



Growth and Communities

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BY EMAIL ONLY

7 January 2025

Dear Sir,

Re: Application for an Order Granting Development Consent for Stonestreet Green Solar – Comments on any further information/additional submissions received by Deadline 1

The County Council wishes to provide the following commentary on further information / additional submissions that were received by the Examining Authority at Deadline 1 of the Examination of the Stonestreet Green Solar Development Consent Order application.

Highways and Transportation

The County Council as the Local Highway Authority notes the revisions to the Outline Construction Traffic Management Plan (OCTMP) (REP1-046) and the Outline Decommissioning Traffic Management Plan (ODTMP) (REP1-052). Updated information has been provided in respect of:

- Provision of the minibus service for workers and confirming that full details would be presented and agreed through the detailed CTMP should consent be granted (paragraph 4.3.5)
- Further clarification regarding the Traffic Regulation Measures Plan (paragraph 6.3.2)
- Confirmation that a passing place on the Bank Farm access shall be provided with full details presented in the detailed CTMP/DCTMP (paragraph 6.3.4)

The changes are acceptable to the Local Highway Authority.

The County Council still seeks a response from the applicant with regards to the points raised regarding Article 15 (AS-005) within it's 'Post-hearing submissions, including written submissions of oral cases' (REP1-088).

Sustainable Urban Drainage Systems

The changes to the Outline Operational Surface Water Drainage Strategy (OOSWDS) (REP1-054) are noted by the Lead Local Flood Authority. The County Council is pleased to note that the requested alterations to the climate change rainfall uplift values have been applied; the County Council also notes that alterations to the Greenfield Run off (GFRR) values have been undertaken.

The Lead Local Flood Authority notes that no breakdown of the areas within the project substation station site had been previously provided with a total area quoted of 0.68Ha and this was used for the GFRR calculation. The latest version of the OOSWDS now states in paragraph 4.4.4 *"The contributing area of the Project Substation is 0.788ha, however this will be split between impermeable development area, gravel (permeable, but lined) compound and areas for the proposed SuDS features. The breakdown between the land use types is 1,870m² impermeable and, 4,930m² permeable areas. and 1,080m² for open SuDS features (swale)."*

In order for the above to be acceptable, it will be essential as the design moves forward for it to be demonstrated that the permeable section of the substation proposals are lined so as to effectively become impermeable and therefore it's area allocation can be used to derive at the original greenfield runoff rate figure. If it is proposed for the area to actually be unlined, then as advised in the County Council's previous response *"The runoff area used in any of the runoff estimation methods should be consistent; for example, if the whole site area is used in the greenfield runoff calculations, the whole site should also be represented in the runoff calculations for the proposed development. If there is a landscaped area in the developed scenario that discharges directly to receiving waters and does not contribute to the drainage system (so is excluded from the calculations) then this area should also be excluded from the greenfield calculations."*

A similar issue applies with regards to the modelling undertaken in relation to the inverter stations; however on this occasion there is no proposal to line the permeable areas and they have been utilised in the greenfield runoff and hydraulic calculations in contravention to the above guidance taken from the Ciria SuDS design manual para 24.2.2. However, given that the discharges from the inverters are so small this adjustment should be easy to undertake as part of the detailed design going forward given the size of the red line boundary and the minimal additional volumes of water that will be required to be attenuated as result.

Further to the above, the County Council would advise that, with reference to paragraph 4.2.5 of the OOSWDS - the County Council's guidance refers to the requirements of Ashford Borough Council's Local Plan, Policy ENV 9 - Sustainable Drainage.

Given the above minimal issues and obviously subject to the applicant confirming their acceptance to deal with as part of the detailed design, the County Council as Lead Local Flood Authority will continue to engage and confirm matters through the SoCG.

Heritage Conservation

As the revised Statement of Common Ground between the Applicant and the County Council notes, there are ongoing discussions regarding pre-determination trial trenching. An update will be provided at Deadline 3.

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

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

Yours sincerely,



Director for Growth and Communities