

This Representation from Kent Ramblers follows our earlier written comments and an overview I gave in the Open Meeting on 19<sup>th</sup> November. As a volunteer Local Footpath Officer, responsible for responding to Planning Applications in a number of parishes, including Aldington. I have attended the Community Liaison panel since 2022 and have visited displays in Mersham, Sellindge and Bilsington.

## **Consultation on the PROW network**

1.1 We have already commented on the apparent reluctance of the Applicant (hereafter EP, for brevity) to engage in real dialogue with us and others about their proposals for PROWs. In an early Panel meeting I was told that “a footpath in a field is a problem” - not one that EP wished to consider in detail with us or others though, it seemed, even though it is, in EP's own words, a “*dense network of PROWs*”.

1.2 Our request for a focussed sub group was agreed but not realised. One meeting was arranged in late 2022 October which I unfortunately could not attend but which another Rambler, also a panel member, did get to. A senior EP spokesman talked only of 2 proposals to divert paths leading to misunderstanding as others were not mentioned and my colleague was given to believe there would be no changes to other routes. This indicated a lack of attention to issues around the large number of PROWs. In my response to the November 2022 Consultation I referred to EP's approach being “diametrically opposed” to ours.

1.3 Probably influenced by other agencies, EP amended some proposals, with the number and length of diversions slightly but not significantly reduced. We have approached these suggestions as we do with all applications to divert routes, comparing the inconvenience to the landowner with that to walkers. When considering solar farms we recognise that moving the line of the path a short distance to the edge of the panels may sometimes improve the quality of the walker's experience, and assist the developer, and some additional distance is justified – our acceptance of some proposed diversions would not be forthcoming if the application were, for instance, for an orchard or vineyard. Surrounding paths with rows of reflective panels will significantly reduce the enjoyment of walking and could thus be described as an inconvenience in itself but our responses to proposed changes to PROWs have focussed on the routes.

1.4 A statement in the ROW and Access strategy 5.2.9 that “*The Applicant has taken a pragmatic and balanced approach to screening and openness with proposed routes through the Order limits determined with legibility in mind*” reads like padding and is a poor substitute for a clear description of what is planned for each path. Similarly, in 5.2.11 the comment that PROWs will be “*a minimum of 2 metres wide without a consideration of 10 metres*” refers to something which should have been considered in a working group with clarification of, for instance, whether the width includes space between the fence and the panels. “*Without*” may be a technical term or perhaps just a typo but, again, this comment reflects a lack of preparation on the

actual plans for each path, and is a concern. In any event, in a large array of panels, not all on level ground, screening with hedges will only have a partial effect to lessen the impact on the experience for walkers.

## **Proposed PROW routes**

2.1 Comments below are of course applicable only if the Application is agreed but do not imply that we are in favour of it. Paths follow the order in the list of PROWs in the Outline Rights of Way strategy. AE precedes the number in all cases so is not included here. As should be realised from our comments below, we are unable to agree with EP's assertion in the Outline Rights of Way strategy, 5.6.1 that proposals have been "*designed to minimise the impacts on the PROW network*". We are opposing the proposals for 4 PROWs, **454, 370, 428 and 377**.

**454** We are concerned about and do not support the proposal to move the line of **454** from the crest of the field down into the valley, next to a ditch, which will decrease the enjoyment of walkers and may create a boggy surface. We suggested moving this path west to the edge of the field and understood this would have been a likely diversion but there were "issues". Some exploration of this may shed light and explain why panels can be placed here but a PROW cannot. This path which links with the very well used **474** should remain where it is. Conditions should be applied to ensure that **474** stays clear of obstructions during construction.

**475** We note this minor diversion of a short section, near a pylon.

**455** We note the extinguishment of this very short short cut.

**656 and 657** We note these minor diversions – a decision not to place panels in fields which are liable to flooding removed one substantial proposed diversion.

**370** We support the notion of a shared cycle and foot path between Mersham and Aldington but oppose this diversion as the proposed route brings cyclists up to or away from a section of Bank Road which is narrow and hilly and not suitable for child cyclists especially. We recommend a rethink on this to create a cycle path along one side or other of Field 19 to finish in Aldington via either of the two wider lanes. The direct line of this arterial path between the two villages should be retained.

**377** We wish to reserve judgement on this proposal subject to reconsideration of the proposal concerning **428**. Although one large dog leg, originally proposed, has been replaced with 2 smaller ones we would wish to see the original route retained, but we would reconsider this to enable our proposal re **428**. The lane down to Handen Farm is a quiet cul de sac – we are not opposing the suggestion to have a new PROW adjacent to it but do not see this as necessary for walkers.

**385** We note this diversion which will facilitate the creation of a new PROW to link

across Roman road with **380**.

**447** See comments on **428** below. N.B. This path crosses field 19, not 21 as in the Outline ROW strategy list.

**378** We agree with this diversion to move the path a few yards to the edge of the large field 19, next to a ditch, but on level ground.

**428** We support the proposal to loop PROWs around Field 19 but we strongly oppose the proposal to divert 428 as it crosses Field 19 from the footbridge over the East Stour south to the edge of Field 18 – in effect this is a closure. This is an arterial route providing connectivity with paths to or from Evegate and Mersham. In informal discussion with an EP manager in the summer 2023 I suggested a small diversion of this path West to the boundary between fields 15 and 16 thus facilitating a new path to link up to **377** (see above). I thought this suggestion was well received – Field 19 is large and retaining this route could assist access for maintenance – but at a subsequent Panel was told it was not accepted, with no reason given. If this route were retained we would reconsider our approach to the doglegged proposal for **377** so that there is a link.

As regards **447** we would not oppose the closure of this path were **428** retained, but otherwise would argue for its retention as a crossing route through this large field. We believe this path used to cross the East Stour on a small bridge to a mill. **428** provides the obvious route through field 19, direct from the footbridge.

**448** We accept this diversion and the creation of a short new path next to the lane, to link them, and the creation of the river path. Many walkers choose to walk by the East Stour anyway – in effect the wide verge provided under the Countryside Stewardship scheme enabled this. Whether the extended river path will be attractive when next to solar panels is a moot point.

**431 and 436** We note minor changes to these paths, with panels not now being placed near it.

## **Conclusion**

3.1 We concur with comments in the earlier KCC Highways representation that, as regards PROWs, *“nothing will reduce the severity of the impact”*, that *“overall.....the development would impose substantial adverse influences on the PROW network”* and that *“the severe impact on the open countryside, landscape and rural character of the area is inescapable and cannot be mitigated.”* Ramblers favour “green” energy but are anxious that large scale developments are situated appropriately.

3.2 We do not share the opinion expressed in 8.35 of the Environmental Statement Vol 1 that *“the site is not considered to be a valued landscape.”* Tens of thousand of

new houses are to be built on green fields in Kent over the coming years. Rural spaces which are close to new developments, which may in themselves be nice but fairly ordinary tracts of land, now need to be safeguarded to provide for the recreation, health and well-being of residents and walkers. This site requires special consideration as a precious green space, especially the fields running down from Aldington to a babbling brook, the East Stour. Similarly, as regards the smaller area east of Goldwell lane, very close to the village and popular with local residents taking short walks. In East Kent solar farms would be better placed on flatter sites on top of the Downs or on remote parts of marshland.

3.3 We value this area. Moreover, with the nearby Otterpool development and with Ashford's continued expansion, we identify an increased need for this particular stretch of green and pleasant land to be valued. These paths provide walkers in this area an unrivalled opportunity to appreciate this rural setting from a wide variety of viewpoints. It is for this reason that we consider these paths to be of significant importance.