

Stonestreet Green Solar

Responses to First Written Questions (ExQ1)

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Table of Contents

1	Introduction	2
1.1	Purpose of the Report	2
1.2	Structure	2
1.3	Approach	2
2	Response to the Examining Authority's First Written Questions	3
2.1	Overview	3
2.2	Responses to First Written Questions (ExQ1)	4

List of Tables

Table 2-1: General and Cross-topic Questions	4
Table 2-2: Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))	10
Table 2-3: Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations	15
Table 2-4: Draft Development Consent Order (DCO)	16
Table 2-5: Historic Environment	21
Table 2-6: Land Use and Soils	23
Table 2-7: Minerals	30
Table 2-8: Landscape and Visuals	31
Table 2-9: Noise and Vibration	36
Table 2-10: Socio-economic Effects	36
Table 2-11: Transportation and Traffic	39
Table 2-12: Water Environment	45

1 Introduction

1.1 Purpose of the Report

- 1.1.1 This report provides the Applicant's responses to the **Examining Authority's written questions and requests for information (ExQ1)** [\[PD-006\]](#) issued on 10 January 2025 in respect of the proposed Stonestreet Green Solar project (the Project).

1.2 Structure

- 1.2.1 Section 1 of this report sets out the purpose and structure of this report and explains the approach taken by the Applicant in preparing responses. Section 2 of this report provides the Applicant's responses to the questions raised of the Applicant by the Examining Authority (ExA), including signposting to other responses and documents where appropriate. Where questions have been raised of other parties, the Applicant has not provided a response to those questions except where it considers that it would be helpful for the ExA for it to do so.

1.3 Approach

- 1.3.1 To minimise duplication, the Applicant has sought to cross-refer back where appropriate to responses provided in the **Responses to Relevant Representations (Doc Ref. 8.2)** [\[1\]](#)[\[REP1-061\]](#) and the **Responses to Deadline 1 Submissions (Doc Ref. 8.8)** [\[REP2-034\]](#), or other relevant submissions that have been entered into the Examination.

2 Response to the Examining Authority's First Written Questions

2.1 Overview

2.1.1 The following topics were raised by the ExA in the **ExQ1** [\[PD-006\]](#):

- General and Cross-topic Questions;
- Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA));
- Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations;
- Draft Development Consent Order (DCO);
- Historic Environment;
- Land Use and Soils;
- Landscape and Visual;
- Minerals;
- Noise and Vibration;
- Socio-economic Effects;
- Transportation and Traffic; and
- Water Environment.

2.1.2 The tables below provide the Applicant's response to these topics arranged under the headings listed above, supported by identification of sub-themes for clarity and ease of reference.

2.2 Responses to First Written Questions (ExQ1)

Table 2-1: General and Cross-topic Questions

ExQ1 Ref	Question	Applicant Response
<i>1.0 Policy and Legislative</i>		
Q1.0.1	<p>The Applicant: Planning Reforms</p> <p>Consultation on “Proposed reforms to the NPPF and other changes to the planning system and the “National Planning Policy Framework: draft text for consultation” was published on 30 July 2024. The government then published the revised NPPF on 12 December 2024. The framework sets out the government's planning policies for England and how these are expected to be applied. Please consider whether the above have any relevance to the Proposed Development.</p>	<p>Please refer to the Planning Statement Addendum (Doc Ref. 8.9) [REP2-035], submitted by the Applicant at Deadline 2, which summarizes the relevant changes made to the National Planning Policy Framework (NPPF) in the version published on 12 December 2024 and confirms that those changes do not materially alter the conclusions of the Planning Statement (Doc Ref. 7.6) [APP-151].</p>
Q1.0.2	<p>The Applicant: Protected Landscapes</p> <p>Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) amends the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England.</p> <p>Relevant authorities must now ‘seek to further’ the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to ‘have regard to’ their statutory purposes. Can the</p>	<p>Please refer to the Response to Deadline 1 Submissions (Doc Ref. 8.8) [REP2-034], submitted by the Applicant at Deadline 2, in particular the response to LIR Ref. WR 12 – 16 on pages 33 – 38 in Table 2-2: ‘Landscape and visual’ in Section 2.2.</p>

ExQ1 Ref	Question	Applicant Response
	Applicant explain how the Proposed Development has regard to this duty?	
Q1.0.3	<p>ABC: Statement of Common Ground</p> <p>Page 7 of the update on the Statement of Common Ground submitted by the Applicant at D1 [REP1-062] states that on the 20 November the Applicant sent an email in response to ISH1 comments and sought a meeting to discuss. Can the Council advise if this has been scheduled or taken place and update on their response if the meeting has taken place? In addition, can you also advise if any of the matters not agreed and under discussion have been resolved?</p>	<p>The Applicant received an email update from Ashford Borough Council (ABC) on 9 December 2024, which confirmed that ABC agree to the changes made by the Applicant in the Deadline 1 version of the Draft DCO (Doc Ref. 3.1(D)). The only outstanding matter relates to ABC's request that Requirement 5 (BSMP) in Schedule 2 of the Draft DCO be amended to specify Kent County Council (KCC) as a consultee. The Applicant has asked KCC whether it wishes to be added as a consultee in this requirement, and KCC have noted that they have no in house battery or fire safety expertise and so do not wish to be a consultee in respect of this requirement. In this context, the Applicant does not consider it necessary or appropriate to oblige KCC to be consulted where they have clearly stated they have no statutory remit or expertise.</p>
Q1.0.4	<p>The Applicant and Environment Agency: Contribution to the Waterlife Recovery South East (WRSE) Project</p> <p>The Statement of Common Ground provided at D1 [REP1-063] with the EA sets out on page 24 in relation to Mink that a payment has been requested by the EA to the WRSE. Could the Parties explain how a contribution to this project will meet the statutory tests for Planning Obligations namely how the funding contribution:</p> <p>(a) is necessary to make the development specified in the order acceptable in planning terms,</p> <p>(b) is directly related to the development,</p>	<p>The Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)) sets out the updated position on this matter. This confirms that no formal or specific request has been made in relation to a contribution to the WRSE, or an explanation as to why such a contribution would be necessary in planning terms.</p> <p>The Applicant has already made a commitment in the LEMP through the Mink Control Strategy, which is agreed and secured by Annex 3 of the Outline LEMP (Doc Ref. 7.10(B)) and Requirement 8 (Landscape and biodiversity) of Schedule 2 of the Draft DCO (Doc Ref. 3.1(D)).</p> <p>The Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)) confirms that this position is agreed between the Environment Agency (EA) and the Applicant.</p>

ExQ1 Ref	Question	Applicant Response
	<p>(c) is fairly and reasonably related in scale and kind to the development, and</p> <p>(d) satisfies such other requirements as may be specified in regulations made by the Secretary of State.</p>	

1.1 Need

Q1.1.1	<p>The Applicant: Scale of Battery Storage</p> <p>A number of RRs from Ips such as Phillipe Foster Back [RR-235] , Bernadette Gregory [RR- 023], Peter Carney [RR-230], Marc Anger [RR-176] , Elaine Rose [RR-199], Claire Gibbs [RR- 051], Matthew Hunt [RR-182], Ian Rose [RR-102], Councillor Simon Betty, [RR-054] , Charles Aldington [RR-036] , Edward Elcock [RR-078], Juliet Fotheringham [RR-138], Phillip Hannabus, [RR-233], Zoe Williamson [RR-306] , Hollie Williamson [RR-100], Karen Williamson [RR-145], Mitchell Williamson [RR-193], and Sandra Ward [RR-255] cite the potential impact of the array of battery storage facilities across the site and its detrimental impact on the landscape.</p> <p>i) Could the batteries be clustered together to minimise the landscape impact?</p> <p>ii) What other forms of mitigation have been considered to minimise the visual impact of the Battery Storage structures?</p> <p>iii) What is the reason for the number of batteries?</p>	<p>i) Could the batteries be clustered together to minimise the landscape impact?</p> <p>As set out in Table 5.4 of ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2(A)) [AS-010], the design for the Project employs a distributed approach with four individual containerised BESS Units located at any one Inverter Station, with a maximum of two Inverter Stations (and therefore eight units) being located in any one area of the Site, as opposed to locating all BESS Units in a single centralised compound area. Table 5.4 of ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2(A)) [AS-010] sets out a number of benefits to this approach.</p> <p>There is no evidence to suggest that clustering the inverters and BESS Units in a single location would reduce landscape and visual effects and there are a number of locations where clustering the BESS Units could worsen the effects.</p> <p>ii) What other forms of mitigation have been considered to minimise the visual impact of the Battery Storage structures?</p> <p>In the majority of cases the BESS Units are located away from field boundaries, minimising any BESS specific visual impact external to the Site. As secured by the Design Principles (Doc Ref. 7.5(B)), the BESS Units will be located at least 150m from any residential receptor, within 4m</p>
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ExQ1 Ref	Question	Applicant Response
		<p>high acoustic wooden board fencing, both of which help to further minimize effects.</p> <p>ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2(A)) [AS-012] assesses the visual impact of the Project, including the BESS Units, taking into account that the maximum height of the BESS Units is limited in the Design Principles (Doc Ref. 7.5(B)) to 4.0m, in-line with the acoustic barrier height. This is the height that has been used to inform the Zone of Theoretical Visibility. ES Volume 2, Chapter 3: Project Description (Doc Ref. 5.2(A)) [REP1-018] provides typical dimensions of BESS Units being 3.7m (width) x 13.7m (length) x 2.9m (height) and therefore the Zone of Theoretical Visibility results in a worse case analysis.</p> <p>iii) What is the reason for the number of batteries?</p> <p>In row 9 of Table 1-1 on pages 3 – 5 of the Response to Additional Submission made at Procedural Deadline A (Doc Ref. 8.1) [REP1-060], the Applicant has set out the justification for the size of the Project, including why there is a necessity for the number of BESS Units proposed required for the delivery of this Project.</p> <p>The proportion of BESS Units included within the scheme is considered to be entirely consistent with the National Policy Statement for renewable energy infrastructure EN-3 (NPS EN-3) (paragraph 2.10.10), which supports co-location of solar and BESS, as this helps to deal with intermittency in power generation by solar projects, as well as providing grid balancing services.</p>

1.2 Site selection and alternatives

Q1.2.1	<p>The Applicant: Plan of Alternative Sites</p> <p>Paragraph 5.5.2 Chapter 5 ‘Alternatives and Design’ within the Environmental Statement (ES) [AS-010] states ‘It is also reasonable to assume that</p>	<p>The Site is within the June 2024 catchment map of the component Site of Special Scientific Interests (SSSIs) of Stodmarsh Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar as defined by Natural England (‘NE’)¹. NE Advice on Nutrient Neutrality for</p>
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ExQ1 Ref	Question	Applicant Response
	<p>organic/natural nutrients (nitrates and phosphates) and agri-chemicals (e.g. biocides and synthetic fertilisers) would continue to be applied to the land [sic] Water quality in the Stodmarsh Designated Site is currently in an 'unfavourable condition' due to this Issue.' Please clarify what evidence was used to support this assessment of condition as it doesn't appear to be covered in ES Chapter 10 Water Environment [AS-007].</p> <p>Further on in this document, paragraph 5.6.5 provides a summary of why the site is the most suitable within 5 kilometres (km) of the point of connection (POC) and Table 5.1 identifies alternative sites raised during the statutory consultation. Figure 5.1 'Alternative Sites raised during the Statutory Consultation' provides potential Developable Land Locations and Cumulative Schemes. Table 5.2 'Alternative Project Site Extent and Order Limits' makes reference to Figure 2.1 'Field Boundaries and Site Area Plan' [APP-040]. Please can clarification be provided on the suitability of alternative sites closer to the POC alongside a plan to show the individual fields considered that would then aid the description in Table 5.2.</p>	<p>New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites² (paragraph 2.2) states that <i>'The best available up-to-date evidence has identified that some of the designated site units are in unfavourable condition due to existing levels of nutrients (both phosphorous and nitrogen) and are therefore at risk from additional nutrient inputs.'</i></p> <p>Paragraph 1.1 states <i>'There are high levels of nitrogen and phosphorous input to this water environment with sound evidence that these nutrients are causing eutrophication at part of these designated sites. These nutrient inputs are currently thought to be caused mostly by wastewater from existing housing and agricultural sources, though recycling of nutrients within the lake habitats cannot be ruled out.'</i></p> <p>Paragraph 4.12 highlights that changes in agricultural practices could be an influencing factor and Section 5 provides modelling of Nitrogen–nitrate/phosphorous loss (through leaching) from agricultural land using a Farmscoper model for the Stour Management Catchment for Stodmarsh. As the Site will be removed from agricultural use as a result of the Project the Applicant believes it is reasonable to assume that this would reduce any current impact, but the reduced nitrogen/phosphorous load from the Site likely to arise as a consequence of the change in land use from the Project has not been calculated as this was not considered necessary in order to the identify any likely significant environmental effects.</p> <p>Appendix 2 (Sequential and Exception Test Report) of the Planning Statement (Doc Ref. 7.6) [APP-151] includes an assessment of land within the 5km search area. Land closer to the POC includes Search Zone 4, which relates to land that was <i>'not on the open market or otherwise considered to be reasonably available'</i>. The Sequential and Exception Test Report has been reviewed by both the EA and ABC who have confirmed that the Project has passed both the Sequential and Exception Tests, as set out in Statement of Common Ground with Ashford Borough</p>

ExQ1 Ref	Question	Applicant Response
		Council (Doc Ref. 8.3.1(A)) and Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)).
Q1.2.2	<p>The Applicant: Alternative Sites</p> <p>Why has the land between the rear of Evergate Park and the Converter Station not been considered as part of the alternative site assessment? And also the land between the A20 and the motorway?</p>	<p>The land between the A20 and the M20 and the land to the rear of Evergate Park and the existing Sellindge Substation, south of the M20, was considered as part of the alternative site assessment and part of that land is identified as '<i>Potentially Developable Land Parcel 1</i>' and '<i>Potentially Developable Land Parcel 2</i>' as set out in ES Volume 3, Chapter 5: Alternatives and Design Evolution Figures 5.1 (Doc Ref 5.3) [APP-046].</p> <p>Each of these land parcels were considered by the Applicant but were discounted for the reasons set out in Table 5.1 of ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2(A)) [AS-010]. These sites were also considered as part of the Sequential and Exception Test Report (Appendix 2 of the Planning Statement (Doc Ref. 7.6) [APP-151]). The Sequential and Exception Test Report has been reviewed by both the EA and ABC who have confirmed that the Project has passed both the Sequential and Exception Tests, as set out in Statement of Common Ground with Ashford Borough Council (Doc Ref. 8.3.1(A)) and Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2 (B)).</p> <p>The Sequential Test analysis demonstrates that there are no suitable and reasonably available sites appropriate for the Project in areas with a lower risk of flooding and therefore the Sequential Test is satisfied.</p>

Table 2-2: Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))

ExQ1 Ref	Question	Applicant Response
Q2.0.1	<p>The Applicant: Mink</p> <p>Table 0.1: Illustrative Maintenance and Management Schedule Years 1-5 of the Outline Landscape and Ecological Management Plan (OLEMP) [APP-155] refers to management of invasive non-native species. Will this include Mink?</p>	<p>The Applicant has made a commitment to manage and control mink in the Outline LEMP (Doc Ref. 7.10(B)) through the Mink Control Strategy, which is set out in Annex 3 of the Outline LEMP (Doc Ref. 7.10(B)) and secured by Requirement 8 (Landscape and biodiversity) of Schedule 2 of the Draft DCO (Doc Ref. 3.1(D)).</p> <p>In addition, paragraph 5.3.3 of the Outline LEMP (Doc Ref. 7.10(B)) confirms that pre-commencement surveys (as detailed in Annex 3 of the Outline LEMP) will be carried out in advance of construction for non-native invasive species. Mink are a non-native invasive species and therefore subject to controls under the Wildlife and Countryside Act 1981.</p> <p>The Outline LEMP (Doc Ref. 7.10(B)) commits that the detailed LEMP will set out the details of the pre-commencement non-native invasive species survey and the Mink Control Strategy. Ongoing monitoring including during the construction and operational phases will be set out within the monitoring programme included in the detailed LEMP. Pursuant to Requirement 8 (Landscape and biodiversity) of Schedule 2 of the Draft DCO (Doc Ref. 3.1(D)), the detailed LEMP would be submitted to and approved by ABC prior to the commencement of construction.</p>
Q2.0.2	<p>The Applicant: Outline Landscape and Ecological Management Plan (LEMP) [APP-155]</p> <p>Could clarity be provided on any advanced planting needed, and cross referenced to phasing and the development Gantt chart requested at ISH1[EV5-001] and noted at paragraph 1.5.12 of the Written summary of Oral Submissions at Issue Specific</p>	<p>The Outline LEMP (Doc Ref. 7.10(B)) states in paragraph 4.3.3 that <i>‘Advanced planting is likely to commence in the first available planting season (November to March inclusive) following the granting of development consent.’</i></p> <p>The Applicant included this statement to demonstrate its intention to seek to maximise the screening potential of planting in the early phases of the Project but notes that the conclusions of ES Volume 2, Chapter 8:</p>

ExQ1 Ref	Question	Applicant Response
	Hearing 1 and Responses to Action Points [REP1-073].	<p>Landscape and Views (Doc Ref. 5.2(A)) [AS-012] do not rely on advanced planting as embedded mitigation.</p> <p>With regard to sequencing, please see the Applicant's response to Action Point 2 in the Written summary of Oral Submissions at Issue Specific Hearing 1 and Responses to Action Points (Doc Ref. 8.5.3) [REP1-073].</p>
Q2.0.3	<p>The Applicant: ES Chapter 9 Biodiversity Appendix 9.5h [APP-090]</p> <p>Paragraph 3.79 states that if more than 18 months elapse between the completion of surveys (October 2022) and the commencement of works, a suitably experienced ecologist will need to undertake a site visit and review the validity of this report. Additional bat survey work may be required within the period May to October - to ensure the status of the on-Site habitat has not changed and to provide up-to date survey data. In this instance, a suitably experienced ecologist should be consulted for advice. Can the Applicant confirm how the pre- commencement surveys will be secured and through which mechanism?</p>	<p>The requirement to undertake pre-commencement surveys is secured by the Outline LEMP (Doc Ref. 7.10(B)) in section 5.3 and will be prepared as part of the detailed LEMPs submitted to discharge Requirement 8 (Landscape and biodiversity) of Schedule 2 to the Draft DCO (Doc Ref. 3.1(D)).</p>
Q2.0.4	<p>The Applicant: ES Chapter 9 Biodiversity Appendix 9.5i [APP-090]</p> <p>Paragraph 3.39 states that if commencement of site works is delayed beyond 18 months of November 2022 (the date of completion of the latest hazel dormouse survey of the Survey Area), a suitably experienced ecologist will need to undertake a site visit and review the validity of this report. Can the</p>	<p>The Outline LEMP (Doc Ref. 7.10(B)) includes a commitment that an ecologist will complete a walkover of the Site to reconfirm the ecological baseline conditions and to identify any new ecological risks. Annex 3 notes that the removal of dormouse suitable habitat will be undertaken with an ecological watching brief. This would be secured by a Natural England EPSM licence. These measures will be set out as part of the detailed LEMPs submitted to discharge Requirement 8 (Landscape and biodiversity) of Schedule 2 to the Draft DCO (Doc Ref. 3.1(D)).</p>

ExQ1 Ref	Question	Applicant Response
	Applicant confirm how the pre-commencement surveys will be secured and through which mechanism?	
Q2.0.5	<p>ABC: Local Nature Recovery Strategy</p> <p>EN-1 Para. 4.6.12 refers to a Local Nature Recovery Strategy (LNRS), if published. ES Chapter 9 Biodiversity [APP-033] doesn't specifically reference a LNRS, can ABC state if a LNRS has been published or if a similar document exists. If not is a LNRS being prepared and if so when is this likely to be published?</p>	No response required from the Applicant.
Q2.0.6	<p>The Applicant: Ecological Enabling Works</p> <p>ES Chapter 9 Biodiversity [APP-033] paragraph 9.4.18 references ecological enabling works. Please clarify whether this includes other 'enabling works' and whether this would have any impacts on interest of biodiversity and if so what mitigation is proposed?</p>	<p>As stated at paragraph 9.4.18 of ES Volume 2, Chapter 9: Biodiversity (Doc Ref. 5.2) [APP-033], any ecological enabling works (e.g. landscape preparation or protected species mitigation) required in advance of the main construction programme have been included within the construction phase for the purposes of the biodiversity assessment. The ecological enabling works would include pre-construction ecological surveys, vegetation works, advanced planting and environmental surveys.</p> <p>In accordance with Requirement 8 in Schedule 2 of the Draft DCO (Doc Ref. 3.1(D)), no phase of the authorised development may commence until a LEMP covering that phase has been submitted to and approved by the local planning authority. Sub-paragraph (4) of Requirement 8 confirms that all landscape and biodiversity enhancement works associated with the authorised development in each phase must be carried out in accordance with the approved LEMP for that phase. For this purpose, sub-paragraph (5) of Requirement 8 provides that "commence" includes part (b) (site clearance and/or vegetation works) of the site enabling works. The other site enabling works are not considered likely to result in any significant environmental effects that require mitigation. This is consistent with other</p>

ExQ1 Ref	Question	Applicant Response
		solar DCOs, such as The West Burton Solar Project Order 2025 (see Requirement 7 in Schedule 2 of that DCO).
Q2.0.7	The Applicant: Badger Group Please provide an update on communication and liaison with the Badger Group who have requested access to confidential documentation.	ES Volume 2, Chapter 9: Biodiversity (Doc Ref. 5.2) [APP-033] includes an assessment of the potential impacts on biodiversity, including badgers. The results of a badger survey have been provided to the ExA but due to their protected status these are confidential. The East Kent Badger Group are not a prescribed consultee and have not at any stage contacted the Applicant to express views on the Project or share relevant baseline information.
Q2.0.8	The Applicant: Beavers The EA have requested that beavers are added to the pre-commencement surveys listed in paragraph 5.3.3 of the OLEMP [APP-155] for which surveys will be completed. Can the applicant confirm that beaver will be included in that list?	Section 2 of ES Volume 4, Appendix 9.5: Riparian Mammal Survey (Doc Ref. 5.4) [APP-090] provides the methodology for the riparian mammal survey. This included a search for signs of water vole, otter and beaver. Paragraph 5.3.3 of the Outline LEMP (Doc Ref. 7.10(B)) states that the pre-commencement surveys detailed in Annex 3 will be carried out in advance of construction, which includes but is expressly not limited to the species in the bullet points within this paragraph. Annex 3, Table 3.0-1 of the Outline LEMP (Doc Ref. 7.10(B)) makes specific reference to pre-commencement beaver surveys.
Q2.0.9	The Applicant: Backhouse Local Wildlife Site (LWS) Please explain why the minimum buffer of 15m from the ancient woodland at Backhouse LWS has not been provided given the potential impacts from the proposal on this irreplaceable habitat. Guidance published by Natural England and the Forestry Commission makes clear that a buffer of 15 metres	The Design Principles (Doc Ref. 7.5(B)) secure that no development will occur within a buffer of 15m from the canopy spread for ancient woodland, which includes Backhouse LWS. As stated in Table 9.1 of ES Volume 2, Chapter 9: Biodiversity (Doc Ref. 5.2) [APP-033] the only structure within 200m of the Backhouse Wood LWS ancient woodland comprises wooden deer fencing that will be installed to minimise recreational disturbance of ground-nesting bird

ExQ1 Ref	Question	Applicant Response
	is a minimum requirement in order to avoid root damage and that where other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.	compensatory habitat areas, noting this will be outside the 15m minimum buffer. An assessment of the construction and operational effects of the Project on Backhouse Wood LWS is provided in Table 1 of ES Volume 4, Appendix 9.7: Assessment of Effects (Doc Ref. 5.4(A)) [APP-092] .
Q2.0.10	<p>Kent Wildlife Trust: Barn Owl Surveys</p> <p>The Kent Wildlife Trust [RR-159] outline that there are two existing pole mounted barn owl boxes present within the order limits which should have been inspected by a suitably licensed ecologist during the barn owl breeding season. Table 9.5 of EN010135-000523-SSG_5.2_ES Vol 2 Chapter 9_Biodiversity.pdf [APP-033] states that barn owl surveys were undertaken.</p> <p>Could the Kent Wildlife Trust reassess the evidence and confirm whether they have any further query?</p>	No response required from the Applicant.
Q2.0.11	<p>The Applicant: Aquatic/Marginal planting provenance</p> <p>The EA in their RR-086 refer to Section 6.17 'Proposed Aquatic/Marginal Planting' of the OLEMP [(APP-155)] in that it does not refer to provenance of the species that are being planted. The EA suggest that specimens that are of local provenance should be procured. All specimens must also be carefully checked for the presence of aquatic non-natives. Could the Applicant comment on the EA's suggestions?</p>	The Applicant has agreed to commit to native species being used for the Project, and which will be detailed in the detailed LEMPs submitted for approval by the local planning authority. This commitment has been secured in the Outline LEMP (Doc Ref. 7.10(B)) , specifically Section 6.17 – Proposed Aquatic / Marginal Planting, along with the commitment for detailed LEMPs to include an INNS Strategy, submitted at Deadline 1 of the Examination. This matter has been agreed with the EA, and is set out Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)) .

ExQ1 Ref	Question	Applicant Response
Q2.0.12	<p>The Applicant: Invasive species (giant rhubarb Gunnera)</p> <p>The EA in their RR-086 refer to that while giant rhubarb Gunnera spp. was not reported as per Table 9.9: Summary of Recent Invasive Species Records in the ES Biodiversity Chapter 9 [AS- 017], it is known to be in the catchment upstream of the development site. The cultivation of Gunnera is now banned. Can the Applicant confirm that Gunnera will be surveyed and a mitigation plan proposed.</p>	<p>The requirement to undertake pre-commencement surveys, including those for non-native invasive species, is secured by the Outline LEMP (Doc Ref. 7.10(B)) in section 5.3 and will be prepared as part of the detailed LEMPs submitted to discharge Requirement 8 (Landscape and biodiversity) of Schedule 2 to the Draft DCO (Doc Ref. 3.1(D)).</p> <p>Section 5.3 of the Outline LEMP (Doc Ref. 7.10(B)) also states that mitigation strategies if required will be submitted and reviewed by the relevant statutory body.</p>
Q2.0.13	<p>Natural England KCC: Aquatic Invertebrates</p> <p>In Buglife - The Invertebrate Conservation Trust [RR-028] they suggest inadequate mitigation measures are proposed to be implemented to safeguard populations of aquatic invertebrates. Could NE and KCC comment on this issue?</p>	No response required from the Applicant.

Table 2-3: Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations

ExQ1 Ref	Question	Applicant Response
Q3.0.1	<p>The Applicant: CA/ TP Update</p> <p>Can the Applicant update on all negotiations and agreements in relation to CA and TP?</p>	Please refer to table 1 within the Schedule of Negotiations and Powers Sought (Doc Ref. 4.4(C)) for a detailed summary of land/rights sought and the most updated status of negotiations.

Table 2-4: Draft Development Consent Order (DCO)

ExQ1 Ref	Question	Applicant Response
4.0 Articles		
Q4.0.1	<p>The Applicant: Article 16(5)(a) - Amendments to Approved Details</p> <p>Clarification is requested on correspondence with the Chief of Police and Highway Authority that four weeks is a reasonable time period for a decision to be reached.</p>	<p>The question refers to "Article 16(5)(a)" of the Draft DCO (Doc Ref. 3.1(D)) but the Applicant assumes that this question relates to Article 17(5)(a), which states: "<i>The undertaker must not exercise the powers in paragraphs (1) or (2) unless it has—(a) given not less than 4 weeks' notice in writing of its intention so to do to the chief officer of police and to the traffic authority in whose area the road is situated</i>".</p> <p>The Applicant considers that the period of four weeks' notice is a proportionate and reasonable notice period, taking into account the established urgent need for the Project. This is the same period of time allowed in an equivalent provision accepted as being suitable by the Secretary of State in other recent solar DCOs, such as The Longfield Solar Farm Order 2023 (see Article 14(5)(a)), The Cottam Solar Project Order 2024 (see Article 15(5)(a)) and The Mallard Pass Solar Farm Order 2024 (see Article 15(5)(a)).</p> <p>The Applicant further notes that both KCC and Kent Police have been consulted about the Project and have not raised any concerns about this in their relevant or written representations.</p>
Q4.0.2	<p>The Applicant: Article 31 - Apparatus in Stopped up Rights of Way</p> <p>Clarification is requested on the process that would be taken to alert all relevant landowners, occupiers, etc. to the possibility of a temporary use of land including the consideration given to their rights and also how the resulting impacts have been assessed.</p>	<p>Article 31(2) provides that "<i>Not less than 28 days before entering on and taking temporary possession of land under this article the undertaker must serve notice of the intended entry on the owners and occupiers of the land</i>". The period of 28 days referred to in this article exceeds the period of 14 days specified in the equivalent provision within the model provisions (see Schedule 1, paragraph 28(2) of the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009).</p> <p>Article 31(5) of the Draft DCO (Doc Ref. 3.1(D)) requires the undertaker to pay compensation to the owners and occupiers of land of which temporary</p>

ExQ1 Ref	Question	Applicant Response
		<p>possession is taken under this article for any loss or damage arising from the exercise of this power.</p> <p>As explained in paragraph 7.10.9 of the Explanatory Memorandum (Doc Ref. 3.3(D)), similar temporary possession provisions have been included in a large number of made DCOs.</p> <p>The process by which notice will be served on owners and occupiers is governed by Article 44 (Service of notices) of the Draft DCO (Doc Ref. 3.1(D)).</p> <p>The Statement of Reasons (Doc Ref. 4.2) [REP1-010] explains the consideration that has been given to the rights of those who may be affected by the compulsory acquisition and temporary possession powers within the Draft DCO (Doc Ref. 3.1(D)). It explains why these powers are needed and justified. It concludes at paragraph 11.1.6 that "<i>The proposed interference with the rights of those with an interest in the Order land is for a legitimate purpose, namely the Project, and is necessary and proportionate to that purpose. The Applicant considers that the substantial public benefits to be derived from the proposed compulsory acquisition would demonstrably outweigh the private loss that would be suffered by those whose land or interests are to be acquired, and therefore justifies interfering with that land or rights</i>".</p>
Q4.0.3	<p>The Applicant: Article 35</p> <p>The Applicant is encouraged to set out the reference numbers of all documents. [Advice Note 15 – paragraph 11.2] to ensure that every individual document is identified either within the DCO itself or within a separate certified document. Ensure that each document listed is the latest version submitted to the Examination and that the version number is identified accordingly.</p>	<p>The Applicant assumes that this question relates to Article 43 (Certification of plans, etc.) of the Draft DCO (Doc Ref. 3.1(D)). Article 43 provides that the documents and plans to be certified are those that are listed in the table in Schedule 14 (documents and plans). The Applicant considers that this approach complies with paragraph 11.2 of Advice Note 15, which states: "<i>Applicants should set out the titles and numbers of such documents, either in the certification Article or, if there are a large number of documents, in a separate Schedule or Schedules to the DCO</i>". The Applicant confirms that each document listed in Schedule 14 is the latest</p>

ExQ1 Ref	Question	Applicant Response
		version submitted to the Examination and that the version number is identified accordingly.
Q4.0.4	<p>The Applicant / The LPA: Part 2 Article 45 - Felling or lopping of trees or removal of hedgerows</p> <p>Consider whether this should be done with prior consent or notification of LPA.</p>	<p>As explained in the Applicant's response to Action Point 15 in Table 2-1 in Section 2.1 of the Written summary of Oral Submissions at Issue Specific Hearing 1 and Responses to Action Points (Doc Ref. 8.5.3) [REP1-073], the wording in Article 45 is based on the model provisions (see Schedule 1, paragraph 39(1) of the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009) and has been accepted by the Secretary of State in recently made solar DCOs.</p> <p>The Applicant does not consider that it is necessary to obtain consent from, or provide notification to, the local planning authority before exercising this power. The model provision included in Article 45 already contains appropriate constraints, including that such power may only be exercised if the undertaker reasonably believes it to be necessary to prevent the tree or shrub from obstructing or interfering with the authorised development or any apparatus used in connection with it or from constituting a danger to persons using the authorised development (Article 45(1)). Further, in carrying out any activity authorised by Article 45(1), the undertaker must do no unnecessary damage to any tree or shrub and must pay compensation to any person for any loss or damage arising from such activity (Article 45(2)).</p>
Q4.0.5	<p>The Applicant: Schedule 1</p> <p>The SoS decision letter for Little Crow Solar dated 15 June 2023 (EN010101) included an amendment to include the capacity of the battery storage system in Schedule 1. It is noted that dDCO (AS-004) for this proposal does not include this provision. Given this and the discussion during ISH1 regarding generating capacity I would advise the Applicant</p>	<p>The reason for the imposition of the 90MW limit on the capacity of the BESS by the Secretary of State in The Little Crow Solar Park Order 2022 is not clear to the Applicant from the Examining Authority's recommendation or the Secretary of State's decision letter. The Applicant notes that this approach has not been included in more recent solar DCOs, even where it has been considered during the examination phase (for example in relation to the Longfield Solar Farm).</p>

ExQ1 Ref	Question	Applicant Response
	considers adding such wording to future dDCO revisions.	<p>The Applicant does not consider an upper limit on capacity is the appropriate way to control the impacts of the BESS as the impacts of the BESS are not directly related to its capacity and this would limit the benefits that the BESS could deliver as technology improves.</p> <p>The Environmental Statement includes embedded mitigation to any BESS impacts as outlined in detail and secured by the Design Principles (Doc Ref. 7.5(B)) and the Outline Battery Safety Management Plan (Doc Ref. 7.16) [APP-161].</p>

4.1 Schedule 2 – Requirements

Q4.1.1	<p>The Applicant: Requirement 11 Operational Surface Water Drainage Strategy</p> <p>Consider amending wording from</p> <p><i>“submitted to and approved by the local planning authority, such approval to be in consultation with Kent County Council”</i></p> <p>To</p> <p><i>“submitted to and approved by the relevant planning authority in consultation with Kent County Council as lead local flood authority and the [whichever is relevant] Internal Drainage Board”</i></p> <p>Also it is considered that the wording should be amended so that it is submitted prior to the operational phase being implemented. At the moment, the Requirement is worded for it to come in <u>before operation</u> of the development, but I consider that thus should be approved before the</p>	<p>The Applicant notes that the wording <i>“submitted to and approved by the local planning authority, such approval to be in consultation with [a consultee]”</i> is used consistently throughout the requirements in Schedule 2 of the Draft DCO (Doc Ref. 3.1(D)) and is the same drafting considered to be acceptable by the Secretary of State in The Longfield Solar Farm Order 2023.</p> <p>In the Draft DCO (Doc Ref. 3.1(D)), the applicable defined term is "local planning authority" rather than "relevant planning authority", noting that the Project is located entirely within ABC's administrative boundary.</p> <p>For the purposes of Requirement 11 specifically, the Applicant considers that the appropriate consultees should be KCC and the EA. It is not considered necessary for the River Stour (Kent) Internal Drainage Board (IDB) to be a consultee for this purpose. The IDB has not requested to be added as a consultee and, as set out in the Schedule of Other Consents and Licences (Doc Ref. 3.4) [APP-018], land drainage consent from the IDB will be required for any works to an IDB-managed drain or other channels (not main river) within the IDB area. The Draft DCO does not disapply the requirement to obtain such consent.</p> <p>The Applicant is content to add the words "as lead local flood authority" after "Kent County Council" in Requirement 11. The Applicant has</p>
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ExQ1 Ref	Question	Applicant Response
	construction of the swales/ drainage/ wetland area to ensure that the drainage and flood mitigation is in place and ready to be up and running for the operational phase.	submitted an updated version of the Draft DCO (Doc Ref. 3.1(D)) that includes this amendment. With regard to the timing of this requirement, the Applicant notes that Requirement 11 was amended at Deadline 1 to state that <i>"No phase of the authorised development may commence until a OSWDS for that phase has been submitted to and approved..."</i> (our emphasis).
Q4.1.2	KCC - Lead Local Flood Authority: Requirement 11 Operational Surface Water Drainage Strategy In relation to the previous question, is the wording acceptable and is there any other additional detail that you would suggest?	No response required from the Applicant.

4.2 Schedule 15 – Hedgerow

Q4.2.1	<p>The Applicant: Part 1 Removal of Important Hedgerows</p> <p>Part 1 uses the term ‘approximately’ for the extent of removal within areas identified in the Vegetation Removal Plan (VRP) [APP-014]. While the VRP provides location numbers and a scale, the extent and exact positioning of the affected areas is not clear. Article 45 does not provide details of how these areas would be identified and approved in advance of removal.</p> <p>The Outline Landscape and Ecological Management Plan (LEMP) [APP-155] which is to be approved under Requirement 8 also refers to the VRP [APP-014] but does not appear to provide any additional information on the extent. The VRP does not appear to provide any details on the species to</p>	<p>The Design Principles (Doc Ref. 7.5 (B)) provide that, unless otherwise agreed with the local planning authority, vegetation loss will be restricted to the maximum extents shown on the Vegetation Removal Plan (Doc Ref. 2.8) [APP-014] and that no more than 150m of hedgerow is to be removed.</p> <p>The Applicant notes that the approach taken in the Draft DCO (Doc Ref. 3.1(D)) to defining vegetation removal is consistent with that taken in other solar DCOs. For example, see Schedule 12 (Hedgerows to be removed) of The Longfield Solar Farm Order 2023, which defines the number and extent of hedgerow removal as that <i>"shown approximately within the area identified by a pink line on the vegetation removal plan"</i>, which has been considered satisfactory by the Secretary of State.</p>
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ExQ1 Ref	Question	Applicant Response
	aid identification. Please provide clarification on this matter.	
Q4.2.2	<p>The Applicant: Tree Preservation Orders</p> <p>Article 45 includes additional clauses 6, 8 and 9 in relation to trees subject to Tree Preservation Orders (TPOs) with the Explanatory Memorandum ([AS-005] citing Cleve Hill Solar Park Order 2020 (EN010085) and Longfield Solar Farm Order 2023 (EN010118).</p> <p>However, these clauses in relation to TPOs were not included in the Little Crow Solar Farm Order 2022 (EN010101). No TPOs are referred to in ES Chapter 9. Biodiversity [AS-017] Please provide clarification on why these clauses for TPOs are required.</p>	<p>The purpose of the provisions within Article 45 of the Draft DCO (Doc Ref. 3.1(D)) relating to the felling or lopping of a tree subject to a tree preservation order (TPO) is to ensure that the delivery of the Project is not impeded by the existence of a tree that is obstructing or interfering with the construction, maintenance, operation or decommissioning of the authorised development or any apparatus used in connection with the authorised development. The Project is expected to be in operation for 40 years, during which time a TPO may be imposed upon one or more of the trees within or near to the Order limits. The power to impose such a designation upon a tree is not within the control of the undertaker. This power is therefore considered necessary to prevent any such future TPOs impeding the delivery of the Project, which is an urgently needed NSIP of critical national priority.</p>

Table 2-5: Historic Environment

ExQ1 Ref	Question	Applicant Response
Q5.0.1	<p>Ashford Borough Council: Conservation Area Character Appraisals</p> <p>ES Chapter 7 Cultural Heritage [AS-011] Paragraph 7.5.25 refers to the absence of Conservation Area Character Appraisals. Do the Council have any plans to produce Character Appraisals or empower the community to undertake the appraisal for their community?</p>	No response required from the Applicant.

ExQ1 Ref	Question	Applicant Response
Q5.0.2	<p>Local Authorities and Historic England: Heritage Assets – construction phase</p> <p>ES 12 – Socio-Economics [AS-008] Paragraph 12.7.51 identifies that there will be no significant direct effects on cultural heritage assets within 5km of the order limits, or indirect effects to the historic landscape character during the construction phase. Do the local authorities and HE agree?</p>	No response required from the Applicant.
Q5.0.3	<p>The Applicant: Restoration following Decommissioning</p> <p>ES Chapter 7 Cultural Heritage [AS-011] paragraph 7.6.22 states that <i>“For the purposes of the EIA, it has been assumed that the landowners will return those areas of the Site that are currently in arable use under the baseline condition (i.e., assessment year 2023) to arable use”</i>. This assumption of arable use returning to arable use does not appear in the outline Decommissioning Environmental Management Plan (DEMP). Could the Applicant confirm what the intention is and if necessary, amend all relevant documents appropriately.</p>	<p>The environmental impact assessment has been carried out on the basis of a reasonable worst case in order to establish the likely significant effects of the Project. With regard to decommissioning, paragraph 7.6.22 of ES, Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2) [AS-011] explains the reasonable worst case that has been assumed for the Project:</p> <p><i>“Post-decommissioning the Site will be returned to the control of the landowners. For the purposes of the EIA, it has been assumed that the landowners will return those areas of the Site that are currently in arable use under the baseline condition (i.e., assessment year 2023) to arable use. It is assumed that established habitats such as hedgerows and woodland provided by the Project will be retained. In addition, the Project will re-establish historic field boundaries with hedgerow planting, particularly on the north facing slopes of the Aldington Ridge line and create new field margins as a result. It is assumed that these new hedgerows will also be retained.”</i></p> <p>This reasonable worst case has been determined based on the Applicant's knowledge of how the Site is currently managed and how it is likely to be managed in the future post decommissioning of the Project in the event it returns to agricultural use. The Applicant cannot compel any future owner to use the Site in a particular way once it has returned control of the Site following the Project's decommissioning and it is therefore not appropriate</p>

ExQ1 Ref	Question	Applicant Response
		for any commitment to be imposed, through the DEMP or any other mechanism, on the future use of the Site following full decommissioning of the Project. As far as the Applicant is aware, no other solar DCO has imposed a requirement to do this.
Q5.0.4	<p>The Applicant: Designated Heritage Assets</p> <p>In the response to Relevant Representations [REP1-061], on page 59 The Applicants states: “The conclusions of ES Volume 4, Appendix 7.2: Heritage Statement [APP-072] of less than substantial harm to designated heritage assets have been confirmed in the SoCGs with both Kent County Council (Doc Ref. 8.2.4) and Historic England (Doc Ref. 8.2.3).” However it is noted from the SOCG submitted at D1 [REP1-065] with KCC, that the Council still have a number of outstanding issues in the assessment of impacts on Heritage Assets. Can the Applicant reconcile this apparent inconsistency between the 2 documents?</p>	<p>The position in respect of Cultural Heritage comprises built and below ground heritage. The identified harm to significance to all assets would be less than substantial with the Applicant assessing the harm at the lower or lowest level of the spectrum and HE assessing the harm at the low end of the spectrum. The parties agree that the difference in relative assessment level is not material. This is set out within the Statement of Common Ground with Historic England (Doc Ref. 8.3.3(B)). The Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(B)) confirms that the Applicant and KCC agree in respect of the impacts on above ground designated heritage assets.</p> <p>The Applicant notes the position of the KCC archaeologist regarding potential non-designated archaeological assets. The Applicant and KCC have had further discussions in respect of the scope of the archaeological investigations undertaken and the Applicant has agreed to undertake further invasive work to address the KCC archaeologist’s requirements. This position is set out within Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(B)).</p>

Table 2-6: Land Use and Soils

ExQ1 Ref	Question	Applicant Response
Q6.0.1	<p>The Applicant: Best and Most Versatile Land: Ministerial Written Statement</p>	<p>The Written Ministerial Statement (WMS) of 15 May 2024 reaffirmed the Government's commitment to solar, along with stating that poorer quality land should be preferred to higher quality land avoiding the use of “Best</p>

ExQ1 Ref	Question	Applicant Response
	<p>ES Chapter 5 Alternatives and Design Evolution [AS-010] fails to mention the recent Written Ministerial Statement {WMS} dated 15 May 2024 titled 'Solar and Protecting our Food Security and Best and Most Versatile Land' on the use of the Best and Most Versatile Agricultural land (BMV). Could the Applicant provide an explanation as to how the WMS has been used to guide and minimise the use of BMV in line with National Policy.</p>	<p>and Most Versatile" agricultural land where possible. The Applicant's view at the time of submission was that the WMS was consistent with NPS EN-3 position at paragraph 2.10.31, and referenced this at paragraph 5.2.7 of ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2(A)) [AS-010]. The Applicant notes that, notwithstanding this view, the Planning Statement (Doc Ref. 7.6) [APP-151] directly references the 15 May 2024 WMS at paragraph 6.8.5 and the WMS was considered.</p> <p>On 23 July 2024 Michael Shanks, the Parliamentary Under Secretary of State for the Department for Energy Security and Net Zero, confirmed in response to a written question tabled on 17 July 2024 that:</p> <p><i>"The Written Ministerial Statement made in May by the previous government did not change the policy on this matter that is set out in the relevant parts of the National Policy Statement (NPS) for Renewable Energy and the National Planning Policy Framework (NPPF). It quoted extracts from that NPS and the NPPF. Decisions on solar that is Nationally Significant Infrastructure will be guided by the NPS in full..."</i></p> <p>Paragraph 5.6.5 of ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2(A)) [AS-010] confirms that the Site is considered suitable including because "approximately 80% of the Site has an ALC of Grade 3b or is non-agricultural, and is therefore not Best and Most Versatile ('BMV') land. Large areas of land within 5km of the POC is provisionally classified by Natural England as Grade 2 and therefore classified as BMV land".</p> <p>The Planning Statement (Doc Ref. 7.6) [APP-151] sets out the relevant parts of the NPS and NPPF and how the Project complies with those policies. Table 5 provides a summary of agricultural land within the Order limits and confirms that, assuming a worst-case scenario in which no land within the Site is used for grazing, the Project will result in a temporary</p>

ExQ1 Ref	Question	Applicant Response
		<p>loss during the Project lifetime of 38.64 ha of BMV land, which represents 0.12% of all BMV agricultural land within Ashford Borough.</p> <p>The Project is therefore not considered to have a material impact on the overall supply of agricultural land in Ashford Borough and would not have a material impact on local or national food security.</p>
Q6.0.2	<p>The Applicant: Best and Most Versatile Land: Justification</p> <p>Following on from the last question, Page 106 of Appendix 16.1 'Soils and Agricultural Land Report' [APP-122] is a plan that shows the Agricultural Land Classification (ALC) for the Proposed Development. The report conclusion in Section 6 states <i>"The detailed ALC survey confirmed the actual grading of the agricultural land within the Site to be predominantly non- BMV quality land (143.47 ha, 74.90%) comprising ALC Subgrade 3b; with smaller areas of BMV quality land (38.64 ha or 20.18 %) comprising ALC Grade 2 and Subgrade 3a. The remaining land within the Site boundary is non-agricultural land (9.43 ha, 4.92 %)"</i>. Following the recent WMS, we would advise the Applicant review this matter and provide clarification to support your findings that <i>'There are no other alternative sites within the search area (5km from the POC) that that are reasonably available which could fulfil the Project requirements and which could have a lesser effect on agricultural land'</i> (ES Volume 4, Appendix 5.2: Site Selection</p>	<p>Please refer to the response in the row immediately above regarding the WMS.</p> <p>In response to the statement at paragraph 1.1.24 in ES Volume 4, Appendix 5.2: Site Selection Influencing Factors (Doc Ref. 5.4) [APP-067], the Applicant notes that paragraph 5.6.3 of ES Volume 4, Appendix 16.1: Soils and Agricultural Land Report [APP-122] confirms that <i>"most land within ABC is provisionally mapped as Grade 3 (potential of BMV) with areas of "high grade" Grade 1 and Grade 2 BMV land. Locating the Project elsewhere in either the Borough or District is likely to incur a similar, if not greater, impact on BMV land"</i> and further notes that paragraph 6.1.3 states that the volume of BMV land within the Order limits represents 0.12% of all BMV land in the Ashford Borough Council area.</p> <p>In respect of cumulative effects of BMV loss, this matter was scoped out of the ES as significant effects were unlikely. This is as a result of the very limited use of BMV land by the Project and therefore no significant cumulative effects on agricultural land are identified in ES Volume 2, Chapter 17: Cumulative Assessment (Doc Ref. 5.2) [APP-041].</p> <p>As set out in paragraphs 12.10.7 and 12.10.8 of ES Volume 2, Chapter 12: Socio-Economics (Doc Ref. 5.2(B)) [REP1-024]:</p>

ExQ1 Ref	Question	Applicant Response
	<p>Influencing Factors, Paragraph 1.1.24 [APP-067]).</p> <p>I would also ask that in connection with the above and Chapter 6 'EIA Methodology' [APP- 030], paragraph 6.9 'Cumulative Effects' that consideration be given to the assessment of the cumulative impacts of the loss of BMV.</p>	<p><i>"The total estimated loss of agricultural land from the cumulative schemes equates to 0.7% of agricultural land in KCC, 0.11% in the region and 0.013% of England total.</i></p> <p><i>It is not possible to provide a definitive quantitative assessment of the impact of the temporary loss of arable production on food security given the complexities of the components (such as existing annual variation of production influenced by weather, climate and economic variables, and the resilience of the economy to respond to changes). However, given the scale of change, this is not considered to be significant in relation to the ability of the UK to produce food products. This conclusion would be supported by the statistics which show that the UK in 2021 imported 42% of its food and that the proportion of food imported has been increasing over recent years."</i></p> <p>As set out above, the Applicant has taken appropriate regard of all relevant policies relating to agricultural land. Section 6.8 of the Planning Statement (Doc Ref. 7.6) [APP-151] sets out how the Project complies with all relevant policies on this matter.</p>
Q6.0.3	<p>The Applicant: Grazing</p> <p>Es Appendices Chapter 16: Other Topics Appendix 16.1: Soils and Agricultural Land Report [APP-122] comments throughout that <i>"the nature of the project (a solar farm) is such that it provides potential for the land beneath and around the PV panels to continue in, albeit altered, agricultural use during the Project's operational lifetime, with potential for agricultural grazing. The Project is not relying on grazing for mitigation."</i> The appendix then implies the agricultural use would only be a temporary loss</p>	<p>Table 5 of the Planning Statement (Doc Ref. 7.6) [APP-151] sets out the assumed scenario that has formed the basis of the assessment. This assumes as a worst-case that there would be no agricultural use during the operation of the Project. As set out at paragraph 6.8.13 of the Planning Statement (Doc Ref. 7.6) [APP-151] the <i>"nature of the Project is such that it provides potential for the land beneath and around the PV panels to continue in, albeit altered, agricultural use during the Project's operational lifetime, with potential for agricultural grazing. However, assuming a worst-case scenario in which no land within the Site is used for grazing, the Project will result in a temporary loss during the Project</i></p>

ExQ1 Ref	Question	Applicant Response
	<p>during the construction phase and then reinstated during the operational phase thereby resulting in a minimal loss to the agricultural use.</p> <p>Can the Applicant outline what potential agricultural grazing would be intended and how likely this is to come forward and when and how it would be managed given there is no Requirement or details of what this would look like within the Draft DCO or any of the submitted documentation.</p>	<p><i>lifetime of all BMV land within the Site (38.64 ha). As stated above, this represents 0.12% of all BMV agricultural land within Ashford Borough</i>.</p> <p>The Outline LEMP (Doc Ref. 7.10(B)) at paragraph 4.5.11 states: <i>"Existing grassland within the perimeter fence may be subject to grazing during Spring and Summer months to prevent shading of the panels and security features. In the interests of biodiversity, the existing grassland will be managed to increase floral diversity and to provide an extensive habitat network for a range of species. If grazing is feasible for the Project, conservation/low intensity grazing is to be encouraged"</i>.</p> <p>Any potential grazing within the Site would be confirmed within the detailed LEMP(s).</p> <p>Natural England confirms in the Statement of Common Ground with Natural England (Doc Ref. 8.3.7(B)) that it considers that the Project is not expected to lead to significant permanent loss of BMV land.</p>
Q6.0.4	<p>The Applicant: Soil Stripping</p> <p>Some soil stripping will need to take place for areas where associated development is proposed such as for the BESS and substation. No details are provided within the Outline CEMP [APP-153] Chapter 6 Soil Management Plan of where soil stripping would take place across the site, whether there would need to be a different methodology for soils stripped for the cabling route; and where soils are to be stripped and stored for the life time of the project, where those soils would be stored within the Order limit for the life time of the project and how those stored soils would be managed and treated for the life time of the project.</p>	<p>As stated in paragraph 6.3.9 of Outline CEMP (Doc Ref. 7.8(A)) [REP1-044], the stockpile areas will be selected prior to the start of construction. Specific details, including the locations of both the stockpiles and construction compounds, will be provided in the detailed CEMP(s), which will be submitted to the local planning authority for approval prior to the commencement of the relevant phase of works pursuant to Requirement 6 of Schedule 2 of the Draft DCO (Doc Ref. 3.1(D)).</p> <p>The Outline Soil Management Plan (Section 6) of the Outline CEMP (Doc Ref. 7.8(A)) [REP1-044] outlines the measures which will be used to ensure that stockpiled soil does not impact on ecology, water drainage or landscape and visual impact. These measures include:</p> <ul style="list-style-type: none"> ▪ Soils will not be stockpiled within 10m of surface water features; ▪ Appropriate seeding will be used to prevent colonisation of the stockpile by weeds; and

ExQ1 Ref	Question	Applicant Response
	<p>Could the Applicant elaborate on this issue</p> <p>i) How would the pre-determined stockpile areas align with the construction compounds and the phasing of works?</p> <p>ii) How would the applicant ensure that the stockpiling areas would not have an adverse impact on ecology, water drainage or landscape visual impact especially if the pre-determined levels require clearing of vegetation.</p>	<ul style="list-style-type: none"> Topsoil stockpiles will not exceed 4m in height and subsoil stockpiles will not exceed 4m in height. <p>Further details of measures to prevent impacts on ecology, water drainage or landscape and visual impact will be provided in the detailed CEMP(s).</p> <p>Natural England, the EA and KCC have confirmed that they are content that the ecological measures within the Outline CEMP (Doc Ref. 7.8(A)) [REP1-044] are appropriate as set out in the Statement of Common Ground with Natural England (Doc Ref. 8.3.7(B)), the Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)) and in the Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(B)).</p>
Q6.0.5	<p>The Applicant: Topsoil Spreading</p> <p>The Outline CEMP [APP-153] Chapter 6 Soil Management Plan paragraph 6.3.12 states that topsoil would be spread into the landscape areas when they become available.</p> <p>[sic] how much soil is expected to be spread in this area and how would this be managed so not to exacerbate flooding within the landscaping area which is in a flood zone?</p> <p>Does the FRA model allow for an allowance of additional soils for this?</p>	<p>The Project does not propose any increases in ground levels in areas at higher risk of flooding. The Outline Operational Surface Water Drainage Strategy (OSWDS) (Doc Ref. 7.14(B)) includes a commitment (at paragraph 4.6.8) that the Project will create a net increase in flood storage provided within the Aldington Flood Storage Area. As a result the Flood Risk Assessment (FRA) has not made any allowance spreading of soil in this area as it is not permitted by the DCO.</p>
Q6.0.6	<p>The Applicant: Soil Survey Points</p> <p>Paragraph 3.2.5 of Appendix 16.1 Soils and Agricultural Land Report' [APP-122] states that 185 soil survey points were undertaken across 178.43</p>	<p>The Order limits cover an area of approximately 192ha.</p> <p>Paragraph 3.2.5 of ES Volume 4: Appendices Chapter 16: Soils and Agricultural Land Report (Doc Ref. 5.4) [APP-122] confirms that survey points were distributed evenly across the Site, giving a survey</p>

ExQ1 Ref	Question	Applicant Response
	<p>hectares alongside 10 survey points across the cable route area. The paragraph goes on to say this is an approximately survey density of one point per hectare as per standard methodology and guidance. Footnote 24 to that paragraph states that the ALC survey covered 1923.54ha [sic] in size and that the discrepancy with reported areas is due to changes in the project boundary.</p> <p>What areas of the Order limit were not covered by the 185 survey points within the 178.43ha? Of the 195 survey points for the agricultural land and cable route, how many of these were conducted in 2021 and how many subsequent ones conducted in 2023? Where the survey points in 2023 in the same location(s) as those in 2021?</p>	<p>density of 185 survey points across the 178.43ha of surveyed agricultural land and 10 survey points across the cable route area. The report confirms that the survey provides an approximate survey density of one point per hectare as per standard methodology and guidance.</p> <p>The location of the augur cores and soil pits is shown on Drawing GM12014/002 (Agricultural Land Classification) in ES Volume 4: Appendices Chapter 16: Soils and Agricultural Land Report (Doc Ref. 5.4) [APP-122]. This drawing demonstrates that the survey has taken appropriate regard to the full extent of the Order limits.</p> <p>The 185 survey points across the non-cable route area were completed in 2021 and the 10 survey points across the cable route area were completed in 2023 once the route was confirmed. As such the 2021 and 2023 surveys covered different areas of the Site.</p> <p>Natural England confirms in the Statement of Common Ground with Natural England (Doc Ref. 8.3.7(B)) that it is satisfied with the soil survey work which has been undertaken and that the Project is unlikely to lead to significant permanent loss of BMV land.</p>
Q6.0.7	<p>Applicant: Agricultural Land Classification grades</p> <p>Table 5.2 of Appendix 16.1 Soils and Agricultural Land Report' [APP-122] provides a summary of the Agricultural Land Classification grades within the site boundary in hectares and percentages.</p> <p>Please provide further detail (in hectares) or signpost to where this is in the submitted documents on what activities would take place within each Agricultural Land Classification and justification for this [example is taken from Mallard</p>	<p>Table 5 and paragraphs 6.8.12 to 6.8.24 of the Planning Statement (Doc Ref. 7.6) [APP-151] provide a breakdown of the BMV used during each stage of the Project. Natural England confirms in the Statement of Common Ground with Natural England (Doc Ref. 8.3.7(B)) that the overall impacts from the Project to BMV agricultural land are limited.</p> <p>Further to the above, the Applicant has set out further details on the uses and activities within each ALC grade within the Order limits.</p>

ExQ1 Ref	Question	Applicant Response						
	Pass] for example the ALC results for the area of biodiversity, area for Solar PV as well as the area affected by the substation and fixed equipment.	ALC (Ha)	Solar and Inverter Station Area	Project Substation & Grid Connection Area	Biodiversity Areas & External Field Margins	Other	Total	% Order Limits
		Grade 1	0.0	0.0	0.0	0.0	0.0	0%
		Grade 2	1.7	0.0	0.3	0.0	2.0	1%
		Grade 3a	23.7	2.2	10.8	0.0	36.7	19%
		Grade 3b	102.7	2.8	37.9	0.0	143.4	75%
		Grade 4	0.0	0.0	0.0	0.0	0.0	0%
		Non-agricultural	0.0	2.9	2.0	4.5	9.4	5%
		Total	128.1	7.9	51.0	4.5	191.5	

Table 2-7: Minerals

ExQ1 Ref	Question	Applicant Response
6.1 Minerals		
Q6.1.1	<p>The Applicant: Mineral Operators</p> <p>Paragraph 1.11 of Appendix 16.3 Mineral Safeguarding Assessment (Doc 5.4) says that feedback was gained from mineral operators supplying building stone and engagement with the Stone Federation Great Britain. Clarification is sought as to whether feedback was sought from any mineral operators or associations from those supplying sand and gravel was obtained.</p>	<p>No specific feedback was sought from sand or gravel operators. The Applicant has relied on the expert advice of the minerals planning team (IC Planning). The Mineral Safeguarding Assessment was produced by a suitably qualified expert, who has obtained planning permission for a number of projects for the extraction of sand and gravel. The Applicant's expert has relied on this experience in coming to the views reached in the report.</p> <p>Kent County Council, as Minerals and Waste Planning Authority confirms in the Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(B)) that the Project does not have a significant impact on the need to maintain a steady and adequate supply (that may be unviable in any case) and that the Project will not result in any new areas of mineral sterilisation.</p>

ExQ1 Ref	Question	Applicant Response
Q6.1.2	<p>The Applicant</p> <p>Brett Aggregates Limited: Mineral Reserves</p> <p>ES Volume 4, Appendix 16.3 Mineral Safeguarding Assessment [APP-124], Paragraph 2.7 states that as a result of restrictions such as residential properties, water bodies, roads, rail lines and PRoW; that the potential mineral extraction is fundamentally impractical and economically unviable irrespective of whether the Project is constructed. Can either the Applicant or Brett Aggregates provide confirmation that this is the case for land parcels 3/36, 3/39, 3/40, 3/41 and 3/48?</p>	The Applicant notes that Brett Aggregates Limited have no land interest in the Site, nor are they an Interested Party in respect of the DCO application.

Table 2-8: Landscape and Visuals

ExQ1 Ref	Question	Applicant Response
Q7.0.1	<p>The Applicant: Topography of site</p> <p>Planning statement para 6.3.20 – suggests site is within a bowl – Could the Applicant provide a cross section to demonstrate this point.</p>	Please refer to Appendix 1 of this report for a response to this question.
Q7.0.2	<p>The Applicant: Viewpoints</p> <p>Appendix 8.12 'Cumulative Effects table' within the ES Chapter 8 Landscape and Views [AS- 012] the Applicant is asked to consider whether there is a possibility to link the viewpoint (VP) locations that are shown in appendices 8.10 and 8.11 [AS-014</p>	An updated ES Volume 4, Appendix 8.12: Cumulative Effects Table (Doc Ref. 5.4(B)) has been provided at Deadline 3. This updated appendix provides clarity on the viewpoint locations relating to each table.

ExQ1 Ref	Question	Applicant Response
	and AS-015] to this table to provide clarity to the locations given and therefore the scale of impact given in the text. For example, the view from Landscape Character Area (LCA) Aldington Ridge in the Table in Appendix 8.12 [APPS-064] – is this the equivalent of viewpoints 27 and 28 in Appendix 8.11 [AS-015]? Upper Stour Valley LCA, do these link with viewpoints 20, 22 and 25?	
Q7.0.3	<p>The Applicant: Colour of the PV Panels</p> <p>ES Chapter 8 Landscape and Views Appendix 8.10 LVIA visualisations [AS-014]. Page 3 of the Design Principles (Document Reference 7.5) refers to the colour of the PV panels as dark blue, black, grey or similar neutral colour.</p> <p>What is the assumed colour of the panels in the LVIA Visualisations? What is the most effective colour for mitigation of the visual effects?</p>	<p>ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4) [AS-014] provides the Accurate Visual Representations (AVRs) for the Project. The AVRs show the PV panels using a dark colouration.</p> <p>When PV panels are located in a field / natural environment, the colour of the PV panels is affected to some extent by prevailing weather conditions such as sunlight, cloud cover and time of day. The dark colour shown on the visualisations within ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4) [AS-014] has been used to reflect what a typical unit would look like under the times of the baseline captured.</p> <p>The assessment set out within ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2(A)) [AS-012] has assumed the description of the Project set out in the ES Volume 2, Chapter 3: Project Description (Doc Ref. 5.2(A)) [REP1-018]. Paragraph 3.5.3 of Chapter 3 notes that each PV panel is "<i>typically built from anodised aluminium or steel and will be dark blue, black, grey or similar neutral colour</i>" and secured by the Design Principles (Doc Ref. 7.5(B)) which is consistent with the approach of multiple precedent consented solar DCOs. Variation within that defined range would not lead to any new or materially different likely significant effects to those predicted within the ES.</p>
Q7.0.4	The Applicant: Heights of Structures	The need for flexibility in design, layout and technology in DCO applications is recognised in Section 4.3: Environmental Effects/Considerations of the

ExQ1 Ref	Question	Applicant Response
	<p>ES Chapter 8 Landscape and Views [AS-012] Paragraph 8.6.2, 1st sentence states: <i>'The Project has been designed, as far as possible, to avoid adverse effects on the landscape and views through option identification, appraisal, selection and refinement, as described in ES Volume 2, Chapter 5: Alternatives and Design Evolution [AS-010]</i></p> <p>Can more detail be provided on how the maximum heights above ground level (Listed in document reference 7.5 Design Principles, Table 1) have been determined for: the PV panels, the Inverter stations, the BESS Units, the DC-DC converters, the intermediate substations and the Project Substation?</p>	<p>Overarching National Policy Statement for Energy (EN-1) and paragraphs 2.6.1 to 2.6.3 and paragraphs 2.10.70 to 2.10.72 of NPS EN-3.</p> <p>To accommodate this flexibility, a 'Rochdale Envelope' approach is used for the Project, in accordance with PINS Advice Note Nine: Rochdale Envelope. This is explained within ES Volume 2, Chapter 3: Project Description (Doc Ref. 5.2(A)) [REP1-018].</p> <p>Illustrative details of the PV Arrays, inverters and BESS Units are provided within the Illustrative Project Drawings (Doc Ref. 2.6(B)). These provide the dimensions of the illustrative design. These designs set out the possible design of the structures, and have been used to inform the Rochdale Envelope set out within the Design Principles (Doc Ref. 7.5(B)).</p>
Q7.0.5	<p>The Applicant: Sensitivity Analysis</p> <p>Has a sensitivity analysis been undertaken to understand what design changes or further mitigation would be needed to further reduce the level of significance of effects for the cases of the project on its own and for cumulative effects from other schemes?</p>	<p>The Applicant has gone through an extensive design evolution process, which is set out within ES Volume 2, Chapter 5: Alternatives and Design Evolution (Doc Ref. 5.2(A)) [AS-010]. As set out in Section 5.9 of that chapter, the extent of the Site has evolved during the design process and has been informed by consultation feedback, engineering, technical design and environmental considerations, and land ownership constraints. Table 5.2 sets out how the Site extent has evolved and the reasons for the main changes. ES Volume 3, Figure 5.4: Changes to Preferred Order Limits (Doc Ref. 5.3) [APP-046] illustrates the main changes to the Order limits extent during design evolution.</p> <p>As set out in the Statement of Common Ground with Ashford Borough Council (Doc Ref. 8.3.1(A)), the Applicant's design and LVIA team also carefully considered the issues raised by ABC and other respondents and provided specific responses to suggestions for additional mitigation. It is important to note that the LVIA identifies some beneficial effects as well as adverse effects. The landscape proposals have been developed by the LVIA competent expert having regard to the effects of the Project. No additional</p>

ExQ1 Ref	Question	Applicant Response
		mitigation has been identified by the LVIA competent expert which would further reduce the significance of landscape and visual effects for either the Project on its own or in cumulation with other schemes.
Q7.0.6	<p>ABC: Agricultural Permitted Development Rights</p> <p>If the Proposed Development did not proceed, what form of development could be built on each field utilising permitted Development rights provided by the Town and Country Planning (General Permitted Development) Order 2015.</p>	No response required from the Applicant.
Q7.0.7	<p>The Applicant: LVIA Convention</p> <p>Chapter 8 Landscape and Views [AS-014] – page 29 in response to KCC’s comments on the 15 year maturity of landscaping, you state “The 15 year timescale for the assessment is an LVIA convention, rather than being related to the maturation of planting. “Please reference where the ‘convention’ originates from and consider outlining why earlier planting or use of mature standards should not be used in this instance to improve mitigatory measures.</p>	<p>The 15-year timescale for the assessment originates from the Design Manual for Road and Bridges, Volume 11, Section 3, Part 5: Landscape Effects and has been adopted by LVIA practitioners as best practice.</p> <p>The Applicant has confirmed to KCC the proposed hedgerow planting is expected to reach the full height within approximately 5 years. Proposed woodland is likely to reach a height of 3.5m within a similar timeframe, and proposed seeding is likely to be fully established within 2-3 years of planting. These timeframes have been considered in the assessment conclusions in ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2(A)) [AS-012].</p> <p>The proposed planting is anticipated to include a range of plant specifications, include standard and semi mature planting, as set out in Annex 1 (Illustrative Planting) of the Outline LEMP (Doc Ref. 7.10(B)). Full details of proposed planting mixes will be developed as part of the detailed landscape design and will be provided in the detailed LEMP(s), secured by Requirement 8 (Landscape and biodiversity) of Schedule 2 of the Draft DCO (Doc Ref. 3.1(D)).</p>

ExQ1 Ref	Question	Applicant Response
Q7.0.8	<p>The Applicant: Landscape Planting</p> <p>Table 8.4: 2023 Statutory Consultation Response Summary of the ES Chapter 8 Landscape and Views [AS-014] states: <i>‘Where possible, advanced landscape planting will be carried out in advance of the construction phase to maximise the screening potential of proposed planting in the early phases of the Project. The proposed planting has also been amended to include a greater proportion of larger stock, which would also help address this point’.</i> However, the Outline LEMP [APP-155] states in Paragraph 4.3.3 <i>‘Advanced planting is likely to commence in the first available planting season (November to March inclusive) following the granting of development consent. The remainder of proposed planting would be undertaken in the first available planting season following the construction of the Project’.</i> Clarification is sought as to the extent of advance planting and how it has been prioritised and for the Applicant to review this matter and the amount of detail shown on the illustrative landscape drawings (Doc 2.7).</p> <p>What is the operational year represented by the size of the trees and shrubs shown in Section 1 (Doc 2.7 Drawing No. 011998.00001.716) to Section 6 (Doc 2.7, Drawing No. 011998.00001.721)?</p>	<p>The Outline LEMP (Doc Ref. 7.10(B)) states in paragraph 4.3.3 that <i>‘Advanced planting is likely to commence in the first available planting season (November to March inclusive) following the granting of development consent.’</i></p> <p>The Applicant included this statement to demonstrate its intention to seek to maximise the screening potential of planting in the early phases of the Project but notes that the conclusions of ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2(A)) [AS-012] do not rely on advanced planting as embedded mitigation.</p> <p>As noted in the response to Q7.0.7, the proposed hedgerow planting is expected to reach the full height within approximately 5 years. Proposed woodland is likely to reach a height of 3.5m within a similar timeframe, and proposed seeding is likely to be fully established within 2-3 years of planting.</p> <p>Drawing No. 011998.00001.716 to Drawing No. 011998.00001.721) in the Illustrative Landscape Drawings (Doc Ref. 2.7(B)) are illustrative and show proposed planting at different heights to reflect variation in species and associated growth rates, forms and habits. The majority of proposed hedgerow tree planting is shown at a height of approximately 7m. Based on planting stock size of 2m and an assumed growth rate of approximately 1m every three years (used in the LVIA), this height would be achieved within a 15 year timeframe following planting.</p> <p>The measures to secure optimal growth rates of planting are set out within the Outline LEMP (Doc Ref. 7.10(B)).</p>
Q7.0.9	<p>The Applicant: Fencing</p> <p>With regards to paragraph 8.6.6 of the ES Chapter 8 Landscape and Views [AS-014], clarification is</p>	<p>Details of the fencing are secured in the Design Principles (Doc Ref. 7.5(B)), and shown within the Illustrative Landscape Drawings – Not for Approval (Doc Ref. 2.7(B)).</p>

ExQ1 Ref	Question	Applicant Response
	sought on what further details are available for the security fence and the stock fence?	

Table 2-9: Noise and Vibration

ExQ1 Ref	Question	Applicant Response
Q8.0.1	<p>The Applicant: Abnormal Deliveries</p> <p>ES Chapter 14 Noise [APP-038] paragraph 14.6.11 and the outline CEMP [APP-153] paragraph 3.3.3, both these documents give hours for the construction works with the exception of abnormal deliveries and night time construction works if required.</p> <p>Could the Applicant update the Outline CEMP containing circumstances or methodology for notifying both the LPA and community of such circumstances because of noise and traffic issues; and for notification of neighbours. Such as giving 24 or 48 hours notice in advance and a plan of action and methods of monitoring etc.</p>	<p>Section 6.7 of the Outline CTMP (Doc Ref. 7.9(C)) provides that local residents, businesses and schools will receive correspondence prior to commencement of construction and during key stages of the construction. This would include abnormal loads or night time construction works.</p> <p>Approval of the detailed CTMP(s) by the local planning authority, in accordance with the Outline CTMP (Doc Ref. 7.9(C)), is secured through Requirement 7 in Schedule 2 to the Draft DCO (Doc Ref. 3.1(D)).</p>

Table 2-10: Socio-economic Effects

ExQ1 Ref	Question	Applicant Response
Q9.0.1	<p>The Applicant: Employment Generation</p> <p>Es Chapter 12 Socio-Economics [AS-008] Paragraph 12.4.56 indicates it is not possible to</p>	<p>ES Volume 1, Chapter 12: Socio-economics (Doc Ref.5.2(B)) [REP1-024] paragraph 12.4.56 refers to the decommissioning phase only. The employment levels generated by the construction phase and operational</p>

ExQ1 Ref	Question	Applicant Response
	quantify the employment levels generated by the scheme. Is it not possible to extrapolate based on similar schemes of a similar size? Acknowledging this is not going to be 100% accurate but it would still give a feel for the employment outputs. At the very least an informed range would be helpful.	<p>phase are set out at paragraphs 12.7.1 to 12.7.3 (construction) and Table 12.1 (operation) – in summary:</p> <ul style="list-style-type: none"> Construction activity will support an average of 132 direct full time equivalent (FTE) jobs and a peak of 199 direct FTE jobs (gross) for 12 months; and Operational activity will support 4 direct FTE jobs. <p>In terms of the decommissioning phase specifically, ES Volume 1, Chapter 12: Socio-economics (Doc Ref.5.2(B)) [REP1-024] states at paragraph 12.4.56 that <i>“Decommissioning of the Project will generate direct and indirect socio-economic effects of the same type and scale/significance to those during the construction phase. The scale of these impacts is not possible to assess quantitatively due to the uncertainty over the nature and costs of this activity”</i>.</p> <p>Further information on the decommissioning phase is included at ES Volume 1, Chapter 12: Socio-economics (Doc Ref.5.2(B)) [REP1-024] paragraphs 12.7.121 and 12.7.122.</p> <p>It can be inferred based on labour productivity levels remaining static in the construction economy, and making no assumptions about future technology, that the decommissioning phase would support around the same level of construction activity and therefore FTE employment as the construction phase – as set out above this would be around 132 direct FTE jobs and a peak of 199 direct FTE jobs (gross) for 12 months.</p> <p>This represents a known maximum case scenario at the present time. However it can be anticipated that by the time of decommissioning, technological advancement and labour productivity may mean the FTE employment supported could be lower than this.</p>
Q9.0.2	The Applicant: Decommissioning	See the response to Q9.0.1 in the row immediately above regarding the potential for technological advancement and labour productivity.

ExQ1 Ref	Question	Applicant Response
	ES Chapter 12 Socio- Economics [AS-008] Paragraph 12.7.122 states that decommissioning is subject to uncertainty given potential changes in construction methods. The decommissioning effects should be based on known worst case scenario at the present time, Can the Applicant explain their approach?	
Q9.0.3	<p>The Applicant: Designing Out Crime</p> <p>Kent Police in their representation dated 4th December 2024 states:</p> <p>“We recommend the applicant follows SBD guidance to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998.”</p> <p>Can the Applicant confirm that the guidance has been adhered to in formulating the Proposed Development? If not, then please outline what steps you intend to take to address this and the other recommendations detailed in Kent Police’s letter.</p>	<p>The Applicant consulted with Kent Police in both rounds of Statutory Consultation in 2022 and 2023, but no response was received from Kent Police.</p> <p>The Applicant has provided a response to the comments in the Response to Deadline 1 Submissions (Doc Ref. 8.8) [REP2-034], submitted at Deadline 2, in particular the response to Kent Police’s WR on pages 262 to 270 in Table 4-10.</p> <p>This confirmed that the Applicant did not identify any in principle concern and that it would expect to incorporate the majority of the measures proposed where practicable, noting that this will not be possible where they may conflict with other commitments such as compliance with the NFCC guidance, or biodiversity commitments set out in the Outline LEMP (Doc Ref. 7.10(A)) [REP1-048]. Measures to secure access, monitor the site perimeter and security mark/alarm key infrastructure are all expected to be included.</p> <p>The Applicant notes Kent Police’s advice to ensure the perimeter fencing has a minimum height of 2m and has added this specific requirement to the Design Principles (Doc Ref. 7.5(B)).</p> <p>As part of the detailed design process the Applicant will seek to engage further with Kent Police to benefit from its advice and experience in ensuring the final project is designed to minimise the risk of crime where possible. The Applicant will need to demonstrate a high level of security at the Site in order</p>

ExQ1 Ref	Question	Applicant Response
		<p>to secure appropriate insurance for the Project, which aligns with Kent Police's request for the Project to design out crime.</p> <p>A range of further security measures are set out in paragraph 2.3.13 of the Outline OMP (Doc Ref. 7.11(A)) [REP1-050]. Details of security measures will be finalised and will form part of the detailed OMP submitted prior to operation, as secured by Requirement 12 in Schedule 2 to the Draft DCO (Doc Ref. 3.1(D)).</p>

Table 2-11: Transportation and Traffic

ExQ1 Ref	Question	Applicant Response
Q10.0.1	<p>The Applicant: Speed Limits</p> <p>Environmental Statement Chapter 12 Socio – Economics [AS-008] Paragraphs 12.7.29 refers to the speed limits for construction vehicles. How will this be monitored and enforced?</p>	<p>The commitment to speed limits for Project vehicles within the Site is set out within the Outline Construction Traffic Management Plan (CTMP) (Doc Ref. 7.9(C)) at paragraph 6.2.2. Monitoring commitments are set out at Section 6.10, which includes logging unforeseen issues by the Site Manager. Monitoring information will then be used to inform and adjust traffic management measures.</p>
Q10.0.2	<p>The Applicant: Traffic and Access</p> <p>Chapter 13 Traffic and Access (Doc 5.2) Table 13.1 'EIA Scoping Opinion Response Summary' page 9 has a typo referring to the RoWAS document as 7.16 when I think it is document 7.15. I would advise the Applicant to check all references to the RoWAS are correctly referenced.</p>	<p>The Applicant has updated ES Volume 2, Chapter 13: Traffic and Access (Doc Ref. 5.2(D)) to correct this error.</p>
Q10.0.4	<p>The Applicant: Public Rights of Way Discussions</p> <p>Please update of details of discussions with the Ramblers Association and Kent RoW officer</p>	<p>The Applicant recognises that there are a number of PRowWs in the area and has worked closely through formal consultation and engagement with KCC, ABC, Kent Ramblers and other stakeholders to evolve the design approach to</p>

ExQ1 Ref	Question	Applicant Response
	including the proposed Rights of Way and Access Group that was proposed.	<p>minimise the need to divert or extinguish PRoW as a result of the Project and to ensure that management and design principles are appropriate.</p> <p>Engagement with KCC:</p> <p>Detail of consultation and engagement undertaken in the pre-application period with KCC Rights of Way Officers is set out within section 12.3 in the ES Volume 1, Chapter 12: Socio-economics (Doc Ref.5.2(B)) [REP1-024] and the Outline RoWAS (Doc Ref. 7.15(A)) [REP1-056], and reflected in the development of the Statement of Common Ground with Kent County Council (Doc Ref 8.3.4(B)) most recently submitted at Deadline 3.</p> <p>There was proactive engagement on the Outline RoWAS (Doc Ref. 7.15(A)) [REP1-056] during the pre-application period, resulting in an agreed Strategy that will secure detail of the management of each PRoW route affected in terms of access and connectivity. Engagement has resulted in KCC's stated position that: <i>"the number of PRoW that were originally proposed to be extinguished has been reduced to two, and the number of routes to be diverted during the operational stage has been reduced to the minimum"</i></p> <p>Following the submission of KCC's and ABC's Local Impact Reports [REP1-087] [REP1-078], the Applicant has had further meetings with KCC's PRoW officer which are reflected in the Statement of Common Ground with Kent County Council (Doc Ref 8.3.4(B)).</p> <p>As set out in the Applicant's Responses to Deadline 1 Submissions [REP2-034] with respect to issues raised in Local Impact Reports and Written Representations, the Applicant acknowledges ABC and KCC's forthcoming joint proposals for off-site PRoW improvements and will consider the reasonableness and proportionality of the proposals when shared (these have not been shared at the time of writing), in the context of the mitigation and enhancements already secured by the Outline RoWAS (Doc Ref. 7.15(A)) [REP1-056] and the Draft DCO (Doc Ref. 3.1(D)).</p> <p>Engagement with Kent Ramblers:</p>

ExQ1 Ref	Question	Applicant Response
		<p>The Applicant has had due regard to the feedback on emerging proposals provided by Kent Ramblers (among others) during the pre-application process through formal and non-statutory consultations.</p> <p>A summary of how the Applicant has reviewed the Kent Ramblers feedback and reflected this in changes to the Project design (or otherwise provided justification as to why changes were not proposed) has been set out in the PEIR Addendum at Volume 3, Chapter 11, Appendix 11.1 (Changes to PRow), which shows as at Summer 2023 how each stakeholder's concern raised during preceding consultations had been responded to, in detail on a link-by-link basis. As per Action Point 11 arising from ISH2, this has been submitted as an annex to Written Summary of Oral Submissions from Issue Specific Hearing 2 and Responses to Action Points (Doc Ref. 8.5.5) [REP1-075].</p> <p>Representatives of the Kent Ramblers have been invited to attend the Community Liaison Panel (CLP) from the outset and have attended five of the six CLP meetings held to date where questions and feedback have been responded to by the Applicant.</p> <p>Rights of Way and Access Working Group:</p> <p>Paragraph 5.2.4 of the Outline RoWAS (Doc Ref. 7.15(A)) [REP1-056] secures the provision of a Rights of Way and Access Working Group post-DCO consent which will review Implementation Plans (the detailed approach to managing changes to PRow) with the aim of minimising disruption and amenity loss to PRow users during implementation. As such this group has not yet been formed.</p> <p>The Rights of Way and Access Working Group will include the Applicant, the Contractor(s) responsible for the Project, ABC, and KCC with other parties invited to contribute where the Group considers this to be beneficial. The Applicant will have due regard to responses from the Rights of Way and Access Working Group prior to finalisation of the submission of an Implementation Plan. Any detailed RoWAS must be generally in accordance</p>

ExQ1 Ref	Question	Applicant Response
		with the Outline RoWAS, as required by Requirement 10 of the Schedule 2 of the Draft DCO (Doc Ref. 3.1(D)) .
Q10.0.5	<p>Kent Ramblers: Kent Ramblers</p> <p>You raised concern in your RR [RR-158] over both the arrangements for individual footpaths and the wider network of PRowS in the area should the project proceed. No precise detail is given as to which RoW you are concerned about, what concerns you then have about that particular RoW, and, what suggestions they have for mitigation for the impact.</p> <p>Please could you provide further detail to be able to understand your concerns and your perceived level of impact.</p>	No response required from the Applicant.
Q10.0.6	<p>The Applicant: PRowS</p> <p>What measures have been explored to extend the rights of way network during the construction and operational phases of the development to offset harm to the connectivity and amenity of users of the PRow network; and if any routes have been discounted an explanation as to why.</p>	<p>The PRow proposals are secured through the provisions within the Draft DCO (Doc Ref. 3.1(D)) and the Outline RoWAS (Doc Ref. 7.15(A)) [REP1-056] and ensure that the network retains connectivity and maintains recreational use during the operational stage with as little disruption as practicable. The proposed new PRowS have been designed having regard to the potential for improvements to wider connectivity and in consultation with the KCC PRow Officer and other stakeholders to minimise visual impact for PRow users.</p> <p>NPS EN-3 paragraph 2.10.44 states that applicants should consider and maximise opportunities to facilitate enhancements to the PRow network by providing new opportunities for the public to access and cross solar sites. The Project will deliver a number of improvements and enhancements to the network as noted below and therefore complies with this policy:</p> <ul style="list-style-type: none"> ▪ FN-6 – new ProW between Roman Road and Handen Farm, which would

ExQ1 Ref	Question	Applicant Response
		<p>run parallel to an existing ProW (AE 377) that currently shares a driveway into Handen Farm with motorised users, to the west side of the hedge next to Field 12. This is intended to improve user safety.</p> <ul style="list-style-type: none"> ▪ FN-7 – ProW running between AE 378 and AE 448 on the west side of Goldwell Lane has the benefit of removing the need for users to cross Goldwell Lane when travelling between these links, and creates a new circular recreational walk around Field 19. ▪ AE 657 Extension / FN-AE657 – new link between the AE 657 and the west of Field 23 connecting to the AE 381 diversion. ▪ FN-2 - A new ProW running from the existing AE 657 at the south of Field 28 / west of Backhouse Wood and New 3 / FN-3 at the East Stour River improving connectivity in this area. ▪ FN-3 – new ProW running from the existing intersection of AE 657 and AE 457 at the East Stour River running alongside the river to create a ‘riverside walk’ and meet the diverted AE 431 at the north east corner of Field 25. This also improves connectivity between Mersham and Sellindge. ▪ FN-8 – new ProW that would link AE 457 and AE 657 to the north of Backhouse Wood resulting in a more direct route and a decrease in journey length, improving connectivity. ▪ FN-AE380 – this will connect the existing AE 380 path (that currently terminates at Bank Road) with AE 385, avoiding the need to walk on Bank Road and Laws Lane to continue progress and improving connectivity and user safety. The Bank Road / Laws Lane route will remain in place for individuals who prefer the on-road route. <p>No new routes within the Site were specifically discounted by the Applicant but new ProW were only considered where they were compatible with delivery of the Project and where they would provide clear benefits to the community.</p>

ExQ1 Ref	Question	Applicant Response
		The Applicant considers that what is proposed complies with and is supported by the policies in NPS EN-1 (paragraph 5.11.30) and NPS EN-3 (paragraphs 20.10.40-2.10.45).
Q10.0.7	<p>The Applicant: Further Engagement with Councillor Clair Bell</p> <p>In the response to Relevant Representations made by Councillor Bell [REP1-061], the Applicant states on a number of issues, including traffic and access, that further engagement welcomes further engagement. Cana [sic] the Applicant conform if this further engagement has taken place, and if so provide a further update of the progress made in resolving the issues.</p>	<p>The Applicant has sought to engage with Cllr Bell a number of times since an initial introductory email was sent in 2021. Cllr Bell has been invited to all six meetings of the Community Liaison Panel but is yet to attend.</p> <p>Cllr Bell has provided further detail in the Written Representation submitted on 10 December 2024, which expands on the bulleted list provided in Cllr Bell's Relevant Representation. The Applicant has provided a full response to Cllr Bell's Written Representation in Section 4.5 of the Response to Deadline 1 Submissions (Doc Ref. 8.8) [REP2-034].</p>
Q10.0.8	<p>Closure of M20</p> <p>On Page 28 of the Applicant's Responses to Relevant Representations [REP1-061] In response to ABPC Relevant Representation [RR-002], it is stated that should there be a closure of the M20 or A20 that affects the proposed construction route, that construction traffic will not be redirected through the centre of Aldington Village. What is not clear is how this will be controlled. Will this be included within the Outline CTMP or be secured through some other means such as a new requirement?</p>	<p>As explained at ISH2 and summarised in the Written Summary of Oral Submissions at Issue Specific Hearing 2 and Response to Action Points (Doc Ref. 8.5.5) [REP1-075], the Applicant has the ability to manage its own construction vehicles in real time. The M20 is rarely closed for more than one day, and so any disruption would be limited to a short period of time. The Applicant would not allow vehicles to travel to Site when parts of the construction route are not available.</p> <p>Paragraph 5.1.2 of the Outline CTMP (Doc Ref. 7.9(C)) provides a commitment that no construction traffic will pass through the centre of Aldington village. Paragraph 6.10.2 confirms how this commitment will be monitored.</p> <p>The Outline CTMP (Doc Ref. 7.9(C)) secures the approval of detailed CTMP. No phase of the authorised development may commence until a CTMP for that phase has been submitted to and approved by the local planning authority, in consultation with the relevant highway authority, as</p>

ExQ1 Ref	Question	Applicant Response
		secured through Requirement 7 in Schedule 2 to the Draft DCO (Doc Ref. 3.1(D)) .

Table 2-12: Water Environment

ExQ1 Ref	Question	Applicant Response
Q11.0.1	<p>The Applicant: Tree Planting and Flood Storage Capacity</p> <p>The Environment Agency in their RR-086 have commented that there may be situations where tree planting could cause obstacles for flood risk management works. The Environment Agency have requested the applicant discuss riverside tree planting to confirm the suitability of the proposed locations and agree them before the planting schedules are published and contractors retained. Could this dialogue also include the LPA landscape architect/ arboriculturist/ ecologist so that any solutions are agreed by all parties who need to approve this via the LEMP?</p>	<p>Section 6.5 of the Outline LEMP (Doc Ref. 7.10(B)) was updated at Deadline 1 to address this point. Agreement with the EA has now been reached on all matters, as set out in the Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)).</p>
Q11.0.2	<p>The Applicant: Flood Risk Assessment</p> <p>Could an update be provided on the outstanding issues relating to the Flood Risk Assessment identified in the Environment Agency's RR-086</p>	<p>Agreement with the EA has now been reached on all matters, as set out in the Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)).</p>

ExQ1 Ref	Question	Applicant Response
Q11.0.3	<p>The Applicant Environment Agency: Site Access</p> <p>The EA in their RR-086 have requested that the applicant should ensure that they have unrestricted access to their site at all times during and after construction. Can the Applicant confirm that this will be the case.</p>	Agreement with the EA has now been reached on all matters, as set out in the Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)) .
Q11.0.4	<p>The Applicant: Drainage Plans</p> <p>The EA in their RR-086 set out that the drainage strategy on the site adjacent to the East Stour downstream of the hydrobrake outlet on the south end of Field 24 may increase water levels in this area. They point out that is a privately owned sluice gate downstream of the outlet that the owner operates to always ensure they have water ponding in their garden. This restricts the maximum flow on this section of river. The implication of this is that the drainage solution may increase the water level as a result of the restriction downstream. The EA suggest that the applicant should ensure that any drainage plans consider restrictions downstream, and that the drainage solution does not increase water levels adversely. The EA have asked that the applicant provide them with calculations and assessments. Could the Applicant confirm that this has been supplied?</p>	Agreement with the EA has now been reached on all matters, as set out in the Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)) .
Q11.0.5	<p>The Applicant: Aldington Flood Storage Area (AFSA)</p> <p>The EA in their RR-086 state that the 8m standoff provided in the AFSARA does not satisfy the</p>	Agreement with the EA has now been reached on all matters, as set out in the Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)) .

ExQ1 Ref	Question	Applicant Response
	standoff document they previously shared. The implications of this is that they may be unable to maintain their owned assets resulting in an increase in flood risk. They suggest that works should remain outside of the standoff area previously provided to the applicant. Can the Applicant confirm that this will be the case?	
Q11.0.6	<p>The Applicant KCC: Calculating the existing Greenfield Runoff rate</p> <p>In the Statement of Common Ground submitted at D1 [REP1-065] with KCC, the Applicant states that the apparent discrepancy in the calculation of the existing greenfield runoff rate highlighted is a result of the conservative assumption the methodology has applied by the Applicant in the assessment process. The outcome of this approach is that the illustrative design allows for a greater allowance for the attenuation volume. To remove confusion and better align with the LLFA expectation this apparent discrepancy will be addressed with revised drainage calculations and submitted to KCC in advance of D1. Was this submitted to KCC? If so, when are KCC likely to respond.</p>	Agreement with KCC on this matter has now been reached, as set out in the Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(B)) .
Q11.0.7	<p>The Applicant KCC: Storm Scenarios</p> <p>In the Statement of Common Ground submitted at D1 [REP1-065] with KCC, the Applicant refers to further modelling being undertaken in advance of D1 and shared with KCC. Was this submitted to KCC? If so, when are KCC likely to respond.</p>	Agreement with KCC on this matter has now been reached, as set out in the Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(B)) .

ExQ1 Ref	Question	Applicant Response
Q11.0.8	<p>The Applicant: Flooding of Spring Cottage</p> <p>An additional submission [AS-021] was received by Ally Payne in relation to previous flooding of Spring Cottage and the concern that the Proposed Development would exacerbate the flood risk to the property. Can the Applicant outline how this has been assessed and any potential mitigation proposed?</p>	<p>The Applicant responded to this matter in Table 4-2: Aldington and Mersham Support Group of the Responses to Deadline 1 Submissions (Doc Ref. 8.8) [REP2-034]. The response is repeated below for convenience.</p> <p>An assessment of the effects of the Project on flood risk both within the Site and to the surrounding area is provided in section 10.7 of ES Volume 2, Chapter 10: Water Environment (Doc Ref. 5.2(B)) [REP1-022] with supporting information provided in ES Volume 4, Appendix 10.2: Flood Risk Assessment (Doc Ref. 5.4(A)) [REP1-036] [REP1-037] [REP1-038]. The assessment concludes that with appropriate mitigation measures which are secured, the Project would not increase flood risk within the Site or to the surrounding area. The Applicant also notes that the approach to flood risk has been agreed with the EA and is set out within the Statement of Common Ground with the Environment Agency (Doc Ref. 8.3.2(B)).</p> <p>The Outline OSWDS (Doc Ref. 7.14(B)) has been developed to ensure existing flood risk within the Site or in the surrounding area is not increased.</p> <p>Requirement 11 in Schedule 2 to the Draft DCO (Doc Ref. 3.1(D)) secures that no phase of the authorised development may commence until an OSWDS for that phase has been submitted to and approved by the local planning authority, such approval to be in consultation with the EA and KCC. This must be in accordance with the Outline OSWDS (Doc Ref. 7.14(B)) and must be implemented as approved.</p>

References

¹ Natural England. (2024). *TIN212 Edition 3 Stodmarsh SAC_SPA Ramsar - Catchment Map June 2024* (2nd ed.). Natural England. Available at:

<https://publications.naturalengland.org.uk/file/5836616309145600>

² Natural England. (2020). *Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites - For Local Planning Authorities*. Natural England. Available at: [https://www.dover.gov.uk/Planning/Stodmarsh-Nutrient-Neutral-](https://www.dover.gov.uk/Planning/Stodmarsh-Nutrient-Neutral-Methodology-July-2020.pdf)

[Methodology-July-2020.pdf](https://www.dover.gov.uk/Planning/Stodmarsh-Nutrient-Neutral-Methodology-July-2020.pdf)



Stonestreet Green Solar

Appendix 1 - Section Study



Table of Contents

1	Introduction	2
2	Site Sections	3

List of Figures

Figure 1 *Section 1: Fields 23, 24 and 26 – Southwest to Northeast*

Figure 2 *Section 2: Fields 17, 18 and 19 – Southwest to Northeast*

Figure 3 *Section 3: Fields 9, 12, 13, 14, 16 and 19 – Southwest to Northeast*

1 Introduction

1.1.1 This document sets out a response to Question Q7.0.1 within the Landscape and Visuals section of the **Examining Authority's Written Questions and Requests for Information (ExQ1)** [[PD-006](#)] issued on 10 January 2025.

1.1.2 Question Q7.0.1 related to the topography of the Site and states:

'Planning statement para 6.3.20 – suggests site is within a bowl – Could the Applicant provide a cross section to demonstrate this point'

1.1.3 For reference in relation to this point, **ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2(A))** [[AS-012](#)] states in paragraph 8.5.10 states:

'ES Volume 3, Figure 8.4: Topography Plan - Site Level (Doc Ref. 5.3) shows that the Site itself sits predominantly within the bowl-like landscape of the East Stour River valley, for the most part occupying low lying land adjacent to the river itself. The Site also extends to a degree up the northern flank of the Aldington Ridge in the south and outwards to the more gently undulating landscape further west.'

1.1.4 Paragraph 6.3.20 of the **Planning Statement (Doc Ref. 7.6)** [[APP-151](#)] states *'The majority of the Site where solar arrays are proposed is within a 'bowl' in the landscape which aids in screening long range views'*. This statement acknowledges that there are parts of the Site that are not within the bowl.

2 Site Sections

- 2.1.1 In order to respond to the Examining Authority's question, a series of sections have been prepared to illustrate the landform of the Site. These sections have been produced using Google Earth software, which creates elevation profiles for 'path' segments. Google Earth uses terrain data based on NASA's STRM survey, which has a resolution of 30m and a vertical accuracy of +/- 1.85m.
- 2.1.2 It should be noted that the elevation profiles presented by Google Earth are subject to vertical exaggeration. As such, they provide an indication of relative heights of landform, however gradients are shown steeper than in reality.
- 2.1.3 The DCO Order limits have been loaded into Google Earth. The section lines have generally been drawn extending outside the Order limits to provide context. Therefore to assist the reader in interpreting the extent of context shown, a white line showing a 400m buffer from the Order limits has been added. The parts of the Site within the Order limits are highlighted in dark red, with those parts outside in light red.
- 2.1.4 The Figures below provide sections as follows:
- **Figure 1** Section of Fields 23, 24 and 26 – Southwest to Northeast
 - **Figure 2** Section of Fields 17, 18 and 19 – Southwest to Northeast
 - **Figure 3** Section of Fields 9, 12, 13, 14, 16 and 19 – Southwest to Northeast

Figure 1: Section of Fields 23, 24 and 26 – Southwest to Northeast

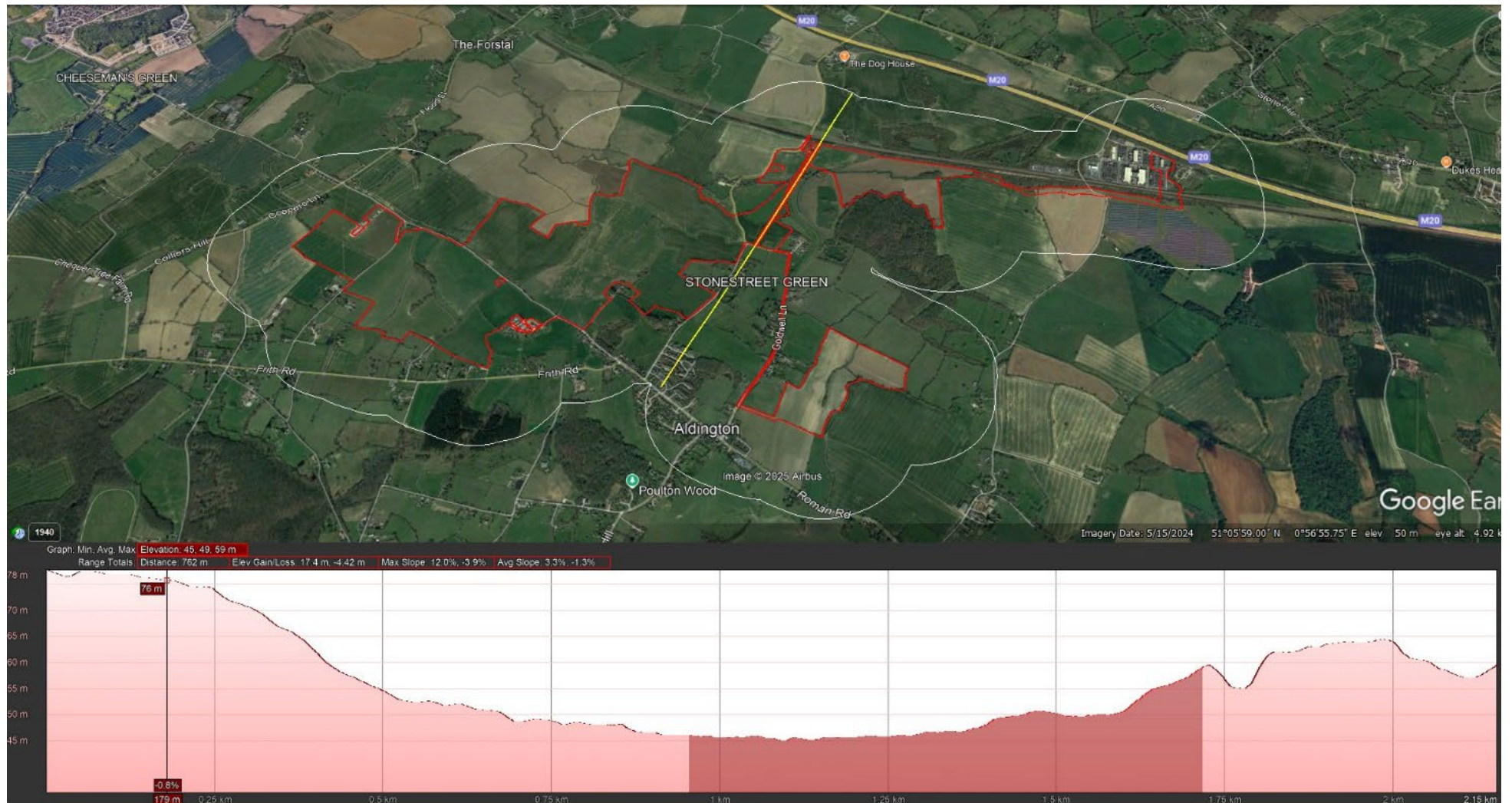


Figure 2: Section of Fields 17, 18 and 19 – Southwest to Northeast

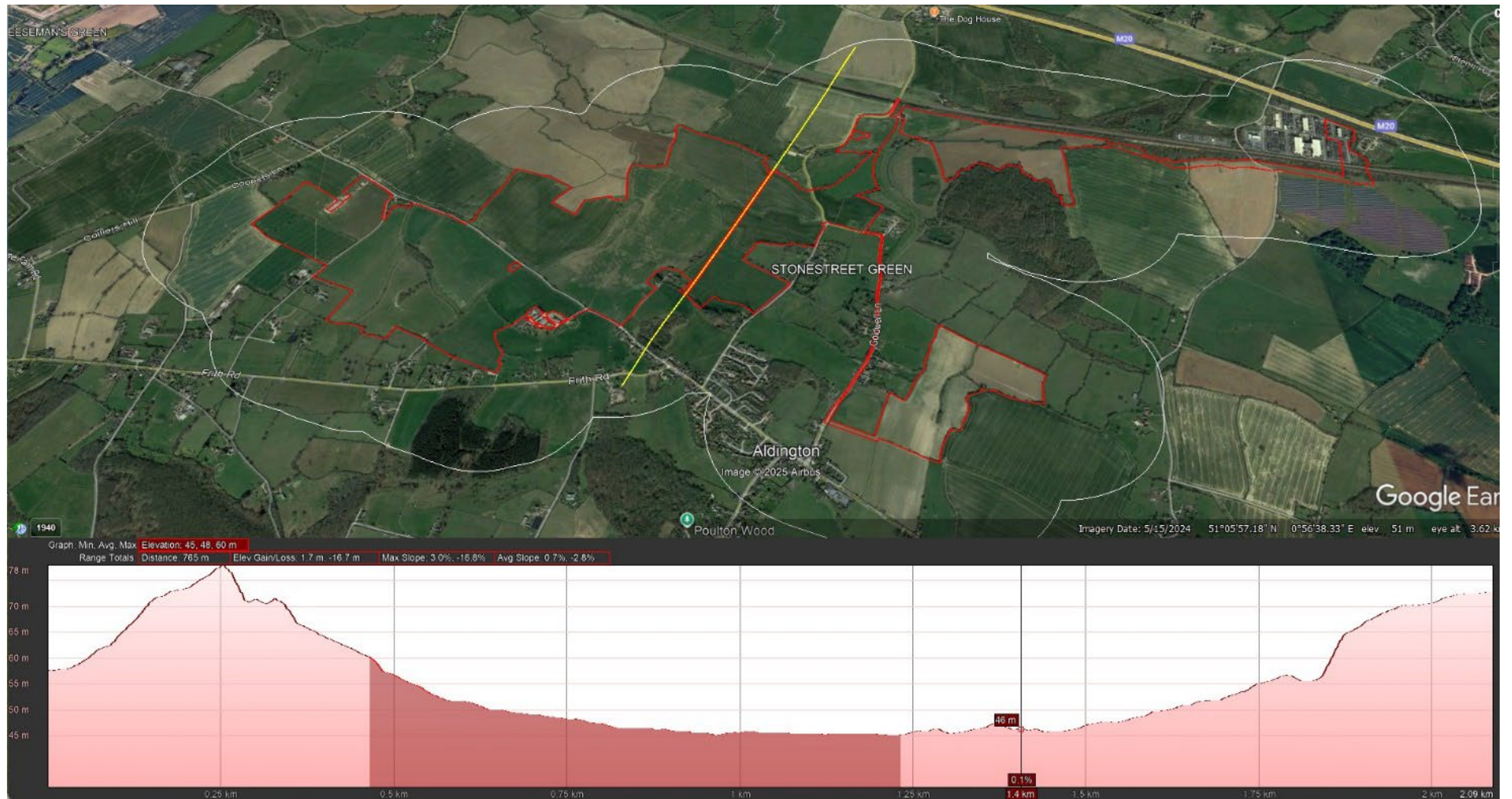


Figure 3: Section of Fields 9, 12, 13, 14, 16 and 19 – Southwest to Northeast

