EAST STOUR SOLAR FARM

Pre-Application Advice Request

PREPARED ON BEHALF OF

EDF renewables

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engena

CONTENTS

INTRODUCTION

1 This document forms the request for Pre-Application Advice from Ashford Borough Council for a 49.9MW-scale solar farm. The potential solar farm is located to the south of the M20, west of Sellindge and north-east of Aldington, as shown at **Plate 1 on page 8**.

2 This Request follows the guidance for Major Application Pre-Application Advice provided by Ashford Borough Council and:

- introduces the project;
- describes the site location;
- describes the potential development in more detail; and
- presents a preliminary Design and Access Statement.

3 Inherent mitigation through design and anticipated assessments are highlighted in blue text.

Project Overview

4 The proposed project near to the Sellindge Converter Station includes 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 site will additionally comprise a below-ground 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 Converter Station. The grid connection will connect from this cabinet under Church Lane to the adjoining National Grid substation.

5 Whilst the battery energy storage application in preparation and this proposed solar scheme are clearly complimentary in nature, the 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 and not considered further here.

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

7 The potential solar farm 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 20-25°) and with a maximum height above ground of approximately 3.0m.

8 A solar farm of this scale in this location would typically have a potential annual yield of approximately 70 000MWh (based on the average solar irradiation figure for the site as taken from the Solar Radiation Database (PVGIS, accessed 6th May, 2021) and typical array parameters).

9 In terms of household electricity consumption, this would be sufficient to offset the equivalent annual energy needs of approximately 17 000 average Ashford Borough homes (to 3 Significant Figures, based on average domestic consumption per household of 4 110kWh (DBEIS, 2020).

10 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.

The Applicant

11 The Applicant for the proposed development will be EDF Renewables. Engena is supporting EDF Renewables with the provision of planning services.

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

13 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.

14 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).

Legislative Context

15 Sections 14 and 15 of the Planning Act 2008 describe the circumstances in which the construction or extension of a generating station constitutes a Nationally Significant Infrastructure Project (NSIP).

16 NSIP projects are examined on behalf of the relevant Secretary of State by the Planning Inspectorate. In the case of energy projects, the decision on whether to award a Development Consent Order is made by the Secretary of State for BEIS, who would also award a generating licence through Section 36 of the Electricity Act 1989.

17 A generating station is considered as an NSIP if:

- it is in England;
- it does not generate electricity from wind;
- it is not an offshore generating station; and
- its capacity is more than 50MW.

18 The Infrastructure Planning (Electricity Storage Facilities) Order 2020 (SI 2020 No. 1218) came into force on 2nd December 2020.

19 As the East Stour Solar Farm will be rated at 49.9MW at the point of export, it also should be considered at local level.

Development Rationale

20 The planning application will provide a detailed development rationale through analysis of supporting climate policy at both national and local level.

21 In addition, the accompanying Planning Statement will consider the policy context, in particular the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance as well as the Ashford Borough Local Plan 2030.

22 Section 14 of the NPPF clearly states that the planning system and low carbon energy projects as part of a programme to combat climate change is a material consideration in the determination of proposals such as this.

23 The Climate Change Act 2008 originally set a legal duty on the Secretary of State to ensure that greenhouse gas emissions are 80% lower than 1990 levels by 2050.

24 On 27th June 2019, the Government formally amended the target within the Climate Change Act as follows:

'It is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least **100%** *lower than the 1990 baseline.'*

25 The United Kingdom was the first major economy to legislate for net zero emissions.

26 In order to achieve the target set by the Climate Change Act, the Climate Change Committee recommend a series of interim targets to Government, alongside recommended pathways to achieve them. The 6th Carbon Budget requires a 78% cut in carbon emissions by 2035. The Government confirmed on 19th April 2021 that this target would be formally adopted.

27 Net Zero requires the electrification of both heating and transport. At the domestic level this means a wholesale shift to heat pumps and electric vehicles and therefore increased electricity demand. To reduce carbon emissions, this demand needs to be met through the utilisation of low-carbon energy sources.

28 In terms of national need, it is clear that in order to meet Net Zero targets, there is an urgent need to deliver sites such as East Stour Solar Farm.

Site Location

29 The potential area for development totals approximately 102ha (252 acres), south of the M20 motorway. The HS1 railway line passes between the northern and central fields of the proposed site.

30 The site is located within the Parishes of Aldington and Smeeth.

31 A map showing the location of the site is at **Plate 1 on page 8**.

32 The site is located adjacent to a major National Grid substation associated with the Sellindge Converter Station. This substation has sufficient spare connection capacity to accommodate the development and connection capacity has been secured by EDF Renewables. This was a significant factor in the site selection of the project.

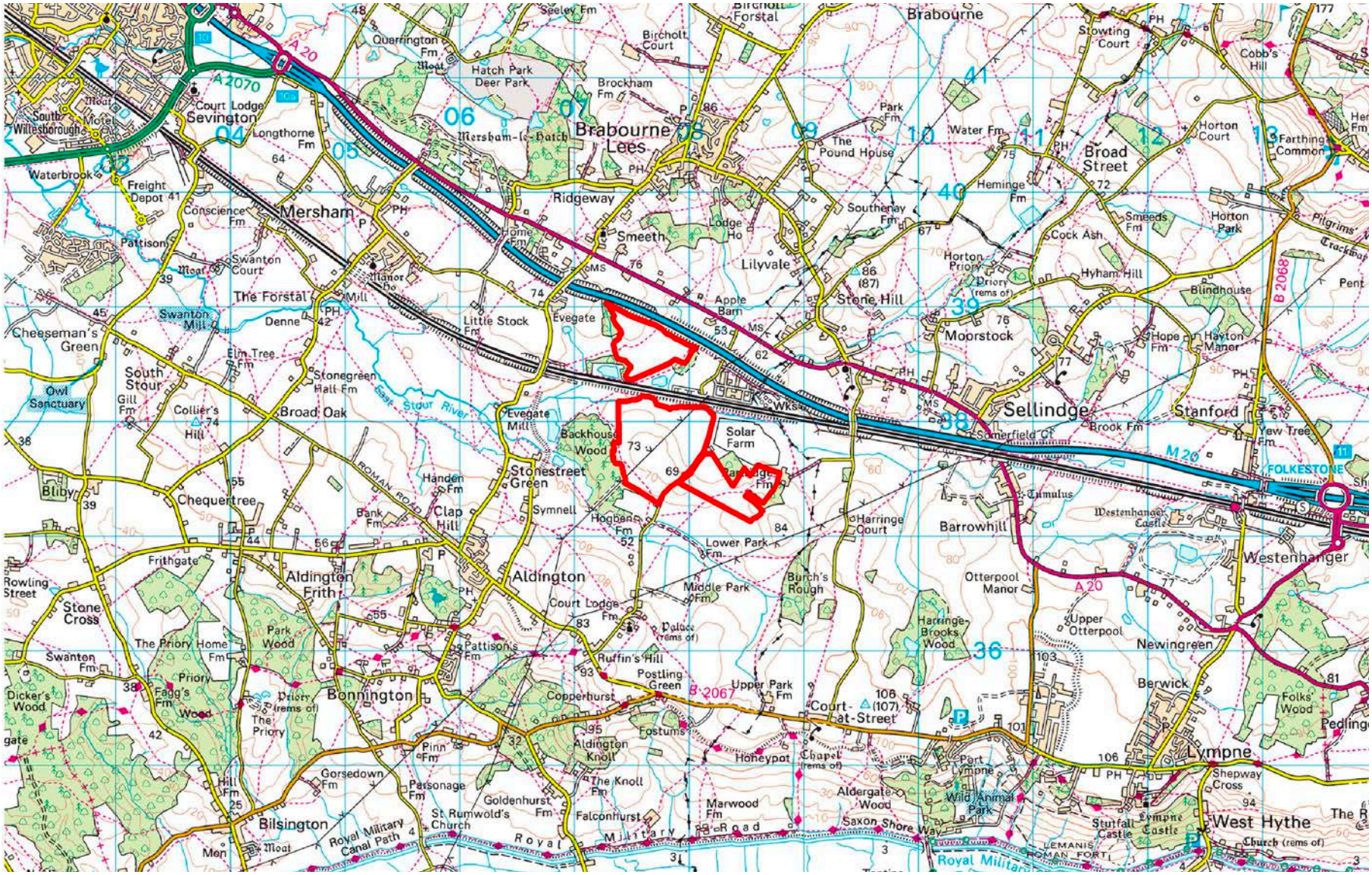

Plate 1 - *Potential Area for Solar Farm*

Existing Conditions

33 The site is predominately arable agricultural land, comprising of three fields within a gently undulating landscape.

34 There are a number of infrastructure features existing in the landscape around the potential solar farm site. These include:

- a line of pylons carrying overhead electricity cables through the central field of the proposed development to the prominent Sellindge Converter Station, north-east of the site area;
- the HS1 railway line and local services line crosses the proposed development area;
- the M20 motorway adjacent to the northern field of the proposed site;
- the existing Sellindge Solar Farm in a field adjacent to the proposed development area (planning application reference 14/00398/AS);
- working farms with associated machinery; and
- The Harringe Court microlight airstrip approximately 850m to the East of the site is normally available for club member's and fliers of model aircraft.

35 A selection of photos are provided in **Plate 1 on page 8** to show the typical conditions at the potential site.

36 Views of the proposed site from the M20 motorway are well screened by existing field boundary vegetation. Views from the railway line, the local path network and some neighbouring properties will be considered prior to mitigation planting.

37 **Assessment of potential visibility of the potential development, with the aid of detailed ZTV models and further site investigation, will take place through a full and detailed Landscape and Visual Impact Assessment (LVIA).**

Agricultural Land Classification

38 Following WWII, the Government undertook an Agricultural Land Classification (ALC) exercise across England in order to identify the Best and Most Versatile (BMV) agricultural land resource to meet unknown future needs.

39 The ALC system concentrates on factors that are outside of the farmer's control (climate, gradient, stone content, soil depth and clay content) and avoids factors that are influenced by land management such as fertility and organic matter.

40 The resultant mapping was produced following desktop assessment and parameters (such as climate) have changed since the exercise was undertaken. It is stated on the pre-1988 maps that they represent a generalised pattern of land classification grades and any enlargement of the scale of the map would be misleading.

41 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.

42 The ALC methodologies changed in 1988 but surveys have only been carried out under this methodology for specifically commissioned sites.

43 **It is therefore planned that a site specific soil survey would be undertaken to ascertain the precise quality of land. In addition, assessments will determine the impact of solar development upon the site's soils, in particular considering the temporary nature of the scheme and the resting of soils taken out of intensive cultivation.**

View south from footpath north of East Stour River south across Bested Hill.

View north from Church Lane over Bested Hill towards Converter Station & Sellindge Solar Farm.

View north-north-east from the approach to St Martin's Church, Aldington.

View north from Public Footpath east from St Martin's Church and Court Lodge Farm.

View west from Harringe Lane over Sellindge Solar Farm towards Bested Hill.

View south between HS1 Railway and M20 across northern site field towards Aldington.

Plate 2 - *Key features around the proposed East Stour Solar Farm Location*

Flood risk

44 The Environment Agency Flood Map for Planning identifies the majority of the proposed development area as located within Flood Zones 1 and 2.

45 Flood Zone 1 is defined as an area with a low probability of flooding, where the annual probability of flooding from river or sea is less than 0.1%. The parts of the site located within Flood Zone 2 have an annual probability of flooding between 0.1 and 1% (Medium Probability; Low Risk).

46 A small section of the site falls under the 'Flood Storage Area' category. This is classed as High Risk, with an annual probability of flooding greater than 3.3%.

47 **A flood risk assessment and surface water drainage plan would be prepared should an application progress. Additionally, a Sequential and Exception Test (SET) would be required for any parts of the proposed development located within Flood Zone 2 and Flood Storage Areas.**

Public Rights of Way (PROW)

48 The northern field of the proposed development is traversed by a public footpath (AE432). A further PROW (AE437) briefly follows the eastern boundary of this field.

49 There are PROWs following the northern and western boundaries of the central field of the proposed development (AE656, AE657 and AE457).

50 One footpath (AE458) crosses the eastern field of the proposed development, from Partridge Farm across Partridge Plantation.

51 Additional PROWs are located in the wider area. These routes are predominantly footpaths and are not part of any long distance routes.

52 **The detailed site design will consider impacts on Public Rights of Way. These will be assessed within the Landscape and Visual Impact Assessment. Locally appropriate mitigating planting and set-backs will be proposed**.

Designations

53 There are no historic, ecological or landscape designations in the potential site area.

54 Within 2km of the land area under consideration there are:

- one Area of Outstanding Natural Beauty (AONB) - Kent Downs, c. 1.3km south at its closest point;
- one Local Nature Reserve (LNR) - Poulton Wood, Aldington, c. 1.8km south-west;
- one Site of Special Scientific Interest (SSSI) - Hatch Park, c. 1.3km north-west;
- one Registered Park and Garden - Hatch Park, c. 1.3km north-west;
- two Scheduled Monuments - Romano-British Building of south of Burch's Rough (c. 960m south) and Chapel at Court-at-Street (c. 1.9km south); and
- 106 Listed Buildings, comprising 4 Grade I, 9 grade II* and 93 grade II. The nearest listed buildings to the potential site are grade II Hogben Farm, barn and former dairy (approximately 200m south) and grade II Water Farm House, barn/granary (c. 220m north).

55 There are no National Nature Reserves; National Parks; Ramsar; Special Areas of Conservation (SAC); Special Protection Areas (SPA); World Heritage Sites; Registered Battlefields or Green Belt within 2km.

Layout Considerations

56 The key constraints that inform the detailed site design are described within **Table 1**.

Table 1 - *Site Constraints and Considerations*

Constraint	Comments
Landowner Boundaries	An initial set back of 5m will be assumed from all boundaries, 10m from tall hedgerows to avoid shading.
Dwellings	The nearest non-involved dwelling is set back from the existing Sellindge Solar Farm by approximately 45m. EDF Renewables would seek to maintain or better this separation. The LVIA will assess the potential effect on residential receptors and establish where appropriate planting mitigation will be of benefit.
Public Rights of Way	A number of public rights of way cross or bound the proposed site. An initial 5m stand off will be assumed. The LVIA will assess the potential effect on users of the rights of way and establish if beneficial planting mitigation is will be of value in line with the local vernacular.
Ecology	Habitat surveys will establish any likely protected species on or using the site and appropriate buffers from potential habitat will be built in to the detailed design.
National Grid Overhead Lines	NGC require a 30m buffer from each corner of a pylon. Access to the pylon is also required at all times. Site track design for the solar array will account for access and panels are permitted beneath the conductors.
UKPN Conductors	UKPN will be consulted regarding 132kV (EHV), 33kV and 11kV (HV) overhead lines.
Cadent Gas	Cadent Gas will be consulted regarding gas assets in proximity to the site and appropriate standoff distances.
South East Water	South East Water will be consulted regarding pipelines, avoidance and crossings.
Oil and Pipelines Agency	Oil and Pipelines Agency will be consulted regarding pipelines, avoidance and crossings.
Flood Zones	The Environment Agency will be consulted during the preparation of the Flood Risk Assessment and surface water drainage design.

THE PROPOSAL

Introduction

57 The proposed development would consist of solar panels that are ground mounted in rows, and ancillary infrastructure including inverters, transformers, grid connection cable route, substation cabinet and a temporary construction compound.

Site Infrastructure

Solar Panels, Frames and Anchors

58 An area of approximately 102ha (252 acres) is available to host the array of ground-mounted solar photovoltaic panels, which would have a rated capacity of up to 49.9MW at the point of connection. A typical solar panel array is shown in **Plate 3**.

59 The solar panels would be mounted on a frame and have a maximum height to panel top of up to 3.0m. The panel frames are fixed to the ground with ground anchors, or if necessary surface mounted feet.

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

Plate 3 - *Typical Solar Array*

Access Tracks

61 Existing farm tracks and field entrances would be utilised and upgraded where necessary to allow access to individual segments of the solar array.

62 Where sections of new, upgraded or widened access track are required this would have the appearance of typical vernacular farm tracks with a crushed stone running surface (**Plate 4**) and would be allowed to grass over in time. The running surface (typically 4m wide) is laid over a stone sub-surface which itself is typically constructed upon a geotextile membrane to reduce the volumes of stone required.

63 Access to the site is discussed from **Paragraph 116 on page 19**.

Plate 4 - *Typical New Site Access Track*

Inverters and Transformers

64 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/national grid. This conversion would be undertaken by a series of centralized inverter/transformer units (circa 17 units distributed across the site) also raise the export voltage to that of the connection point.

65 The panels and inverters are connected via cabling which is mounted onto the

panel frames or suspended behind the panels. Communications and power cables link the inverter/transformer units.

Plate 5 - *typical centralised combined inverter/ transformer units (alternative finish colours are available and would likely be pursued).*

66 The typical substation (**Plate 6 on page 14**) contains switchgear, isolation and metering equipment.

67 The site will also comprise a welfare cabin and spares storage in standard containers, finished in agreement with Ashford Borough Council.

Plate 6 - *Typical Substation cabinet*

Temporary Construction Compound

68 For the duration of the construction (and future decommissioning) period, a temporary compound would 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.

Security Fence

69 A perimeter fence and CCTV system comprising inward-facing cameras would likely be installed to protect the solar panels and cabling from theft. A typical fence is shown at **Plate 7**.

70 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 7 - *Typical Security Fence*

Operational Phase

71 The site would be remotely monitored and operated with the automated system alerting an engineer in case of component or system issues. Regular checks would be undertaken to ensure the panels, inverters, frames and fittings are all in good working order. The panels would be cleaned periodically to ensure maximum production.

72 During normal operations, personnel would visit the site approximately once a month, in a light van or four-wheel drive vehicle.

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

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

PRELIMINARY DESIGN AND ACCESS STATEMENT

75 The following Design and Access Statement is provided to explain the solar farm's location and anticipated design process. It is produced in accordance with Planning Practice Guidance 'Making an Application' (DCLG, 2014). As recommended by The Commission for Architecture and the Built Environment (CABE) publication 'Design and Access Statements - how to write, read and use them' (CABE, 2006), this statement concentrates on seven Key Design Issues and answers a set of Key Questions for each one, based upon the 'Assessment Crib Sheet' contained within the CABE guide.

76 In 2010, the Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2010 (SI 2010/567) was superseded by the Town and Country Planning (Development Management Procedure) (England) Order 2010, SI 2010 No. 2184, which introduced 'context' to be discussed with respect to the development as a whole, rather than with respect to the sub-components discussed by the CABE guide.

77 Questions shown in square brackets are not considered relevant to the proposed solar farm development.

The Process

Have the physical characteristics of the scheme been informed by a rigorous process which should include assessment of the site's full context (physical, social and economic characteristics and relevant planning policies); involvement; evaluation; and design?

78 Within the boundaries of the landholding the site design will be based on technical and environmental constraints and best practice.

79 Technical factors include:

- available landholding, existing use and land quality;
- available grid connection capacity;
- access;
- location of Public Rights of Way; and
- glint and glare effects.

80 Environmental factors include:

- proximity to designated sites;
- proximity to settlements;
- flood risk;
- landscape character and site visibility; and
- proximity to existing ecological features.

81 An initial visual appraisal will be undertaken by way of a site visit to identify visibility and sensitive receptors. This will inform the initial site design.

82 An environmental assessment phase will be undertaken by specialist consultants and in consultation with statutory consultees, such as Ashford Borough Highways, Ashford County Archaeologist and the Environment Agency.

83 The site design will be refined in response to findings of environmental assessments. Ashford Borough Council will be consulted throughout.

84 Public consultation will be key to the proposed development and feedback will be incorporated into the site design where appropriate.

85 The planning policy context of the development will be described in full in a separate Planning Statement to accompany any future application.

Use

What are the buildings and spaces used for?

Would the application help to create an appropriate mix of uses in the area?

Would different uses work together well, or would they causes unacceptable annoyance?

86 The proposal is for infrastructure to allow for the generation of renewable electricity. The development would be limited to a solar array and those other elements required for its construction, operation and maintenance, as described from **Paragraph 57 on page 13**.

87 The land is currently in agricultural use for arable crops. It is anticipated that the land between the panels will be sowed with a wild flower seed mix, thereby providing biodiversity benefits. Grazing or mowing would take place between the rows of solar panels when the solar farm is operational as part of an environmental management plan.

88 A detailed site specific soils and Agricultural Land Classification (ALC) mapping survey will be undertaken to assess the acceptability of the proposal in terms of soil quality and agriculture and for quantifying the value of resting land from intensive production.

Amount

The planning application will say how much development is being applied for. Why is this the appropriate amount?

Is the density appropriate?

89 The available landholding is approximately 102ha (252 acres). It is expected that only a portion of this will be used to host the solar panels and associated infrastructure given technically required shading, technical and environmental setbacks from features, the findings of environmental assessments and with input from Ashford Borough Council. Only a small proportion of this area will penetrate the ground by the frame legs and fence posts.

90 In total the solar array would have an export capacity of up to 49.9MW.

91 The proposed operational lifetime of the project is 40 years, following which the

solar farm would be decommissioned, unless a fresh planning permission was granted for its retention.

Layout

How will the buildings and public and private spaces be arranged on the site, and what is the relationship between them and the buildings and spaces around the site?...

92 The suitability of the landholding for a solar farm and the initial site design, within the boundaries of the landholding, will be based on consideration of technical and environmental constraints as guided by Planning Practice Guidance and industry best practice:

- the rows of solar panels will be arranged east to west on the site and approximately south-facing to maximise energy generation;
- existing site tracks will be used where available, and new access tracks will follow field boundaries as far as possible. This means that site tracks will generally be obscured from view by field boundary vegetation;
- the inverter/transformer units will be containerised and dispersed amongst the rows of solar panels rather than being grouped in one area to minimise their potential prominence; and
- appropriate separation will be incorporated into the layout to minimise impacts for users of PROWs.

93 Existing hedgerows will be maintained or enhanced, and a planting scheme will be designed to minimise potential views from neighbouring dwellings.

94 There are no public spaces within the proposed development.

[Will public spaces be practical, safe, overlooked and inclusive?]

[Will private spaces be adaptable, secure and inviting?]

Do all spaces have a purpose?

95 The elements of the potential development would be limited to those which are necessary for the generation and export of renewable electricity, or for the access to and maintenance of the solar farm.

96 The key determinant for the use of space on the site is the height and angle of the solar panels. It is currently anticipated that the solar panels would be mounted at an angle typically of around 20 to 25 degrees with a maximum height of up to 3.0m. This arrangement requires a space between panel rows of typically 4m to avoid shading. Space between the panel rows would typically be set to a mix of grass and wild flowers for the purpose of enhancing biodiversity.

97 The design process will be iterative, with adjustments to the site layout made as assessments progress. The panel angles, height, number and spacing may therefore change, but will not exceed 3.0m.

Scale

The statement should explain and justify:

the height, width and length of buildings;

the size of spaces in relation to each other and their surroundings; and

[the size of parts of a buildings or its details]

The statement should provide clear evidence that the planned scale has been influenced by the existing character of the local area or, where relevant, opportunities to improve that character.

98 Modern ground-mounted solar farms range from approximately 5MW to over 50MW rated capacity.

99 This solar array has been proposed with an export capacity of up to 49.9MW (3 S.F.) to maximise available generation from the unconstrained site area.

100 The spacing of the solar farm relative to its surroundings will be driven by consideration of various constraints such as landholdings, proximity to dwellings, existing infrastructure and trees and hedgerows. The aim of incorporating separation from such features is to minimise potential environmental impacts and maximise output.

Will the buildings sit comfortably with their surroundings?

[Will they, and parts like doors and windows, be of a comfortable scale for people?]

101 Solar farms by nature have a large footprint but the whole area is not covered with panels as space is left in between to avoid panel-panel shading, for access, ancillary equipment, perimeter fencing and habitat-improving planting.

102 The panels are mounted with a maximum height of up to 3.0m. It is proposed to seed the areas between the panels and seasonally graze or mow.

103 It is expected that the external finish of the 'buildings' included with the proposal (transformers and substation) will be agreed with the Local Planning Authority prior to construction commencing.

Landscaping

How open spaces will be treated to enhance and protect the character of a place.

104 Landscape and land use will be considered throughout the project development.

105 During the assessment phase it is anticipated that a landscaping scheme will be developed to: provide screening of views to the development where of benefit, and enhance the biodiversity of the site. Landscaping is expected to include measures such as species-rich wild flower and grass margins, beehives, hedge planting and tree planting.

Appearance

The statement should explain and justify the appearance of buildings and spaces, and show how they relate to their surroundings. It should cover: architecture, materials, [decoration], lighting, colour and texture.

106 The appearance of a solar array is largely functional, with materials primarily chosen for their weight, strength and practicality.

107 By their nature, the operating surface of the PV panels (i.e. the active face of the array) will be a deep metallic blue. The intention of the solar panels is to absorb light and so they will have a non-reflective surface, minimising glint/glare. The framing system is usually self-coloured aluminium and typically only visible from below or behind the panels.

108 The appearance of the different elements typically forming a solar farm is discussed from **Paragraph 57 on page 13**.

How will the development visually relate to its surroundings?

Will it look attractive?

109 The solar farm would have a wooden post and wire perimeter fence similar in appearance to standard deer fencing. This type of fencing is chosen to be less intrusive and more rural in character than other types of fencing. Field gates will be used at the site entrance(s) to blend with the local vernacular.

110 Visual representations of the proposed development in the landscape will be provided to accompany the planning application.

Context

A design and access statement should demonstrate the steps taken to appraise the context of the proposed development. It is important that an applicant should understand the context in which their proposal will sit, and use this understanding to draw up the application.

111 A brief description of the site's physical context is provided from **Paragraph 20 33 on page 9**.

112 In terms of social and economic context, the effects of climate change are now being experienced at all levels – global, national, regional and local. Similarly the socio-economic impacts of the proposal will also have effects at the global, national, regional and local level.

113 Consultation with the Local Planning Authority, including for EIA Screening, and members of the public will be undertaken during the pre-planning assessment phase of the potential development.

114 The potential for a solar farm at the proposed site is being investigated in the context of the M20 motorway to the north, the HS1 railway line, the existing overhead electricity lines and pylons crossing the site, the existing Sellindge Converter Station to the east and a forthcoming battery energy storage proposal due west of the Sellindge Converter Station.

115 Further feasibility assessment and a detailed site design process will be followed to determine if the site is suitable against the environmental, technical and social constraints. The planning policy context of the development will also be considered during this process.

Access

The design and access statement will need to cover two potential aspects of access vehicle and transport links, and [inclusive access...]

Will the place be safe and easy for everyone to move around?

Will it make the most of the surrounding movement network?

116 Delivery vehicles would use the motorway and A-road network as far as possible. It is expected that construction deliveries to East Stour Solar Farm would access the local road network from the M20 motorway and the A20 trunk road with construction traffic limited to use the northern section of Church Lane - no construction traffic will be permitted through Aldington as can be controlled through an agreed Traffic Management Plan.

117 **Consultation with Ashford Borough Highways will be undertaken to further assess the access route for construction deliveries.**

118 Existing farm entrances will be used to access the proposed site from Church Lane.

119 Existing farm tracks, field entrances and breaks in hedgerows will be used for the internal site track design to minimise potential environmental impact.

120 There will be no public access to the proposed site, although existing public footpath access will be protected and maintained. Construction personnel will be required to adhere to health and safety procedures, as set out in a Construction Traffic Management Plan to be agreed with the Local Planning Authority prior to construction.

Has the applicant clearly described their policy approach and consultation process, whether carried out or planned?

121 This pre-submission consultation with the Local Planning Authority will be followed by a formal EIA Screening Request.

122 Prior to submission of a planning application, a public consultation exercise will be undertaken. The scope of this consultation will be discussed with Ashford Borough Council.

DEVELOPMENT PROCESS - NEXT STEPS

123 In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, following consideration of the pre-application advice received, the Applicant, EDF Renewables, will submit a request for the LPA to provide a Screening Opinion.

124 To assist with this process, a Screening Request report would be submitted including an indicative site layout and further details of the proposed development - building on the outcome of this pre-application consultation exercise.

125 Depending upon the outcome of the Screening process, the Applicant will then consult the LPA to agree the appropriate scope for the planning assessments. Should the proposal be deemed EIA development, this would be through the formal Scoping Request procedure as stated in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

126 In both EIA and non-EIA circumstances, assessments of the proposed site would be undertaken and in any case are expected to include a:

- **Preliminary Ecological Assessment (PEA), including a Phase 1 Habitat Survey, and additional protected species surveys (where identified);**
- **Soil quality and Agricultural Land Classification Assessment;**
- **Surface Water Drainage Assessment and management strategy;**
- **Landscape and Visual Impact Assessment;**
- **Cultural Heritage Assessment; and**
- **Glint and Glare Assessment.**

127 During the site assessment phase, a public consultation exercise will be undertaken. The scope of this consultation will be discussed with Ashford Borough Council.

128 Upon reaching a final site design the environmental assessments will be collated into an Environmental Report or Environmental Statement, depending upon whether the development is EIA or non-EIA. A planning application would then be submitted to Ashford Borough Council.

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Planning and Development

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

Our Ref:	21/00183/PRE
Date:	22 June 2021

Dear Mr I Booker

Location	**Land south of M20 and south of railway line to the east and west of, Church Lane, Aldington, Kent**
Proposal	**Proposed 49.9MW ground-mounted solar array**

I write further to your request for pre-application advice regarding the above which I received on 3 June 2021.

The pre-application submission consists of a single document titled 'Pre-Application Advice Request'. It is on the basis of this submission that the following advice is given - without prejudice to the future determination and assessment of any formal planning applications

The Site and Constraints

The site is predominately arable agricultural land, comprising of three fields within a gently undulating landscape. It measures 102 hectares (252 acres) and lies on the south side of the M20 motorway. The HS1 railway line passes between the northern and central fields of the proposed site. The site is located adjacent to a major National Grid substation associated with the Sellindge Converter Station (Approved under ref: 14/00398/AS).

There are Public Rights of Way (PRoW) traversing parts of the site and the site lies within a Landscape Character Area.

The Proposal

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 forty (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.

Planning Policy Context

The Development Plan

Section 38(6) of the Planning & Compensation Act 2004 replaces section 54A of the Town & Country Planning Act 1990 and states that if regard is to be had to the development plan for the purpose of any determination (including the assessment of any planning proposal) to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise

The Development Plan comprises the Ashford Local Plan 2030 and the relevant policies to the proposal under consideration are:

SP1 - Strategic Objectives
SP6 - Promoting High Quality Design
TRA7 - The Road Network and Development
ENV1 - Biodiversity
ENV3a - Landscape Character and Design
ENV5 - Protecting Important Rural Features
ENV6 - Flood Risk
ENV10 - Renewable and Low Carbon Energy
IMP1 - Infrastructure Provision

The Local Plan can be accessed here:
https://www.ashford.gov.uk/media/jw3nbvq1/adopted-ashford-local-plan-2030.pdf

The following guidance notes are also relevant:

Sustainable Design SPD
Sustainable Drainage SPD

These documents can be accessed here:
https://www.ashford.gov.uk/planning-and-development/planning-policy/adopted-development-plan-documents/other-planning-guidance/

The National Planning Policy Framework

The NPPF was published on 27 March 2012 and amended on 24 July 2018 and again on 19 February 2019. Paragraph 11 of the National Planning Policy Framework sets out a presumption in favour of sustainable development. Paragraph 47 states that applications for planning permission should be determined in accordance with the development plan, unless material considerations indicate otherwise. The Framework is a material consideration in planning decisions.

The following headings and content of the NPPF are relevant to the consideration of the current proposals:

4. Decision-making
2. Achieving Sustainable Development
14. Meeting the challenge of climate change
15. Conserving and enhancing the natural environment

Planning Policy Guidance
In March 2014 the Department for Communities and Local Government (DCLG) launched its planning practice guidance web-based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning policy guidance documents cancelled when the NPPF was launched. PPG contains a range of subject areas, with each area containing several subtopics. Those of particular relevance to the determination of this planning application comprise:

- Design
- Determining a planning application

Advice on The Proposal

Principle of The Development
It is considered that any submission would be primarily considered against the criteria under policy ENV10 of the Local Plan which states:

'Planning applications for proposals to generate energy from renewable and low carbon sources will be permitted provided that:
a) The development, either individually or cumulatively does not result in significant adverse impacts on the landscape, natural assets or historic assets, having special regard to nationally recognised designations and their setting, such as AONBs, Conservation Areas and Listed Buildings;
b) The development does not generate an unacceptable level of traffic or loss of amenity to nearby residents (visual impact, noise, disturbance, odour);
c) Provision is made for the decommissioning of the infrastructure once operation has ceased, including the restoration of the site to its previous use; and,
d) Evidence is provided to demonstrate effective engagement with the local community and local authority.

Furthermore, Local Plan policy IMP1 and the NPPF support the provision of sustainable infrastructure required to support development.

There is a presumption in favour of sustainable development in the NPPF. Paragraph 148 of the Framework states:

'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'

Paragraph 154

'When determining planning applications for renewable and low carbon development, local planning authorities should:
a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
b) approve the application if its impacts are (or can be made) acceptable.'

Having regard to the Development Plan and the NPPF, it is considered that the proposed develpment is acceptable in principle, subject to compliance with the other relevant Development Plan policies.

Character & Appearance and Landscape Visual Impact
The proposal would be sited close to an existing substation and against the backdrop of the M20 and a railway line and as such, any impact could be afforded lower significance. In the circumstance, the following advice is given:

A statement should be submitted alongside any planning application illustrating how the proposal complies with the criteria above and any mitigation measures necessary and be informed by a Landscape and Visual Impact Assessment to demonstrate the landscape impact from key public viewpoints.

In the light of the foregoing, the proposal would be policy compliant provided it can be demonstrated that it would not have a detrimental impact on the rural setting of the site, or that this can mitigated against through appropriate screening and adequate landscaping, which, given the characteristics of the site, are achievable.

Screening and landscaping would be expected to accord with the character of the landscape and rural settting. In accordance with policy ENV10, evidence should submitted with any application to demonstrate this.

Other Matters
I note the observations in your submission regarding flood risk, Agricultural Land Classification (ALC), ecological and amenity impacts and agree with your conclusions and intentions in respect of a formal application in all instances. Notwithstanding, I would advise that consideration be given to the submission of a Construction Management and Maintenance Plan.

In relation to ecological impact in particular, policy ENV1of the Local Plan states proposals should safeguard features of nature conservation interest and should include measures to retain, conserve and enhance habitats, including ancient woodland. The NPPF requires new development to minimise impacts on biodiversity and provide net gains in biodiversity. Local planning authorities are required to conserve and enhance biodiversity when determining planning applications and take opportunities to incorporate biodiversity in and around developments.

In the circumstance, the formal application should be accompanied by an up to date Phase 1 Ecological Ssurvey along with any subsequent survey work that it identifies. Measures should be incorporated into the proposal to achieve a net gain in the biodiversity value of the site.

I trust the foregoing is of assistance.

Yours sincerely

Development Management Manager

Notes for your information:

1.	When you make an application please ensure that it meets the requirements of the council's validation advice note and that a validation checklist appropriate for the type of application is completed and submitted with it.
2.	The advice note and relevant checklist can be accessed via the "Applying for planning permission" pages of the council's website (www.ashford.gov.uk) on the "Is in my application valid" page.
3.	The advice given by Council Officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to any future planning application. Any views or opinions are given in good faith, and to the best of ability, without prejudice to the formal consideration of any planning application.
4.	The final decision on any application can only be taken after the Council has consulted local people, statutory consultees and any other interested parties.
5.	A final decision on an application will be made by senior officers or by the council's Planning Committee and will be based on all the information available at that time.
6.	This advice will be carefully considered in reaching a decision or recommendation on any resulting applications; subject to the proviso that the circumstances and information may change or come to light that could alter the position. It should be noted that the weight given to pre-application advice will decline over time.
7.	It should be noted that if the planning application is delayed for a significant period then any pre-application advice may be overtaken by changes in national, regional or local policy and guidance.