkers, and the effectiveness of mitigation measures to screen views of the solar power infrastructure. Evolution Power has produced an LVIA based on these mistaken assumptions to underestimate the adverse effects of the Proposed Development, both in the short and longer term. It has sought to present the changes to the landscape, and to the network of re-routed PRoW as, on balance, positive ones. We would ask the Planning Inspectorate to question these assumptions and take full account of the perspectives of those who enjoy and value the rural environment of Aldington and Mersham, and the opportunities for healthy outdoor activity that it provides.

APPENDIX I

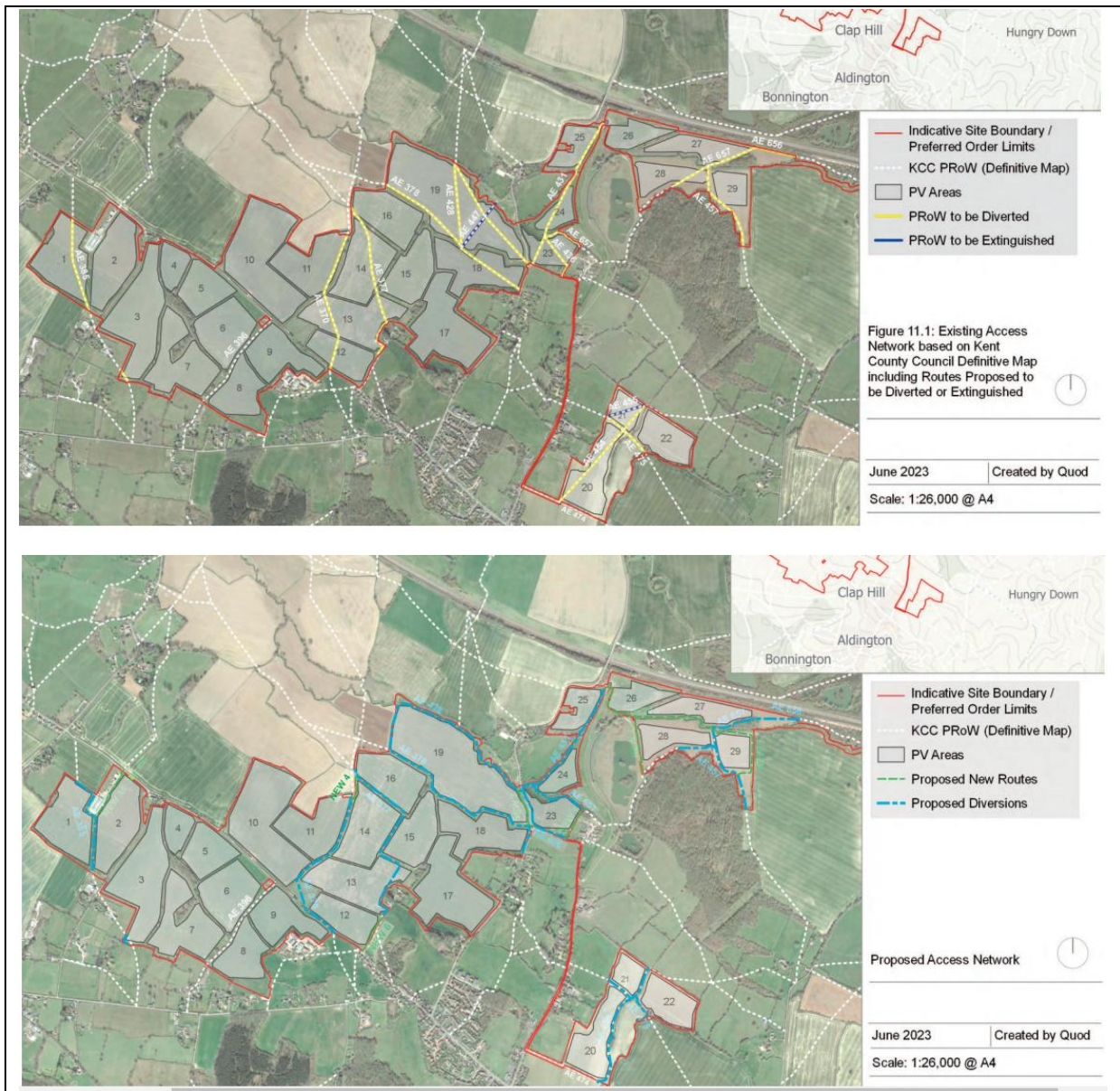


Figure 1: Existing and Proposed Access Networks extending across the Application site, showing the numbered PRoW from Kent County Council’s Definitive Map, and the changes proposed by the Applicant to accommodate the solar power infrastructure. Copied from exhibition board 12 used by the Applicant in the second Statutory Consultation during 12 June–17 July 2023

The full set of exhibition boards used in the second Statutory Consultation can be accessed at:
<https://www.stonestreetgreensolar.co.uk/files/image/consultation/2023%20Statutory%20Consultation/Exhibition%20Boards%20-%20June%202023.pdf>

APPENDIX II

SUMMARY

This evidence is a response to Evolution Power's (Stonestreet Green Solar) Landscape and Visual Impact Assessment (LVIA), on behalf of Aldington and Bonnington Parish Council. It highlights impacts from the perspective of walkers and other outdoor enthusiasts.

UK Government policy is to increase solar power generation; yet there is also increasing attention to the benefits of outdoor activities, including walking, in the promotion of public health, and the importance of rural footpaths to this.

The LVIA presents a generally positive impression of the changes to the landscape as the proposed planting and landscaping become established over 15 years. It also anticipates that this will significantly reduce the initial impact on visual receptors using the public rights of way (PRoW) and the road network.

This paper assesses the visual impact of the proposed development on five clusters of viewpoints and PRoW, and concludes that the applicant has:

- a. underestimated the expectations of people wanting to experience the countryside – in particular, users of the dense network of PRoW throughout the site – and
- b. overestimated significantly the mitigation benefits of the proposed landscaping and planting, which will in fact obscure the attractive long-distance views that characterise the area.

The applicant has sought to present the changes to the landscape, and to the network of re-routed PRoW, as generally positive ones. We ask the Planning Inspectorate to question these assumptions and take full account of the perspectives of those who enjoy and value the local rural environment, and the opportunities for healthy outdoor activity that it provides.