

**From:** [Matthew Sharpe](#)  
**To:** [Barrowman, Spencer](#)  
**Cc:** [Stonestreet Green Solar Project](#); [Dyer, Charlotte](#); [REDACTED]@evolutionpower.co.uk; [Tiffany Ho](#); [Alex Higgin](#)  
**Subject:** RE: Derek Burles AS - Stonestreet  
**Date:** 19 May 2025 19:30:36  
**Attachments:** [image001.png](#)  
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Hi Spencer,

Further to your email below, the Applicant has reviewed this submission and provided our responses to the matters raised. We have also considered the responses from Ashford Borough Council and Kent Fire and Rescue.

Many thanks,

Matt



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19 May 2025

Dear Spencer

**Application by EPL 001 Limited: Stonestreet Green Solar (Application Reference: EN010135)**

**Responses to Deadline 8 Submissions**

In order to assist the Examining Authority, this letter provides the Applicant's comments on submissions made by Ashford Borough Council (ABC) [\[REP8-030\]](#) [\[REP8-037\]](#), Kent Fire and Rescue Service (KFRS) [\[REP8-031\]](#) [\[REP8-032\]](#) and Derek Burles [\[AS-029\]](#) at Deadline 8 of the Examination.

**ABC's Submissions**

The Applicant confirms that ABC provided a copy of the draft Section 106 Agreement referred to in the submissions made by ABC at Deadline 8 on 14 May 2025 (being the Deadline 8 date). The obligations contained within that draft agreement relate to proposed enhancements of Public Rights of Way (PRoW), both within and outside the Order Limits.

As stated at paragraphs 4.4.26 to 4.4.28 of the **Closing Statement (Doc Ref. 8.25)** [\[REP8-029\]](#) submitted by the Applicant at Deadline 8, a s106 agreement as proposed by ABC is not "*necessary to make the proposed development acceptable in planning terms*", which is one of the tests that paragraph 4.1.18 of NPS EN-1 confirms any development consent obligation must satisfy. The Applicant notes that the submissions made by ABC do not explain the planning necessity or justification for the type of obligation sought. Additionally, the proposed PRoW enhancement is not included within the agreed **Outline Rights of Way and Access Strategy (Doc Ref. 7.15(A))** [\[REP1-056\]](#). The Applicant notes this was discussed and agreed with Kent County Council, as Highways Authority, prior to submission of the Application.

Therefore, the Applicant does not intend to enter into the Section 106 Agreement.

**KFRS's Submission**

The Applicant welcomes the submission made by KFRS, which is consistent with the information relating to battery safety provided by the Applicant in the Application and throughout the Examination. The additional information requested by KFRS will be provided in support of the application for approval of the Battery Safety Management Plan by ABC, in consultation with KFRS (and the Environment Agency), pursuant to Requirement 5 of the **Draft Development Consent Order (Doc Ref. 3.1(G))** [\[REP8-004\]](#).

#### **Late submission by Derek Burles**

The Applicant notes the representation made by Mr Burles which suggests the capacity of the proposed BESS would lie somewhere between 400MW and 660MW. In terms of storage, the Applicant confirmed in Action Point 2 of the **Written Summary of Oral Submissions from Issue Specific Hearing 4 and Responses to Action Points (Doc Ref. 8.14.2)** [\[REP4-031\]](#) that the Project is assumed to provide approximately 4 hours of storage per 1MW capacity. This means that a 99.9MW BESS, as currently anticipated by the Applicant, would provide circa 400MWh of energy storage. This is consistent with other current proposals for BESS in the UK market.

The **Outline Battery Safety Management Plan (Doc Ref. 7.16(A))** [\[REP5-019\]](#) secures that the final scheme design will be in accordance with the National Fire Chiefs' Council Grid Scale Battery Energy Storage System planning – Guidance for FRS, which is stated to relate specifically to grid scale BESS in open air environments, using lithium-ion batteries.

As noted above KFRS' submission at Deadline 8 confirms they have reviewed the submitted materials and do not object to the Project.

Yours sincerely



Conor McNally

**Director EPL 001 Limited**