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To: [Stonestreet Green Solar Project](#)
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Subject: AMSG Submission for 19th May Deadline
Date: 19 May 2025 20:56:32
Attachments: [AMSG.Rule17 Response.19.05.25.pdf](#)

Dear Spencer,

Please find attached our submission for the 19th May deadline.

Unlike the other deadlines we have not been able to make our submission via the have your say link on the PINS website, but opefully you will still be able to accept our submission.

Best regards

Simon Lunn
Aldington and Mersham Support Group

Aldington and Mersham Support Group - Rule 17 Response 19_05_25

We note the Examiner's invitation to Interested Parties to comment in relation to the further question regarding Landscape Strategy and we are responding accordingly.

In relation to the Statement of Common Ground with Ashford Borough Council (ABC) at **Rep 8 – 016** we would highlight the following:

Section 2.3.1

How is it possible for the Applicant to state that this is “agreed”? ABC states that *“the discussions between ABC and the applicant have not materially influenced the macro scale design of the project”*.

The Applicant has indicated that the proposals put forward by ABC would result in a *“significant reduction in the generating capacity of the project”*.

This response only serves to highlight the inflexibility that the Applicant has displayed throughout. How can it be considered a rational response to what the LPA have asked for? Is the applicant really saying that *any amount* of extra tree belts and/or land reduction on Aldington Ridge would cause a *“significant reduction in generating capacity”*?

Section 2.3.6

ABC are quite clear when they say they **“do not agree that the specific mitigation measures proposed would sufficiently mitigate the impacts of the development”**.

The fact that ABC considers that *“the outline LEMP would secure the necessary controls in relation to the landscape mitigation **that the applicant proposes**”* is, we suggest (and we are sure ABC would agree) entirely beside the point.

Whilst it is for ABC to respond, it seems clear from what they have said that the Applicant has not done nearly enough to mitigate the impacts on landscape, especially in relation to those elements of the development on Aldington Ridge and we endorse that view. Indeed, it should be noted that the Applicant has throughout the process (and even when asked specifically by the Examiner) declined to make any assessment whatsoever of the likely impact on the generating capacity if the scheme were to incorporate compromises on footpath alignment and/or provide some additional tree belts. It has even refused to consider including more “occasional trees”!

Photomontages

We maintain that “the Strategy” employed by the Applicant all along has been to provide the least possible detail on what the finished development will look like in the landscape.

It remains the case that the Landscape Visualisations presented during the consultation process and as part of the DCO application are of insufficient resolution for the community and the Examiner to determine the visual impact of the proposed development.

It is not clear whether the Applicant has intentionally sought to obscure the true visual impact of the scheme or has not taken sufficient care to ensure that the resolution of the images meet the standards set by the Landscape Institute.

We have already made representations about the poor quality of the visualisations, but it is worth comparing the resolution of the following two images to emphasize the point.

The photograph below is an extract from **APP-082** Viewpoint 31(dated 17.05.2022 - existing 90° pano LVIA Summer). We have enlarged it to try and pick out features on Aldington Ridge. Just visible are, arrowed (1) the large Barn at Bank Farm, Bank Road and (2) Becket's Green, the white cottage on Bank Road. As can be seen, the buildings are very indistinct.



The photograph below is ours. It was taken about a month earlier on 11.04.2022 very close to Viewpoint 31(note the same trees are in the foreground of the photograph). Here again we have enlarged the original but note the quality of the photograph. By way of example, it is possible not only to clearly see Becket's Green (2) but even to discern that there are two dormer windows in the roof.



The low resolution of the landscape visualisations presented means that it is impossible to properly determine the visual impact of the solar and battery infrastructure that the Applicant intends to locate on the Aldington Ridge. The decision to locate a large part of the scheme on a hill is a strange one, but surely it is not an unreasonable to expect the visual impact this causes to have been properly demonstrated in an open and honest way from the outset.