

PUBLIC ENQUIRY SUBMISSION

Sir, my name is Derek Burles and I am the author of the common determination submission to the Secretaries of State, concerning both this appeal and the Stonestreet Green Solar DCO application, which was copied to you last week and added to the appeal file.

May I start by apologising for the lateness of my submission. My motivation to do so was sparked by receipt of the 13th January letter from Ashford Borough Council informing that this appeal would be the subject of a public inquiry, under the jurisdiction of the Planning Inspectorate, thus placing both this appeal and the Stonestreet Green Solar DCO application in the hands of the Planning Inspectorate.

In turn, on behalf of the local community, I thank you for accommodating my input during this inquiry.

The purpose of my submission is to facilitate the principle of common determination of both this appeal and the Stonestreet Green Solar DCO application. This in an effort to achieve 2 goals. One, recognition that there is considerable merit and logic in both schemes being heard and determined on a common and consistent basis. And two, that the cumulative impact of both schemes is taken into full and proper account. This is particularly pertinent given a mandate formed by the community at a meeting in November 2022 that the Stonestreet Green Solar scheme should be opposed on the grounds of size, position and cumulative impact, a decision taken in specific consideration of one scheme, but with the knowledge that the second EDF scheme was also in play.

Of course, the most obvious interpretation of cumulative impact is that a combination of the existing Partridge Farm solar array and the

planned addition of the Stonestreet Green and EDF schemes will occupy a total in excess of 700 acres, on adjoining land, representing more than 20% of the acreage of the Aldington parish footprint, in some parts in very close proximity to the village environs, literally at the bottom of resident's gardens. What's more, the recently approved and related Welsh Power and Pivot Power schemes add further to the impact in the ugly form of industrialisation at the northern end of Church Lane, with Pivot Power's planning application clearly indicating that there's more to follow.

In this context, I believe it relevant to highlight the unique status of Aldington, wherein it is proposed to add the 2 new solar developments to an existing one, with the 2 new schemes in the hands of 2 completely different types of applicant. One, EDF, wholly owned by the French government, who have accumulated relevant experience from multiple, similar developments across the UK, with a brand to protect via its consumer business. Two, EPL 001 Limited who, it is reasonable to speculate, will prove to be nothing more than a speculator who, if approval is granted, will have sold their asset some time ahead of construction. I acknowledge that there is nothing wrong with this, indeed the existing Partridge Farm solar array was developed on this basis. But it does bring into sharp focus the question of accountability and responsibility for actions that will be undertaken in the name of Stonestreet Green Solar during both the construction process and beyond.

Continuing with the theme of cumulative impact, I would like to turn to its effect on the hearts and minds of the community throughout the entire gamut of planning, construction and operation, where residents are currently into the 4th year of the process and all its attendant uncertainty, including the threat of devaluation of their homes.

Starting with the contemptible behaviour of both EPL 001 Limited and EDF during the consultation phases of both schemes, where the former conducted a process that was both unlawful and sham like in its undertaking, whilst the latter, EDF, not only kept the community guessing for an exceptionally long period of time, following ABC's decision to reject the application, but also failed to enter into any meaningful response to the compromise proposal put before them.

Looking ahead to the construction phase, the principle of common determination has the potential to ensure that the building of both schemes, if approved, is conducted with the community's best interests in mind, especially if there is scope for both schemes to be constructed at the same time. In which circumstances the decisions of Kent County Council to refuse the closure of Church Lane to northbound traffic and ignore the appalling safety record and cramped layout of the Smeeth crossroads might be reconsidered in the context of a common construction and transport plan.

Otherwise, we need to consider the very realistic prospect of repeated blockages of Church Lane due to opposing traffic flows and the closure of Smeeth crossroads due to accidents, combined with the influx of literally hundreds of additional traffic movements on a daily basis, courtesy of component transportation on HGVs, construction workers and other visitors to the sites.

Let's think about the chaos that would ensue and the impact on residents going about their everyday life. But the situation could get worse, seriously worse. From time to time, the adjacent stretch of the M20 motorway is closed, due to accidents and incidents. During which time, the principle option for motorway traffic is to use the A20, where the pinch-point under the railway bridges in Sellindge

leads to long delays in both directions of the A20, past the junction with Church Lane and through the Smeeth crossroads.

Furthermore, in such circumstances, some locals and SatNav users will often take to the B2067 and then attempt to use Church Lane and roads leading to Smeeth crossroads as a means of rejoining the A20 and in turn the M20, or vice versa.

Potentially creating circumstances where chaos and severe inconvenience leads to tragedy, when ambulances are no longer able to reach either patients or the William Harvey hospital and the Fire Brigade are unable to attend fires.

Alternatively and logically, the common determination process could be used to appropriately schedule the construction of each scheme according to the confirmed capabilities of the National Grid, rather than the current drive towards completion based only on the availability of grid connections, together with what might politely be called blind optimism concerning the grid's capability to accommodate the energy generated.

Moving on from cumulative impact, I will conclude my input by turning to the key issues concerning both the planning appeal and the DCO application, where there is considerable merit and logic in them being heard and determined on a common, consistent basis. In which context, I think of the combined and/or cumulative environmental effects of both schemes, along with landscape, visualisation, heritage, ecology, ornithology, biodiversity, PROWs and many more.

I will specifically sight one example, which concerns the type of solar panels to be used, where in relation to the Stonestreet Green DCO application, bifacial panels have been suggested as an alternative to

the more conventional single sided panels specified by the applicant. Such a choice has the potential to make a significant impact on panel output, in turn the number of panels required to hit the rated capacity target which in turn has the potential to reduce the footprint and visual impact of the entire development.

Similarly, the number of panels in the Stonestreet Green DCO application relies heavily on a degradation of panels concession to achieve the targeted rated capacity of the development.

But, such a fundamental matter, is not considered in the EDF development.

For me, this is an appropriate topic on which to close seeing as it directly relates to the mandate I referenced at the start concerning opposition in the context of size, location and cumulative effect.

The ultimate objective of these submissions is not to stop the developments. Rather it is that common and cumulative matters are adequately considered with a view to reducing the impact of both schemes.

I thank you for allowing me to make this submission and sincerely trust that the merit and logic of common determination can find its way into the outcome of both this appeal and the DCO application.

ENDS

4th February 2025