

The Parish Council have considered this application in detail. At the present time we wish to register an objection due to a number of concerns that the Parish Council feel must be addressed:

- Visual impact – the placement of panels on the southern slope of Bested Hill is contrary to Ashford Local Plan Policy ENV10 as they will have an adverse impact on the landscape and a visual impact on nearby residents. Paragraph 174 (b) of the NPPF requires the recognition of the intrinsic character of and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economies and other benefits of the best and most versatile agricultural land, and of trees and woodland. The southern slope of Bested Hill has for many years supported arable crops. The draft National Policy Statement for Renewable Energy Infrastructure (NPS) EN-3 states that “Where possible, ground mounted Solar PV projects should utilise previously developed land, brownfield land, contaminated land or agricultural land preferably of classification 3b, 4 and 5 (avoiding the use of ‘Best and Most Versatile’ cropland). There does not appear to be an assessment of land quality submitted with this application to support its selection as a suitable site. The British Energy Security Strategy published April 2022 states that the Government will; “continue supporting the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites.” All the land proposed in this application is agricultural land, the location is rural and crossed by several PROW’s. The mitigation scheme proposed does not provide sufficient explanation to inspire confidence that the proposal can be installed with less than significant harm.

We therefore request that EDF put forward a proposal that removes ground mounted solar panels from the South side and crown of Bested Hill.

Church Lane is a picturesque rural location that should be protected from harm. This proposal represents an extension of the industrialisation of the A20 end of the lane, which, should be confined to areas that are not visible in the longer views and which abut the existing infrastructure not the rural residences.

- Lack of planting scheme – Continuing the concerns described above; a detailed scheme of type of native species and scale of planting is missing. This would give some indication regarding the level of screening that will be provided in the short, medium and long term. In addition, the scheme should specify what protection the plants will be given from damage by wildlife and adverse weather as well as describing provision that is to be made for replacement if trees fail to grow. To ensure success there should be a plan outlined for future maintenance of any planting. We would like to see much more detail for this development, so that, should it proceed, it enhances the landscape and biodiversity of its location. The treatments around the PROW’s are key to this and should therefore be conducted in partnership with a body such as the Kent Wildlife Trust, through which an expert proposal could present a hIn uge opportunity.
- Construction compounds – these are not shown on the plans, Ashford Local Plan Policy TRA9 requires plans to demonstrate that a site is able to accommodate HGV manoeuvring and parking in a way that does not lead to the public highway being used for either purpose. This should be outlined for both the lifetime of the proposed development and for the construction phase.
- In a similar way – car parking – the plans do not show where the contractors parking will be located, Church Lane is single track and therefore cannot be considered for on street parking.
- Construction traffic – the application does not describe how EDF plans to prevent construction traffic from entering Aldington Village, or from travelling to the site from Roman Road. Church Lane is a quiet, single track, rural lane that is unsuitable for HGV traffic. The width of the road prevents safe access from Aldington. Previous works during the installation of the existing solar farm caused severe damage to the road whilst recent works at the Converter Station have resulted in lorries ignoring travel plans and getting stuck part way down Church Lane, with residents having to assist them to reverse out. The Parish Council therefore request that a very detailed traffic management plan is submitted. In the original proposal presented to residents the applicant verbally committed to ensure that ALL traffic would be confined to access only from the A20 end of Church Lane. A detailed management plan is

needed to show how this will be achieved. The Parish Council also asks that the applicant agrees with KCC to provide signage at the Roman Road end of Church Lane to prevent accidental contractor access and also to agree to fund road closure for the whole of the construction period at the crossing point between the south and north parts of the proposed sites. There should also be a restriction on working hours to prevent disruption to local residents.

- Cable routes – the plans are of such scale that the routing of cables and conduits cannot be identified. We request a better map and description that is understandable. Is there a requirement to dig trenches?
- Welfare cabins – it is hard to distinguish where the welfare cabins are to be sited on the plans submitted. the EDF documents state that there will be discussions as to the finish of these buildings, but what that is to be is not stated. What are the plans for screening? Are they permanent or temporary structures? Much more detail is required on this point.
- Storage areas – again these are not shown on the plans, how are they to be screened and kept secure. Will there be lighting? This is a Dark Skies Zone that has already been badly undermined by the works being carried out at the Converter Station. Residents do not want ANY permanent lighting.
- Location of inverter/transformer substations – the location of these is unclear on the plans. As these will be on site for the life of the solar panels and are large structures a detailed explanation of where they are proposed is needed.
- Flooding – Church Lane, by the railway bridge is subject to flooding. Should this application be approved, the Parish Council request that the applicant is required by condition to carry out drainage improvements following the installation of their cables that ensures that all surface water during any storm event is carried into the East Stour River.
- Automated Traffic Counts – whilst a count was undertaken this was carried out during school half-term therefore a true picture of traffic volume was not achieved. It should also be noted that when there is a problem on either the A20m or M20 Satnav users are diverted to the nearest roads, including Church Lane, where, residents have frequently reported increased traffic on the occasion of an incident. This is supported by evidence from the Parish Council's Speed Indicator Device, located on the village roads where a 30 mph speed restriction applies, which though not Church Lane gives a very clear picture of the significant increase in traffic flows. The Parish Council requests that the traffic assumptions are not based on the traffic count supplied by the applicant.
- Visibility splays – whilst the plan shows the access point to the respective areas of the site no detail as to the size of gate or the visibility from the site are given. Despite being a mostly single track, rural lane, Church Lane is subject to the National Speed Limit therefore excellent visibility from the site is required.
- Height restriction – the railway bridge on Church Lane carries a 3.8m height restriction. From the information provided in the application, the inverter/transformer units are of a similar dimension to a shipping container some 3m by 3m at the end. The running height of a standard HGV designed to carry containers when loaded is 4.12m. immediately after the railway bridge there is a bridge across the waterway which is assumed to have a 40 tonne weight limit, the crane they show unloading containers is 45 tonne, assuming they can negotiate the height restriction. How is this planned to be feasible? At the Public Consultations held by the applicant a verbal process of off-loading and bringing elements through the bridge in small loads was described but is not referred to in the application.
- Passing places – Church Lane is single track at best 3.5 metres width, given that the loads quoted are 3 metres wide what provision is being made for oncoming traffic as there are no passing spaces and drainage ditches at the roadside. Country lanes do not have retaining edges and large vehicles cause damage that creates driving hazards for residents. The applicant should be required by condition to repair any damage to road edges and drainage.
- Listed buildings – Church Lane consists of some 15 Listed Buildings. Whilst the application does not directly affect the historic buildings, it does significantly and demonstrably affect the setting, both from the road (Church Lane) and the PROWs that are historic paths, trodden

by farm workers to the church over centuries. The Parish Council requests that this aspect is addressed by the applicant, who should be required to show how the Church Lane Conservation area has been considered and how mitigation aims to improve the setting through expansion of hedgerows and planting that is managed to improve the location.

- Bringing renewables to Aldington – should this application be approved, the Parish Council request that the applicant brings the advantages of use of solar energy into the Parish, through an agreement to the installation of a full solar system with battery storage on Aldington Village Hall to be put in place prior to solar production beginning at the East Stour Solar site. This should be in addition to the Community Funding which in any case is shared with other parishes, despite Aldington being the most significantly impacted.