EAST STOUR SOLAR FARM

Screening Request

PREPARED ON BEHALF OF

EDF renewables

JULY 2021

engena

EAST STOUR SOLAR FARM SCREENING REQUEST

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EXECUTIVE SUMMARY

i This document, and accompanying figures, form the Screening Request for a proposed solar farm on land south of the M20, to the west of Sellindge and north-east of Aldington. It constitutes a request for a formal Screening Opinion from Ashford Borough Council under the terms of the EIA Regulations 2017.

ii The area under investigation comprises approximately 252 acres (102ha) and the proposed solar array will have a rated capacity of up to 49.9MW.

iii The Screening Request confirms that the proposal is Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, the requirement for EIA needs to be tested through Screening against a set of criteria (listed at Schedule 3) to determine the likelihood of significant environmental effects.

iv The Screening process is presented through a flow diagram (**Plate 6 on page 7**), adapted from National Planning Practice Guidance (NPPG), and the potential impacts are considered against the Schedule 3 assessment criteria from **Paragraph 31 on page 6**.

v The screening process determines the proposed development is located outside of any 'sensitive' areas and the initial ZTV's show that the potential for significant visual effects is limited.

vi It is concluded that an **Environmental Impact Assessment (EIA) would not be required**.

vii To inform a future planning application, it is proposed that detailed reports on environmental and technical impacts (including landscape, heritage, hydrology and ecology) will accompany the planning application. These assessments follow Nationally accepted and tested guidelines and ensure that a thorough, robust application is presented to Ashford Borough Council.

viii Alongside the provision of a Screening Opinion, Officers of Ashford Borough Council are invited to comment on this scope of work to ensure that the submitted application meets their expectations.

INTRODUCTION

1 This document, and accompanying figures, form the Screening Request for a proposed large scale solar farm on land south of the M20, to the west of Sellindge and north-east of Aldington. The proposed location of the site is shown in **Figure SC1**.

2 This submission constitutes a request for a formal Screening Opinion from Ashford Borough Council under the terms of the EIA Regulations 2017.

3 This Screening Request:

- introduces the project;
- describes the proposal in more detail; and
- presents the formal prescribed screening process to determine whether or not an EIA is required.

Project Overview

4 The proposed project west of Sellindge includes an array of ground-mounted solar panels and ancillary infrastructure including inverters (mounted behind the panels), transformer units, electrical infrastructure, switch gear and substation, and temporary construction compounds.

5 It is anticipated that the proposed development would be generating electricity for a period of forty five (40) years.

6 The proposed solar farm would have a rated capacity of up to 49.9MW. The panels would be ground-mounted to a maximum height above ground of approximately 3.0m angled at around 20-25 degrees facing south.

7 It is currently estimated prior to layout optimisation that the solar farm will be sufficient to offset the equivalent annual energy needs approximately 17 000 Ashford Borough homes (based on average domestic consumption per household of 4 110kWh (DBEIS, 2020).

8 From the displacement of electricity generated from fossil fuels powered generation, the proposed development would offset the emission of a significant quantity of pollutants, particularly carbon dioxide, into the atmosphere. This reduction in emissions would contribute to the national legislation of zero net carbon emissions by 2050 and international reductions required under the legally binding obligations of the Kyoto Protocol. It also contributes to the reduction of emissions in Ashford Borough to assist the council in reaching its net zero carbon emissions by 2030 committment.

The Applicant

9 The Applicant for the proposed development will be EDF Renewables.

10 EDF Renewables is a joint venture between EDF Renewables Group (EDF's global renewable business) and EDF Energy (EDF's UK generation business).

11 EDF Renewables operates in more than 20 countries around the world. The company develop, construct and operate wind farms, solar and battery storage projects, and have more than 25 years' experience in delivering renewable energy generation.

12 Engena Limited is an independent planning consultancy which has over 600MW of development experience in the renewable energy industry, specialising in project planning, development management and Environmental Impact Assessment (EIA).

THE PROPOSAL

Introduction

13 The proposed development will consist of solar panels that are ground mounted in rows, and ancillary infrastructure including inverters, transformers, grid connection cabling, a substation cabinet and a temporary construction compound. The indicative development boundary is shown in **Figure SC2**.

Site Infrastructure

Solar Panels, Frames and Anchors

14 The array of ground-mounted solar photovoltaic panels will be located within an area of approximately 102 hectares and have a rated capacity of up to 49.9MW. A typical solar farm array is shown in **Plate 1**.

15 Space between frames is provided for maintenance access and to avoid shading from neighbouring panels.

Plate 1 - Typical Solar Array

16 The solar panels will be mounted at a fixed angle of approximately 20 to 25 degrees with a maximum height of up to 3.0m, on panel frames that are fixed to the ground with ground anchors or if necessary surface mounted feet.

Access

17 Existing field entrances off Church Lane will be used for access from the local road network. These access points and tracks already take agricultural vehicles. All traffic will be required to arrive from and depart to the north.

18 Existing farm tracks and field entrances will be utilised and upgraded where necessary to allow access to individual segments of the solar array. Public footpaths will be avoided by the on-site access tracks as far as possible. Advanced notifications and safety measures such as banksmen will be deployed, when necessary, during construction.

19 Where sections of new, upgraded or widened access track are required this will have the appearance of typical vernacular farm tracks with a crushed stone running surface (**Plate 2 on page 4**), grassed over in time. The running surface (4m wide) is laid over a stone sub-surface which itself is typically constructed upon a geotextile membrane.

Plate 2 - Typical New Site Access Track

Plate 3 - Typical Combined Inverter/Transformer Unit (alternative finish colours are available and would likely be pursued)

Plate 4 - Typical Substation Cabinet

Inverters and Transformers

20 The solar panels generate Direct Current (DC) electricity, which must be converted to electricity with an Alternating Current (AC) before it is exported into the Local Distribution Network. This conversion would be undertaken by a series of distributed inverter/transformer units (circa 17 units distributed across the site), which also raise the export voltage to that of the connection point.

21 The panels and inverters are connected via cabling which is mounted onto the panel frames or suspended behind the panels. Underground communications and power cables link the panel arrays to inverter/transformer units and substation.

Substation

22 The substation cabinet contains switchgear, isolation and metering equipment. The typical substation cabinet is shown in **Plate 4**.

Temporary Construction Compound

23 For the duration of the construction (and decommissioning) periods, a temporary compound (typically 30m by 40m) will be required to provide secure storage of equipment and construction materials, welfare facilities and office accommodation for construction staff. It is typical for a development of this scale that temporary construction compounds are set up in each field area to allow teams to work in parallel through the construction period.

Ancillary Cabinets and Containers

24 Three additional containers/cabinets will contain the security and solar farm control systems, equipment for general maintenance and spare parts should they be needed during the operational phase and welfare facilities for visiting personnel.

Security Fence

25 A perimeter fence and CCTV system comprising inward-facing cameras will likely be installed to protect the solar panels and cabling from theft. The security fence will be up to approximately 2.1m tall (**Plate 5**).

26 Space below the fence will permit the passage of small mammals with larger gaps at any badger commuting routes.

27 No operational lighting is proposed within the solar farm. The CCTV cameras operate in infra-red mode at night time, which is not visible to the naked eye.

Plate 5 - Typical Security Fence

Operational Phase

28 The site is remotely monitored and operated with the automated system alerting an engineer in case of component or system issues. Monthly maintenance visits in a light van or four-wheel drive vehicle will ensure the panels, inverters, frames, fencing and fittings are all in good working order. The panels will be cleaned periodically to ensure maximum production.

29 Wild flower meadow and hedge planting will be managed in accordance with an agreed Landscape and Environmental Management Plan.

30 It is anticipated that the proposed development will be operating for a period of forty (40) years.

THE SCREENING PROCESS

31 Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) implemented European Council Directive No. 2011/92/EU, the intent of the Directive being to ensure that, in consenting a development, an authority is able to reach a decision in knowledge of any likely significant effects on the environment in terms of the Regulations.

32 For certain types of major development (listed in Schedule 1) the regulations stipulate a mandatory requirement for an Environmental Impact Assessment to accompany an application.

33 For other types of development (as listed in Schedule 2) the requirement for EIA will need to be tested through Screening against a set of criteria (listed at Schedule 3) to determine the likelihood of significant environmental effects.

34 Schedule 2 developments in, or partially in, sensitive areas (even if falling below the 'exclusion thresholds and criteria') will also need to go through the Screening process.

35 Other types of development not listed in Schedule 2, or developments that fall below the exclusion thresholds and criteria, would not usually require further Screening or a formal Environmental Impact Assessment to be undertaken.

36 If the project is listed under Schedule 2 of the EIA Regulations, and exceeds relevant thresholds, then the Local Planning Authority must determine whether significant effects are likely and therefore if EIA is required.

37 Solar energy developments are not listed under Schedule 1 and are not explicitly listed under Schedule 2. However, Class 3(a) lists the following as Schedule 2 development:

'(a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)'; where 'the area of the development exceeds 0.5 hectare.'

38 A formal Screening Process is set out within the EIA Regulations to determine whether or not an EIA is appropriate. The online Planning Policy Guidance (PPG) (from Paragraph: 017 Reference ID: 4-017-20170728) sets out guidance to the Regulations for developers and Authorities on EIA and their application including the application of the Screening Process.

39 The following flow diagram, **Plate 6**, is adapted from a diagram included within the PPG (Paragraph: 030 Reference ID: 4-030-20170728) and includes the exclusion thresholds and criteria from Schedules 2 and 3 to the EIA Regulations. This presents the methodology followed in the document for determining if an EIA is required, highlighted in purple.

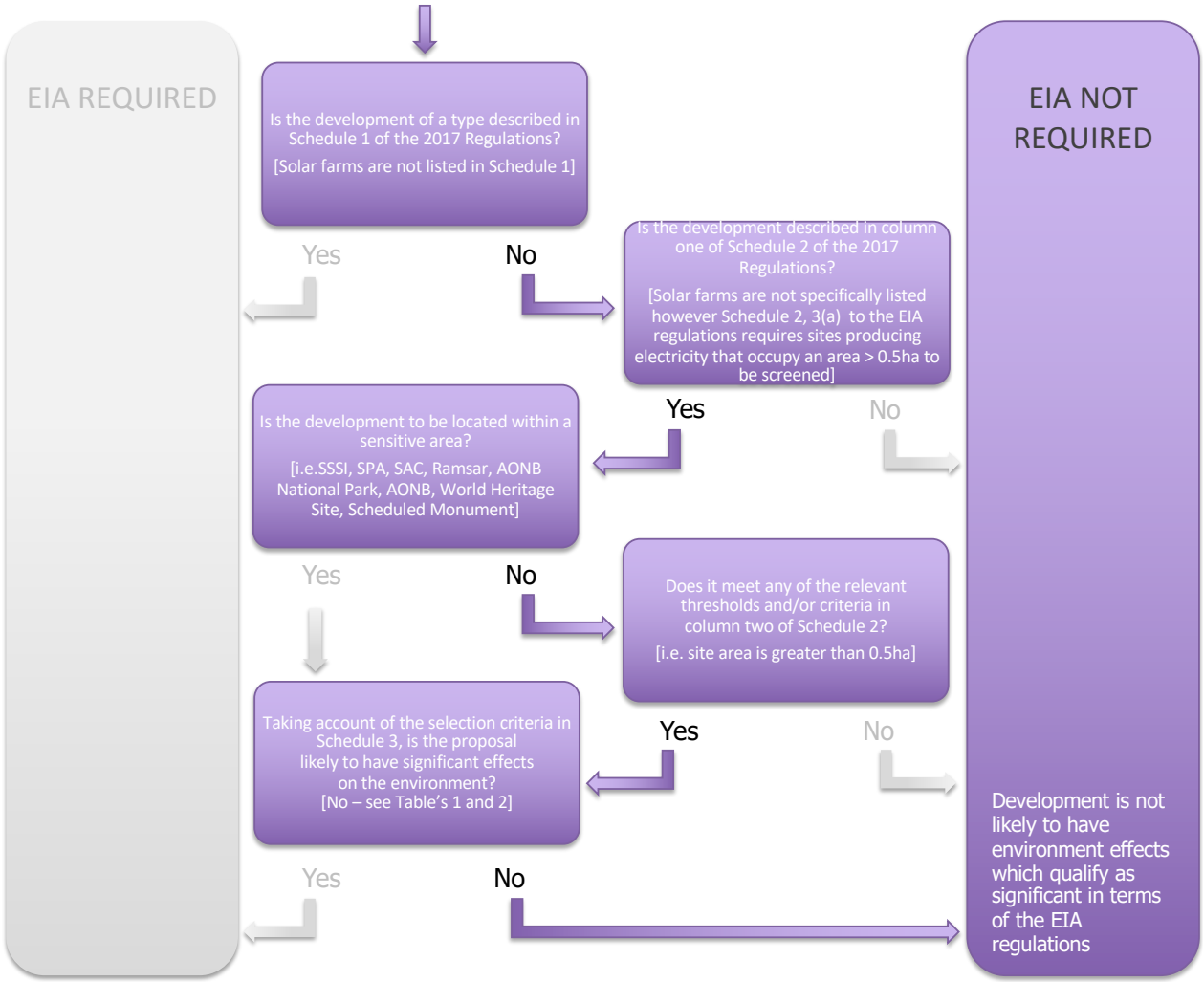

Plate 6 - PPG Methodology for Determining if an EIA is Required - Solar Developments

Determining if EIA Is Required

40 Having established that the type of development proposed requires further assessment as to whether significant effects are likely, the initial question posed when considering whether an EIA is required is:

'Is the development to be located within a sensitive area?' (PPG, Reference ID: 4-030-20170728)

41 The proposed development is not within a National Park, AONB, Ramsar, SAC, SPA, World Heritage Site, SSSI, or Scheduled Monument. As such, the East Stour Solar Farm is not located in a sensitive area.

42 The next question posed by the NPPG, when a development is not located in a sensitive area is:

'Does it meet any of the relevant thresholds and/or criteria in column two of Schedule 2?'

43 Schedule 2 of the EIA Regulations lists different types of development and, for each type, defines the specific thresholds at which the development proposal requires an EIA.

44 The proposed development for a solar farm falls under '*Item 3 Energy Industry*' in column 1 of the table at Schedule 2. There is no specific class for solar energy and is considered to fall within the general classification - *part (a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)*.

45 Column 2 of the Schedule 2 table, for type 3(a) development states the applicable threshold as '*The area of the development exceeds 0.5 hectare*'.

46 The potential site area is around 252 acres (102ha). Based, solely on this criteria, this scale of development has the *potential* to require an EIA.

47 The final step in determining whether EIA is required for a proposed development is:

'Taking account of the selection criteria in Schedule 3, is the proposal likely to have significant effects on the environment?'

48 In order to answer this question, Engena has considered each criteria of Schedule 3 against the proposed development. This assessment is provided in **Table 1 on page 10**.

49 Schedule 3 also requires the Planning Authority to consider the types and characteristics of the potential impact. **Table 2 on page 13** considers this section of the Schedule, cross-referenced against the potential impacts (a to g) identified.

50 The Annex (NPPG Reference ID: 4-057-2070720), for item *3 - Energy Industry (a) Industrial installations for the production of electricity, steam and hot water*, states that the key issues to consider are the '*Level of emissions to air, arrangements for the transport of fuel and any visual impact*'. There are no emissions to air associated with the development of a solar farm, nor any requirements to transport fuel to the site. **Table 2 on page 13**, therefore considers potential visual impacts against the Schedule 3 criteria. The limits of potential visibility are set out from **Paragraph 53**.

51 It should also be borne in mind that Screening is used to determine whether a proposed project is likely to have significant effects in terms of the EIA Regulations on the environment (Paragraph: 017 Reference ID: 4-017-20170728), and only a very small proportion of Schedule 2 development proposals will require an EIA (Paragraph: 018 Reference ID: 4-018-20170728).

52 In conclusion to the internal screening exercise that Engena has performed, following the 2017 EIA Regulations and PPG, it is considered that the proposed Solar Farm at East Stour **would not require an Environmental Impact Assessment**.

Zone of Theoretical Visibility

53 In order to inform the initial assessment of potential landscape impacts, as referred to in **Table 2 on page 13**, an initial Zone of Theoretical Visibility (ZTV) map has been produced (**Figure SC3**). An indicative panel height of 3.0m has been used at this stage. The ZTV has been reported to a radius of approximately 5.0km.

54 The analysis was produced using Ordnance Survey Digital Terrain Data on a 5m grid. The predicted visibility is for panels with a maximum highpoint of 3.0m and an observer eye level of 2m AGL.

55 The analysis does not take into account the screening effects of vegetation, buildings or other surface features.

56 It should be noted that this is an indicative ZTV. As the site layout is refined through environmental assessments, a more detailed ZTV model will be created.

57 The ZTV at **Figure SC3** shows that the potential visibility of the proposed solar farm would be contained mainly to areas within approximately 2km of the centre of the solar farm within the natural bowl formed by the terrain. Beyond 2km, potential visibility extends out towards the east, north-east and west, although in reality, the vast majority of views will be screened by intervening vegetation and built form. The majority of views beyond 2km will see portions of the site rather than open views of the entire development.

58 The ZTV identifies very limited potential for views from the two registered parks and gardens within 5km.

59 There are very limited views from the AONB where it extends to the south of the site. Views identified from the AONB where it extends to the north will be more distant.

60 Views of the site are likely to be possible from some areas of Aldington, including the Conservation Area.

61 The visibility predicted by the ZTV's will be tested on the ground to ascertain the effect of field boundary vegetation and other screening features in reality. Findings of the ZTV verification will be represented through visualisations produced from a series of viewpoints to be agreed with the Council.

62 Overall the ZTV demonstrates that the potential for significant effects is limited and visibility will be greatly reduced once built form (e.g. Sellindge, Smeeth and Brabourne Lees) and natural screening from trees and hedgerows are taken into account.

63 A full assessment of landscape and visual impact will be undertaken to accompany any future planning application.

Table 1 - Schedule 3 Selection Criteria for Screening Schedule 2 Development

Selection Criteria	Comment
Characteristics of development	
Size and Design	Ground mounted solar array occupying an area of approximately 252 acres (102ha). The panels will be fixed in a south-facing plane at an approximate tilt of 20-25 degrees.
Cumulation with other existing development and/or approved	Sellindge Solar Farm (13MW) is located on land adjacent to the proposed site, just south of the Sellidge Converter Station and alongside the M20, local railway and HS1 transport infrastructure. There are no other operational solar farms within 5km of the proposed site boundary. There are a number of proposals in the pre-application (screening) stages within the study area, including: two solar farm proposals near Bank Farm, c. 2km west of the propose site (18MW, 13/00014; and 18.6MW, 14/00010); a 1.1MW solar development at Park Farm, c. 2.5km north-east (13/00021); and a 1.5MW solar development at land south of the railway line, c. 450m west of the proposed site (12/00018 and 12/00021). Following appropriate mitigation, cumulative impacts are likely to be limited and contained. No likely significant cumulative effects are anticipated.
Use of natural resources	The solar farm will generate electricity from sunlight. The proposed layout will be designed such that no natural features will require removal. No likely significant effects anticipated.
The production of waste	There will be no waste produced during operation of the site. No likely significant effects anticipated.
Pollution and nuisances	There are no emissions associated with the operation of the proposal. Potential noise impacts from electrical equipment are likely to be low. No likely significant effects anticipated.
Risk of major accidents	The developer will install established and fully certified technology. Under CDM, the HSE will be notified at the appropriate time. No likely significant effects anticipated.
Risks to human health	There is no evidence to suggest that there are potential risks to human health from solar farms. No likely significant effects anticipated.

Selection Criteria	Comment
Location of Development	
The environmental sensitivity of geographical areas likely to be affected by development must have regard to:	
Existing and approved land use	The site is currently agricultural land of mixed grade. It comprises slowly permeable, seasonally wet loamy and clayey soils. The high level pre-1988 agricultural land classification map shows the land at the potential site as having a desktop classification at that time of Grade 2 and Grade 3 (Subgrades 3a and 3b). A soil survey will be conducted to identify the Agricultural Land Classification (ALC) conditions specific to the proposed site.
The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	The area proposed for the solar array can still be used for grazing during the solar farm operational period. Existing biodiversity will be conserved and enhanced through appropriate separation distances incorporated into the site design, and landscape and ecological enhancement measures provided as part of the design. There is sufficient solar irradiance for a viable project.
The absorption capacity of the natural environment	There are no environmental designations on the site. The following designations can be found within approximately 2km of the site boundary: • Kent Downs Area of Outstanding Natural Beauty (AONB); • Poulton Wood, Aldington, Local Nature Reserve (LNR); • Hatch Park Site of Special Scientific Interest (SSSI); • Hatch Park Registered Park and Garden; • Romano-British Building south of Burch's Rough Scheduled Monument; • Chapel at Court-at-Street Scheduled Monument; • Church of St Mary in Sellindge (GI); • Church of St Mary in Smeeth (GI);

Selection Criteria	Comment
	Location of Development
The absorption capacity of the natural environment (Continued)	• Church of St Martin (GI); • Mersham Le Hatch (GI); • Cobb's Hall (GII*); • Court Lodge Farmhouse (GII*); • Lodge House (GII*); • Ruffyn's Hill Farmhouse and walls projecting (GII*); • Bower Farmhouse (GII*); • Evegate Manor (GII*); • 96 GII Listed Buildings, predominately within the settlements surrounding the proposed site. The nearest listed buildings to the proposed site are Grade II Hogben Farm, barn and former dairy (approximately 200m south) and Grade II Water Farm House, barn/granary (c. 220m north). Within the confines of the topography and well vegetated field boundaries, the solar scheme is not expected to conflict with the purposes of these designations.

Table 2 - Schedule 3 - Characteristics of Potential Impact

Schedule 3 Criteria		Landscape impacts
a	Magnitude and spacial extent of	The indicative Zone of Theoretical Visibility, **Figure SC3**, shows constrained visibility from the nearest settlements and transport routes. The predicted visibility based on the preliminary site area does not take into account the screening effects of buildings or vegetation.
b	Nature of	Impact on landscape character and visual amenity.
c	Transboundary nature of	Impacts limited to extent of site.
d	Intensity and complexity of	Impacts limited to extent of site.
e	Probability of	Low, due to existing screening around site and panel height. Potential impacts will be assessed within the full LVIA, which will include for viewpoint analysis.
f	Onset, duration, frequency and reversibility of	Impacts limited to operational period. Landscape impacts are fully reversible as the solar farm will be removed at the end of its operational life.
g	Cumulation of	Low, due to screening from existing vegetation and topography and proposed mitigation planting. Potential cumulative impacts will be assessed within the full LVIA which will include for viewpoint analysis.
h	Possibility of effectively reducing the impact	Where impacts are identified, strategic planting may assist with reducing or eliminating the effects.

PROPOSED APPLICATION PROCESS, ASSESSMENTS AND DOCUMENTATION

64 On the basis that Ashford Borough Council concur with this report and advise as an outcome of the Screening Process that an EIA is not required, it is proposed that detailed reports on environmental and technical impacts will accompany the planning application to ensure that the Council has sufficient information to determine the application.

65 It is envisaged that a number of assessments will be undertaken as identified in **Table 3**, in accordance with the associated present best practice and relevant guidance including:

- National Planning Policy Framework (NPPF), MHCLG, 2019;
- National Policy Statements: EN-1 (Overarching Statement) and EN-3 (Renewable Energy Infrastructure), DECC, 2011;
- National Planning Practice Guidance, MHCLG, 2019 (online); and
- The Town and Country Planning (England and Wales) Regulations, The Stationery Office, 2011.

66 The assessments will be submitted with the planning application, together with: a description of the proposal; a Design and Access Statement; and a full and complete Planning Statement that will describe the planning context at the national and local level, as well as appraising the development's compliance with the development plan. Figures referenced within the application documents (including visualisations) will be presented as part of the application.

Table 3 - Scope of Work and Guidance

Topic	Scope	Guidance
Ecology	Desk-based assessment with consideration of potential effects on legally protected/BAP species and a Phase I Habitat survey. Targeted ecological surveys if identified as necessary from the Phase 1 Survey.	Guidelines for Ecological Assessment (IEEM, 2006) Handbook for Phase 1 Habitat Survey (JNCC, 2003) Disturbance and Protected Species: Understanding and Applying the Law in England and Wales - A view from Natural England and the Countryside Council for Wales (Natural England, 2008) Protection of Badgers Act 1992 (as amended): Interpretation of 'Disturbance' in Relation to Badgers Occupying a Sett, Guidance Note (Natural England, 2009)
Landscape and Visual	5km study area with representative viewpoints selected in consultation with the Local Authority. Assessment of direct and indirect impacts on the LCT and LCAs within the study area.	Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA) (Landscape Institute and IEMA, 2013) Landscape Character Assessment – Guidance for England and Scotland (Swanwick and LUC, 2002, produced on behalf of the Countryside Agency and Scottish Natural Heritage)
Heritage	Heritage assessment that would address the potential direct physical impacts upon heritage assets of archaeological interest, together with any predicted effects upon the setting and significance of Scheduled Monuments, Listed Buildings and Conservation Areas within the vicinity.	NPPF, 2019 Management of Recording Projects in the Historic Environment: MORPHE (English Heritage, 2006) Code of Conduct (Chartered Institute for Archaeologists [CIfA] [revised edition], 2014) Standard and Guidance for Historic Environment Desk-Based Assessment (CIfA, 2017)

Topic	Scope	Guidance
Glint and Glare	Desk-based assessment of predicted operational stage impacts upon residents, users of highways, railways and aviation interests.	NPPG (online) Planning Guidance for The Development of Large-Scale Ground Mounted Solar PV Systems (BRE, 2013) Interim CAA Guidance – Solar Photovoltaic Systems (CAA, 2010) US Federal Aviation Administration Policy, 2010
Noise	Desk-based assessment of predicted construction noise and noise during operation.	Noise Policy Statement for England NPPF, 2019 NPPG (online)
Traffic, Transport and Access	Desk-based assessment of predicted construction traffic and access route.	Guidelines for the Assessment of Road Traffic (IEA, 1993) Design Manual for Roads and Bridges (Highways Agency, 1995)
Flood Risk and Surface Water Drainage	As the site is over 1ha, a Flood Risk Assessment will be undertaken - noting the majority of the site lies within Flood Zone 1, although Flood Zones 2 and 3 are also located within the site area. Surface Water Drainage Assessment and Management Plan to be prepared considering the site terrain and placement of permeable and impermeable infrastructure, SuDS and climate change.	NPPF, 2019 NPPG (online)
Socio-Economic Effects (including for Pre-Application Consultation)	Electrical production, emissions offset and energy balance. Pre-application consultation with the local community.	NPPG (online)

CONCLUSIONS

67 Following an initial assessment of the proposed East Stour Solar Farm against the Schedule 3 criteria of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It is concluded that **an Environmental Impact Assessment (EIA) would not be required**.

68 It is proposed that detailed reports on environmental and technical impacts (including landscape, heritage, ecology, traffic, transport and access, noise, flood risk and socio-economics) will accompany the planning application. These assessments follow nationally accepted and tested methods and guidelines and will ensure that a thorough, robust application is presented to Ashford Borough Council.

69 Alongside the requested provision of a Screening Opinion, Officers of Ashford Borough Council are invited to comment further on this scope of work to ensure that any future application meets requirements.

REFERENCES

Act of Parliament, 2017, Town and Country Planning (Environmental Impact Assessment) Regulations: Statutory Instrument 2017 no. 571, HMSO, UK.

Department for Business, Enterprise and Industrial Strategy (DBEIS), 2020, Sub-National Electricity Consumption Statistics, retrieved from: https://www.gov.uk/government/statistical-data-sets/regional-and-localauthority-electricity-consumption-statistics [Accessed 04/05/21].

Department of Energy and Climate Change, 2011a, Overarching National Policy Statement for Energy (EN-1), HMSO, UK.

Department of Energy and Climate Change, 2011b, National Policy Statement for Renewable Energy Infrastructure (EN-3), HMSO, UK.

Ministry of Housing Communities and Local Government, 2019, National Planning Practice Guidance, Environmental Impact Assessment, Screening Flowchart, retrieved from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/630686/eia-flow1.pdf [Accessed 04/05/21].

Ministry of Housing, Communities and Local Government, 2019, National Planning Policy Framework, HMSO, UK.

EAST STOUR SOLAR FARM

Screening Request Figures

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JULY 2021

engena

EAST STOUR SOLAR FARM SCREENING REQUEST FIGURES

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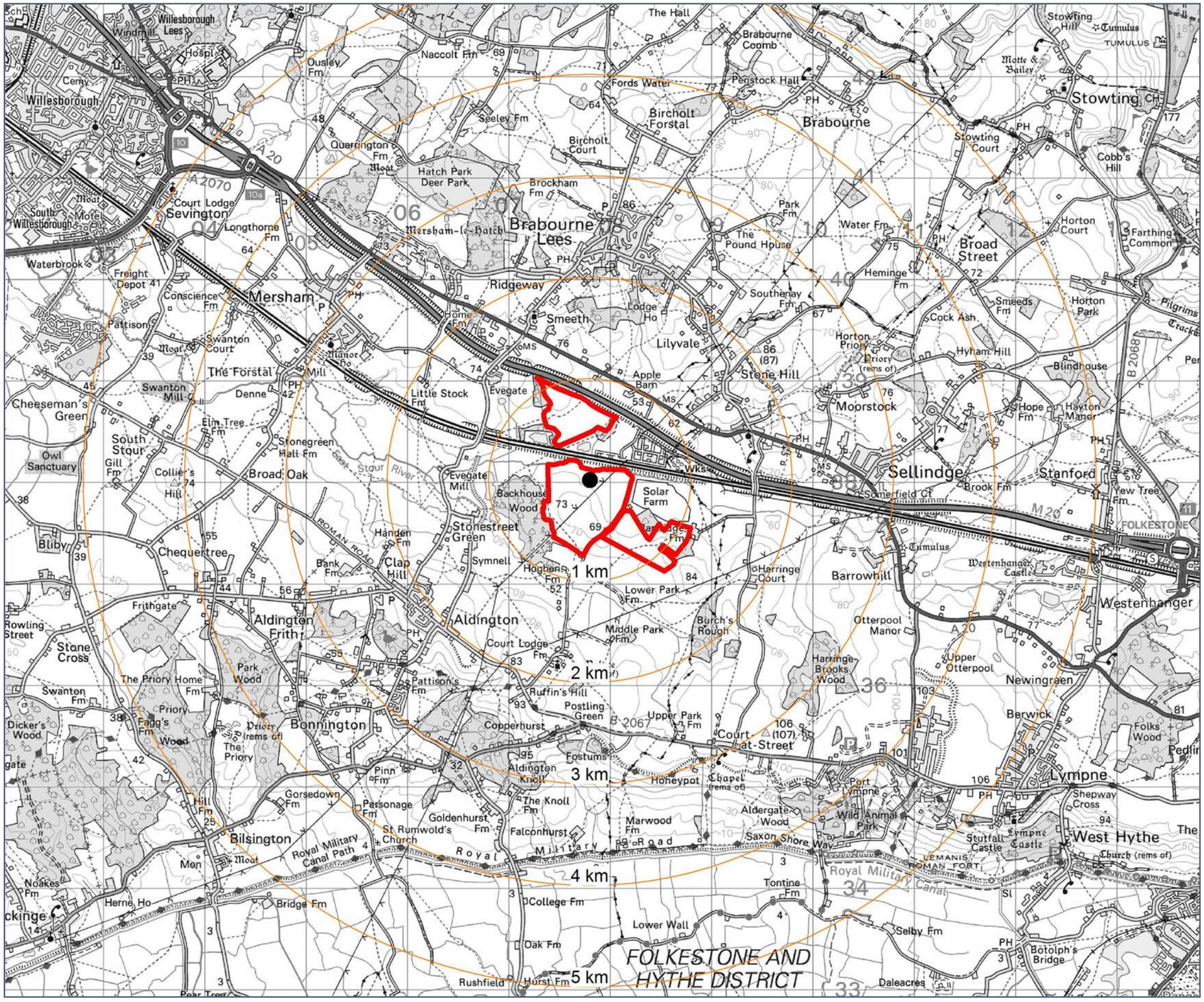
Figure SC3	Zone of Theoretical Visibility (ZTV) for 3.0m panels	3



Scale 1:40 000 at A3

EAST STOUR SOLAR FARM

Proposed Site Location

Figure SC 1

KEY

- North
- Proposed Development Boundary
- 1km radius from approximate site centre

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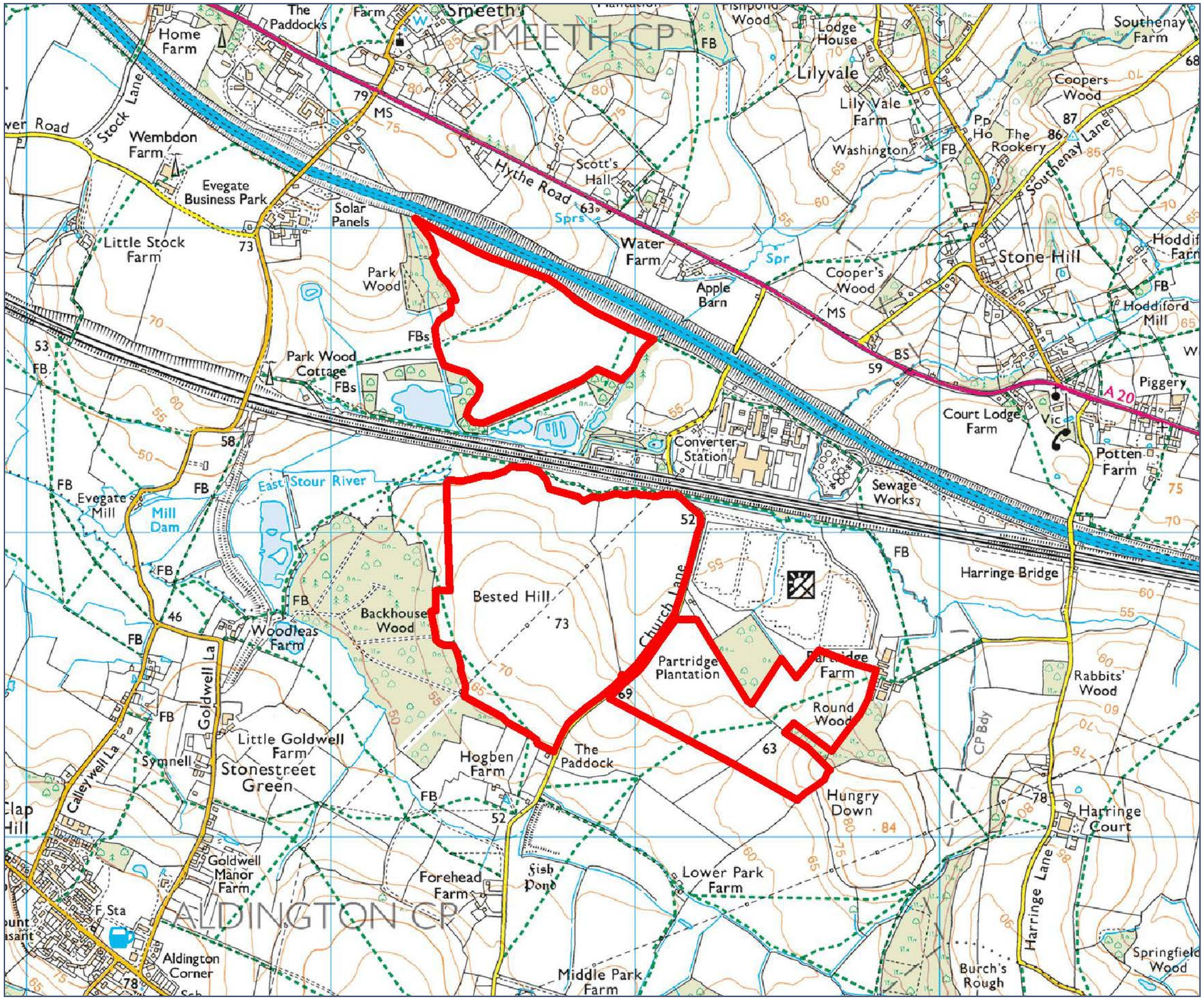

EAST STOUR SOLAR FARM

Proposed Development Boundary

Figure SC 2

KEY

North

Indicative Development Boundary

Scale 1:10 000 at A3

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Project: East Stour Solar Farm

Viento Environmental

- Approximate overall ownership boundary
- Locational marker within proposed development
- Approximate location of AONB boundary
- Historic Parks and Gardens

Theoretical visibility of East Stour Solar Farm:

- 1 locational marker visible
- 2 locational markers visible
- 3 locational markers visible
- 4 locational markers visible
- 5 locational markers visible
- 6 locational markers visible
- 7 locational markers visible

Locational marker points:

A	607500, 138850	+3.0m AGL
B	607680, 138500	+3.0m AGL
C	607540, 138160	+3.0m AGL
D	607580, 137730	+3.0m AGL
E	608100, 138060	+3.0m AGL
F	608020, 137500	+3.0m AGL
G	608480, 137350	+3.0m AGL

Notes:

1. ZTV, generated 10th May 2021.
2. Predicted visibility is for observer eye level 2m above ground level.
3. The analysis does not take into account the screening effects of vegetation, buildings or other surface features.
4. Created using Ordnance Survey digital 5m terrain data.
5.

Scale: 1:40,000 @A3

0 500m 1km 2km

N

Figure: SC 3
5km Radius Zone of Theoretical Visibility

Drawn by: BJD
Checked by:
Date: 23-05-21

NOTIFICATION OF SCREENING OPINION OF THE LOCAL PLANNING AUTHORITY

Date of Decision **31 August 2021**

ASHFORD
BOROUGH COUNCIL

Mr I Booker
Engena Limited
The Old Stables
Bosmere Hall
CREETING ST MARY
IP6 8LL

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

APPLICATION NO: **21/00002/EIA/AS**

PROPOSAL: **Screening opinion for proposed solar farm with a rated capacity of up to 49.9MW**

LOCATION: **Land south of M20 and south of railway line to the east and west of, Church Lane, Aldington, Kent**

APPLICANT: **Engena Limited The Old Stables Bosmere Hall CREETING ST MARY IP6 8LL**

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

APPLICATION NO: **21/00002/EIA/AS**

PROPOSAL: **Screening opinion for proposed solar farm with a rated capacity of up to 49.9MW**

LOCATION: **Land south of M20 and south of railway line to the east and west of, Church Lane, Aldington, Kent**

APPLICANT: **Engena Limited The Old Stables Bosmere Hall CREETING ST MARY IP6 8LL**

DECISION: The Local Planning Authority is of the opinion that an Environmental Impact Assessment is required for the following reasons:-

This decision is issued in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The proposal comprises an array of ground-mounted solar panels and ancillary infrastructure including inverters, transformer units, electrical infrastructure, switchgear, storage and welfare cabins and a temporary construction compound. The development also include the installation of underground cable route to a substation cabinet on a proposed Pivot Power battery energy storage site north of the M20 on Church Lane west of the existing Sellindge Converter Station. The grid connection will connect from this cabinet under Church Lane to the adjoining National Grid substation.

It is understood that the proposed solar farm and battery are each independent stand-alone projects and viable and implementable each in their own right - should either consent not be forthcoming. The battery energy storage project is therefore subject to a separate application. It is anticipated that the proposed solar farm development would be generating electricity for a period of fourty (40) years and would have a rated capacity of up to 49.9MW at the point of connection. The panels would be ground-mounted, orientated to face approximately south, at a fixed angle (typically between 20-25º) and with a maximum height above ground of approximately 3 metres.

Solar energy developments are not listed under Schedule 1 and are not explicitly listed under Schedule 2. However, Class 3(a) lists the following as Schedule 2 development:

> *'(a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)'; where 'the area of the development exceeds 0.5 hectare.'*

A formal Screening Process is set out within the EIA Regulations to determine whether or not an EIA is appropriate. The online Planning Policy Guidance (PPG) (from Paragraph: 017 Reference ID: 4-017-20170728) sets out guidance to the Regulations for developers and Authorities on EIA and their application including the application of the Screening Process.

The area of the development exceeds 0.5 ha which is the applicable threshold in column 2 of the table under schedule 2 of the Regulations and therefore EIA may be required. For a development which exceeds the threshold in column 2, the potential significant effects of the development should be considered in relation to the criteria set out under schedule 3.

Paragraph 058 of the National Planning Practice Guidance provides further guidance on indicative screening thresholds. Under column 3 (Indicative Criteria and Thresholds) in respect of thermal output of more than 50MW, it is advised that small stations using novel forms of generation should be considered carefully with column 4 suggesting that level of emissions to air, arrangements for the transport of fuel and any visual impact are the key issues for consideration. Although the proposed output is below 50MW and the operation of the solar farm does not involve the transportation of fuel or emissions. Nonetheless landscape visual impact, heritage impact and impact upon the wildlife habitats and ecology are main issues for consideration.

Schedule 3 to the Regulations provides selection criteria for screening schedule 2 development. The proposal is a schedule 2 development by virtue of exceeding the 0.5 ha threshold set out under schedule 2. An EIA is required if the development is likely to result in significant effects on the environment. These effects are examined under 3 broad headings:

1. Characteristics of development
2. Location of development
3. Characteristics of the potential impact**.**

<u>1. Characteristics of the development</u>

Of the 7 criteria listed under this heading, the size and design of the whole development; cumulation with other existing development and/or approved development; and the use of natural resources, in particular land, soil, water and biodiversity are of particular importance.

The proposed solar farm would extend over an area of approximately 102 hectares. It is adjacent to the Sellindge solar farm which covers 25 hectares, approved and implemented under reference 14/00398/AS. The cumulative size of 127 hectares is considered to be very large in the context of this rural location, where the largest developments are modest farm buildings, residential dwellings and an ecclesiastical building. In an area which is characterised by open countryside with expansive views and scattered dwellings, it is considered that the impact of the proposed installation in combination with the existing installation would be great. The installation and its visual impact would be visible from many viewpoints.

2. Location of the development

The environmental sensitivity of geographical areas likely to be affected by the development must be considered having regard to existing use, relative abundance, quality and capacity to regenerate the natural resources and the absorption capacity of the natural environment with particular regard to a number of specified areas.

The site lies within a designated Landscape Character Area with a number of public footpaths through and around the site. There are many extensive and panoramic views into and out of the area, including the view from the St. Martin's churchyard on Church Lane and the Aldington Conservation Area. The surrounding area is characterised by a very undulating landform and this provides a strong local distinctiveness and continuity throughout the area.

3. Types and characteristics of the potential impact

The likely significant effects of the development on the environment must be considered in relation to criteria set out under the 2 headings above, especially with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

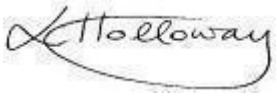
(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
(b) the nature of the impact;
(c) the transboundary nature of the impact;
(d) the intensity and complexity of the impact;
(e) the probability of the impact;
(f) the expected onset, duration, frequency and reversibility of the impact;
(g) the cumulation of the impact with the impact of other existing and/or approved development;
(h) the possibility of effectively reducing the impact

The impact of the proposal would persist for the lifetime of the development, which is anticipated to be 40 years. Although the impact of the development is reversible provided adequate planning safeguards are attached and implemented, in general EIA will be needed for Schedule 2 development in three main types of case:

a) for major developments which are of more than local importance;
b) for developments which are proposed for particularly environmentally sensitive or vulnerable locations; and
c) for developments with unusually complex and potentially hazardous environmental effects.

When the potential significant effects of the development are considered in relation to the characteristics of the development (particularly the cumulation with other existing development and/or approved development; and the use of natural resources, in particular land, soil, water and biodiversity) and the location of the development in relation to nearby heritage assets, the development is considered to be an EIA development and an EIA is therefore required.

Information to be included in the Environmental Statement can be found at Schedule 4 of the 2017 Regulations.



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