



# **LOCAL IMPACT REPORT**

## **Stonestreet Green Solar**

**Produced by Kent County Council (KCC)**

**December 2024**

### **1. Introduction**

- 1.1. This report has been prepared by Kent County Council (KCC) as a statutory consultee, in accordance with advice and requirements set out in the Planning Act 2008 and Government Guidance - Nationally Significant Infrastructure Projects: Advice for Local Authorities as published 8 August 2024.
- 1.2. The Guidance states that the purpose of a Local Impact Report (LIR) is “to make the Examining Authority aware of the potential impacts of the project based on local knowledge. It is a technical evidence-based assessment of all the impacts”.
- 1.3. The Guidance states “host and neighbouring local authorities are invited to submit a LIR” which includes positive, neutral and negative local impacts.
- 1.4. The Report may “cover any topic the local authority consider is relevant to the impact of the project on their area and the local communities affected”.
- 1.5. This LIR covers areas where the County Council has a statutory function or expertise. The County Council defers to Ashford Borough Council on other matters, as set out within this LIR.

### **2. Location**

- 2.1. The site lies within the administrative district of Ashford Borough Council and of Kent County Council.
- 2.2. The development site is located on land to the north and west of the village of Aldington, south east of Ashford Town Centre.
- 2.3. The total development area of the site is approximately 192ha, and is predominantly in agricultural use for arable crops and grazing.

### **3. Description of Proposed Development**

- 3.1. The County Council notes that the application is for a Development Consent Order (DCO) for a solar photovoltaic array plus energy storage with associated infrastructure and grid connection, with a generating capacity greater than 50MW.
- 3.2. The County Council recognises that the applicant is using the Rochdale Envelope approach to provide flexibility in the development to allow for the most up to date technology possible to be utilised by the proposal at the time of construction.

### **4. Likely Significant Effects of the Proposed Development**

- 4.1. KCC has been consulted on the scope of the Environmental Statement (ES) and has considered the following local impacts:
  - Highways (as Local Highway Authority);
  - Public Rights of Way (as Local Highway Authority);
  - Sustainable Urban Drainage Systems (as Lead Local Flood Authority);
  - Minerals and Waste (as Minerals and Waste Planning Authority);
  - Heritage conservation;
  - Biodiversity (as Responsible Authority for the Local Nature Recovery Strategy); and
  - Other Matters.

#### **Highways and Transportation (as Local Highway Authority)**

- 4.2. The Applicant has worked collaboratively with KCC, as Local Highway Authority, from the pre-application stage onwards regarding the assessment of the impact on the highway network and mitigation of any highway related concerns. The highway impact of the proposed solar farm will vary greatly between the construction/decommission period and the operation of the completed solar farm. As such these are detailed separately as follows.

#### **Operational Solar Farm:**

- 4.3. As a completed and operational solar farm, the proposal will have minimal traffic impacts with only a low number of vehicle movements serving the site for periodic maintenance needs. The farmland on which the solar farm is intended would have associated agricultural vehicle movements and with this in mind the completed project would be considered to have a neutral traffic impact on the highway network.

## Construction and Decommissioning Traffic Impact:

### *Strategic Impacts*

- 4.4. National Highways (NH) have made representation regarding the impact of the development construction traffic on the M20 and M20 J10a. Table 13.4 of Environmental Statement (ES) Volume 2 Chapter 13 (APP-056) details that NH have raised no objection.

### *Principal and Local Road network*

- 4.5. The vehicle routing for the proposal is via the M20, exiting at M20 Junction 10a onto the A20 Hythe Road, approaching the Smeeth Crossroads from the west. At this point construction traffic will turn into Station Road and head south towards the proposal site.
- 4.6. Table 13.4F within the ES Volume 4, Appendix 13.4 (APP-110) shows that the proposed development would increase total traffic levels on the A20 between the site and M20 J10a by 1.2% over the 12-hour workday. This would include a 9.2% increase in Heavy Goods Vehicles (HGVs) over existing numbers.
- 4.7. While the County Council does not dispute the methodology or conclusion relating to Institute of Environmental Management and Assessment (IEMA) magnitude of impact on the highway network, the traffic impact has been presented as evenly distributed across the workday. In practice there will be peaks in movements for worker arrivals and departures.
- 4.8. The applicant has committed for deliveries to be timed such to avoid peak traffic hours, including PM collection period for Caldecott School. The applicant has also confirmed that daily operation would have the majority of workers arrive on site prior to 8am and as such would be clear of the highway network before the AM peak traffic hour.
- 4.9. In the intervening period since the application commenced, the Smeeth crossroad junction (A20 / Station Road / Church Road) has been identified within the County Council's yearly crash investigation cycle, with the crash record for the most recent three years now meeting the criteria for investigation. The primary area of concern however is the northern arm of the junction, Church Road, with its limited visibility. Taking account of which arms of the junction would be used by vehicles associated with the proposal, the daily vehicle movements, HGV movements being timed as avoiding the peak traffic hours and the fact that the construction traffic impact only being for a temporary 12-month period, it is not considered that the resulting uplift in traffic would significantly worsen the crash risk in this location.
- 4.10. The ES Volume 2 Chapter 13 (APP-037) discusses the specific traffic generation of the proposal. Table 13.11 shows that the site would generate an average of 124 two-way construction related trips across a 12-hour workday (62 in and 62 out). This number is inclusive of the predicted 37 two-way HGV movements across the workday

(approximately 19 in and 19 out). These figures also include an uplift buffer of 40% for a robust assessment.

- 4.11. A further uplift to the predicted traffic generation figures has also been shown in Table 13.12 that caters for an absolute peak workforce on site. This shows an average of 163 two-way construction related trips across a 12-hour workday (approximately 82 in and 82 out). The predicted HGV movements are unchanged at 37 two-way movements across the workday (approximately 19 in and 19 out). Again, a 40% uplift buffer has been applied for a robust assessment.
- 4.12. Following highway safety concerns expressed initially by the County Council regarding HGV routing on Station Road at Evegate Mill, the applicant revised their initial proposed access strategy to include a main site compound to be accessed off Station Road, 100m south of the railway bridge. This compound will receive all deliveries and worker arrivals and departures. As such the highway between this compound and the A20 junction will be subject to the highest traffic impact resulting from the proposal. HGVs already use this part of the highway network.
- 4.13. Appendix 13.4 (Table 13.4F) of the ES Volume 4 (APP-056) details that across the 12-hour workday the length of Station Road south of the railway would see an increase in overall traffic levels of 5%. The proportion of HGV traffic increases by 346%, this is however due to the previous measured number only being an average of 10 HGVs across a 12 hour day.
- 4.14. Road crossings for construction traffic at Station Road, Bank Road and Laws Lane to access the proposed site will be manned and use traffic management to stop traffic on the highway and allow safe passage for construction vehicles, to maintain highway safety.
- 4.15. Construction related vehicles that do need to use the highway network (Station Road and Goldwell Lane) will be a tractor with trailer arrangement. Escort vehicles will be employed to assist when using Goldwell Lane where the tractor and trailer would require the full road width to navigate the right-angled bend.
- 4.16. The County Council is satisfied that the impact of the construction and decommissioning traffic can be suitably managed through the imposition of the Construction Traffic Management Plan (CTMP) and Decommissioning Traffic Management Plan respectively, in line with the mitigation measures already identified in the ES Outline Construction Traffic Management Plan (Document 7.9, 9 July 2024) (APP-153). This document adequately demonstrates how the mitigation measures required will be controlled, including traffic timing and routing, vehicle cleaning, highway condition surveys and subsequent repairs, speed restrictions, traffic management and monitoring/compliance. The CTMP will also include a worker travel plan where the principal contractor will outline measures to manage worker transport and related trips.

- 4.17. A draft Statement of Common Ground has been produced which includes commitment from the applicant to resolve the only remaining highway concerns resulting from previous Relevant Representations; these were the Bank Farm Access and clarification regarding minibus provision for worker transport.
- 4.18. Based on the above, the increase in vehicle movements on the highway network, including HGV and tractor/trailer arrangement, is viewed to have a negative impact on the local highway network. However, the impact is temporary in nature, purely for the construction/decommissioning periods and the impact would not be considered severe in nature. As such, when viewed against the criteria set in the National Planning Policy Framework, this would not be of a scale that would warrant objection from KCC as the Local Highway Authority.

### **Public Rights of Way (PRoW) (as Local Highway Authority)**

- 4.19. There are eighteen (18) Public Footpaths and one (1) Byway Open to all Traffic within the site boundary. Public Footpaths: AE385, AE442, AE370, AE377, AE378, AE448, AE447, AE431, AE438, AE657, AE457, AE656, AE454, AE475, AE455, AE474, AE436 (Ashford) & HE436 (Folkestone & Hythe). Byway Open to all Traffic: AE396 (Ashford).
- 4.20. These routes connect to the wider PRoW Network of the area and together provide significant opportunities for outdoor recreation and active travel across both the Borough of Ashford and east into the District of Folkestone and Hythe. The site is visible from a much wider area of the Network with PRoW routes designated as receptors within the Landscape and Visual Assessments.
- 4.21. The importance of the PRoW network, the countryside, riverside, coast and publicly accessible green space is recognised in many national and local strategies and is afforded strong protection in law through individual statutes, regulations and judgements have a direct relevance to its protection, use and development.
- 4.22. PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic. The value of the PRoW network is in providing the means for residents and visitors to access and appreciate landscapes for personal health and wellbeing, enhancing community connectivity and cohesion, reducing local traffic congestion for economic benefit and improvement in air quality, and much more. The existence of the Rights of Way are a material consideration.
- 4.23. The substantial size of this development will have an adverse impact on the PRoW network, through loss of amenity and user experience related to the impact on the landscape and rural character of the wide area affected, and also on area connectivity and directness of routes due to the proposed diversions. The severity of the impact is heightened by the development being in place for a significant period of time.

- 4.24. There will be substantial impact on the PRow network during all stages of development including the pre-construction/early design stage of the project, and the construction and operational phases of the project, as well as decommissioning stage.
- 4.25. There is likely to be visual and air quality impact on users participating in recreational activity on the PRow network in both the affected area and the wider network during the construction, operational and decommissioning stages of the project.
- 4.26. The development will have a significant impact on the network within the site, from both an alignment and direct connectivity perspective, due to diversions of existing routes as well as user amenity
- 4.27. There will be an impact from the loss of recreational walks within open countryside; and the multiple benefits thereof to local and wider communities
- 4.28. The construction and decommissioning stages will see a negative impact of increased vehicular traffic along rural lanes during construction, which currently provide valuable connections for equestrians and cyclists travelling between off-road PRow routes. The proposed development could deter public use of the PRow network if vehicular traffic increases along these roads.
- 4.29. It must be recognised that the amount of use on the PRow network is not a factor, as a PRow has public rights regardless of use.
- 4.30. In consideration of potential Cumulative Effects - regarding the East Stour Solar Farm (22/00668/AS), Otterpool development, existing development east of Ashford (including Sevington IBF and current consultation to extend), all combine to a wide loss of open countryside and rural network between the wide area between Ashford and Folkestone. This will impact on the PRow network in the local area.

### *Summary*

- 4.31. The County Council Considers that the proposal would impose a substantial adverse impact on the Public Rights of Way 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 severe impact on the open countryside, landscape and rural character of the area cannot be underestimated, is inescapable and cannot be mitigated for.

### *Policy base*

- 4.32. The policy basis for these comments in respect of PRow is provided below.
- NPPF December 2023:
    - Paragraph 104 - Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better

facilities for users, for example by adding links to existing rights of way networks including National Trails.

- Paragraph 124 - Planning policies and decisions should:  
a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside.
- National Policy Statement for Renewable Energy Infrastructure (EN-3):
  - 2.10.42 Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.
  - 2.10.43 Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.
  - 2.10.44 Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths).
  - 2.10.45 Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.
- Kent County Council Rights of Way Improvement Plan 2018-2028
  - The Kent County Council Rights of Way Improvement Plan 2018-2028 is a strategic policy document setting out its goals and priorities for Public Rights of Way and Access.
- Ashford Borough Council Policies: TRA5 / TRA6 / ENV10 / ENV12

### **Sustainable Urban Drainage Systems (as Lead Local Flood Authority)**

- 4.33. The County Council as Lead Local Flood Authority notes that the application proposes to manage surface water via the use of a system of attenuation with a restricted outflow to the surrounding water bodies.
- 4.34. For surface water management purposes, the application site has been considered in four distinct subsets: Project substation, Inverter Station, the PV panels themselves,

and the Sellindge Substation. It is proposed for the Project Substation and Inverter Substations to be connected into the created water network within the limits, the PV panels will simply shed water to ground and the Sellindge Substation expansion connecting into the existing network.

- 4.35. It is likely that both the permanent and associated temporary works required for the installation of the infrastructure will have implications for various watercourses along the route.
- 4.36. There are also several, some considerable, existing surface water flow paths throughout the order limits which again the permanent and temporary works will have implications on.
- 4.37. Whilst the volume of water being shed from the site is not expected to alter greatly (given the existing impermeable geology), there is a risk that this could be conveyed in concentrated pathway where before a sheet flow was experienced. This poses the risk of causing scarification to the existing land essentially reducing the flora available and also could lead to the mobilisation of silts from site where none occurred (in comparison) before, resulting in possibility of downstream blockages and increased flood risk.
- 4.38. For any surface water leaving site it should be demonstrated that the mechanisms proposed 'manage' the surface water so as to be in compliance with the requirements of DEFRA's Sustainable Drainage Systems Non Statutory Technical Standards, the relevant chapters of the NPPF and County Council Drainage and Planning Policy (2019).
- 4.39. Any works that will (or has the potential to) affect a designated 'main river' will require the prior formal written Consent of the Environment Agency (EA). This requirement also covers any works that fall within any main river's byelaw margins. In this area, the byelaw margins extend to 8m from the banks of any non-tidal main river, and 15m where a watercourse is tidally influenced.
- 4.40. Any works to any non-main river watercourse that lies within River Stour (Kent) Internal Drainage Board's administrative boundaries will require their formal written Consent. 'Ordinary watercourses' are the watercourses which are not maintained by the EA or by an Internal Drainage Board. In the absence of any express agreement to the contrary, maintenance will be the responsibility of the riparian owners. Irrespective of any planning permission granted, any diversion, culvert, weir, dam, or obstruction to the flow of any such watercourse will also require the explicit consent of the Lead Local Flood Authority (KCC) under the Land Drainage Act 1991, as amended by regulations of the Flood and Water Management Act 2010. This requirement also covers potential temporary works.
- 4.41. The Lead Local Flood Authority would refer to its Written Representation submitted alongside this Local Impact Report for a summary of its views on the application.



## **Minerals and Waste (as Minerals and Waste Planning Authority)**

- 4.42. The adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP) safeguards economic land-won minerals in Kent and any minerals and waste infrastructure. This is in line with the National Planning Policy Framework (NPPF) and National Planning Policy for Waste (NPPW) requirements to ensure that the county has sufficient mineral supply and waste management provisions.
- 4.43. The County Council would refer to its commentary raised within its Relevant Representation (AS-018) and has no further comments to raise.

### *Waste Management Facility or Minerals Infrastructure Processing/Handing Safeguarding*

- 4.44. The proposed development does not have an impact on any safeguarded waste management facility or minerals processing or Infrastructure.

## **Heritage conservation**

### *Consultation*

- 4.45. The County Council has been engaged in discussions with the applicant on this project, and provided detailed commentary on the relevant submitted application material within its Relevant Representation submission. The County Council would highlight that this engagement has not been consistent, nor has it enabled a resolution of concerns to be reached as raised by the County Council throughout its consultation responses.

### *Proposed mitigation*

- 4.46. Within the 5.1 Environmental Statement Volume 1: Non-Technical Summary (APP-023), there is no mention of heritage issues or protection for significant archaeology or attempts to minimise impact on heritage or even enhancement measures such as interpretation boards informing results of archaeological investigations. The scheme does not put forward any proposals for positive benefits for heritage, even to mitigate harm from construction and installation works - positive enhancement could help to balance the harm that the development would cause to heritage.

### *Cultural Heritage*

- 4.47. The County Council considers that the setting out of the impacts on heritage assets within the application is not informed by robust or comprehensive data.
- 4.48. The County Council that the Environmental Statement Volume 1: Non-Technical Summary does not consider the impacts on all heritage assets within the impact zone during the construction phase (APP-023).

- 4.49. The Environmental Statement Volume 2 Chapter 7: Cultural Heritage (APP-031) contains no consideration as to the impacts on as yet unknown non-designated heritage assets. The County Council is therefore unable to comment further on any potential impacts arising from the scheme on as yet unknown non-designated heritage assets.
- 4.50. Furthermore, there is a need for consideration and assessment of the impacts of Glint and Glare on nearby heritage assets.

### *Archaeology*

- 4.51. There is also potential for harm to buried archaeological remains from enabling works, construction works, or environmental protection or enhancement works. The County Council would request details of archaeological protection measures be provided.
- 4.52. The County Council considers that there has been inadequate assessment in the field to test geophysical anomalies and desk based assessment. Therefore, the understanding of the actual presence/absence of as yet unknown significant archaeological remains is extremely limited and, at this stage, the County Council considers insufficient fieldwork has been undertaken.
- 4.53. The County Council therefore considers that the Cultural Heritage assessment has not yet considered the direct physical effects of the Project on below ground heritage assets. There needs to be a better and far more detailed understanding of the negative impact of this scheme on buried non-designated heritage assets, especially potentially buried significant heritage assets.
- 4.54. The applicant has not undertaken reasonable fieldwork including trial trenching. The number of intrusive trial trenches is only 12, not even 1% of the development site, the potential impact on as yet unknown non-designated, potentially significant, heritage assets is currently still unclear. The lack of ground-truthing trenching across the site means that the mitigation for buried heritage assets is not evidence-based and therefore not sound or reasonable.
- 4.55. Therefore, the County Council does not have a reasonable understanding of the extent, range, or significance of the buried archaeological resource across the site. This means that the impact of the development is not clear. Therefore, the County Council concludes the applicant's proposed archaeological mitigation is insufficiently informed.
- 4.56. The application has noted that there will be further trial trenching evaluation prior to construction but this will not enable the need to consider preservation in situ for significant archaeology, especially as most of the proposed Works are already established in location, scale, and methodology. In accordance with NPPF (2023) heritage assets need to be preserved in a manner proportionate to their significance. This proposal is on "undeveloped" land and has the potential for yet unknown significant buried archaeological remains. The County Council consider it is appropriate in view of the scale and extent of the proposed scheme that reasonable

testing for significant buried archaeology is an essential requirement of pre-determination assessment.

- 4.57. The County Council considers that the Archaeological Management Strategy (AMS) (APP-0162) is not appropriately based on reasonable information and in accordance with NPPF (2023) paragraph 200. The County Council therefore raises considerable concerns that this strategy can only be considered draft at this stage until further evidence, as set out, is gathered and the impact of archaeology is clear.

#### *Historic Landscape Character*

- 4.58. The Environmental Statement Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 4 (APP-070) does not reflect a fully comprehensive understanding of the potential time depth of the landscape. The Summary of Impacts (section 4.2) seems to focus entirely on direct physical impact. There seems to be no regard for impact on wider setting/understanding of nearby archaeological landscape features or from other impacts, e.g. Glint and Glare.
- 4.59. With regard to Direct Impacts (section 4.3), the County Council raises a question as to how many of the hedgerows to be removed are of archaeological significance in accordance with the Hedgerow Regulations. Furthermore, would also question; how many of the public footpaths to be re-directed may be along the alignment of a post medieval or earlier routeways. The County Council would also question how many field boundaries of archaeological interest will be impacted by this scheme – this information would aid an understanding of the impact that this scheme may have.

#### *East Stour*

- 4.60. The East Stour is a major river for this part of Kent. The immediate river valley zone has potential to contain important and rare Palaeolithic remains such as stone artefacts and palaeoenvironmental remains, such as seeds, wood, shell. The river valley was a focus for Prehistoric human activity ranging from travel corridor, utilisation of water environment, to utilisation of water for industry. The East Stour would also be a focus for Roman and Early Medieval and later activity and settlement. The range and significance of archaeological remains within the channel of the East Stour could be considerable. As such works close to the river need to be particularly mindful of archaeological remains.
- 4.61. The extent of archaeological investigations will be dependent upon the extent of impact but the archaeological mitigation for this watercourse crossing proposal need to be informed and robust.
- 4.62. The County Council recommend that informed archaeological mitigation is undertaken as soon as possible, and the results of preliminary investigations being used to guide further mitigation during the challenging crossing works themselves.

## Summary

- 4.63. The County Council wishes to advise the Examining Authority that it continues to engage with the applicant. The County Council notes proposals for discussions with the applicant regarding evaluation work being undertaken post consent, but it must be noted that the County Council remains concerned that the AMS is not evidence based at this stage and a reasonable amount of ground truthing is still required. The County Council will update the Examining Authority accordingly regarding any progress made through this engagement.

## **Biodiversity (as Responsible Authority for the Local Nature Recovery Strategy)**

### *Protected Species Mitigation*

- 4.64. The County Council considers that with the exception of breeding birds, the majority of species can be retained on site on the understanding that the habitats can be retained/enhanced/created as proposed. The County Council highlights that there is a need to ensure that any fencing will ensure connectivity through the site for any terrestrial species.

### *Biodiversity Net Gain*

- 4.65. In respect of the submitted Biodiversity Net Gain Assessment (BNG) (APP-146), this document does suggest that BNG is achievable as the proposal will result in a gain substantially over 10% for rivers, hedgerows and habitats. However, it should be noted that BNG can only be achieved if the proposed habitats are managed as intended and achieve the intended condition.

### *Grassland*

- 4.66. The application sets out that a moderate condition for other neutral grassland can be achieved. The submitted Outline Landscape and Ecological Management Plan (APP-155) details that for existing grassland, grazing will be carried out; and paragraph 4.5.11 states the following: "Existing grassland within the perimeter fence will be subject to grazing during Spring and Summer months to prevent shading of the panels and security features. In the interests of biodiversity, the existing grassland will be managed to increase floral diversity and to provide an extensive habitat network for a range of species". Conservation/low intensity grazing is to be encouraged. The County Council understands that issues have been raised with other applications about the ability to carry out conservation grazing and therefore any management proposed must be achievable.

### *Outline Landscape and Ecological Management Plan*

- 4.67. The Outline Landscape and Ecological Management Plan (APP-155) provides details of Proposed Winter Bird Crop Strips management in paragraph 4.6.9. The winter bird

crop strips will be managed (i.e. stripped and replanted) on a biennial rotation with the strip being removed at the end of its second winter. Insects and weed seeds are important components of the diet of farmland birds, so the use of insecticides and herbicides should be avoided if possible. These areas are within the solar farm area and therefore there is a need for any site layout to demonstrate that there is sufficient space to create and manage these for the lifetime of the development.

### *Bats*

- 4.68. The County Council understand that the layout has yet to be finalised - Illustrative Landscape Drawings - Not for Approval (APP-013). The County Council would highlight that any layout needs to be designed to ensure the final design will achieve a minimum of the anticipated BNG. In addition, the retained boundaries must ensure that the proposed, enhanced, retained landscaping is fit for purpose regarding any species mitigation. For example, with bats – the County Council would highlight that is limited scientific data regarding the effect of solar farms on bats. However, a recent research article on this subject was published in June 2023<sup>1</sup>. This article indicates that *“ground-mounted solar photovoltaic developments have a significant negative effect on bat activity, and should be considered in appropriate planning legislation and policy. Solar photovoltaic developments should ...[have]...appropriate mitigation (e.g. maintaining boundaries, planting vegetation to network with surrounding foraging habitat) and monitoring should be implemented to highlight potential negative effects.”* As detailed above it has been demonstrated that this is the intention but there is a need to ensure it is demonstrated in the final plans.

### *Ground nesting birds*

- 4.69. Ground nesting birds are a concern to the County Council. The main issue is Skylarks. The submitted information has detailed the site has 39-46 territories and to mitigate the impact they have highlighted the open space in fields 26,27 and 28 and the increase in foraging opportunities within the site. The submitted Illustrative Landscape Drawings - Not for Approval (APP-013) does confirm that the intention is for these habitats not to be included within solar panel area. Research indicates that fields with two skylark plots per ha can accommodate more nesting skylarks compared with conventional winter-sown wheat management (0.3 territories per ha compared to 0.2 territories per ha: - Conservation Evidence; PR 416 SAFFIE Project Report 1 (nerc.ac.uk)). If skylark plots are combined with arable field margins, 0.4 territories per ha could be supported. The County Council does not disagree that additional foraging opportunities will be created within the wider site and this will increase foraging opportunities for the wider area. In addition, the County Council acknowledges that open space will be managed to provide optimum nesting habitat for skylarks but the reduction of land where skylarks can breed cannot be ignored.
- 4.70. The submitted information has detailed that ongoing monitoring will be carried out but if the submitted information demonstrates there has been a reduction in skylark

---

<sup>1</sup> [Do solar farms affect foraging & commuting bats? - BSG Ecology](#)

numbers within the wider area it's not clear how this will then subsequently addressed.

- 4.71. The County Council would highlight that there is a need for additional to be submitted addressing how this loss of breeding habitat will impact the skylark population.

#### Other matters

- 4.72. The County Council will defer to Ashford Borough Council's Local Impact Reports on the following matters:

- Socioeconomics, employment and tourism
- Land contamination
- Landscape and visual
- Built heritage
- Noise
- Climate change
- Glint and glare
- Telecommunications, television reception and utilities
- Major incidents and/or disasters
- Soils and agricultural land
- Air quality
- Vibration
- Electromagnetic fields
- Lighting
- Daylight, sunlight and overshadowing.

## **5. Conclusion**

- 5.1. KCC will continue to engage positively with the applicant and the Examining Authority as the examination advances and would refer to the County Council Written Representation which should reviewed alongside this report.