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Our ref: 483813
Your ref: Planning Inspectorate Scheme ref: EN010135



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BY EMAIL ONLY

Dear Mr Frampton,

This advice is provided through the Natural England Nationally Significant Infrastructure Projects (NSIP) cost recovery advice service, estimate number: SAS A015830.

Development proposal and location: Nationally Significant Infrastructure Project (NSIP). Stonestreet Green Solar. Construction, operation, maintenance and decommissioning of solar photovoltaic arrays and energy storage. Land located to the north of the village of Aldington, Ashford, Kent.

Thank you for the updated consultation documents.

The following advice is based upon the information within:

- APP-033 5.2 Environmental Statement Volume 2: Main Text Chapter 9: Biodiversity
- APP-091 5.4 Environmental Statement Volume 4: Appendices Chapter 9: Biodiversity Appendix 9.6: Biodiversity Air Quality Screening Report
- APP-032 5.2 Environmental Statement Volume 2: Main Text Chapter 8: Landscape and Views
- APP-122 5.4 Environmental Statement Volume 4: Appendices Chapter 16: Other Topics Appendix 16.1: Soils and Agricultural Land Report
- AS-005 EPL 001 Limited Post Submission Changes - 3.2(A) Draft DCO Validation Report
- SSG-5.4_ES Vol4 Appx 9.6_Biodiversity Air Quality Screening Report: Stonestreet Green Solar. October 2024
- 241017_DRAFT_Kent Downs NL – Special_Qualities_Assessment_issues.docx. October 2024
- NE SoCG DRAFT_NE_Issue_1.docx

- Stonestreet email response to Natural England, dated 17/10/2024
- Stonestreet email response to Natural England, dated 13/11/2024
- Stonestreet email response to Natural England, dated 19/11/2024

Protected sites

Natural England’s Relevant Representations, Section 4, Part 2: Natural England’s detailed advice - NE1. Information to Inform a Habitats Regulations Assessment.

Potential air quality impacts:

Folkestone to Etchinghill Escarpment Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC).

After reviewing information provided within the draft Statement of Common Ground, which now considers the transport generated air quality impacts in-combination with Otterpool Park, I am satisfied that a likely significant effect alone or in-combination can be avoided. For completeness documents: APP-164 - 7.19 Information for Habitats Regulations Assessment and APP-091 - 5.4 Environmental Statement Volume 4: Appendices Chapter 9: Biodiversity Appendix 9.6: Biodiversity Air Quality Screening Report, should be updated to reflect this information.

Natural England has no further comments on the assessment undertaken. [Green]

Natural England’s Relevant Representations, Section 4, Part 2: Natural England’s detailed advice – NE2. Sites of Special Scientific Interest (SSSI).

Potential air quality impacts:

Hatch Park SSSI.

After reviewing information provided within the draft Statement of Common Ground shared with Natural England, which now considers the transport generated air quality impacts in-combination with Otterpool Park, I am satisfied the Project will not cause damage to the notified features of the SSSI. For completeness document: APP-091 - 5.4 Environmental Statement Volume 4: Appendices Chapter 9: Biodiversity Appendix 9.6: Biodiversity Air Quality Screening Report should be updated to reflect this information.

Natural England has no further comments on the assessment undertaken. [Green]

Natural England’s Relevant Representations, Section 4, Part 2: Natural England’s detailed advice – NE5. Kent Downs National landscape Special Qualities Assessment.

Applicant’s Special Qualities Assessment Summary	My Response
1. Introduction	
The Project does not include land which falls within the designated area. The majority of the Kent Downs NL’s Special Qualities relate to the characteristics of the designated area itself, which the Project will not have a direct effect on.	This statement is correct.
However, as the Project is located within the setting of the NL	I agree that the North Downs National Landscape special qualities could be affected by this type and scale of development in the context of setting and welcome that the

	eight special qualities are further examined in section 3: Special Qualities Assessment.
2. Kent Downs NL Special Qualities	
The applicant identifies the 'special components, characteristics and qualities of the Kent Downs AONB' as set out in Paragraph 1.2 of the Kent Downs AONB Management Plan 2021-2026.	I agree with the eight special qualities identified.
<p>Kent Downs NL Setting - is not noted as a Special Quality in its own right, however it is acknowledged that the setting of the NL contributes to '<i>Breath-taking, long-distance panoramas</i>', particularly from the south facing escarpments.</p> <p>The AONB Management Plan defines the setting of the NL as '<i>broadly speaking the land outside the designated area which is visible from the AONB and from which the AONB can be seen, but may be wider when affected by intrusive features beyond that</i>'.</p> <p>However, the AONB Management Plan also states that 'Proposals which would affect the setting of the AONB are not subject to the same level of constraint as those which would affect the AONB itself. The weight to be afforded to setting issues will depend on the significance of the impact. Matters such as the size of proposals, their distance, incompatibility with their surroundings, movement, reflectivity and colour are likely to affect impact'.</p>	<p>I agree that the Landscape and Visual Impact Assessment (LVIA) and the Kent Downs National landscape Special Qualities Assessment approach focuses on the impact of the Project is appropriate and proportionate covering:</p> <ul style="list-style-type: none"> - Visual receptors experiencing views from the National Landscape, as well as views towards the National Landscape. - Assessing the effects on the National Landscape's Landscape Character Areas (LCAs). <p>I welcome the assessment taking into full account the recommendations within the Kent Downs AONB Joint Advisory Committee Setting Position Statement (updated 2022).</p>
3. Special Qualities Assessment	
<p>The document takes each of the 8 special qualities and provides a response. No direct effects are identified for Biodiversity-rich habitats, farmed landscape, woodland and trees, history and cultural heritage, the heritage coasts, geology and natural resources or tranquillity and remoteness.</p> <p>Further detail is provided for Dramatic landform and views; a distinctive landscape character, Tranquillity and remoteness below.</p>	I agree this response is appropriate and follows a clear methodology.
<p>Dramatic landform and views; a distinctive landscape character</p> <p>The Project is not located on or in close proximity to the dramatic landform that characterises the Kent Downs NL.</p> <p>The south facing steep chalk slopes of the North Downs ridgeline are located 4km north of the Site at its nearest point (measured from the Sellindge Substation), however the parts of the Site that are visible from the ridge are approximately 6km distant.</p> <p>The south facing scarp slopes of the greensand ridge are located approximately 400m south of the Site at the nearest point (measured from the southern edge of Parcel E). However, there is no intervisibility between the south facing greensand scarp and the Site, with views from this feature focused on the Romney Marshes to the south, and extensive intervening vegetation combining with landform to prevent intervisibility.</p> <p>The Project is not located on or in close proximity to the dramatic landform that characterises the Kent Downs NL.</p> <p>The south facing steep chalk slopes of the North Downs ridgeline are located 4km north of the Site at its nearest point (measured from the Sellindge Substation), however the parts</p>	<p>I agree that, as identified within the Kent Downs National landscape Special Qualities Assessment, that at its closest (400metres at parcel E) the visual effects are limited due to the orientation of the south facing ridge away from the development with views focused to the south.</p> <p>I agree with the approach outlined in Table 3.1, specifically the Special Qualities Assessment identified distances of, '<i>parts of the site that are visible from the ridge are approximately 6Km in distance.</i>' I agree that the Project, '<i>is considered to result in very limited effects on the special qualities of dramatic landform and views</i>'.</p>

<p>of the Site that are visible from the ridge are approximately 6km distant.</p> <p>The south facing scarp slopes of the greensand ridge are located approximately 400m south of the Site at the nearest point (measured from the southern edge of Parcel E). However, there is no intervisibility between the south facing greensand scarp and the Site, with views from this feature focused on the Romney Marshes to the south, and extensive intervening vegetation combining with landform to prevent intervisibility.</p> <p>For visual receptors experiencing long distance expansive panoramic views from the North Downs chalk scarp, the Project will be partially screened with limited parts of the Site visible at a distance of approximately 6.8km, within a varied landscape that includes existing settlement and infrastructure. The effect on visual receptors in this location has been assessed as minor-negligible as a worst case and are not significant.</p> <p>For visual receptors in the NL to the south of the Site, an isolated, glimpsed and partial view of the Project from Roman Road could be experienced, leading to a minor adverse effect as a worst case scenario (not significant).</p> <p>With respect to the character of the NL, the assessment of indirect effects on the setting of NL LCAs concluded that LCA 4C Stour Valley and LCA 5b Lympe Greensand Escarpment would be subject to negligible effects (not significant). Effects on LCA 2C Postling Scarp and Vale were assessed as minor-moderate (not significant) as a worst case scenario, however this primarily relates to views towards the North Downs ridge, which are available in many locations within the setting of the NL, and are not subject to the same level of protection, or assigned the same value, as views from within the designated landscape. No direct effects on the landscape character of the NL would occur as a result of the Project.</p> <p>On the basis of the above, the Project is considered to result in a very limited effect on the Special Quality of Dramatic landform and views; a distinctive landscape character.</p>	
<p>Remoteness and tranquillity</p> <p>The Site's context, strongly influenced as it is by major existing infrastructure (M20 Motorway, HS1 railway), and areas of settlement including Ashford and surrounding villages is not perceived as remote or tranquil. These influences contribute to an active landscape with varying land uses, which already forms a key characteristic of the setting of the NL.</p> <p>The Project will not have an adverse effect on the NL Special Quality of Tranquillity and remoteness.</p>	<p>I welcome the reference and quotation of Natural England's guidance for assessing landscapes for designation as National Parks or Area of Outstanding Natural Beauty.</p> <p>I do not agree in the framing of, '<i>perception of natural landscape</i>'. The assessment suggests that the Project will not lead to an '<i>urban development</i>' with '<i>lots of people</i>'. However the Project is introducing new large scale energy infrastructure into a predominantly rural setting which should be addressed by mitigation.</p> <p>I do agree that; '<i>due to the distance between the Site and the NL, the partial nature of views and the Site's context (i.e. including HS1, the M20 Motorway, Ashford), these changes are unlikely to alter the sense of tranquillity experienced within the NL[National Landscape].</i>'</p>
<p>Mitigation</p> <p>The Kent Downs NL team has requested additional vegetation planting on the south of the Parcel E to remove any visibility and this is secured in the [LEMP]. However, views from this location (i.e. north facing from the north side</p>	<p>I would advise a precautionary approach is applied and therefore advise the Kent Downs National Landscape team's advice is followed and added to the, '<i>proposed hard and soft landscape and biodiversity enhancement works</i>' within: APP-033 5.2 Environmental Statement Volume 2: Main Text Chapter 9: Biodiversity, S9.6.10 [p90] and these details are</p>

of the Greensand Ridge) are not considered to contribute to this special quality of the NL.	also updated in the Landscape and Ecological Management Plan (LEMP) which will be secured via the draft Development Consent Order.
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NE5. LVIA draft Statement of Common Ground (SoCG)

The following table sets out my response to the draft SoCG section covering Nationally Designated Landscapes (page 21) key issue ref: NE5. The statements have been summarised and my comments added to the final comment.

Row	Natural England's summary position	Applicants summary response	My response
1: Special qualities assessment	Natural England advise the information provided within the LVIA does not comment specifically on how the relevant key characteristics or special qualities of the Kent Downs National Landscape could be affected. Natural England advises the effects are considered not just in terms of potential visibility, but also how key characteristics could be impacted.	A draft of the Kent Downs NL - Special Qualities Assessment provides further consideration of how key characteristics or Special Qualities of the Kent Downs NL could be affected by the Project.	I welcome the draft Kent Downs National Landscape Special Qualities Assessment and am satisfied that this document correctly identifies the special qualities and the effects of the project, as part of the landscape relevant documents submitted within the Environmental Statement (ES).
2: Scale of effect terminology	Natural England note the scale of the effect is described as 'none, compact, modest, ample or extensive'. Natural England requests definition clarity for these terms.	The criteria used for establishing the scale of landscape and visual change are set out in Table 4 and Table 7 (respectively) of ES Volume 4 Appendix 8.1: LVIA Methodology (Doc Ref. 5.4).	Accepted. No further comments.
3: ZTV	NE request for a bare ground ZTV	The ZTV does not form the basis of the assessment of visual effects and in this case it is considered that a bare-earth ZTV would not change the assessment of significant environmental effects particularly given the combination of landform, vegetation and distance that intervene between the Site and the NL.	I agree that the field surveys and photography provided, as an approached supported by Guidance for Landscape and Visual Impact Assessment (GLVIA3), identify an accurate baseline assessment of visibility. And [APP-032] 5.2 Environmental Statement Volume 2: Main Text Chapter 8: Landscape and Views (p34) s8.4.10 confirms the zone of theoretical visibility (ZTV) does not form the basis of the assessment of visual effect.
4: Character of the site	Natural England advise the examination of landscape receptors consider the landscape of the site as a single entity, rather than disaggregating the	ES Volume 2 Chapter 8: Landscape and Views (Doc Ref. 5.2) includes both individual landscape features and the landscape of the Site as a single entity.	I have reviewed: APP-032 5.2 Environmental Statement Volume 2: Main Text Chapter 8: Landscape and Views and

	landscape into its component parts		<p>agree with the applicant's response that the LVIA does consider the character of the site. APP-032 5.2 Environmental Statement Volume 2: Main Text Chapter 8: Landscape and Views. (page 96) s8.11.36. The Views from the North Downs ridgeline, within the Kent Downs National Landscape identifies minor to negligible adverse during the operational phase. I recommend given the timeline of the Project that standard trees are incorporated into the proposed mitigation measures to further reduce this effect. The proposed mitigation should form part of the Landscape and Ecological Management Plan (LEMP) and will need to be secured via the: [AS-005] EPL 001 Limited Post Submission Changes - 3.2(A) Draft DCO Validation Report, (page42) Landscape and Biodiversity s8(2).</p>
5: Cumulative impacts	Consideration of cumulative impacts with Otterpool and surroundings proposed solar farms	These are shown in the Draft SoCG as 'green' i.e. agreed with Natural England, although NE has indicated as an 'amber' risk rating..	I consider that findings on cumulative effects of this scheme in relation to the Kent Downs National Landscape are appropriate.
6. Mitigation	Mitigation appropriateness of 2.5 – 5m hedgerows	These are shown in the Draft SoCG as 'green' i.e. agreed with Natural England, although NE has indicated as 'amber' risk rating.	<p>I agree that 2.5- 3m hedgerows are a feature of the character area and note that shorter clipped hedgerows are also present on parts of the site. These allow some more open views. In designing the hedgerow planting and management plan it would be useful to include options for taller hedgerows as well as retaining some more clipped boundaries to allow open views towards the Kent Downs scarp, where possible, notably for walkers on the rights of way that cross the site.</p> <p>The proposed mitigation should form part of the Landscape and Ecological Management Plan (LEMP) and will need to be secured via the: [AS-005] EPL 001 Limited Post Submission Changes - 3.2(A) Draft</p>

			DCO Validation Report, (page42) Landscape and Biodiversity s8(2).
7. Mapping	NL boundary to be clearly shown on all maps	Applicant highlights maps where it is shown and agreed to show on all maps.	This is helpful when reviewing documents.

In summary, the Landscape Visual Impact assessment (LVIA), specifically the field surveys and photomontage and additional response document outlined above are sufficient to accurately explain the effects of the Project on the landscape, visual resources and special qualities of the Kent Downs National Landscape.

Natural England has no further comments on the assessment undertaken. **[Green]**


NE6. Soils and best and most versatile agricultural land

I confirm, based on a total percentage of 1% of infrastructure works sited on best and most versatile (BMV) agricultural land that the overall impacts from the Project to BMV agricultural land is limited. I advise: APP-122 5.4 Environmental Statement Volume 4: Appendices Chapter 16: Other Topics Appendix 16.1: Soils and Agricultural Land Report, is updated to include the micrositing mitigation methodology used to restrict the sites infrastructure to 1% of BMV agricultural land.

Natural England has no further comments on the assessment undertaken. **[Green]**

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Kind regards,


Senior Officer
Sustainable Development, Sussex and Kent – Area Team 14