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HALLIDAY**

Planning, Landscape & Environment  
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# East Stour Solar Farm

## Land South of the M20, Church Lane, Aldington, Kent

Rebuttal Landscape and Visual Evidence of:  
John Ingham BA (Hons), Dip LA, CMLI

Prepared for:  
EDF Energy Renewables Limited (trading as EDF Renewables)

Core Document 10.7  
27th January 2025

LPA Planning Application Reference: 22/00668/AS  
PINS Appeal Reference: APP/E2205/W/24/3352427

Town & Country Planning Act 1990

# Contents

<b>1</b>	<b>Introduction</b>	<b>2</b>
<b>2</b>	<b>The LVIA as Part of the Design Process</b>	<b>2</b>
<b>3</b>	<b>Landscape Character</b>	<b>3</b>
<b>4</b>	<b>Visual Amenity</b>	<b>3</b>
<b>5</b>	<b>Proposed Landscape Mitigation</b>	<b>4</b>

**Appendix 1 – Additional photomontage at Viewpoint 7 showing the visual effect of a reduced solar array across Bested Hill as proposed by Mr Withycombe**

**Appendix 2 – Plans Showing Additional Detail of the Proposed Landscape Mitigation**

# 1 INTRODUCTION

- 1.1.1 The following Rebuttal Proof of Evidence has been prepared further to my main Landscape and Visual Proof of Evidence (**CD10.2**) on behalf of EDF Energy Renewables Ltd. It responds to evidence submitted to the Inquiry by Mr Withycombe on behalf of Ashford Borough Council.
- 1.1.2 In this rebuttal I respond to specific issues raised by Mr Withycombe but I have not sought to respond to every point in his evidence. It should not be inferred that I agree with other matters which are not addressed in this Rebuttal Statement. Section 4 of Mr Withycombe's evidence in particular is essentially a repetition of his previous comments concerning the original LVIA (**CD 1.8.2**) and the SEI LVIA (**CD 1.14.2**). I have already addressed these comments in Section 6 of my main proof of evidence (**CD 10.2**).

# 2 THE LVIA AS PART OF THE DESIGN PROCESS

- 2.1.1 In Section 5 of his evidence Mr Withycombe suggests a lack of evidence to demonstrate how adverse visual effects were considered as part of the design process although he does acknowledge the Layout Progression Plan in SEI Figure 11.10 which identifies zones of the wider land holding that were excluded from the scheme for broad visual amenity reasons and residential visual amenity reasons.
- 2.1.2 Specifically he refers to the view from Footpath AE474 (Viewpoint 7) on the Aldington Ridge, from which I have previously acknowledged that solar panels located on the southern side of Bested Hill would be visible. Mr Withycombe asserts that a '*substantial benefit to the reduction of visual harm*' (Paragraph 5.4) could have been delivered by removing solar panels to a line he identifies further north in the field.
- 2.1.3 To illustrate his point, Mr Withycombe presents in Appendix 5 of his evidence a series of photographs and hand annotated sketches based on telescopic (zoomed-in) photography at Viewpoint 7. These were originally prepared and submitted to the planning authority by the Church Lane Residents Group and Aldington Parish Council. The annotations and sketches do not purport to follow recognised guidance for the production of visualisations and they are essentially crude schematic illustrations.
- 2.1.4 Contrary to Mr Withycombe's assertion that the Appellant did not take visual effects on this view into consideration, I am aware that the Appellant reviewed and gave due consideration to a proposal by the Church Lane Residents Group and Aldington Parish Council to remove solar panels from the southern side of Bested Hill in September 2022. A photomontage was prepared from the same viewpoint illustrating the visual effect of an alternative layout where solar panels were drawn back to the line proposed by the Parish Council. For information, I present the photomontage as Appendix 1 to this rebuttal proof of evidence.
- 2.1.5 The photomontage demonstrates that while there would be a marginal reduction in visibility by drawing the solar array back to the line suggested, the array would still be substantively visible across the crest of the hill (even with mitigation hedgerow planting in year 10). In my opinion, the reduction in the magnitude of the visual effect at this viewpoint would be minor. The reduction in generating capacity which would result from the removal of these panels would not in my opinion justify the removal of these solar panels.
- 2.1.6 Despite acknowledging the Layout Progression Plan in SEI Figure 11.10, Mr Withycombe suggests that it may have been possible to relocate the solar panels from the southern side

of Bested Hill to the field immediately adjacent to Bested House. I do not agree that this would have been a preferable design solution. The additional effect on the visual amenity of Bested House would have outweighed any benefit to the small reduction of visual impact on Footpath AE474.

### 3 LANDSCAPE CHARACTER

- 3.1.1 I believe that there is little between Mr Withycombe and myself in terms of the likely effect on landscape character. We both recognise that there would be some localised effects on landscape character. However, I wish to clarify the Appellant's and my own position which is slightly misrepresented in paragraph 6.3 of his evidence.
- 3.1.2 Mr Withycombe states that '*there is agreement [in the Statement of Common Ground] that the proposed development would have a residual significant adverse effect on these two local character areas*' with reference to the two host landscape character areas.
- 3.1.3 For clarification and as recorded in the Landscape Statement of Common Ground (**CD 9.2**), it is my position that in Year 10 '*significant adverse effects on landscape character would still affect land within the Evegate Mixed Farmlands LCA and part of the East Stour Valley LCA*' [my emphasis].
- 3.1.4 I have set out in my main proof of evidence the extent of where I believe significant effects on landscape character would occur in the two host character areas. I explain that significant effects would not affect all parts of either of the two host character areas.

### 4 VISUAL AMENITY

- 4.1.1 In Section 7 of his evidence Mr Withycombe presents his own analysis of effects on visual amenity with a primary focus on the localised PROWs which pass through or adjacent to the Appeal Site. I note that despite his previous criticisms of the submitted LVIA and SEI LVIA, he presents no methodology or assessment criteria to justify his own conclusions.
- 4.1.2 Nevertheless, there appears to be little between Mr Withycombe and myself in terms of our conclusions on the likely effect on visual amenity in the early years of operation. The principal difference in opinion appears to be the extent to which we consider effects would be mitigated in due course by new or enhanced landscaping.
- 4.1.3 I have acknowledged in my main proof of evidence that some significant visual effects would remain along certain sections of some localised PROWs for the operational duration of the solar farm but I also note that along many sections of these PROWs mitigation planting would reduce the magnitude of change and significance of the visual effect.
- 4.1.4 Mr Withycombe correctly notes that Table 10.2 in the Appellant's Statement of Case suggests that from year 10 onwards there would be a beneficial effect on the view from some sections of the footpaths which run immediately adjacent to the site (Paragraph 7.8 which refers to PROW AE432, Paragraph 7.9 which refers to PROW AE656 and Paragraph 7.11 which refers to PROW AE457). He disagrees with this conclusion.
- 4.1.5 As noted in my main proof of evidence, I did not have any involvement in the preparation of the Appellant's Statement of Case. I therefore wish to clarify my own position in this regard.

- 4.1.6 Where in Table 10.2 of the Appellant's Statement of Case, it is suggested that there would be a beneficial effect on the view from certain defined sections of PRoWs AE432, AE656 and AE457, I consider the effect would be neutral rather than beneficial (ie there would be a balance of positive and negative effects on the view). However, along each of those sections of the PRoW identified above, I consider that the effect on visual amenity would be much reduced and the residual effect on these sections of PRoW would be not significant.
- 4.1.7 The above clarification should not be confused with and does not alter my conclusion on the separate matter of landscape fabric. It remains my opinion that the proposed landscape mitigation would have an overall beneficial effect on the landscape fabric of the Appeal Site.

## 5 PROPOSED LANDSCAPE MITIGATION

- 5.1.1 In Section 8 of his evidence Mr Withycombe makes some suggestions regarding potential additional mitigation.
- 5.1.2 He criticises the Mitigation Plan presented in SEI Figure 11.9 Revision B (**CD 1.21**) but in my opinion this is clearly only a conceptual illustration of the landscape mitigation proposed for the purposes of setting the parameters against which the landscape and visual effects have been assessed. In my opinion there is sufficient flexibility within the plan to accommodate much of the mitigation he has proposed. A condition is proposed which would require the submission of full landscaping details. Nevertheless, in an attempt to communicate more clearly the mitigation which is already illustrated on SEI Figure 11.9 Revision B I have included at Appendix 2 of this rebuttal a series of larger scale plans illustrating the landscaping mitigation proposed.
- 5.1.3 Mr Withycombe suggests native scrub and tree belts west and east of Church Lane. I do not consider this to be necessary. Once established, the new and enhanced hedgerows along the road will deliver adequate mitigation screening from the lane. New hedgerows could be planted as triple rows and include hedgerow trees to provide additional density.
- 5.1.4 I have addressed above his proposal to move some of the panels from the southern side of Bested Hill to the field adjacent to Bested House and stated clearly that I do not consider this to be a preferable design solution.
- 5.1.5 He also suggests riparian planting adjacent to the River Stour. This is already proposed on the SEI Figure 11.9 Revision B but the plans presented in Appendix 2 of this rebuttal demonstrate that riparian tree planting and wet grassland could be accommodated alongside the River Stour. This would complement the riparian habitats proposed in the Stonestreet Green scheme.
- 5.1.6 He proposes a more substantial scrub belt located between Footpath AE457 and the solar panels. Again I do not consider this is necessary and a new triple row hedgerow alongside the footpath will provide adequate mitigation to users of the PRoW.
- 5.1.7 He proposes new scrub planting in the northern field parcel. Whilst I acknowledge this would deliver landscape enhancement and betterment, I do not consider this is necessary to mitigate adverse effects of the Proposed Development.
- 5.1.8 Likewise, I do not consider that further scrub planting adjacent to the Footpath Diversion B is necessary to mitigate visual effects. The proposed enhancements to the existing hedgerow would adequately screen the Proposed Development from the diversion.

- 5.1.9 I therefore conclude that the additional mitigation measures outlined by Mr Withycombe are unnecessary to adequately mitigate the Proposed Development.

**Appendix 1 – Additional photomontage at Viewpoint 7 showing the visual effect of a reduced solar array across Bested Hill as proposed by Mr Withycombe**





Photomontage at completion - based on Church Lane Group proposals

**VIEWPOINT 7:** Footpath AE474 west of Aldington  
**Revision A**

**East Stour Solar Farm**



Location Plan

OS reference:	607222E 136331N	Visualisation Type:	Type 3	Camera:	Canon 6D Mk II
AOD:	85m	Horizontal field of view:	90° (cylindrical projection)	Lens:	Canon 50mm FFL
Direction of view:	20°	Vertical field of view:	25°	Camera height:	1.5m AGL
Nearest solar panel:	1161m	Enlargement factor:	96% @ A1	Date and time:	11/10/2021 10:37





Photomontage after 10 years - based on Church Lane Group proposals and suggested mitigation

**VIEWPOINT 7:** Footpath AE474 west of Aldington  
**Revision A**

**East Stour Solar Farm**



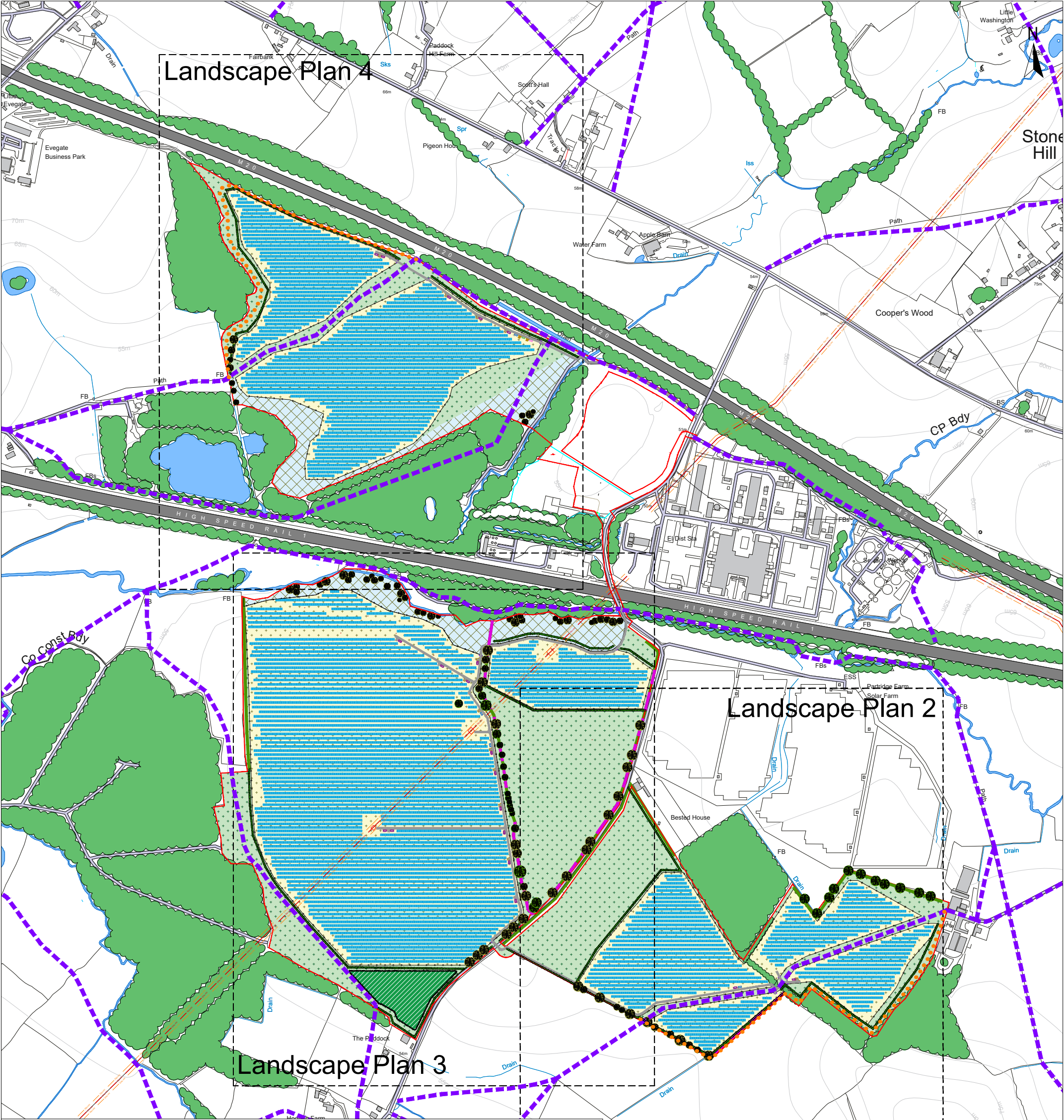
Location Plan

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AOD:	85m	Horizontal field of view:	90° (cylindrical projection)	Lens:	Canon 50mm FFL
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Nearest solar panel:	1161m	Enlargement factor:	96% @ A1	Date and time:	11/10/2021 10:37



## Appendix 2 – Plans Showing Additional Detail of the Proposed Landscape Mitigation



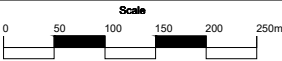


- KEY**

  - Application site boundary
  - Existing woodland / shrubs
  - Existing hedgerow / trees
  - Existing overhead powerlines
  - Improvements to existing field boundary
  - Approximate route of existing PRoWs
  - Proposed new permissive footpaths
- Proposed low density native woodland planting
  - Proposed hedgerow
  - Illustrative location of proposed trees / riparian trees
  - Proposed meadow with wildflowers
  - Proposed meadow grass
  - Proposed wet grassland

GENERAL NOTES

This plan is for illustrative purposes only. Not for construction.



Rev.	Date	Amendment	Drawn	Chkd.	Appd.

Client	EDF Renewables
Project Title	East Stour Solar Farm
Drawing Title	Illustrative Landscape Mitigation Plan (Plan 1 of 4)
File Path	ESP-SH-ELS-M2-LS-001.dwg

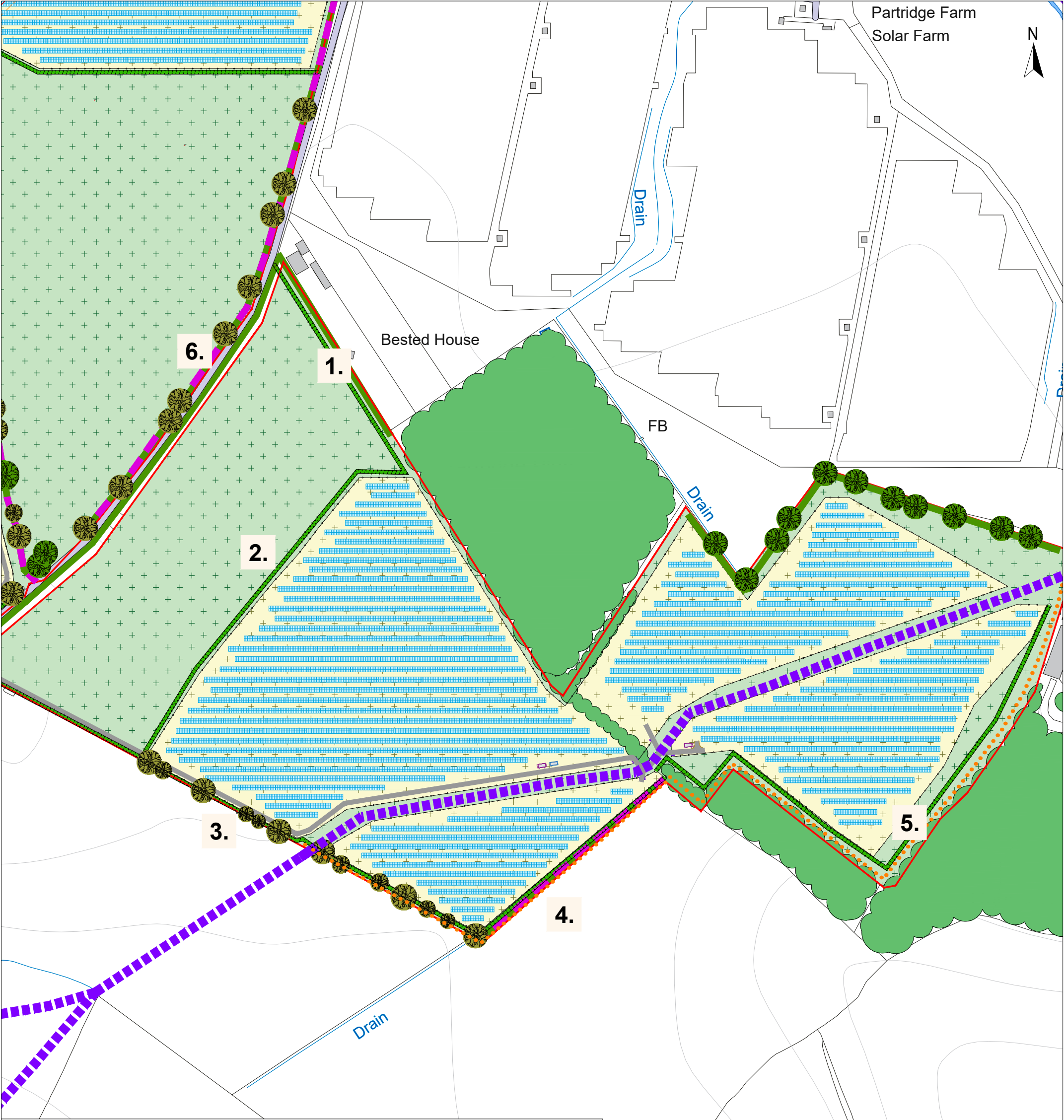
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Drawn	Date	Checked	Date	Approved	Date
JD	01/25	JI	01/25	JI	01/25
Scale	1:7,500	Orig Size	A3	Status	PUBLIC INQUIRY
Drawing No.	0969-01	Rev.	-		





KEY

Application site boundary

Existing woodland / shrubs

Existing hedgerow / trees

Existing overhead powerlines

Improvements to existing field boundary

Approximate route of existing PRoWs

Proposed new permissive footpaths

Proposed low density native woodland planting

Proposed hedgerow

Illustrative location of proposed trees / riparian trees

Proposed meadow with wildflowers

Proposed meadow grass

Proposed wet grassland

11.

Target note - see below

TARGET NOTES

1. Additional native hedgerow (maintained at 3m in height) immediately south of Bested House to supplement existing hedgerow and provide additional screening to residential property.

2. New native hedgerow (maintained at 3m in height) along western boundary of solar array to provide additional screening of infrastructure from Bested House and Church Lane.

3. New native hedgerow (maintained at 3m in height) with hedgerow trees to provide screening of infrastructure from the south.

4. Gaps in existing hedgerow infilled and an additional row of hedgerow planting to provide screening of infrastructure from the south east and the new permissive footpath.

5. New hedgerow (maintained at 3m in height) to provide screening of infrastructure from the new permissive footpath.

6. Gaps in existing hedgerow infilled and an additional row of hedgerow planting on the field side (maintained at 3m in height) to increase density and provide screening from Church Lane. Scattered native tree planting along the hedgerow to provide additional structure and enhance the character of Church Lane.

GENERAL NOTES

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<div>020406080100m</div> <div>Scale</div>					
Rev.	Date	Amendment	Drawn	Chkd.	Appd.

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Client

EDF Renewables

Project Title

East Stour Solar Farm

Drawing Title

Illustrative Landscape Mitigation Plan (Plan 2 of 4)

File Path

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Drawn	Date	Checked	Date	Approved	Date		
JD	01/25	JI	01/25	JI	01/25		
Scale	Orig Size		Status				
1:3,000	A3		PUBLIC INQUIRY				
Drawing No.					Rev.		
0969-02					-		





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- KEY
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Target note - see below

TARGET NOTES

1. Additional native hedgerow (maintained at 3m in height) immediately south of Bested House to supplement existing hedgerow and provide additional screening to residential property.

2. New native hedgerow (maintained at 3m in height) along western boundary of solar array to provide additional screening of infrastructure from Bested House and Church Lane.

6. Gaps in existing hedgerow infilled and an additional row of hedgerow planting on the field side (maintained at 3m in height) to increase density and provide screening from Church Lane. Scattered native tree planting along the hedgerow to provide additional structure and enhance the character of Church Lane.

7. Gaps in existing hedgerow infilled and an additional row of hedgerow planting on the western field side (maintained at 3m in height) to increase density and provide screening from Church Lane.

8. New native hedgerow (maintained at 3m in height) to provide screening of infrastructure from Church Lane.

9. New native hedgerow (maintained at 3m in height) to provide screening of infrastructure from Church Lane.

10. Meadow maintained for skylark mitigation.

11. New triple row of native hedgerow planting (maintained at 3m in height) along the western side of Church Lane and north of The Paddock for additional screening of infrastructure.

12. New low density native woodland planting to provide additional screening of infrastructure from the Paddock.

13. New triple row of native hedgerow planting (maintained at 3m in height) along the western side of solar array for additional screening of infrastructure from the south including PRoW AE457.

14. Additional planting outside of the redline boundary is proposed as part of the Stonestreet Green Scheme.

15. Wet grassland with scattered riparian tree planting within the low lying flood plain adjoining the River Stour.

GENERAL NOTES

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020406080100m

Scale

Rev.	Date	Amendment	Drawn	Chkd.	Appd.

Client	EDF Renewables
Project Title	East Stour Solar Farm
Drawing Title	Illustrative Landscape Mitigation Plan (Plan 3 of 4)
File Path	ESP-SH-ELS-M2-LS-001.dwg

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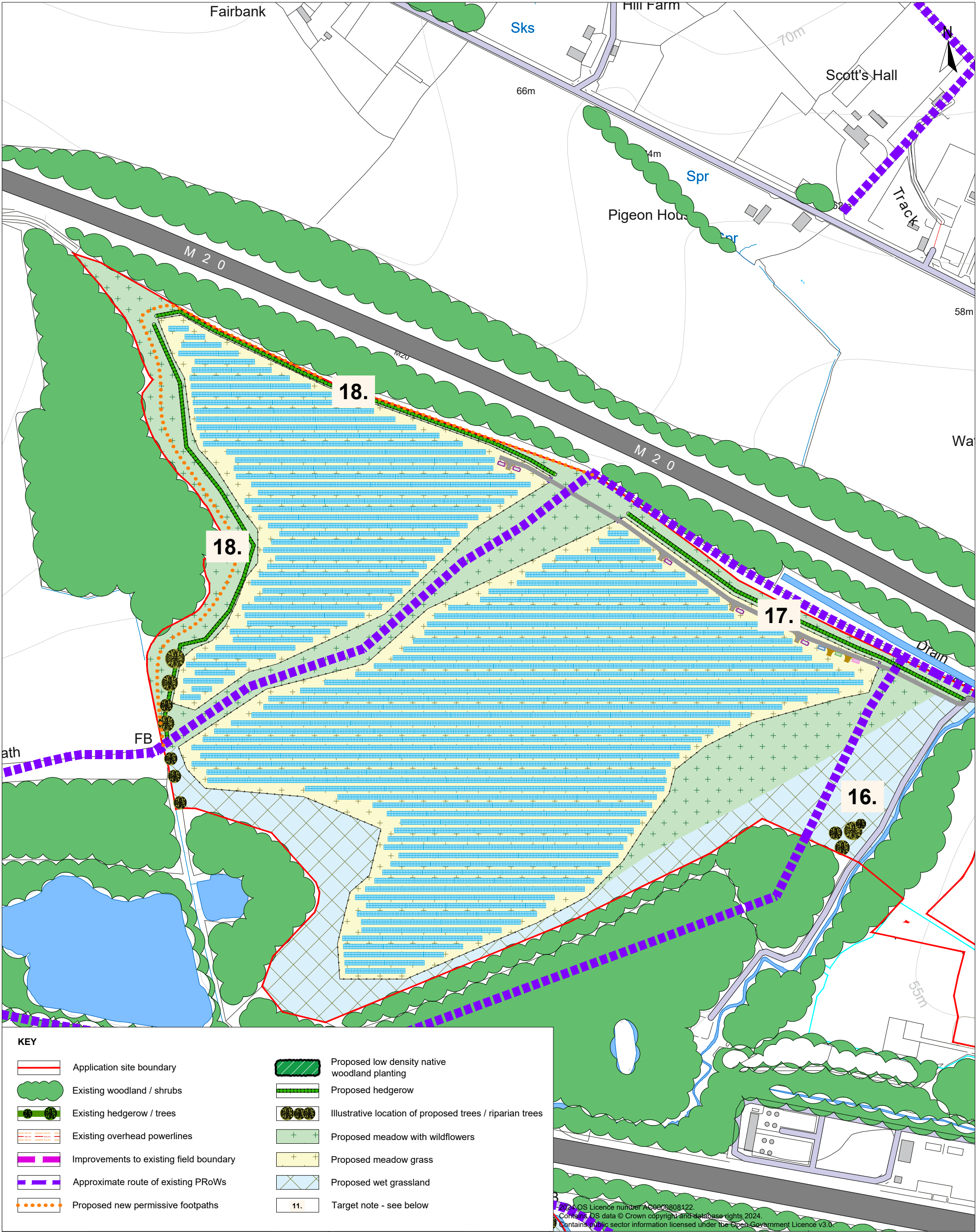
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Scale	1:3,000	Orig Size	A3	Status	PUBLIC INQUIRY
Drawing No.	0969-03	Rev.	-		





Application site boundary

Existing woodland / shrubs

Existing hedgerow / trees

Existing overhead powerlines

Improvements to existing field boundary

Approximate route of existing PRoWs

Proposed new permissive footpaths

Proposed low density native woodland planting

Proposed hedgerow

Illustrative location of proposed trees / riparian trees

Proposed meadow with wildflowers

Proposed meadow grass

Proposed wet grassland

Target note - see below

**TARGET NOTES**

16. Wet grassland with scattered riparian tree planting within the low lying flood plain adjoining the River Stour.

17. New triple row of native hedgerow planting (maintained at 3m in height) along the northern side of solar array to provide screening of infrastructure from PRoW AE432.

18. New triple row of native hedgerow planting (maintained at 3m in height) along the northern and western sides of solar array to provide screening of infrastructure from the new permissive footpath.

**GENERAL NOTES**

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Drawing Title					
Illustrative Landscape Mitigation Plan (Plan 4 of 4)					
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0969-04					-		