

Church Lane Group – LETTER OF OBJECTION

1. Reaching a consensus

Whilst there is virtually universal consensus from those in the group that they *object* to having a solar farm on the undulating land either side of Church Lane (and that by various means it would be possible for them to hold up and possibly prevent the scheme going ahead altogether) they would still *prefer* that a compromise solution is reached.

Having achieved some negotiated improvements to the original EDF proposals in 2021 we only seek one further concession - which is in terms of a reduction in solar panel footprint at a specific location - together with some additional mitigation measures and clarifications. These changes to the footprint are a *fundamental* requirement for our group - as is the way in which the applicant will guarantee to *implement and maintain* the development once complete. Until such time as these related points (all covered in this paper) are resolved we all **STRONGLY OBJECT** to the application.

2. Changes Required

Location

Our aim is, if a scheme is to be approved, to achieve (at least cost and least stress) a scheme that is as “invisible” as it possibly can be, with the minimum disruption to the daily lives of local residents. As part of the drive for more renewables, national legislation is sadly now framed to encourage taking perfectly good agricultural land out of production in favour of solar farms. However, there are numerous policy safeguards in place under the National Policy Planning Framework (NPPF) and within the provisions of the Ashford Borough Council (ABC) Local Plan and other policies. These all emphasise that solar schemes *must be sited in the right place* and in that way minimise impact on landscape - particularly in important settings where close to Heritage Assets, Conservation Areas and Areas of Outstanding Natural Beauty.

Mitigation

A considerable amount of new hedging is proposed and some tree planting. This is to be applauded. However, these solar schemes add nothing to the beauty of the landscape and should be hidden from view so far as is reasonably possible, rendering such mitigation as essential. Views that are enjoyed by walkers, cyclists, and motorists as well as homeowners who treasure views from their own properties should also be protected.

To this end, *more hedging and tree planting is necessary*. The extra amount we wish to see is not substantial and in the main involves specific short sections on existing boundaries to protect a view and avoid drawing attention to the solar panel development and associated infrastructure.

Construction

Experience both historic and ongoing has shown us that the construction phase would have the potential for huge disruption to local people and in particular those living in Church Lane.

The Sellindge Solar Scheme, also on Church Lane (constructed 2015), saw numerous articulated lorries accessing the development from the south down the lane with disastrous results. These events occurred despite the Consent stipulating that all access must be from the north off the A20.

Indeed, the disruption in 2015 was such that it would have been better if the applicant had applied for a temporary road closure during the main phase of work. They elected not even to post somebody at the entrance to the lane off Roman Road, nor did they install any additional signage to advise site traffic not to use the lane for access. They failed dismally – and this new scheme is vastly larger.

Work currently taking place at the Sellindge Converter Station, north of the HS1 railway bridge is causing disruption for residents of Church Lane. In the space of ten days (5-15th July 2022) three UK registered articulated vehicles accessed Church Lane to attempt to deliver construction materials to the Converter Station travelling as far as the bridge over the East Stour River. On 5th July the disruption and road blockage caused lasted more than an hour before the drivers could be persuaded to drive into the field used to host the Aldington Point to Point where they could safely turn instead of reversing the length of the lane which staff from the Converter Station were supervising.

The EDF draft Traffic Management Plan (TMP) is inadequate since although underlining that traffic will not approach from the south there is no talk of manning the access at the southern end nor of seeking consent to erect substantial signage. Electricity companies routinely station personnel 24/7 on remote sites where they are installing new copper cable. Why won't they do the same here?

More worryingly (and to emphasise our views on the TMP) the copious drawings showing the radii required for articulated lorries manoeuvring indicate that all the materials and equipment will travel under both bridges and over the elderly small bridge across the river in these lorries. In the plan data it indicates that the bridges have a maximum height limit of 3.8 m whereas within the same paperwork EDF talks about the height of the lorries being 3.87 m! This is hardly reassuring. The two landowners involved in the scheme both have land to the north of the railway bridges where a site compound could easily be established for offloading on to smaller vehicles. Why hasn't this been specified?

Whilst flood maps are included there is no mention of the flooding which regularly occurs in winter months from the East Stour which overtops northwards along the lane (under the railway bridges) a problem that has been compounded by the lack of maintenance on drainage ditches by the landowner. When flooding occurs, it renders access under the bridge impossible. Why has this not been factored in?

There is mention elsewhere within the documents about shipping container units being brought to site and other items of substantial infrastructure. The containers alone are 3m high. How will these fit under the bridges (on a lorry)?

Has the weight of the heaviest item been declared together with the gross weight that will therefore be imposed on the old bridge? What are the plans and why are they not described?

There has been a marked increase in traffic within the lane since 2015 yet there is no discussion within the application about how large vehicles (if indeed they can somehow come under the bridge and safely over the small bridge) are going to negotiate other vehicles on this single-track lane - particularly at rush hour and school times.

A very much more robust and believable approach to this whole issue of Construction Access within a TMP is called for to protect those living in and regularly using the lane – and to avoid accidents.

From what we have said above it will be abundantly clear that the only means by which construction can safely take place is to *incorporate a temporary road closure for Church Lane*. Experience has proved this is essential. The way in which EDF have underestimated the issues in their approach to traffic management leaves us quite certain that even if they now amend their proposals in some shape or form this will do little to reassure those living in the lane that this critical aspect of the proposal will be properly and safely handled.

Maintaining the Mitigation

As indicated, there is nothing whatever that is attractive about these schemes. Mitigation is therefore key, but it is not enough to plant trees, hedges, wildflowers and then leave everything to run itself and walk away.

Here again we have first-hand experience of this with the existing 2015 scheme where, for example, individual specimen trees were included in the scheme, planted but then never allowed to establish and within two years were cut off at the same height as the nearby boundary hedge. These mitigation items must be linked to a detailed Management Plan which describes in detail the way the new boundaries and fields (with and without solar panels) are going to be established and then managed during the life of the scheme.

Hedges and trees at the very least require a five-year period for proper establishment during which any plants that fail need to be replaced.

Because these plantings are largely part of a scheme to *screen views of the panels* it is equally essential that the intended managed *height* is agreed and recorded and that this is adhered to during annual end of summer hedge cutting throughout the life of the scheme.

If hedges are, year after year (as often seems to be the case) cut shorter and shorter (and there's plenty of evidence of this all along the western boundary of the lane between the railway bridge and The Paddocks) then a key mitigation component is lost and through that a scheme which on balance could be accepted by the community very soon becomes completely unacceptable and an eyesore.

Such a situation would create seriously adverse PR for EDF but rather than having to rely upon that as an incentive for proper management the applicant should provide (in considerable detail) how it will be gone about, and this plan should be included *now at the application stage* and not left until a later stage post Decision. It's too important for that.

If, despite our concerns, ABC consider that this aspect is a matter for subsequent approval with the applicant we request that conditionality is attached to it. This should be that the development is not permitted to go “operational” until such time as this Plan has been approved by ABC.

Matters deferred until Construction

Within the ES Volume 3 – Figures Part 1 (Figure 6.4) site cabinets measuring 3 m tall, 6 m long and 3 m wide are referred to but that “external finishes are to be agreed with the local planning authority prior to construction”.

We have not at this stage been able to identify details of the proposed location of these units. We would expect EDF to supply precise locations, the purpose of each, their colour and any other relevant information in relation to these (and all other infrastructure to be stationed in the fields) now *at the planning application stage*. Their positioning and colour are directly relevant to the positioning of new hedging and tree planting.

Community Benefit Scheme (CBS)

Any promoter of large infrastructure schemes is today expected to provide some “payback” to the community affected – in this case Aldington. EDF should understand this as being an expectation bearing in mind that France is one of the leaders in this concept through what it calls the “Grand Chantiers Programme” where the level of funding for local communities derived from infrastructure schemes ranges from *between 1% and 10% of the project value*. For example, EDF established a £20 million community fund to help communities affected by the Hinkley Point project.

Whilst accepting that comparable evidence shows funding at a lower level (although not less than £1000 per megawatt per annum) for Solar this is a vital component of the overall proposal, notwithstanding that CBS lies outside the planning application process itself. EDF have to date proved willing to listen to concerns raised by communities affected by similar solar schemes and we wait to understand what their proposals are and whether any conversations have yet taken place with the Borough or Parish Councils where terms for CBS are normally negotiated.

We request that the local community is kept informed of the process, the level of funding proposed by the applicant, its duration, its indexing and have the opportunity to consider the arrangements for fair distribution of funds annually to provide meaningful benefit to those living in Aldington.

Pivot Power

It is curious that EDF is at pains to emphasise that arrangements for energy storage (i.e., batteries) is a separate matter and forms no part of this application.

Firstly, this is at odds with some other solar farms that EDF have been promoting (where energy storage is an integral part of the solar farm) and it would be useful to understand why in this instance they are taking a different approach.

Secondly, if Pivot Power (a company wholly owned by EDF), are in the process of preparing an application for a battery scheme near the Converter Station (which we are told is separate and unconnected to the Solar Farm) why is it that within the Environmental Statement Volume 3 Part 1 at Figure 3.1 there is a detailed drawing *showing the Pivot Power battery installation within the red line boundary of the solar application?*

It is essential that the cumulative effects of the solar farm and the battery storage proposal are considered as part of this application and therefore further and better particulars need to be provided by EDF. This is particularly relevant in connection with construction and potentially mitigation.

If both projects were to be constructed concurrently the TMP would have to address this as well as looking at upcoming works that might be proposed at the same time by National Grid (there is a major repair project underway at the moment at their operational site, the other side of the lane) - works which within their own site may require no planning application at all and yet would have an impact on those using the lane.

In summary it is essential that a much more open explanation of the situation regarding battery storage in relation to this project is now provided by EDF.

PROW Impact

We refer later to the public footpath AE459 - the public right of way which runs from Church Lane at a point close to Forehead House to the point where it exits onto the public highway near Harringe Lane beyond Partridge Farm.

The scheme substantially affects the enjoyment of this path and although EDF have made provision for hedge planting in the vicinity there is nothing that takes account of the impact on walkers as they walk along the northern element of this path.

New hedging should be included on either side of this pathway to help mitigate the situation and bearing in mind the angle of the path, hedging maintained at say 2 m height should have no impact on the functionality of adjoining solar panels – particularly so on the eastern side.

We anticipate that the Ramblers Association will have their own observations but suggest this additional hedging should be a minimum requirement in order to ameliorate the “industrial” proposal on each side of this public footpath.

We are aware that EDF have in similar circumstances on other solar farms recognised this aspect and put forward reasonable mitigation of this sort and we see no reason why they should not take the same approach here.

Observations

- We have referred above to the inadequacies of the TMP, and it is worth noting that EDF refers to this scheme as “Bloy’s Grove Solar Farm” (!) in the contents page of Volume 3 Part 1. We hope this does not speak of a “cut-and-paste” approach in the critical elements of the ES and a resultant lack of substance and careful consideration of the unique characteristics of the East Stour scheme setting.

- We also notice the term “Riparian Meadow”. The word riparian can be used in various contexts but here, in terms of habitat, it can only relate to land adjacent to a watercourse. Is this a phrase inadvertently borrowed from text related to another scheme? If not, what precisely is it meant to mean?
- There would appear to be an inconsistency contained within the socio-Economic and Sustainability Statement. This document, which EDF highlights is not part of the planning application (but is presumably there to lend weight to the proposal by reference to benefits it believes are going to accrue). The first part of the document at SE.6 states:

*“In consideration of planning policy and socio-economic effects for energy projects, the Overarching National Policy Statement for Energy (EN-1) (DECC, 2011), which is a material consideration for projects determined through the Town and Country Planning Acts, states: ‘The Government’s wider objectives for energy infrastructure include contributing to **sustainable development** and ensuring that our energy infrastructure is safe. Sustainable development is relevant not just in terms of addressing climate change, but because the way energy infrastructure is deployed affects the well-being of society and the economy’ and; ‘In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account: its potential benefits including its contribution to meeting the need for energy infrastructure, **job creation** and any long-term or wider benefits.’ (**bold** is our emphasis)*

- On the matter of Sustainable Development, and with reference to the panels, we can find nowhere in the application reference to them other than that they are likely to be sourced from abroad. There is no detailed specification for the panels. It is essential that the most efficient of type should be used to minimise the overall footprint and the acreage of agricultural land taken to achieve the required performance). Nor can we find details about the method of their manufacture, the treatment and conditions of those who will be making them, the transportation method to the UK and naturally the *carbon footprint* of the *whole process*. EDF have multiple solar farm projects on the go at various stages of completion in the UK and they must therefore have well established supply chains. How else would they have been able to assess the cost of this scheme at £23-£25m?

For the applicant to claim at SE.64 *“this project therefore provides a material contribution to the net zero target by 2050 at both National (through the Climate Change Act) and Local level”* is unconvincing to say the least without the provision of these further details which should now be requested.

- In terms of job creation, we think the statistics are extremely “creative”. We have first-hand experience of the 2015 scheme in the lane which is operated remotely (as this one would be) and the number of visits to site (usually just a man in a van) are tiny. The applicant states at SE.82 *“CEBR projections find that employment associated with each MW of installed capacity will gradually fall to around **5.6 full time equivalent jobs per MW by 2030**”*. The report concludes: *‘Large-scale solar PV arrays deliver substantial output at low input cost, providing value to the UK economy, and deployments of all scales sustain employment across the nation.’ (**bold** is our emphasis).*

We know this array is rated at 49.9 MW. Presumably EDF have not done the calculation because it will stand out as ridiculous. How on earth could this development procure jobs once operational for 5.6 staff per MW meaning a total of 279 staff?! EDF simply move on and say at SE.83 *“As such, there are material benefits associated with the operational phase of the proposal”*.

It would be much more helpful to know, in very much more detail, how the subject scheme alone will measure up to the requirements of EN-1, in terms of job creation, whether that be nationally or more importantly *locally* (specifically what preference will be given to those in Aldington?).

We suspect, once operational, the number of new jobs created will be *insignificant*.

3. Environmental Statement – Overview

The aim of this document is, of course, for the applicant to demonstrate that despite the findings of all the survey work they have carried out during the EIA, the scheme appearing in the Planning Application is fine and one which should be granted consent.

In fairness the applicant has through the consultation process removed an area of solar panels that we maintained impacted the landscape, the enjoyment of residential property and important views. It has also extended some areas of mitigation.

However, there are areas where it is obvious that the applicant simply doesn't have the means by which it can mitigate an impact adequately and, in these instances, within the application, merely provides a brief résumé of the issue together with an even briefer explanation as to how the point will be addressed - or simply downplays the likely level of the impact.

How can we expect land covered with solar panels to remain a favoured nesting ground for the red listed (NERC species) Skylark any more than we can rely upon the expert who assessed that there are perhaps just “2 to 3 pairs” across the whole application site!? Any of us who walk the lane regularly (as many of us do) know that these marvellous birds are making a strong comeback on this land, and it is ridiculous to assess such a tiny number. Will these birds decide to stay anywhere in the locality during a year of dusty construction? Are they really going to return the following year to nest in the “riparian wildflower meadow” or will that over time just become intensive sheep grazing (as currently in the field south of Bested House) providing no habitat at all for these birds (or anything else)?

Nowhere can we find mention of brown Hares. This species is often seen from the lane and from footpaths across the area of the southern array in all seasons. Deer have also been recorded in the same area and we have photographs of these taken recently. All of this only demonstrates that the survey work of EIAs can only go so far, and one needs to be careful in treating any EIA as a definitive picture of wildlife living in an area. Like the Skylark, these mammals will inevitably be adversely impacted by these proposals.

No, our view is that the losses are bound to outweigh the gains – there will be no biodiversity net gain compared with leaving wildlife and habitat as it is and nowhere in the application does it state the way in which outcomes (the performance of the newly created habitat) will be recorded by EDF in the years ahead and over what period. If it did, then that at least – if publicly available – would potentially provide some reassurance (as well as useful data for other schemes coming forward elsewhere).

Whilst within this area of concern there is a limit as to what can be proved one way or the other until after the scheme has been in place for some years, EDF should and can still take proper note of what we say concerning the way in which they have overstepped the mark when it comes to panel footprint on Bested Hill and address this in the way we suggest.

This is not a “grey” area like the question of net biodiversity gain but a matter of oversight and an inconsistency of approach which can be corrected now by a relatively small reduction in panel footprint of between 15 and 20 acres.

4. Environmental Statement – Specific Points of Concern and Objection

Overview

When the application was registered on the ABC website the application appeared to be incomplete. Logging onto the portal is temperamental at the moment and we understand that ABC is in the process of transferring to a new system. Whatever the situation, the notification of this and other planning applications by automatic email to those registered has not been working for some time. This coupled with the lack of statutory planning notices on the ground means that many of those potentially concerned by this proposal may not yet even be aware that an application has been validated. We ask that this situation is rectified as soon as possible, and that sufficient time is provided for comments to be made.

There are therefore a number of points that we would like to raise separate to the central issue of specific solar panel footprint reduction. We propose to raise these at a forthcoming meeting with EDF but some of these may be matters for ABC. The most critical of these are covered in this letter.

However, it is important in the meantime that ABC register the real concerns of those within the Church Lane group and to that end this Letter of Objection together with the attached PowerPoint slides is deposited today.

Visualisations

As far as Church Lane residents are concerned and, we suspect, many in the Parish, it is the *views* of this scheme in the landscape that are the most critical of various remaining concerns.

It is important to note that among other safeguards for the environment, Government has issued guidance to help local councils in developing policies for renewable and low carbon energy and planning considerations. Below is an extract from their 2015 document for councils – even for councils where their Local Plan may not yet cover all aspects:

In shaping local criteria for inclusion in Local Plans and considering planning applications in the meantime, it is important to be clear that:

- the need for renewable or low carbon energy does not automatically override environmental protections;
- cumulative impacts require particular attention, especially the increasing impact that wind turbines and large scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases;
- local topography is an important factor in assessing whether wind turbines and large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas;
- great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;
- proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration;
- protecting local amenity is an important consideration which should be given proper weight in planning decisions.

Paragraph: 007 Reference ID: 5-007-20140306

Revision date: 06 03 2014

These arrays of panels together with shipping container type metal objects strewn over the area are always going to be unattractive - adding a jarring industrial tone to an otherwise rural scene of undulating fields with distant views of the North Downs AONB.

On the one hand EDF seems to recognise the importance of this since it has agreed in our previous discussions to exclude an area of arable land at Round Wood visible from the Conservation Area as well as from important public rights of way on Aldington Ridge to the west and east of St Martin's Church.

On the other, it has retained the panels on the south facing slope of Bested Hill. Here, the addition of a triangle of new woodland may (in years to come) do something to screen the panels when viewed from the adjacent lane but it will make no difference at all to important views from points on footpaths along Aldington Ridge.

Why is there this inconsistency? Why is the terrible impression as to what these panels would look like on the south face of Bested Hill (shown in EDF's ES at Visualisations Volume 3 – Viewpoint 7) not discussed in far greater detail within the text and an explanation given as to why this is nonetheless somehow acceptable?

Why in particular is it deemed acceptable when clearly the same south facing escarpment on the arable field further to the east at Round Wood was agreed as impactful on the landscape and nearby Heritage Assets and therefore removed from their scheme?

Our Own Visualisations

We, in the spring this year, carried out our own assessment and looked carefully at what it was reasonable for Bested Hill to accommodate without ruining the northward views towards the Downs as viewed from the Aldington Ridge.

We found that the maximum southern extent of the panel boundary would need to be approximately on a line that is the westerly projection of the northern boundary of the point-to-point course on the other side of the lane. Only by revising the boundary to this line would it be possible to obscure (with the addition of new boundary hedging) the serious adverse visual impact.

PowerPoint

We refer now to the attached numbered PowerPoint slides in turn:

1. The slide shows on Google Earth two important viewing points on public footpaths from each of which walkers enjoy a “vista” looking across the East Stour Valley landscape to the North Downs beyond. The Conservation Area is approximately shown verged green and marked “CA”.
The inconsistency just referred to is in relation to the two areas of land marked “A” and “B”. Area A was in the original EDF plans during the consultation phase but has been subsequently removed as being too prominent in the landscape.
2. This photograph is taken at what is referred to as viewpoint 7 within the EDF application. Areas A and B are both clearly visible from this much used public footpath AE474 and yet it is only Area A that is no longer in the application - impossible to reconcile when the south facing slope of Bested Hill is so plainly visible in exactly the same way.
3. This photograph is taken to the east of the church, on the footpath AE478 on the Aldington Ridgeway, and here again both areas are clearly and equally visible to walkers.
4. This is EDF’s photograph providing their visualisation from viewpoint 7 and to give credit where due, it makes a realistic and dramatic representation of what the Bested Hill will look like if the application were consented in its present form. Leaving alone the debate on Glint and Glare and the impact that may have on this viewing point (as well as the Church, conservation area, and houses in the lane) the impact on the view is plain to see.
5. This is one of our photographs taken in March. It is difficult to identify them but on Bested Hill three orange dots can be seen running across the face of the hill. These are orange paint marks on the top of 2.5 m high posts, and they are on the line that we maintain as being the appropriate revised southern boundary of the panel footprint.

6. It is easier to see the orange dots in this zoomed in photograph to which we have superimposed the line of what would need to be a new planted hedge with indigenous species with occasional hedgerow trees. The hedge would need to be maintained at a height of not less than 2.5 m once established and this would then afford adequate line of sight protection of existing views from Aldington Ridge. It would not obscure the panels altogether because the ground on the hill dips away towards the west, but this is a reasonable minimum requirement. This is not *additional hedging* – just a revised alignment of that already proposed.
7. This slide shows the EDF planning application plan (southern element of the scheme only) on which we have superimposed vergered green the area of panel footprint that needs to be removed. Note that the new southern boundary to the panel footprint is the projection of the northern boundary of the point-to-point course on the other side of the lane.
8. This slide shows an extract from Google Earth and the polygon of solar panels to be removed calculated to be between 15 and 20 acres only.

Advantages achieved through removal of these panels on the south slope of Bested Hill

1. As explained in the slides, valuable and historic views from the public footpaths along the ridge will remain as previously. Heritage Assets are also protected. The setting of the Church, the Conservation Area and the numerous historic and listed buildings within the valley that lies between the ridge and Bested Hill will no longer be impacted.
2. Public footpath AE 457 that runs across the southern slope of Bested Hill will be much the better for the retreat of the southern boundary of the panels. Indeed, walkers will hardly be aware of the panels until they come to the very top of the hill. Public footpath AE 459 will throughout most of its northerly length stands to be ruined by these proposals where it crosses through the middle of the field of panels heading towards Partridge Farm. By way of counteracting that adverse effect the quality of AE 457 should be maintained, and the change of footprint will help that.
3. Houses in the lane just to the south of Bested Hill enjoy an unspoilt view up the hill today. These houses being The Paddocks, Forehead House, and Hogben Farm. They all object to the scheme in its present form.
4. Whilst it would not be appropriate to specify on any plan the location of substantial Badger sets, we are sure that the applicant's experts will have identified these. If so, they will know that long established routes between the sets across the adjoining farmland (of which there is much evidence each spring) will be protected by not having panels and boundary fencing across the southern slope. Figure 6.6 in ES Volume 3 Figures Part 1 shows the intended perimeter fencing and indicates a gap beneath this of 150 mm (6 inches). This is insufficient for free passage of badgers. To our certain knowledge these sets have been established for more than 30 years.

5. Summary

1. We are not satisfied that the planning protocols in terms of noticing for this application have yet been followed and we await further detail about this including a deadline date for submissions. How can the wider public know that there is an application running?
2. The application available on the planning portal may still be incomplete. How is it possible for the public to obtain access to a definitive complete copy? Critically, how can they/will they be advised of this?
3. The concerns of the Church Lane Group about the detail of the application currently available are set out in this note and can be summarised as follows:
 - the extent of the panel footprint on Bested Hill is unacceptable for all the reasons given and the boundary should be redrawn accordingly
 - further and better particulars regarding access during construction must be provided through a revised TMP
 - there must be greater transparency about battery storage for this scheme and cumulative effects of the two schemes considered
 - we need to have clarity on the CBS and how this is to be handled to the benefit of Aldington
 - we wish to see further modest amounts of mitigation in the form of plantings which we wish to discuss with the applicant/ABC (including mitigation for footpath AE 459
 - we want the landscaping plans to be part of the planning application showing the detail of *exactly* what will be planted (and where) together with the management and maintenance regime and replanting obligations where required
 - we want there to be an obligation on EDF to commission ongoing biodiversity/habitat survey work through construction and beyond over a period of years to record the impact on wildlife and to appraise the extent (if any) of net biodiversity gain (promised) and for the results to be publicly available
 - we want details of all additional infrastructure (particularly site cabinets), including location and colour, to be installed on the land
 - We wish to have far more detail of the type of panel being used (including the carbon footprint assessment) and a site-specific assessment of local job creation during the various phases of the scheme as highlighted in EN-1
 - we wish to know the enforcement provisions available to the public if the detailed management, maintenance, and survey arrangements we seek are not adhered to and how ABC would handle any concerns raised by the public.

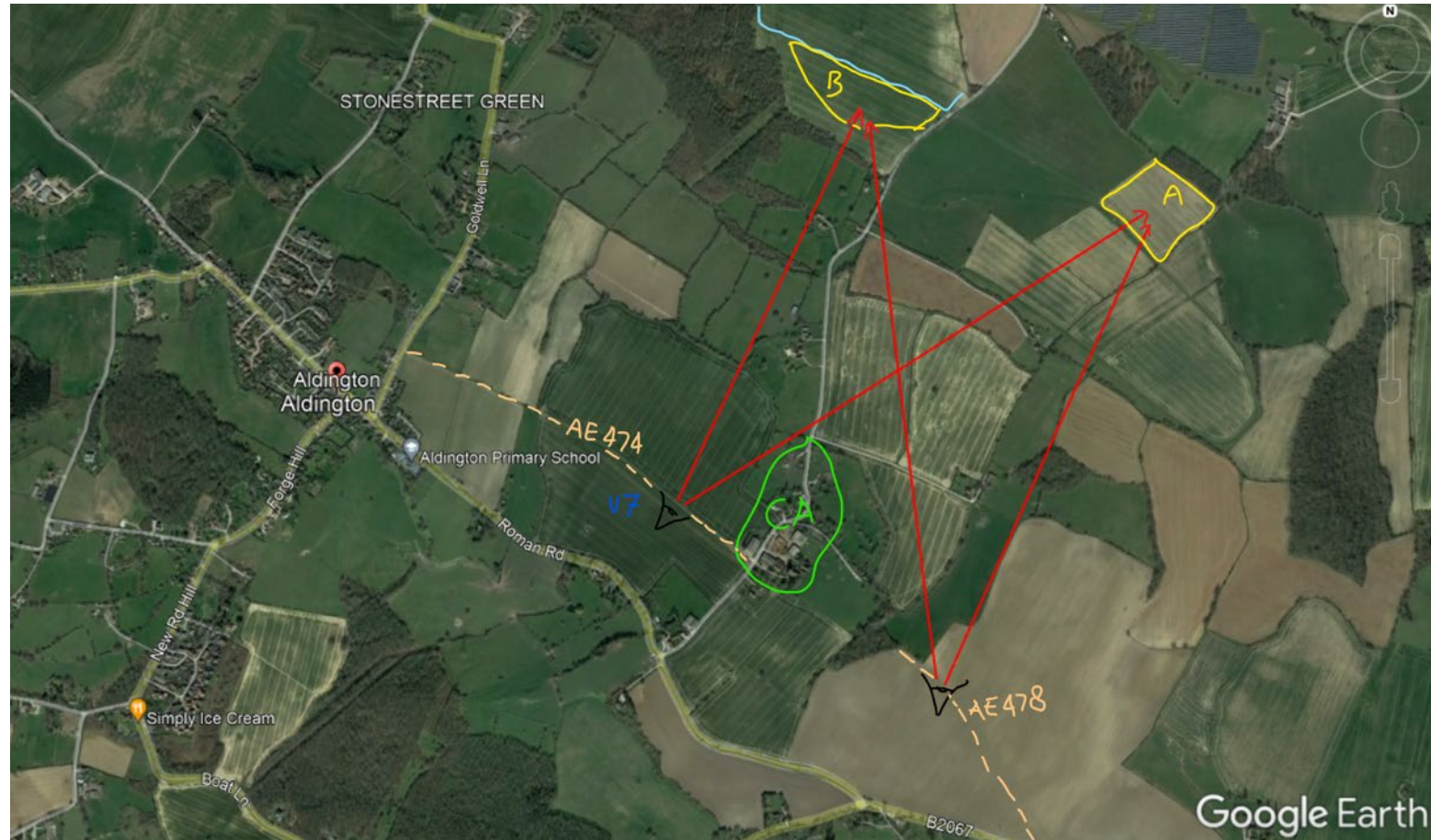
Jonathan Tennant and Alison Baldwin

for the

Church Lane Group - 26.07.22

KEY VIEWPOINTS from ALDINGTON RIDGE

Bested Hill (B) Round Wood (A). Note Conservation Area (CA) and footpaths on Ridge



EDF's Viewpoint 7. Bested (B) Round Wood (A)



Viewpoint on Footpath AE478 East of Church Showing Round Wood (A) and Bested (B)



EDF's Proposition for Bested Hill

Their Viewpoint 7 in Visualisations

On Footpath AE474 West of Church



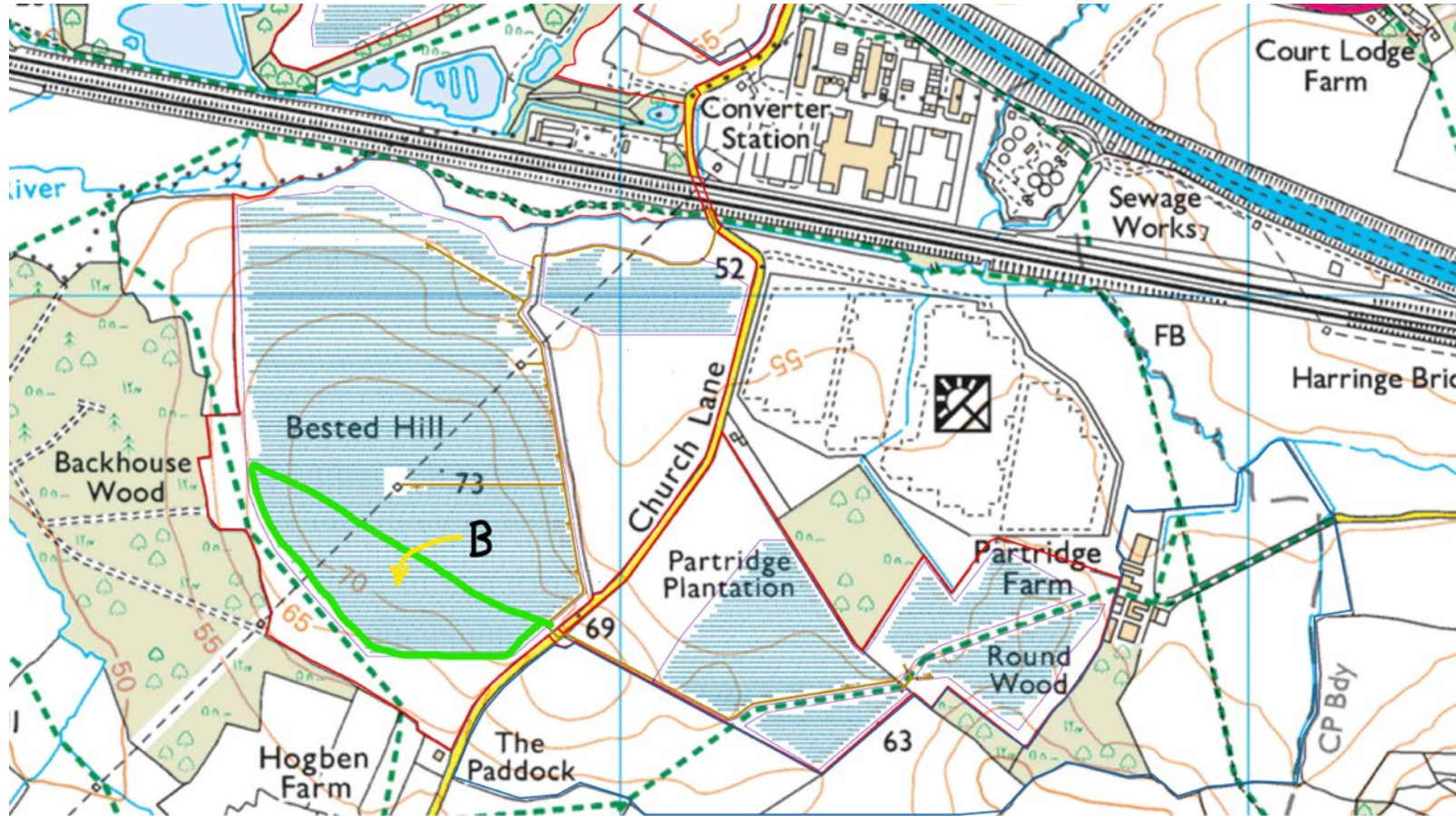
March 2022. Orange dots are paint on 2.5m high posts on proposed solar panel boundary realignment.



Orange dot line showing where new hedge line would be almost entirely obscuring panels (2.5m)

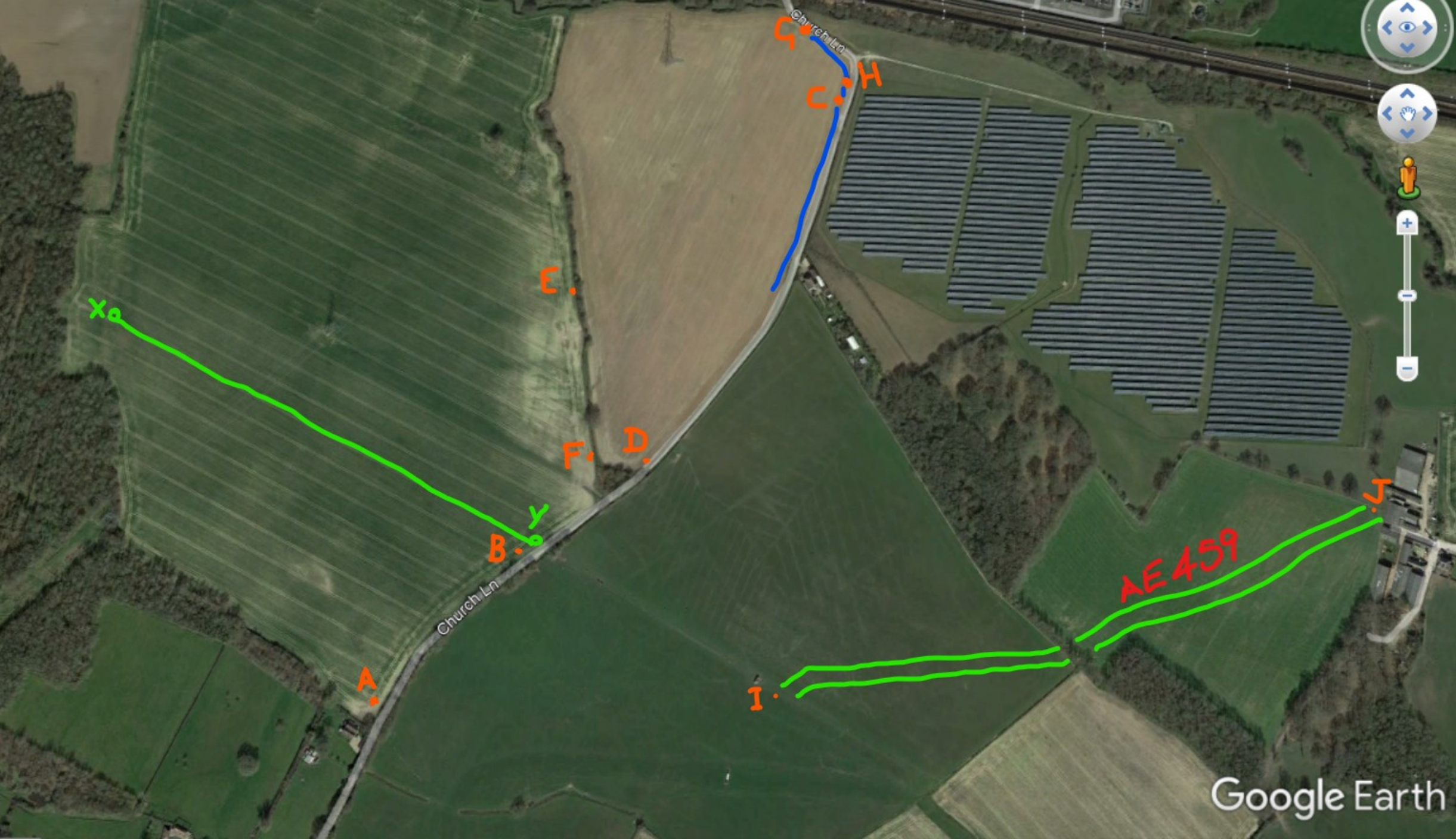


EDF Application Plan: Green line inserted showing panel area to be removed on south facing slope of Bested Hill



Extent of area to be removed. Approximately 15 – 20 acres of solar panel footprint





Church Ln

Church Ln

AE 459

Google Earth