

Rebuttal Planning Proof of Evidence of Steven Longstaff BA (Hons) MSc MRTPI

**Prepared for EDF Energy Renewables Limited (Trading as
EDF Renewables)**

**Land South of the M20, Church Lane, Aldington, Kent
(known as East Stour Solar Farm)**

PINS ref: APP/E2205/W/24/3352427

Ashford Borough Council Reference: 22/00668/AS

CD10.8



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Rebuttal Proof of Evidence

- 1.1 This Rebuttal Planning Proof of Evidence has been prepared further to my Proof of Evidence (CD10.6) on behalf of EDF Energy Renewables Ltd. It responds to the evidence submitted to the Inquiry by Mr Durling on behalf of Ashford Borough Council.
- 1.2 This Rebuttal Proof of Evidence has been prepared following the exchange of the main proofs of evidence to provide a response to specific issues and not respond to every point made by the Council's Planning Witness. It should not be inferred that I agree with those matters which are not addressed in this Statement.
- 1.3 The issues I will address are:
- Assessment against EN-1 and EN-3
 - Grid Connection

Assessment against EN-1 and EN-3

- 1.4 It is noted that Mr Durling states at paragraph 2.9 of his PoE (CD11.8) that:

“The NPS’s relate to nationally significant energy infrastructure. The threshold is 50Mw and above and the NPS contains guidance on how the Secretary of State should consider those developments. The Secretary of State has determined that substantial weight should be given to the need for NSIP development (EN-1 para 3.2.7). I accept that NPSs are a material consideration in this appeal and that when proposals are for development close to the NSIP threshold then the policies within the NPS’s can be regarded as having greater weight than for smaller developments”.

- 1.5 There is also detailed reference in Mr Withycombe’s evidence (CD11.2) to the NPSs (Paragraphs 3.4 to 3.11) in relation to landscape and visual matters.

- 1.6 My position on the NPSs is set out at paragraph 5.22 of my PoE and whilst our positions on the level of weight may differ there is agreement that the NPSs should be given weight in the determination of the appeal.
- 1.7 As such, I have set out the paragraphs of EN-1 and EN-3 which I consider to be relevant then provide an assessment against the Proposed Development and to assist the Inspector given both parties have accepted weight should be given and to signpost where particular guidance is addressed by the Proposed Development.

EN-1 – Overarching National Policy Statement for Energy	
Paragraph	Comment
3.3.62 Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure	This demonstrates the importance of utility scale solar schemes and reinforces the clear position of the Government as set out in paragraph 8.3 of my main PoE (CD10.6).
3.3.63 Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.	As above.
4.3.8 In this NPS and the technology specific NPSs, when used in relation to environmental matters the terms ‘effects’, ‘impacts’ or ‘benefits’ should be	This further highlights that there is a difference between ‘effects’ and ‘impacts’ as set out in my main PoE (CD10.6) at paragraphs 6.31 and 6.32.

understood to mean likely significant effects, likely significant impacts, or likely significant benefits	
4.7.5 To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent.	The Appellant's approach to this and the process that was undertaken in the design evolution is set out in detail in the ES chapter 3 – Site Selection & Design (CD1.8.2) and SEI chapter 11 Section 1 - Solar Farm Design Progression (CD1.14.2).
4.7.7 Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.	The Appellant's approach to this and the process that was undertaken in the design evolution is set out in detail in the ES chapter 3 – Site Selection & Design (CD1.8.2) and SEI chapter 11 Section 1 - Solar Farm Design Progression (CD1.14.2).
5.10.5 Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.	This is an important consideration set out at paragraph 6.30 of my main PoE (CD10.6).
5.10.6 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	The proposed mitigation strategy is set out in detail in Mr Ingham's Landscape and Visual Evidence (CD10.2).

minimise harm to the landscape, providing reasonable mitigation where possible and appropriate	
5.10.13 All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.	Noted.
5.10.19 The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme.	The Appellant's approach to this and the process that was undertaken in the design evolution is set out in detail in the ES chapter 3 – Site Selection & Design (1.8.2) and SEI chapter 11 Section 1 - Solar Farm Design Progression (CD14.2).
5.10.27 Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings	The proposed mitigation strategy is set out in detail in Mr Ingham's Landscape and Visual Evidence (CD10.2).
EN-3 – National Policy Statement for Renewable Energy Infrastructure	
Paragraph	Comment
2.10.17 Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of	This is an important consideration as set out at paragraph 6.40 of my PoE (CD10.6).

output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas	
2.10.43 Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.	The proposed mitigation strategy is set out in detail in Mr Ingham's Landscape and Visual Evidence (CD10.2).
2.10.44 Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.	The proposed mitigation strategy is set out in detail in Mr Ingham's Landscape and Visual Evidence (CD10.2).
2.10.45 Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in	The proposed mitigation strategy is set out in detail in Mr Ingham's Landscape and Visual Evidence (CD10.2).

an outline Public Rights of Way Management Plan.	
2.10.59 Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.	The Appellant's approach to this and the process that was undertaken in the design evolution is set out in detail in the ES chapter 3 – Site Selection & Design (1.8.2) and SEI chapter 11 Section 1 - Solar Farm Design Progression (CD1.14.2).
2.10.60 As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land-use, and ability to mitigate environmental impacts and flood risk.	The Appellant's approach to this and the process that was undertaken in the design evolution is set out in detail in the ES chapter 3 – Site Selection & Design (1.8.2) and SEI chapter 11 Section 1 - Solar Farm Design Progression (CD1.14.2).
2.10.61 For a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.	The Appellant's approach to this and the process that was undertaken in the design evolution is set out in detail in the ES chapter 3 – Site Selection & Design (1.8.2) and SEI chapter 11 Section 1 - Solar Farm Design Progression (CD1.14.2).
2.10.94 The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.	The assessment of cumulative landscape and visual effects is set out in Mr Ingham's Landscape and Visual Evidence (CD10.2).

<p>2.10.98 Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.</p>	<p>The Appellant's approach to this and the process that was undertaken in the design evolution is set out in detail in the ES chapter 3 – Site Selection & Design (1.8.2) and SEI chapter 11 Section 1 - Solar Farm Design Progression (CD1.14.2).</p> <p>The proposed mitigation strategy is set out in detail in Mr Ingham's Landscape and Visual Evidence (CD10.2).</p>
<p>2.10.131 Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.</p>	<p>The proposed mitigation strategy is set out in detail in Mr Ingham's Landscape and Visual Evidence (CD10.2).</p>

- 1.8 As demonstrated above, the Proposed Development positively addresses the guidance contained with EN-1 and EN-3 and the planning application sets out the process that the Appellant went through in evolving the design of the scheme in response to the constraints and opportunities of the Appeal Site. For ease of reference to supplement the commentary within the ES and SEI, the layout progression is shown on SEI Figure 11.10 (CD1.14.4).

Grid Connection

- 1.9 Information on the proposed grid connection was provided in my PoE (CD10.6). Further correspondence from National Energy System Operator ("NESO") has been provided at **Appendix A.**
- 1.10 The delay letter issued by NESO is a technical letter, so it is considered necessary to explain it further. The letter refers to an agreed 24-month delay to the connection dates referred to as "milestones 7-10", which is a cross reference to the construction programme in the connection agreement. When added to milestone 8 (which is

specifically the solar PV connection date), the 24-month delay makes the connection date 31st July 2028.

Appendix A:

Letter from NESO

The Company Secretary
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nationalenergyso.com

21 January 2025

Our Ref: **A/PIVOT/18/01-7EN(3)**

For the attention of James Wylie

Dear Sir,

We regret to inform you that National Grid Electricity Transmission Plc will not be able to complete "completion date" milestone date of 31st October 2025. This is due to historic issues around the agreement offer which has yet to be changed. This has now been agreed to be completed via an Agreement to Vary to correct the schedules. This delay is expected to last 24 months and we anticipate that this will subsequently affect the User's completion of its milestone 7-10.

All communications in relation to this letter should, in the first instance, be directed for the attention of Danielle Farndon by email at [REDACTED].

Yours faithfully

BINIAM HADDISH

E&W ONSHORE GENERATION CONNECTIONS TEAM MANAGER

FOR AND ON BEHALF OF

NATIONAL ENERGY SYSTEM OPERATOR LIMITED