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**BY EMAIL ONLY**

10 December 2024

Dear Sir,

**Re: Application for an Order Granting Development Consent for Stonestreet Green Solar – Relevant Representation Summary**

Following the Planning Inspectorate's Rule 8 letter dated 28 November 2024, the County Council wishes to submit its Relevant Representation summary as its submission was over 1,500 words.

This summary should be read in conjunction with the Written Representation and Local Impact Report also submitted at this Deadline as some of the matters raised, are currently being addressed.

**Highways and Transportation**

Traffic generation and routing

It is acknowledged that the additional traffic is temporary for the estimated 12-month period of construction. The Local Highway Authority notes that normal operational traffic levels for the completed site would be so low as to have near zero impact on the highway network. In practice, it is likely these would be lower than the associated farm use of the site area.

The vehicle routing for all development related traffic arrives via the Smeeth crossroads junction on the A20. In the intervening time since the previous formal response from the Local Highway Authority (July 2023), the Smeeth crossroad junction (A20 / Station Road / Church Road) has been flagged on Kent County Council's yearly crash investigation cycle. The primary area of concern is the northern arm of the junction, Church Lane, with its limited visibility. Taking account which arms of the junction would be used by vehicles associated

with the proposal, the daily vehicle movements, HGV movements being outside the peak traffic hours and the fact that the traffic impact is only for a temporary 12-month period, it is not considered that the resulting uplift in traffic would significantly worsen the crash record in this location.

Traffic generation data as shown in Table 4.1 in the Outline Construction Traffic Management Plan (OCTMP) (APP-154), is averaged out over the whole workday which may be reasonable for delivery vehicles. However, for workers, their arrivals are expected to be far more concentrated than shown. The modal split for worker arrivals states that 75% of workers would arrive/depart site by minibus - this is ambitious and would require multiple minibus trips. In terms of workers arriving by car, given the location and public transport access, a degree of car sharing is highly likely.

Supporting information relating to proposed start time and working hours on site indicates that many workers would be arriving on site to begin their day shifts at 8am – therefore the worker related traffic would all navigate the Smeeth crossroad junction prior to the standard AM traffic peak hour of 8-9am.

The OCTMP confirms that the AM and PM weekday traffic peak times for HGV deliveries will be avoided so that the large delivery vehicles do not coincide with other road users in the busiest traffic period. Drop-off/collection times for Caldecott School are also to be avoided. This level of HGV traffic accessing Station Road only from the A20 is acceptable to the County Council. It is also detailed that construction traffic in relation to the Goldwell Lane Access will, where possible, be coordinated to arrive/depart outside the drop-off and pick-up times for Aldington Primary School and this is welcomed.

Supporting traffic generation figures have now been uplifted by 40% of the initial predicted figures. This provides some flexibility in terms of worker arrival numbers and some of these quoted daily movements may in practice be lower.

### Access Strategy

The primary site access is on Station Road where adequate visibility is available, including vegetation cut back on the northwest verge to allow for warning signage and provide maximum forward visibility of large vehicles manoeuvring from Station Road into the site access. This entrance will take all HGV deliveries, other deliveries, and direct staff arrivals and this is welcomed.

HGVs and deliveries will then be unloaded within the site compound and transferred to the other parts of the proposal site via tractor and trailer. Highway crossing points are to be controlled by temporary traffic management. This prevents the need to remove large sections of hedgerow for traditional visibility splays and is therefore supported.

No off-site parking will be permitted for workers. This is welcomed by the County Council. However, as the public highway in the surrounding area is not subject to formal parking restrictions, it may not be within the developer's ability to prevent this. Verge parking would cause damage and may also limit access and visibility. Full details regarding the layout of the primary site compound will need to be provided with details demonstrating adequate

parking space, in addition to access, turning and manoeuvring for delivery vehicles within the CTMP and approved accordingly by the Local Highway Authority.

For the five month construction period to deliver the south-east cluster (fields 20, 21 and 22), the OCTMP confirms that escort vehicles will be used to manage traffic and enable passage of the right-angled bend on Goldwell Lane. The stated number of construction workers using this road is not considered by the Local Highway Authority to be unreasonable in a rural area.

There are sections of Goldwell Lane that suffer from encroachment by boundary hedges over the highway verge/edge of carriageway - particularly in the vicinity of Goldwell Farm. Similarly, there are sections of the Station Road access route that would benefit from localised cutback. The County Council recommends that these sections should be trimmed back to a reasonable level prior to the start of works such that this vegetation does not prevent users being able to use the full width of the road to pass other large vehicles. This should be included and secured as part of the pre-commencement highway inspections. The applicant requested that the full width of the highway (including verge) is to be included within the works area that is to be approved in several locations. This is to ensure the County Council's previous requests for vegetation cut back can be delivered to maintain forward visibility of turning manoeuvres, mainly at the Station Road site compound entrance, but also to allow site related direction and warning signage.

Vehicle track drawings have been provided for the detailed access locations. The County Council considers that all of these are workable.

The applicant has confirmed within the application the agreement to carry out highway condition surveys before, during and after the construction period. This is to ensure any damage from vehicle overrun is recorded and repaired at the applicant's expense but will also enable localised hard surfacing improvements in the event of regular overrun from large vehicles.

As part of the access strategy, to reach all of the plots to the south of Bank Road, the proposed routing as shown uses the existing access road to Bank Farm. Although the crossing of Bank Road itself can be undertaken via traffic management, the Bank Farm access road is already restricted in width and only wide enough for one-way working for vehicles. Visibility is not adequate from the southern end of the access road to the Bank Road junction to prevent conflicting movements. Any resulting reversing manoeuvres of large vehicles for both direct solar site traffic or other access users would not be welcomed. Localised widening to the access road to allow for overtaking space, taking account of forward visibility, should be implemented.

### **Public Rights of Way (PRoW)**

The County Council considers that the impact on the PRoW Network should be seen from two overarching perspectives: that of continued access and connectivity across both the development site and the wider area, and that of the impact on user amenity and enjoyment of the existing open countryside i.e. the landscape and visual impact criteria.

The proposal will transform the character of the area and will clearly have a significant impact on the PRow network, causing disruption to path users during the construction period, significantly affecting the experience of path users during the operational phase and again causing disruption during decommissioning. The County Council has also engaged with the Landscape consultancy commissioned by Ashford Borough Council to provide a suitably qualified response to the applicant's assessments.

Overall, the County Council considers that this this development would impose substantial adverse impact on the PRow Network, a network that not only provides a safe, sustainable means of travel, but also delivers the benefits that access to the network, countryside, and green spaces can make to improve the quality of life for Kent's residents and visitors. The County Council would generally seek to encourage solar proposals to view local open space as an asset, rather than a constraint, given the proven positive associations between its quantity and value in the living environment, and community health and wellbeing. The County Council would, however, recognise that the PRow Management Plan will go some way to maintaining the accessibility and connectivity of the network, however, the severe impact on the open countryside, landscape and rural character of the area is inescapable and cannot be fully mitigated.

### **Sustainable Urban Drainage Systems (SuDS)**

The County Council, as Lead Local Flood Authority responsible for matters relating to the surface water environment, is generally accepting of the principles proposed for managing surface water run-off, namely via a system of attenuation with a restricted outflow to the surrounding water bodies.

However, the Lead Local Flood Authority notes that there are some fundamental concerns raised with regards to the methodology proposed for calculating the existing Greenfield Runoff Rate and the associated allowable post development discharge rate proposed.

In addition to this, the County Council, as Lead Local Flood Authority, also raises concerns with regards to the proposed discharge rates as proposed in the Outline Operational Surface Water Drainage Strategy (OOSWDS) (APP-159) and their compliance with the Ashford Borough Council Local Plan Policy ENV 9 - Sustainable Drainage.

Whilst understanding the practicalities associated with low discharge rates, the County Council would suggest modifications to the design, such as the provision of additional attenuation with controls as part of the network, and not individually locating these at each inverter station position.

As the Lead Local Flood Authority, the County Council now seeks the 'upper end' allowance designed for both the 30 (3.3%) and 100 (1%) year storm scenarios. The latest information on the allowances and map can be found at the following link: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

Analysis must determine if the impacts of the greater allowance are significant and exacerbate any flood risk. The design may need to be minimally modified but may also need additional mitigation allowances, for example attenuation features or provision of

exceedance routes. This will tie into existing designing for exceedance principles. The design submission received only applies climate change uplift to the 100 (1%) year storm scenario.

### **Minerals and Waste**

The County Council, as Minerals and Waste Planning Authority, has reviewed Appendix 16.3: Minerals Safeguarding Assessment (APP-124). The County Council agrees with its basic approach in that the temporary nature of the proposal does not have a significant impact on the need to maintain a steady and adequate supply of River Terrace deposits (that may be unviable in any event). In respect of the Hythe Formation (Kentish Ragstone), though there is a greater arguable need (which the Minerals Safeguarding Assessment acknowledges), there is likely to be a limited ability to extract any meaningful quantity of hard rock and to do it acceptably with regard to meeting the requirements of Policy DM 9 of the adopted Kent Minerals and Waste Local Plan (KMWLP). Extraction of hard rock in this locality would, in all probability, give rise to unacceptable impacts on the environment and communities.

### **Heritage Conservation**

The County Council has welcomed engagement on this project and has reviewed the documents and archaeological reports submitted at this stage. Although, it is noted that this liaison has not been consistent. The County Council requires reasonable ground truthing to be carried out, via trenching, and some geoarchaeological work but it has not had any clarification on this from the applicant or its consultant, Wardell-Armstrong.

The County Council considers that the Archaeological Management Strategy and archaeological mitigation is completely unacceptable as they are not suitably informed by a robust evidence base. Such scarcity of ground truthing evaluation trenches means that the archaeological mitigation proposals are not evidence-based. Therefore, the County Council would draw to the attention of the applicant and the Examining Authority, the proposal is at risk of encountering significant archaeological remains post consent when details are agreed and there are few options to avoid or mitigate in a proportionate manner.

### **Biodiversity**

The County Council considers that the majority of impacts on ecology have been avoided as the proposal is largely located on arable fields. Furthermore, the creation of grassland within the site will benefit species within the site and ensure connectivity is being maintained and enhanced. Habitat creation and active management of the retained, enhanced and established habitats will benefit biodiversity within the site.

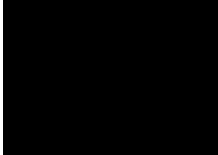
The County Council considers that the main issue is Skylarks. There is a need for additional information to be provided addressing how this loss of breeding habitat will impact the skylark population.

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The County Council looks forward to working with the applicant and the Planning Inspectorate as the project progresses through the DCO process and would welcome the opportunity to comment on matters of detail throughout the Examination.

Should you require any additional information or clarification, please do not hesitate to contact me.

Yours sincerely,



Corporate Director – Growth, Environment and Transport