Stonestreet Green Solar Project

Planning Inspectorate Reference: EN010135

Deadline 1 Written Representation by

CPRE Kent

Unique Reference Number: 20035769

1.0 Summary of CPRE Kent's Written Representation

1.1. CPRE Kent, and indeed CPRE nationally, fully supports the UK's transition toward clean energy, though believes this transition cannot come at the cost of our landscape, food security or rural communities.

1.2. CPRE has therefore been campaigning hard for solar to be on rooftops and brownfield sites rather than on green fields and agricultural land. A rooftop-first approach would allow us to protect land needed for food, housing, nature and energy, all without industrialising our countryside.

1.3. It is CPRE Kent's overarching view that the project, in its current form, contradicts the National Policy Statements EN-1 and EN-3, the National Planning Policy Framework, the Ashford Local Plan and the Aldington and Bonnington Neighbourhood Plan.

1.4. Specifically, NPS EN-1 mandates that all NSIPs should mitigate the adverse impacts on local communities and draws attention to the opportunity for energy development to deliver benefits to communities that are relevant to the local area.

1.5. A summary of our concerns is as follows:

- The excessive scale of this proposed development and its potential to drastically alter the local rural landscape.

- There is not the "considerable effort" national policy expects in minimising visual impact on the landscape. Specifically, NPS EN-1 mandates that all NSIPs should mitigate the adverse impacts on local communities and draws attention to the opportunity for energy development to deliver benefits to communities that are relevant to the local area.

- We also raise concerns with respect to impact on public rights of way (PROW), biodiversity and ecological impact, impact on designated heritage assets and loss of best and most versatile soils.

- Overall, it is our view that, by adopting a maximisation of generation output "at all costs" approach, the project has been unnecessarily over-specked. By taking such an approach, it seems that the applicant is taking the view that any reductions in terms of its scale and extents would be unacceptable.

- This clear focus on maximising output from every piece of land is at the expense of some relatively minor mitigation opportunities that would go a significant way in reducing the impact of the scheme.

- In particular, we believe that removing panels from fields 20, 21 and 22 as shown on the illustrative masterplan would go a long way towards lessening the impact of the proposal. These fields are a particular focus of our concerns in terms of the identified

impacts. It is unclear why this detached site has been included or is considered necessary to the overall scheme.

1.0 Introduction

1.1 CPRE Kent is the local branch of the Campaign to Protect Rural England, which is part of national CPRE, the Countryside Charity. Throughout Kent we represent 1,450 individual members, of which 173 are parish councils, local amenity groups and civic societies.

1.2 CPRE Kent is an independent charity that works closely alongside other CPRE branches, as well as the national CPRE organisation.

1.3 It is our objective to retain and promote a beautiful and thriving countryside that is valued by everyone. It is our position that planning decisions should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

1.4 As set out in our summary and oral statement, CPRE Kent and CPRE nationally are supportive of successive UK governments' mission to speed up the transition away from fossil fuels and towards clean energy, but this cannot be at any cost.

1.5 This is why CPRE has been campaigning hard at the national level to encourage solar on rooftops, particularly commercial buildings and new-builds. We are concerned at the loss of large areas of farmland and greenfield areas to large-scale energy projects that will detrimentally affect our landscape and food production ability.

1.6 Rooftops are the best place for solar panels for our landscapes and wildlife, too. We have huge competing demands for the use of land in this country. We've got to consider new homes, growing food, space for nature and generating the energy we all use in our daily lives. Putting solar panels on the millions of roofs across the country means that we don't need to use as much extra land to meet our energy needs. This saves land from industrialisation and paves the way for regenerative agriculture that will produce food and provide a much-needed home for declining wildlife species.

1.7 Finally, we wouldn't be living up to our heritage at CPRE if we didn't make the case that placing solar panels on urban rooftops protects the beauty of our landscapes. After all, it's unspoiled views of green fields and rolling hills that make the English countryside so special. Whether the land outside a village or town is considered 'high grade' or not, the loss of green fields to metal and glass is so strongly resisted by local communities because it would transform a part of the countryside that matters intimately to them.

1.8 CPRE Kent has engaged with the application prior to its submission. This has included direct engagement with the applicant, who kindly met CPRE Kent to discuss our concerns. We are therefore well aware of the details, along with the arguments being made for and against the development.

1.9 CPRE Kent welcomed the opportunity to provide oral evidence at the third open-floor session held on the 19th of November. However, in recognition that this is a primarily written process, the purpose of this written representation is to expand upon our concerns and provide context to future representations that we may seek to make.

2.0 Landscape impact and the need to reduce the scale of the project

2.1 It is our overarching concern that the current development, as proposed, would completely redefine the landscape and not just occupy it. To us, the current design efforts fall short of the "considerable effort" national policy expects in minimising visual impact on the landscape.

2.2 NPS EN-1 Section 5.10 considers the landscape and visual effects of energy projects, recognising the impacts will vary on a case-by-case basis according to the type of development, its location and the landscape setting of the proposed development.

2.3 Specifically, Paragraph 5.10.4 highlights that landscape effects stem not only from the landscape's sensitivity but also from the scale and nature of the changes introduced by the proposed development. Consequently, developments should be thoughtfully designed, with due consideration given to their potential impact on the landscape. By considering factors such as location, operational requirements and other relevant constraints, efforts should be made to reduce harm to the landscape, incorporating suitable and practicable mitigation measures where feasible.

2.4 Further, paragraph 5.10.6 of NPS EN-1 advises that *"projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints* ***the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible****"* (our emphasis added). Paragraph 5.10.26 acknowledges that reducing the scale of a project can help to mitigate visual impacts. While this might result in operational constraints and reduction of functions, there may be exceptional circumstances where mitigation could have a very significant benefit and warrant a small reduction in function.

2.5 Meanwhile, it is NPS EN-3 that specifically addresses renewable energy infrastructure, including solar PV projects over 50MW in England. While EN-3 supports large-scale solar developments, development should be focused mainly on brownfield and industrial land, ahead of low- and medium-grade agricultural land

2.6 NPS EN-3 also sets out the key siting considerations that need to be taken into account include irradiance and topography, local grid connection capacity, proximity to dwellings (addressing visual amenity and glint), land type (favouring poorer-quality or previously developed land), site accessibility, public rights of way (minimising visual impact), site security and potential visual and landscape impacts, especially in protected areas like National Parks and AONBs.

2.7 Combined, NPS EN-1 and NPS EN-3 are clear that siting and project design are important factors in minimising adverse landscape and visual effects, and that such impacts should

be considered carefully in pre-application by applicants, as well as directing considerable effort towards minimising the landscape and visual impact of solar PV arrays.

2.8 At a local policy level, the Ashford Local Plan 2030 includes overarching policies related to design. Specifically, Policy SP6 (Promoting High-Quality Design) requires development proposals to exhibit a high standard of design, carefully considering and positively addressing various aspects such as local character, accessibility and adaptability. The policy also outlines the importance of demonstrating compliance with design principles and guidance, including national standards. Additionally, Policy ENV3a (Landscape Character and Design) stipulates that all development proposals within the borough must appropriately consider landscape characteristics, with the level of detail proportionate to the site's landscape significance. Furthermore, Policy ENV10 requires that for renewable energy installations, "the scale and design of renewable energy provision is compatible with the character and appearance of the area, having special regard to nationally recognised designations and their setting, such as AONB".

2.9 Finally, Policy AB10 of the now-made Aldington and Bonnington neighbourhood development plan requires an application to demonstrate that any harm to the local environment will be minimised and, where necessary, mitigated.

2.10 The site lies within two National Character Areas (NCAs), the NCA 120: Wealden Greensand and NCA 121: Low Weald. The key characteristics include its "overall undulating and organic landform" and note that in the east of Kent it "has a gentler and more open aspect than in the wooded west". It notes the "fields are predominantly small or medium, in irregular patterns" and "agricultural land comprises a mosaic of mixed farming, with pasture and arable land set within a wooded framework". The NCA also references "the rural settlement pattern is a mixture of dispersed farmsteads, hamlets and some nucleated villages".

2.11 At the more local level, Aldington Ridge, Old Romney Shoreline Wooded Farmlands and Upper Stour Valley Landscape Character Areas (LCA). The Aldington Ridge LCA in particular is recorded as being of high sensitivity, where there is need to conserve and restore the landscape. Its character assessment further highlights the need to avoid large-scale development along the visually prominent ridgeline while conserving the pastoral land use and to resist further agricultural intensification.

2.12 In refusing the adjoining EDF proposal (planning application number 22/00668/AS), Ashford Borough Council (ABC) has rightly pointed to the undulating topography of the area and the significant adverse effects on landscape character and on visual amenity this smaller EDF proposal would have.

2.13 A key concern raised by ABC in refusing the EDF scheme was the lack of assessment of cumulative effects, in particular with regard to the current project and a lack of evidence as to how the assessment has informed the design process and mitigation. In particular, ABC took the view that the applicant was exaggerating the anticipated benefits of mitigation.

2.14 Clearly, at over three times the size, the impact on the local landscape is going to be far greater for the current scheme; it would dominate and transform the local landscape, altering it beyond recognition to create a new landscape altogether. This goes beyond the applicant's current assessment of a development simply occupying a wider landscape.

2.15 The introduction of built structures covering most of the site, along with large-scale energy infrastructure, would result in a clear loss of openness. This, combined with the regimented rows of solar panels, would alter the character of the traditional agricultural landscape, leading to a long-term urbanising effect that would harm the local landscape character. It is therefore our view that these impacts, both individually though especially cumulatively should the proposed EDF proposal also proceed, would be of much higher significance than that currently being suggested by the applicant within its assessment.

2.16 It is our view that this would be contrary to the expectation of the national policy statements set out above, that applicants (through good design) should "direct considerable effort towards minimising the landscape and visual impact of solar PV arrays" with that "considerable effort" clearly applying to the analysis informing the design and the thought processes applied to the design of a scheme as a whole, *ie* design at a macro-level.

2.17 That is, while a degree of landscape impact will clearly be inevitable, our particular concern is that the applicant is failing to consider the more granular variations in landscape character and associated value and susceptibility.

2.18 Nowhere is this more apparent than through the decision to continue to include fields 20, 21 and 22 (as shown on the illustrative masterplan). Distinct and separate from the rest of the development, the siting of solar panels on these fields unnecessarily fragments the development, though in doing so brings the impact of the development much closer to the main residential area of Aldington.

2.19 From conversations that CPRE Kent has had with local members and other concerned residents, the impact from the development of these fields is causing a disproportionately greater level of concern than other elements of this proposal. This is not surprising given that, by virtue of proximity to a residential area and connectivity to St Martin's Church, along with the wider PROW network, obviously development of these fields would have a disproportionately greater impact on local residents' day-to-day perception and enjoyment of their landscapes.

2.20 That is, the impact on local communities and their enjoyment of the existing landscape is significantly greater due to this fragmentation of the development. This impact would be significantly less pronounced if the project were confined to a single area and the panels were removed from fields 20, 21 and 22.

2.21 Likewise, we support ABC's calls to reduce the panels towards the Aldington Ridge, along with its calls to further fragment the main bulk of scheme so as to lessen its visual impact and avoid large-scale development along the visually prominent ridgeline

2.22 Unfortunately, we believe that such obvious design and mitigation options available to the applicant to reduce the landscape impact have not been taken because the developer wants to maximise the output and therefore profits generated by the project.

2.23 This was confirmed at Issue Specific Hearing 1 part 1, where it stated that, despite the grid connection agreement having set the export capacity output at 99.9MW, the project as currently designed anticipates an output of up to 144MW, though rising to "around 165 megawatts" once likely improvements in technology are accounted for.

2.24 It is therefore our clear view that the project is being deliberately over-specked with a theoretical output far higher than the 99.9MW connection that the agreement in place necessitates. Consequently, there is ample opportunity for the applicant to make modest reductions to the vast swathes of panels proposed.

2.25 The benefits such relatively minor amendments would have in reducing the landscape impact of the scheme would be significant.

3.0 Impact upon Public Rights of Ways (PROW)

3.1 Paragraph 5.10.24 of NPS EN-1 states that rights of way and other rights of access to land are important recreational facilities, for example for walkers, cyclists and horse-riders. Applicants must take appropriate mitigation measures to address adverse effects on rights of way and where this is not the case the ExA should consider what appropriate mitigation requirements might be attached to any grant of development consent.

3.2 Paragraph 100 of the NPPF requires development to protect and enhance public rights of way and access, including new links. Paragraph 98 recognises the importance of attractive, well-designed, clear and legible pedestrian and cycle routes.

3.3 As set out in our oral statement, our other significant concern is that the project will heavily impact public rights of way, with at least 12 ancient paths either closed or diverted. This is a particularly dense area of public rights of way, of which public enjoyment would clearly diminish if surrounded by tall solar panels, fencing and CCTV altering once-open routes.

3.4 The site's topology and proximity to key Public Right of Way (PROW) networks amplify this impact, with insufficient mitigation proposed. Linked to the landscape impact, there is an underestimation of the significance of the effect of the development and the impact on both the physical resource and the visual amenity value for users of the PROW network.

3.5 That is, while the effect on individual diverted or closed PROW might be regarded as minor, when considered in combination, the impact becomes significant. Walkers,

cyclists and horse-riders using public rights of way or open-access land experience the countryside as an integrated whole. This includes the richness and variety of views, the presence of wildlife and natural features, the sense of remoteness, tranquillity and the absence, or presence, of traffic, noise, artificial lighting and air pollution, alongside the continuity and connectivity of the access network.

3.6 Again, however, it is the impact on PROW AE474, which bisect fields 20, 21 and 22, that causes us the greatest individual concern. In addition to the views expressed to CPRE Kent by members and local residents, it is clear from the representations of Aldington Parish Council, Ashford Council and Kent County Council that this is a clearly cherished local footpath linking Aldington village to St Martin's Church. Remote from the rest of the site, it is clear it is one of the most important footpaths in the parish connecting Aldington village and St Martin's Church. Surrounding this footpath with solar panels would impact the visual amenity of that historic footpath and significantly affect the experience of path-users.

3.7 We also share concerns that the documents, as presented, were and are not sufficiently clear to residents as to exactly where existing footpaths would be diverted or closed as existing footpaths are not shown at all on the maps. This lack of clarity makes it difficult for residents to understand the likely impact of the scheme

3.8 One of the proposed footpath diversions would lead through the proposed biodiversity area; it is unclear what the impact on wildlife/habitats in that area would be, notably with dog-walkers, for instance.

3.9 We also share concerns that the collectively significant impacts that the project would have on the qualities of the PROW network may be ones that displace recreational use to other locations. In all likelihood, given the location, that would be by private vehicle, which would be a regrettable environmental consequence

4.0 Biodiversity and Ecological Impact

4.1 With respect to biodiversity, while we have a number of concerns that we will expand upon in due course, our principle concern at this stage remains the impact on farmland birds and in particular skylarks. As highlighted by both the county council and Kent Wildlife Trust, the reduction of land where skylarks can breed cannot be ignored.

4.2 The project threatens habitats for Red-listed farmland birds like yellowhammers (declined by 61% since 1967) and skylarks (declining since the 1970s). Insufficient details are given on lost territories, and proposed mitigation and compensation measures lack clarity. Little evidence supports skylark plots as effective compensation, especially with potential issues from livestock grazing and predator perches.

4.3 At this stage, however, CPRE Kent's ecologist wishes to make the following observations regarding the surveys undertaken so far:

CPRE Kent Biodiversity comments on protected species surveys

We include our comments on certain protected species surveys listed below. However, due to time constraints we are yet to comment further on other protected species surveys such as Breeding Bird and Winter Bird Surveys, the lighting scheme, EIA and BNG assessment. We are still awaiting the Excel spreadsheet for the BNG assessment that we requested at the Preliminary Hearing on 19th November.

App. 9.5i: Hazel Dormouse Survey Report

Lloyd Bore Ecology states that a minimum of 50 nest tubes, deployed at a density of one tube per 20m within suitable Dormouse habitat, should be deployed. Yet although initially effort was made to carry out this advice, so many survey tubes were rendered useless that in fact only a small percentage of the tubes were able to be surveyed in the end. We counted circa 801 missing inserts from 2020 to 2022. Although the report states that some were repaired or replaced, it fails to state how many and when.

Furthermore, Lloyd Bore Ecology claims it is not necessary to survey the nest tubes monthly and that they could be checked bimonthly, yet it failed to carry out its own advice by missing several months at a time, even missing virtually a whole season of surveying in one instance. In 2020 it missed August and September consecutively and in 2021 it missed six months of surveying from April through to and including September.

While Dormouse presence was established on-site, the robustness of the data supplied is weak and patchy at best. The survey could have provided valuable data on how widespread across the site Dormice are, which would in turn supply important information on how they are utilising the site. Due to the issues within the report, all that has been established is that Dormice are present in some capacity, but it is unknown in what capacity.

As Dormice are to be directly affected by the solar farm activities, during the construction phase and the operational phase from ALAN, human disturbance, dust and habitat fragmentation, we feel that further Dormouse surveys should be conducted so we can fully understand how the site and its existing habitat is being utilised. Only then can any kind of meaningful mitigation be carried out.

App. 9.5j: Hedgehog Survey Report

While no Hedgehog field signs were recorded during the survey visits, we feel that is highly likely Hedgehogs are present and actively using the site. On our site visit, we found there to be extensive opportunities for foraging, resting and shelter, including good connectivity to gardens and the wider landscape.

Hedgehogs are notoriously difficult to survey and it is often down to luck at times that any Hedgehogs or their signs are ever spotted, especially on an area that extends to 192 ha (474 acres).

Lloyd Bore Ecology adopted 'spotlighting' as the preferred method for surveying, along with looking for field signs. While this method does work, especially if the Hedgehog is looking into the light, it does have its limitations; it relies on any Hedgehog being active at night and works best on short sward lengths, so it is not best suited to tall ruderal vegetation or hedgerow buffer strips. It is not the most thorough or robust of research methods and should be used

alongside other methods and not in isolation. Hedgehogs will freeze if they are disturbed and it is almost impossible for surveyors to walk quietly enough for that not to happen. The British Hedgehog Preservation Society states that the encounter rate for this method is low, at less than one Hedgehog per hour in most habitats[1]. It goes on to say that this method needs to be applied "rigorously and consistently in order to provide reliable data…".

Furthermore, the British Hedgehog Preservation Society claims that using dazzling lights to detect a Schedule 6 species at night is technically illegal unless a licence is carried.

Other methods that have been utilised with some success and could have been used in this instance alongside spotlighting include footprint tunnels, static camera traps and thermal imaging.

One of the surveys carried out on 28th October 2020 was cut short due to an imminent bat activity survey on the same day. Would it not have been possible to pick an alternative day to survey or possibly carry out an extra survey on another day?

All the surveys were carried out in late October. While this is within the survey window, it is late in the season.

We would like to see at least four further surveys carried out earlier in the season using at least two or more survey methods mentioned above, carried out on nights that would not be affected by any other protected species survey or activity.

Hedgehogs are a near-threatened species and a Priority Species under the UK Post 2010 Biodiversity Framework IUCN Red List for British Mammals - classed as vulnerable to extinction; therefore we would like Hedgehogs to be a consideration within the lighting scheme that we are yet to comment on. Artificial light at night (ALAN) can act as a barrier to Hedgehogs, which actively avoid lit areas. ALAN is highly likely to affect feeding behaviour and territory range.

App. 9.5k: Riparian Mammal Survey Report

Riparian mammals seem to have been surveyed as one, yet Water Vole, Beaver and Otter can be surveyed all year and have optimal times that differ. With Otter and Beaver, it is easier for access and visibility that they are surveyed when the vegetation is at its lowest. With Otter, that is autumn, late winter and early spring; Beaver winter and spring; and Water Vole from June to September.

This may have yielded suboptimal results from the surveys. Furthermore, we would be cautious in assuming that Beaver is absent from the whole site, which is riddled with waterways. Beavers are highly mobile creatures and may travel through a site or linger at any point in the future. Therefore, monitoring for Beaver should be ongoing.

We agree with Lloyd Bore Ecology's view that there should be further Otter surveys prior to construction commencement.

However, we would like to see a stand-alone Water Vole survey carried out during optimal times as we do not feel confident that the conclusion of likely absence of Water Vole has been

[1] https://www.hedgehogstreet.org/wp-content/uploads/2018/06/Guidance-for-surveying-hedgehogs.pdf

arrived at using robust data from a thorough survey. The Water Vole Mitigation Handbook[2] *states the following:*

"Water voles can be found in areas that may be assessed as being very poor habitat."

App. 9.5l: Bat Tree Survey Report

There are a number of trees at risk across the site that could potentially host bat roosts. We question if it is absolutely necessary to fell these trees, which are all mature. We will comment further in due course on the Arb report.

Ground-level tree assessments are not an ideal way to establish the likely presence/absence of any roost. The best this type of survey can do is determine likely suitability of any bat use, but even then, bats, especially Pipistrelles, are tiny at just 5g and can squeeze themselves into the tiniest crevice not visible to someone feet below. Therefore, discounting any tree comes at a risk.

We agree with Lloyd Bore Ecology that surveys would need to be repeated before the commencement of any works but disagree that trees found to be of low suitability or likely absence of roosting bats should not be surveyed prior to any commencement of works, for the reasons stated above.

Bats are negatively affected by ALAN; it affects their feeding behaviour and their use of an area. Myotis *species are especially negatively affected by light. Therefore, we would like to see artificial lighting turned off when no one is on site during the construction phase and operational phase.*

It would also be prudent to have an ecological clerk of works (ECoW) present during any works on site.

Summing up

From the reports reviewed thus far, we found that some of the surveys were lacking robust data or were suboptimal, making any effective mitigation proposals unlikely. We also found an element of dismissing limitations listed rather than admitting that further surveys may be required.

5.0 Underestimation of the heritage harm of the scheme, including archaeological significance and designated heritage assets

5.1 As set out within our oral statement, we are concerned as to the potential adverse impacts on historic assets, including the Grade I-listed St Martin's Church and archaeological sites along Roman Road.

5.2 Again, however, our principle concerns are with respect to fields numbers 20, 21 and 22. The reason is that there is a uniquely high density of designated assets in the Aldington Church area (ref fig 7.1A in the Wardell heritage report). The connection line following the road to connect field 23 and 20 would not only intrude directly on

[2] https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/1e/30/1e3072bf-0ffe-4df2-8ee2-e1af6f66755e/d93_-_water_vole_mitigation_handbook81824175_1.pdf

designated assets along Goldwell Road but there is also the risk of harm to underground heritage assets (archaeology) for these connection lines. These harms are disproportionate to the generation benefits of including fields 20, 21 and 22.

5.3 The dismissive approach of the report suggesting that agriculture will have destroyed archaeology contradicts the facts that the ground-mounted frames will be pile-driven three metres into the ground - except when underground assets require concrete footings to be used instead. The inverter, battery storage and water tank for fire-protection installations are also going to be substantial structures located across the fields (except where they have been specifically omitted (9, 20, 21 and 22)). These installations will be in a highly visually and heritage-sensitive area, and will need to be in defined locations and assessed for heritage setting and historic environment as well as landscape impacts. The archaeological potential of the site requires much greater respect for the historic environment than is shown in these proposals. This needs to be a matter dealt with by condition or as reserved matters, but only when the level of heritage risk and potential has been considered to the Examiner's satisfaction at a hearing. KCC is the statutory heritage authority for Kent after Historic England and in its letter of 12th September it states "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 11 archaeological mitigation proposals are not evidence-based. Therefore, the County Council would draw to the attention of the applicant and the Examining Authority that if these matters are not dealt with either at Pre-Examination or Examination stages, 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".

5.4 The principle concern that needs considering is that the absence of evidence based on desk-based research and a limited amount of trenching in a small area cannot be taken as evidence of the absence of important archaeology over the very substantial area that this energy installation would cover and impact with three-metre pile-driven panel supports, concrete bases and platforms for the 30 inverters and BESS, the emergency service access roads etc. In a part of the country well known for early history burial grounds and Romano-British infrastructure and settlement, it would be contrary to the Energy NPS to ignore this potential. Treated positively and inclusively with the community, this could be a discovery opportunity.

5.5 We have also identified harm to the significance of the Church of St Martin, Aldington (Grade I: NHLE 1071208), a Saxo-Norman parish church listed on 10th August 1988. The church is set on a small hill with an architecturally exceptional medieval tower that acts as a landmark in the landscape. The open fields within the application site contribute positively to the significance of the church and add to historic value as the location of the church with its surrounding fields means it is at the heart of the agrarian community who built and worshipped there. This appreciation would be altered in a key view of the church from the west by the presence of solar panels. The fields (and footpath) also act as an important land buffer showing the historic separation between church and village and this landscape separation would be eroded to a small extent by the proposed

development. The historic landscape and its appreciation from the footpath connecting the church and the village will be lost for a generation in a disproportionate manner if the fields 20, 21 22 are retained in the proposal.

6.0 Understatement regarding loss of productive farmland, including loss of Best and Most Versatile land (BMV)

6.1 Avoiding and minimising the loss of best and most versatile agricultural land (BMV) is a key campaigning issue for CPRE Kent and CPRE national. BMV soil is needed to help feed the country's population. Recent world events indicate the need to protect such land. The loss of such an important resource will compromise the ability of future generations to meet their own needs, contrary to the NPPF.

6.2 This position is supported in both national and local policy. As set out within NPS EN-1 at paragraph 5.11.12, "*Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)".*

6.3 Further, on 15th May 2024 the Secretary of State published a written ministerial statement (WMS) stating (with our emphasis added):

> "The new National Policy Statement that we published in January makes clear that applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, **poorer quality land should be preferred to higher quality land avoiding the use of 'Best and Most Versatile' agricultural land where possible**. The government in Powering Up Britain: Energy Security Plan clarified that while 'solar and farming can be complementary', developers must also have 'consideration for ongoing food production' and 'due weight needs to be given to the proposed use of Best and Most Versatile land when considering whether planning consent should be granted for solar developments'. For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary. **Applicants for Nationally Significant Infrastructure Projects should avoid the use of Best and Most Versatile agricultural land where possible**."

6.4 Paragraph 180(b) of the NPPF requires that planning decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land.

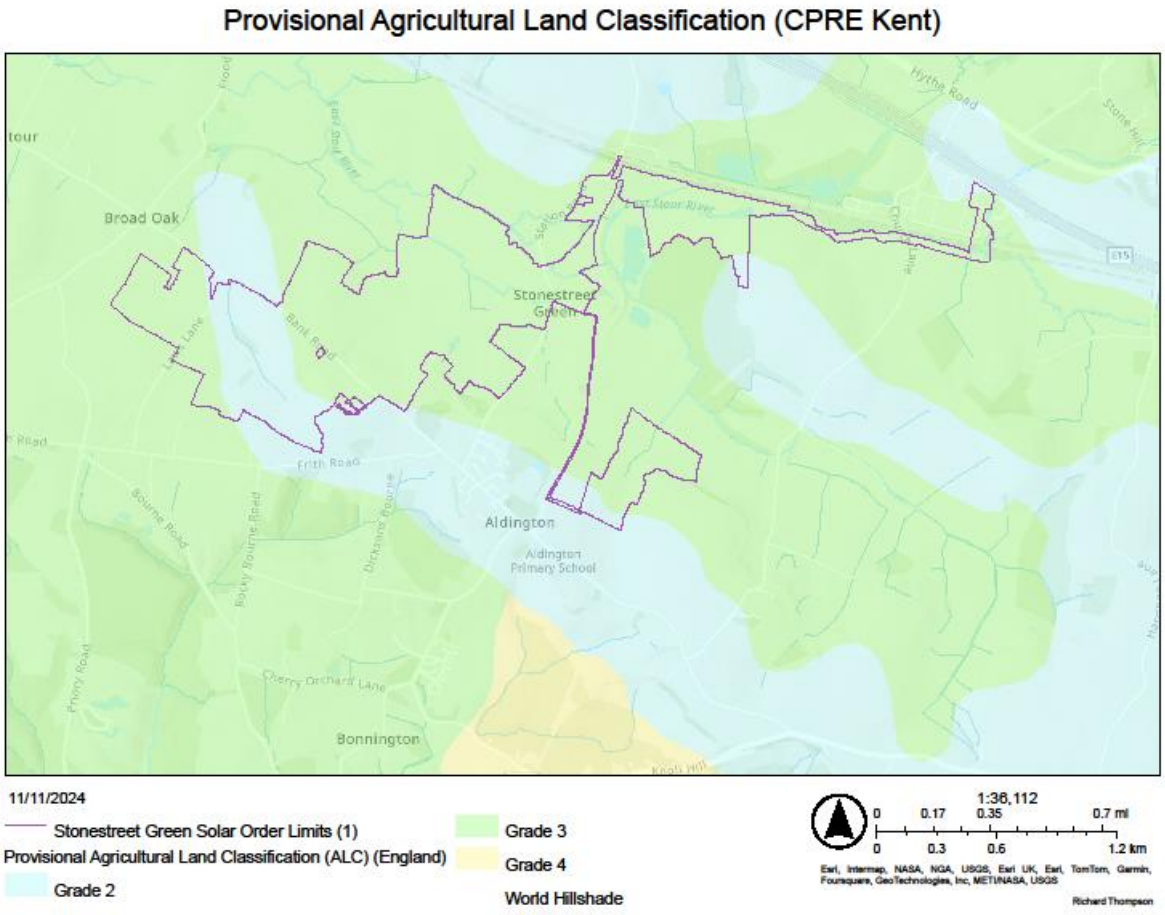
6.5 Footnote 62 to paragraph 180 states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer-quality land should be preferred to those of a higher quality. In the interests of ongoing food security, this valuable agricultural land should not be lost to development

6.6 Finally, Criterion (vi) of adopted Policy AB10 of the Aldington and Bonnington Neighbourhood Plan requires proposals to demonstrate how land beneath or surrounding panels will be managed and how the applicant has avoided land with high potential for agriculture ('Best and Most Versatile Land').

6.7 The policy requirement at both national and local is therefore clear to first seek to avoid development on BMV land, or, where it is unavoidable, to minimise the loss of BMV.

6.8 The identified site, as detailed in the Agricultural Land Classification Report [APP-122], includes 1.95 ha of Grade 2 land, 36.69 ha of Subgrade 3a and 143.47 ha of Sub-grade 3b. This indicates that more than 21% of the land is classified as BMV, which is highly valuable for productive agricultural purposes.

6.9 As indicated by the below map based on Natural England's Provisional Agricultural Land Classification Grade dataset (and provided at full scale within Annex 1), there are significant swathes of Grade 2 land across the southern section. Notably, this includes field 20.



6.10 It is recognised that Natural England's Provisional Agricultural Land Classification Grade dataset does not differentiate between Sub-grade 3a (good quality, BMV) and Sub-

grade 3b (moderate quality, non-BMV) and therefore does not accurately identify the coverage of BMV land.

6.11 Consequently, while it is noted a map (Reference GM12014/002 APFP 5(2)(a)) has been provided within the Environmental Statement Chapter 16 Appendix 16.1: Soils and Agricultural Land Report (APP-122), this is not easy to interpret, nor does it give a clear indication as to how the soil types interact with the proposed built infrastructure. We therefore note and support the comments made by Natural England in this respect.

6.12 It is also not clear to CPRE Kent as to the design process undertaken to have firstly avoided any permanent construction on BMV land, or, failing this, to have minimised construction upon BMV land. Without a clear demonstration that the solar farm's design avoids higher-quality soils, the proposal remains inconsistent with national and local polices as outlined above.

6.13 Likewise, we are concerned as to the extent that the results from the soil surveys undertaken appear to be downgraded from that indicated by Natural England's Provisional Agricultural Land Classification Grade dataset. We would like to understand better the reasons this might be the case.

6.14 Further, we note comments made by Natural England at the Sunnica Energy Farm NSIP Examination that the overall impact of a temporary solar development on soil health was unknown, and it was not possible to conclude that it would have a beneficial impact on the soil resource during operation.

6.15 Overall, it is our position that the applicant is not sufficiently demonstrating it has sought to minimise impacts on BMV agricultural land by giving preference to use of land in areas of poorer quality.

7.0 Conclusions

7.1 As set out in our introduction, CPRE Kent and CPRE nationally are supportive of the successive UK governments' mission to speed up the transition away from fossil fuels and towards clean energy, but this cannot be at any cost.

7.2 In this instance, it is clear to us that the project is being deliberately over-specked with a theoretical output far higher than the 99.9MW connection that the agreement in place necessitates. Consequently, there is ample opportunity for the applicant to make modest reductions to the vast swathes of panels currently being proposed.

7.3 By deliberately over-specking the project to such a degree and not making modest reductions in size, we find it hard to agree that the applicant is minimising "*harm to the landscape, providing reasonable mitigation where possible"* as required by NPs EN-1.

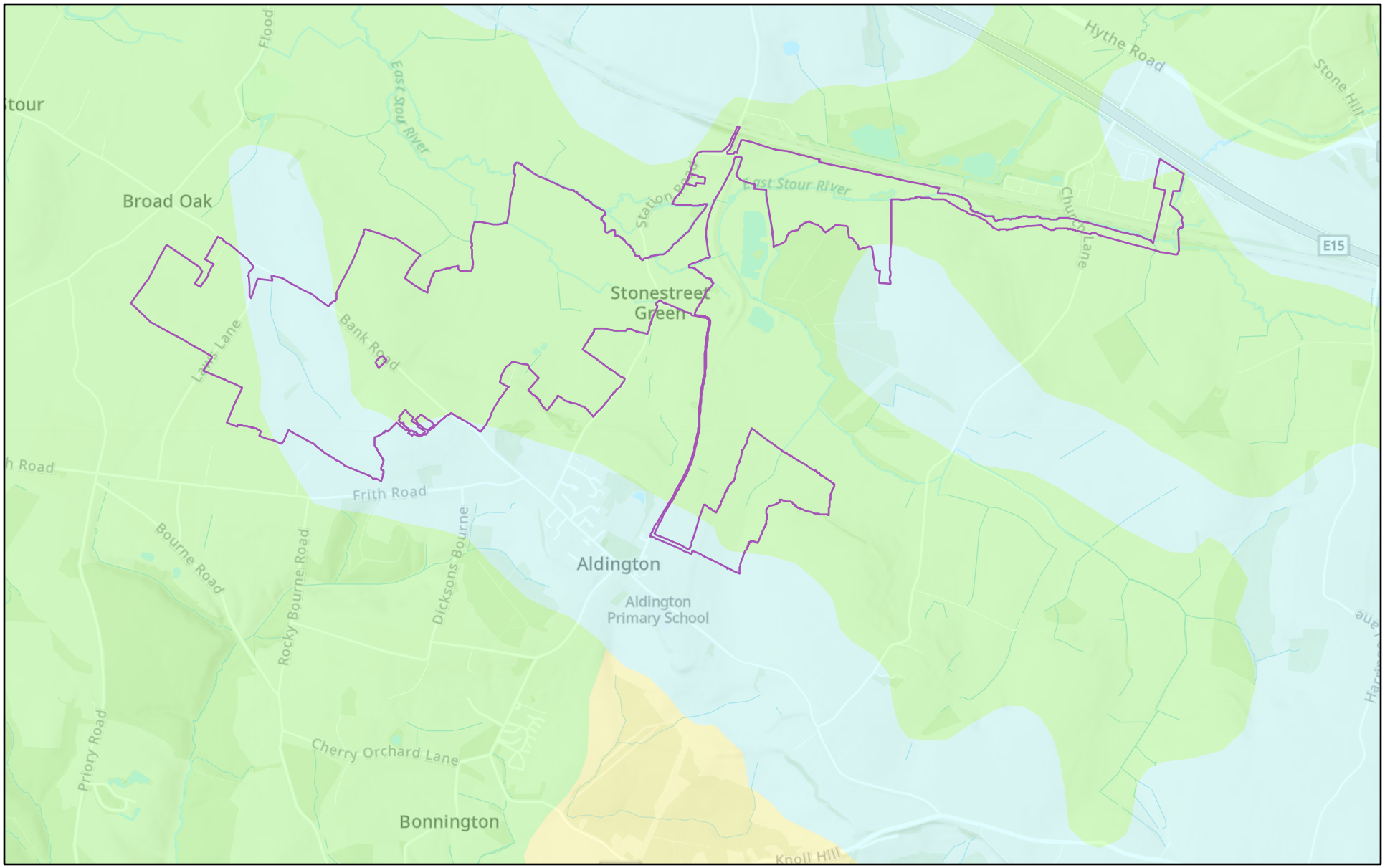
7.4 This clear focus on maximising output from every piece of land is at the expense of some relatively minor mitigation opportunities that would go a significant way to reducing the impact of the scheme.

7.5 In particular, we believe that completely removing the panels from fields 20, 21 and 22, reducing the panels towards the Aldington Ridge and further fragmenting the main bulk of scheme would significantly reduce the currently unacceptable impact of this scheme both on the landscape and PROW network.

7.6 Additionally, we have identified the need for further information with respect to ecology, heritage and best and most versatile soils.

Annex 1 - Natural England's Provisional Agricultural Land Classification Grade Map

Provisional Agricultural Land Classification (CPRE Kent)



11/11/2024

Stonestreet Green Solar Order Limits (1)

Provisional Agricultural Land Classification (ALC) (England)

Grade 2

Grade 3

Grade 4

World Hillshade

1:36,112

0 0.17 0.35 0.7 mi

0 0.3 0.6 1.2 km

Esri, Intermap, NASA, NGA, USGS, Esri UK, Esri, TomTom, Garmin, Foursquare, GeoTechnologies, Inc, METI/NASA, USGS

Richard Thompson