

Proposed East Stour Solar Farm at Aldington Planning Application 22/00668/AS

A summary of amendments to this application considered reasonably necessary by the **Church Lane Group** to avoid it maintaining its Objection (26.07.22) to the scheme:

A. Mitigating Impact on Designated Landscapes

The applicant must demonstrate that the benefits of proceeding with this scheme are not outweighed by the adverse impact caused – particularly to enjoyment of landscape. Therefore:

1. The applicant must reposition the southern boundary to the Southern Array in accordance with the detail on the attached plan (green line X-Y)
2. The line of hedging along the southern boundary must be adjusted accordingly
3. New hedging alongside the lane must continue across existing field entrances A, B and C
4. We support retaining the existing gateway farm access at D into new wildflower meadow
5. The applicant should plant individual trees (min 8 No.) in gaps in hedge line E to F
6. Specify in LEMP (see below) for all hedges to be managed to a minimum height of 2.5m on west side of Church Lane (except section G to H to be at 1.0m for visibility on blind bend).
7. Create shallow (500mm) ditch on field boundary as per blue line on plan linking with SUDS.

B. Traffic Management Plan (TMP)

The applicant has provided a TMP that has not been fully thought through and will prove unworkable. It will make the lane unsafe for public use during the construction phase. Therefore:

1. The applicant must apply to KCC for a Temporary Road Closure of Church Lane between its junction with Roman Road and point B on the plan throughout construction. This is because:
 - The proposed traffic light system cannot operate effectively on a singletrack highway where vehicles progressing under a green light meet queueing vehicles (some large) waiting on red
 - The applicant's own survey shows between 700 and 800 vehicle movements in each direction in the lane every day. Any HGV ignoring the applicant's proposed Condition requirement to access *from the north only* which tries to come from the south will have to reverse for more than a mile causing severe disruption, damage to trees and verges, local disturbance and unacceptable health and safety risks. There is ample historic and current project evidence that HGV drivers either don't receive instruction to come from the north or choose to ignore it
 - Closing the road will enable the applicant to progress works without interruption and thereby reduce the duration of the construction phase and through that the associated disturbance to residents and businesses
 - Reducing traffic to "residential access only" will mitigate the impact of the construction phase on habitats and local wildlife – including endangered species
 - The TMP indicates that the impact on Church Lane throughout the construction will be "*Significant*". As such it is entirely reasonable for the residents living in the lane to expect mitigation through a temporary road closure.

2. The applicant must specify appropriate signage at the southern end of Church Lane to advise of the road closure and that there is no access to the project for *any contract vehicle*.
3. The applicant must provide more clarity about the gross weight of the crane that will cross the East Stour River bridge based on the bridge's presumed 40-tonne weight limit (the application shows a 45-tonne crane).

C. Landscape Environmental Management Plan (LEMP)

The applicant has provided some reassuring proposals in terms of future management. However, it indicates that the LEMP is a matter for later detailed discussion and agreement with the planning authority. The level of detail to be provided, the extent of the commitment to management of the planted landscape (and the ongoing farm management of the solar farm area and adjoining wildflower meadow areas) as well as exactly how the public can raise legitimate concerns if there is non-compliance must be essential elements of this process. As residents knowledgeable about the area and hugely concerned about this application, we ask that we have a chance to be involved in the discussions alongside the Parish Council. We maintain that the following should be included in the LEMP - as a minimum:

1. Must include cross sections and plans of new hedge planting and the way in which plants will be protected from browsing (rabbits, hares and deer etc)
2. Must include the specification for livestock fencing to be installed around wildflower meadow areas where no fencing currently exists
3. Must include details of the minimum mature trimmed height of specific sections of existing and proposed hedgerows
4. Must include details of tube and stake protection for individual new planted indigenous trees (which needs to anticipate deer browsing)
5. Must indicate wildflower/grass seed mixtures to be specified for (a) solar panel footprint area and (b) newly created wildflower meadow areas
6. Must describe "stocking and cropping" proposals for (a) solar panel footprint area and (b) newly created wildflower meadow areas and how the taking of a "hay" continuously on wildflower meadows can be sustained for 40 years with only a short period of light sheep grazing on aftermath each year. Must make provision for further wildflower establishment if required
7. Must indicate how the "Biodiversity Net Gain" is going to be measured over the 40-year life of the scheme and confirm that the results of the appropriate survey work will be made available upon request by the planning authority and be available for public inspection.

Proposal

Bearing in mind the request we are making for this level of detail our view is that responsibility for overseeing the management of the mitigation should be contracted to a local and respected organisation familiar with this sort of habitat and through being local be able to react in a timely manner when work is required.

We know that in precisely the same situation a recent major project – the Inland Border Facility (IBF) at Ashford - the Kent Wildlife Trust (KWT) were instructed to provide advice on habitat creation and management of the adjoining area (known as the Highfield Land) to ensure that local residents were not only protected from the adverse effects of the new development but also could be reassured that they would over time see real biodiversity net gain - something which KWT have been contracted to monitor and presumably they could offer the same service here for the applicant.

D. Public Rights of Way (PROW)

The applicant has not yet provided adequate mitigation for members of the public that enjoy footpath AE459 in the Eastern Array. A sufficiently wide grassed corridor for the footpath should be specified but even allowing for this, walkers will be suddenly subjected to the metal and glass and fencing either side of the path without any mitigation whatsoever. We do not accept that the provision of hedges will create a “tunnel effect” for the walker. Hedges will partially obscure the panels either side and together with verge areas provide improved wildlife habitat (and connectivity) - creating its own interest for walkers. The angle of the path which is almost north-south will do nothing to diminish (by shading) the performance of the panels through the addition of hedges on either side as shown approximately on the plan marked green points I and J.

1. The applicant should be required to create a 10m wide grassed area and plant indigenous species hedges either side of footpath AE459 from the point it leaves the point-to-point course until it reaches Partridge Farm buildings.

E. Community Fund

The applicant has made an offer of £20,000 per annum for a fund to help the local community and is waiting for contact about it. We believe it is essential that this offer is discussed with the applicant at the earliest possible opportunity and not left until such time as a decision on the application has been made. We understand there has been no contact yet made as between the applicant and either the Parish Council or Borough Council. As explained in our Letter of Objection, we consider this opening offer from the applicant (which is approximately 0.08% of the project cost) is far below what would be considered reasonable. From our research into comparable solar schemes the amount should be not less than £1000 per MW (£50,000 per annum).

1. Agreement should be reached urgently as between Parish Council and Borough Council as to who will be negotiating the Community Fund
2. Great care should be taken in the negotiations so that such issues as index linking and appropriate professional costs are catered for within whatever may be settled.

Jonathan Tennant and Alison Baldwin

Church Lane Group (09.08.22)