

The Church Lane Group represents residents that live in close proximity to this proposed solar scheme. We have done our best to reach a compromise with the applicant about its scheme. In the very early days, there were signs that our endeavours could result in a workable and acceptable solution both in terms of design and access arrangements.

However, over the last year we have tried to progress those discussions but have not been able to elicit any response from EDF's agents. Instead, the applicant has now submitted some additional documentation to Ashford Borough Council paying little or no heed to the conversations we have had with them previously and the representations we have made. Instead, EDF has decided to press on regardless and, to the extent that it has made any changes, has made these almost entirely focussing on one isolated residential property which is already located adjacent to an existing solar array.

This approach to the design of this scheme is all the more extraordinary because, as EDF well knows, there have been opportunities (which we believe still exist) for it to purchase this house and then focus on a revised design which together with hedge and tree planting will mitigate the impact of its scheme within the wider landscape. The irony is that even if the applicant remains unwilling to purchase the house it is perfectly possible to provide adequate mitigation without removing panels from the field to the west of the house – as we will demonstrate.

The application in its present form, despite the latest submissions from EDF, remains unacceptable on numerous counts:

1. The solar array should not be on the south slope of Bested Hill because of the visual impact this will cause - particularly when viewed from the designated Landscape Character Area on Aldington Ridgeline to the south on footpath AE 474 close to St Martin's Church and the Conservation Area. EDF's most accurate photomontage of what the view will become is attached (Viewpoint 7. 2022).
2. In EDF's latest submission in relation to LVIA's it notes at para. A2.6 that the LVIA assessments must be, among other things "consistent".  
The attachment "Fields 1 and 3 from Viewpoint 7" is our photograph of the panoramic view available from footpath AE 474 at Viewpoint 7. It highlights two areas in the landscape marked 1 and 3. Following our representations, EDF removed area 3 from its scheme because of the impact panels here would cause in the landscape. Area 1 is Bested Hill and yet despite being at the same contour (both are broadly between 65m and 70m AOD), in the same line of sight looking towards the North Downs AONB, EDF, inexplicably, refuse to remove the panels from the southern slope of this hillside.

3. Curiously, EDF's agents (within their Chapter 11 that deals with landscape and the visualisation) studiously avoid referring to "Viewpoint 7". Of all the photomontages it is the most striking and yet the nearest they come to referring to it is in very general terms - "viewpoints 6-11". Viewpoint 6 nearby is mentioned at 11.111 no less than 3 times whereas there is no such discussion within the text about the impact on the view at viewpoint 7 nor is footpath AE 474, from which the photograph is taken, referenced.
4. In the latest documentation submitted by EDF's agents (East Stour SEI Volume 3 Figures Part 4 of 5(1) Slide 4) uploaded onto the planning portal on 15.0.24 there is what purports to be a "photomontage at completion based on the submitted layout". This is attached ("SEI Viewpoint. 7.photomontage.Jan.24"). It is in fact *not* based on the submitted layout at all but instead shows the approximate line of the array if, as we have asked, the southern boundary on Bested Hill is drawn back. Those viewing the SEI will have been comforted - but sadly misled - by this slide.
5. The concern about this part of the proposed array on Bested Hill has been the subject of representations not only from Aldington and Bonnington Parish Council (14.09.22) but also from the Kent Downs National Landscape Unit (previously AONB Unit) which comments in relation to another viewpoint (13) also on the Ridgeline, that "*We consider the magnitude of impact to be underassessed from this viewpoint in the LVIA*". This comment might have been more critical still if the photograph had actually been taken on the higher ground inside the Kent Downs boundary rather than outside it standing in the public highway.
6. Instead of doggedly pursuing the application on the basis of including this sensitive area on the southern slope on Bested Hill (which comprises approximately 15 acres of solar array footprint) EDF could relocate this element to the triangular field opposite Bested House. The acreage of the two areas is identical.
7. This triangular field (marked as Field 2 on the second attachment "Mitigating Visual Impact") is of poor agricultural quality (something which we know the landowner can confirm), forms a natural shallow bowl in the landscape and will (once boundary hedging has been improved by further planting) be an area of the proposed scheme which will be very difficult to see from any vantage point (much like the existing Partridge Farm solar scheme on the other side of the lane).
8. Relocating this small part of the solar array (Field 1 on the same attachment) to this field need not have an unacceptable impact on Bested House. On the contrary, (as shown on the attachment) a swathe of land on the other side of the lane from the house can be planted up with trees (complementing the proposed new hedge planting) to protect views from the house to the west (without any significant shading of panels). In the context of those views, it should be noted that the existing views from the house westwards across the lane are towards the National Grid pylon line and its towers that run across the skyline in full view only 350 metres away.

9. The wildflower meadow (currently proposed for Field 2) is likely to establish far better on the lighter ground on the southern slope of Bested Hill (Field 1) rather than in the heavy clay in this field. Furthermore, a wildflower meadow on the hillside will provide a more valuable and natural replacement habitat for the endangered species impacted by the scheme – in particular, Skylark, Lapwing and Brown Hare. It is well documented that these species (and in particular Skylark) are much more prone to predation in smaller enclosed fields.

## Other Aspects

As far as other aspects of this scheme are concerned, our group finds itself in the same position as the Aldington and Bonnington Parish Council in that EDF have not taken any material account of the representations we made 18 months ago which are still on the portal and dated 30.08.22. Referring again to those same issues:

1. Church Lane must be subject to a *temporary road closure* during the period of construction to avoid serious traffic disruption, road safety issues and a huge amount of damage to the highway and its verges. As the Aldington and Bonnington Parish Council stated in their representation of 14.09.22 the applicant should “*agree to fund road closure for the whole of the construction period at the crossing point between the south and north parts of the proposed sites*”. The latest response from KCC Highways and Transportation dated 21.02.24 highlights aspects which EDF still need to address - many of which we, like KCC, have raised previously.

Whilst we will be interested to see what further proposals EDF come forward with to address these aspects in response to KCC, we fear the magnitude of the problem has not yet been fully understood. Please note the following:

- Whether traffic is managed by traffic lights or Stop/Go signs with banksmen it is not going to be practical or safe to manage construction traffic and “background traffic” along this singletrack highway.
- Whilst cars are held pending the movement of slow-moving construction vehicles over what might be a period of several minutes, queues waiting to the north and south will develop in the lane. When the construction vehicles have got into the compound how will these two queues then pass each other?
- Consider the intermediate accesses on this section of the lane. Ongoing at the same time will be Pivot Power’s battery construction, Welsh Power’s condenser construction, the regular HGV access to Southern Water’s sewage station and National Grid’s Converter Station traffic – each of these generating large numbers of vehicle movements, including many HGVs.

- Construction traffic from each of these sites will deposit mud on the lane which it will not be possible to manage adequately on a daily basis for so many sites with so much ongoing traffic – particularly during the winter months when this section of the lane by the bridges regularly floods.
- Add to this the Evolution Power Solar scheme disrupting background traffic on Station Road to the north where traffic management on this busy lane into Aldington will encourage drivers to try and use Church Lane instead.
- Add to this the way in which Church Lane gets used by the public when the M20 is closed coast bound (which now occurs quite regularly) to avoid queueing on the A20 on the approach to Sellindge and its traffic lights at the bridge.
- Add to this EDF's intention, as set out Chapter 11.21 where it states: *"It is worthwhile noting at this stage that a proposal for a Battery Energy Storage System (BESS) is due to come forward into the planning system within 6 – 12 months within part of the application area for the East Stour site"*. As such yet another substantial construction project (scale as yet unclear) will also rely on Church Lane for its construction access.
- If there is an issue with Bested House needing to (or preferring) to take access and egress from the north to the A20 rather than the south, then surely this occasional requirement can be accommodated by means of the banksmen arrangement that KCC suggest. It is just one house.
- Similarly, Monday afternoon's weekly refuse lorry can surely be accommodated in the same way if, as we believe is claimed, it cannot turn round within the adopted highway area south of the bridges.
- Farmer access to fields along the lane can be achieved satisfactorily from the south. There will no longer be harvest traffic during construction - nor afterwards - once these arable fields are covered with solar panels.

## Further Aspects

2. A new hedge (interspersed with trees) should be planted along the west boundary of Church Lane northwards from The Paddock - not just to the top of Bested Hill - but all the way to the bridge over the East Stour River. It is not enough to just gap up the sparse existing hedge.
3. New hedging and tree planting should be undertaken on the northern boundary of Bested Hill. The existing hedge line in places is very gappy and the gaps need infilling to help screen views of the panels from the lane. This boundary has to shield from view the enormous shipping container units which makes this requirement so much more important than it might otherwise be (see attachment "BestedHill.NorthernBoundary").

4. Wherever the southern boundary of the panel footprint is ultimately located on Bested Hill, the new hedge on its boundary, should, like others be interspersed with individual indigenous trees characteristic of the area. EDF has prescribed this on the northern boundary of the point-to-point field and should do so here as well.
5. *All new hedging* should be indigenous species, double row, alternate spacing, protected from browsing damage and if and when plants fail during the first 10 years they must be replaced. All plantings must be properly established and maintained.
6. All new hedging once mature should be maintained at a height of not less than 3m to act as a screen in the landscape as well as providing improved wildlife habitat.

We **OBJECT** to this proposal

**Church Lane Group**  
**1<sup>st</sup> March 2024**

EDF's Proposition for Bested Hill  
Their Viewpoint 7 in Visualisations  
On Footpath AE474 West of Church















