

EAST STOUR SOLAR FARM

Design and Access Statement

PREPARED ON BEHALF OF



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PREFACE

This Design and Access Statement accompanies a planning application for the proposed East Stour Solar Farm.

The application is also supported by a four volume Environmental Statement which describes the findings of the Environmental Impact Assessment (EIA). The volumes of the complete ES are:

Document	Title	Contents
Volume 1	Non-Technical Summary	Summarises the proposal and the key conclusions of the EIA for the non-technical reader
Volume 2A	Written Statement	Presents the full assessments of the EIA
Volume 2B	Appendices	Presents the appendices referred to in the Written Statement
Volume 3	Figures	Presents the figures referred to in the Written Statement
Volume 4	Visualisations	Presents the visualisations referred to in the Landscape and Visual Impact Assessment (LVIA) within the Written Statement.

In addition to the Environmental Statement, the developer, EDF Renewables, has submitted a Planning Statement which summarises the planning policy context of the proposal as well as a supporting Socio Economics and Sustainability Statement.

A complete set of application documents can be viewed in person at Ashford Borough Council Offices at Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, Kent TN23 1PL or downloaded from the project website, as detailed in the box below.

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DESIGN AND ACCESS STATEMENT

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INTRODUCTION

- DA.1 The following Design and Access Statement is provided to explain the solar farm location and design process. It is produced in accordance with Planning Practice Guidance 'Making an Application' (DCLG, 2014). As recommended by the Commission for Architecture and the Built Environment (CABE) publication 'Design and Access Statements - how to write, read and use them' (2006), this statement concentrates on seven Key Design Issues and answers a set of Key Questions for each one, based upon the 'Assessment Crib Sheet' contained within the CABE guide.
- DA.2 The Town and Country Planning (Development Management Procedure) (England) Order 2015 (SI 2015/595) superseded the Town and Country Planning (Development Management Procedure) (England) Order 2010, SI 2010 No. 2184 (and subsequent amendment), which introduced 'context' to be discussed with respect to the development as a whole, rather than with respect to the sub-components discussed by the CABE guide.

- DA.3 This Statement has been prepared on the basis of the application being classified as 'Major' development.
- DA.4 Questions shown in square brackets are not considered relevant to the solar farm development.

THE PROCESS

Have the physical characteristics of the scheme been informed by a rigorous process which should include assessment of the site's full context (physical, social and economic characteristics and relevant planning policies); involvement; evaluation; and design?

- DA.5 As discussed in **Chapter 3 - Site Selection and Design (ES Volume 2A)** the suitability of the landholding for a solar array and the initial site design, within the boundaries of the landholding, was based on consideration of technical and environmental constraints and best practice.
- DA.6 Through a broad search approach the south-east of England was identified as an area of the UK receiving adequate solar radiation for a viable solar farm. This is discussed further in **ES Volume**

2A, Chapter 3 - Site Selection and Design.

- DA.7 Within Kent, the Applicant secured a 49.9MW grid connection at the Sellindge Converter Station. Land within relative proximity of this existing infrastructure was then screened to identify areas with potential to host a solar farm.
- DA.8 In selecting the potential solar farm site, the developer considered the proximity to designated sites within the locality.
- DA.9 Initial factors considered through desktop study also included:
- availability of adequate contiguous land;
 - viable grid connection route to the Sellindge Converter Station;
 - proximity to settlements;
 - Agricultural Land Classification;
 - access; and
 - location of Public Rights of Way.
- DA.10 An area of unconstrained land was identified to the south and east of the Sellindge Converter Station, primarily on Bested Hill and Partridge Plantation, but also north of the railway lines. It was observed that an

existing solar array was in place west of Partridge Farm. It was considered that with careful design a further area of ground mounted solar panels could be accommodated amongst the existing infrastructure (eg. power lines, railway line), thus potentially minimising impact upon landscape character.

DA.11 Consultation with Ashford Borough Council was initiated at an early stage of the project and discussed amongst other matters the assessment methodologies, viewpoint selection and public consultation activities.

DA.12 At this stage it was felt appropriate to introduce the site to residents of the area and invite comment. Feedback from neighbouring residents and parish councils was gathered through public consultation. The key topics raised by public comment were loss of agricultural land, consideration of heritage assets, continued accessibility and maintenance of the public rights of way, planting to provide visual screening and habitat improvement, minimisation of construction traffic impacts and access to the site for construction.

DA.13 In light of these comments and as the proposed site layout evolved, more

specific environmental constraints were accounted for, including:

- separation from the railway line and East Stour river;
- separation from utilities infrastructure;
- avoidance of key flood areas;
- maximising separations from dwellings;
- separation from the footpaths crossing and around the site;
- additional tracks included within the site to reduce use of Church Lane during construction and operation;
- set back of panels and infrastructure from highways;
- inclusion of hedges and tree planting as landscape mitigation, with appropriate separation from panels to avoid shading; and
- swales for surface water management.

DA.14 The draft layout was shared with the local residents through a second round of consultation.

DA.15 Following this round of consultation, an area of panels was removed from the eastern fields and the design of the mitigation planting refined.

DA.16 It was considered that the current proposed location and layout fits well within the existing infrastructure of the wider area, whilst balancing the views of the community with environmental and technical parameters. The environmental effects were considered in detail through the Environmental Impact Assessment (EIA) the results of which being presented within the Environmental Statement accompanying the application.

DA.17 Relevant policies of the Council's Local Plan (2019) were considered in the assessments, as identified during the pre-application advice consultation process:

- SP1 - Strategic Objectives
- SP6 - Promoting High Quality Design
- TRA7 - The Road Network and Development
- ENV1 - Biodiversity
- ENV3a - Landscape Character and Design

- ENV5 - Protecting Important Rural Features
- ENV6 - Flood Risk
- ENV10 - Renewable and Low Carbon Energy
- IMP1 - Infrastructure Provision

DA.18 Guidance from Ashford Borough Council's *Renewable Energy Planning Guidance Note 2 - The Development of Large Scale (>50kW) Solar PV Arrays* (2012) was also followed.

USE

What are the buildings and spaces used for?

Would the application help to create an appropriate mix of uses in the area?

Would different uses work together well, or would they cause unacceptable annoyance?

DA.19 The proposal is for infrastructure to allow for the generation of electricity from renewable solar energy. The application is for a solar array and those other elements required for its construction, operation and maintenance. Details of the associated infrastructure (including ground

anchors, access tracks, substation, inverter/transformer units and security fence) are provided at **ES Volume 2A, Chapter 6 - Development Proposal** and associated **Figures** in **ES Volume 3**.

DA.20 The operation of the solar farm would utilise approximately 103.9ha of arable and pasture land. Arable land would be removed from intensive agricultural production for the lifetime of the solar farm.

DA.21 A change of management with no cultivation will enable a return towards a higher equilibrium of soil organic matter. Benefits of this change will be land that is more fertile, easier to cultivate and permits more rapid infiltration of rainfall.

DA.22 Alongside the solar farm the land can continue to be used for low density sheep grazing.

DA.23 The presence of overhead electricity power lines across the site, the railway line adjacent to the site boundary, and the operational Sellindge Solar Farm adjacent to the proposal provide an existing element of development within the local landscape. The proposed solar farm would fit well within the

context of existing electricity grid infrastructure.

DA.24 The use of renewable energy in the UK is supported through the National Planning Policy Framework (MHCLG, 2021), which states at Paragraph 155 that:

'To help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts).'

DA.25 A detailed Agricultural Land Classification survey of the site found agricultural land in Grades 3a and 3b.

DA.26 Natural England provide guidance on the protection of valuable agricultural land within TIN049 (Natural England, 2012) and state that the best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance. This is reiterated within Annex 2 of the NPPF.

DA.27 A full assessment of agricultural land quality is provided within **Chapter 4 - Existing Conditions** which concludes *'a long term fallow period will enhance*

the soil's functional capacity for the support of agricultural production'.

DA.28 The location of the proposal is technically and economically viable and the site has been designed to minimise environmental and social impacts where possible, with resultant impacts determined in the studies contained within the Environmental Statement.

AMOUNT

The planning application will say how much development is being applied for. Why is this the appropriate amount?

Is the density appropriate?

DA.29 The total site area is approximately 103.9ha. The array will be sited within a fenced area of approximately 65.5 hectares, albeit not all of the ground is covered by panels. Approximately 28.8ha will be over-sailed by panels which is approximately 27.7% of the site area, or 43.9% of the fenced area). Only a small proportion of this area will penetrate the ground by the frame legs. The total solar array would have a rated capacity of up to 49.9MW at the point of connection. The proposed

operational lifetime of the project is 40 years, following which the solar farm would be decommissioned, unless a fresh planning permission was granted for its retention.

DA.30 Whilst the wider landholding extends beyond the site area, the development is considered to be the appropriate amount for relatively contained visibility of the site and maximising the available grid connection capacity.

DA.31 The Landscape and Visual Impact Assessment provided at **ES Volume 2A, Chapter 11**, assesses the impact of the solar farm on local landscape and visual receptors.

DA.32 The site will be subject to biodiversity enhancements. These include new hedgerow planting and enhancement of existing hedges, planting of new woodland and scattered hedgerow trees, creation of grassland/ wild flower meadow between and under solar panels, and creation of riparian meadows. Bat and bird boxes will also be installed as will invertebrate habitat piles. These enhancement measures offer a material environmental benefit of the proposed East Stour Solar Farm.

LAYOUT

How will the buildings and public and private spaces be arranged on the site, and what is the relationship between them and the buildings and spaces around the site?

DA.33 As stated in **Paragraph DA.5 on page 7**, the suitability of the landholding for a solar farm and the initial site design, within the boundaries of the landholding, were based on consideration of technical and environmental constraints as guided by Planning Practice Guidance and industry best practice.

DA.34 The rows of solar panels are arranged east to west on the site and approximately south facing to maximise energy generation. Existing site tracks are used where available, and new access tracks will follow field boundaries as far as possible. This means that the site tracks will generally be obscured from view by field boundary vegetation.

DA.35 The inverter/transformer units are containerised and look similar in form to the spare part containers. These elements are located alongside hedgerows where possible to minimise their potential prominence. Other site

containers and cabinets are located along the maintenance tracks that serve the three distinct sections of the proposed development.

- DA.36 There are no public spaces within the proposed development. There are a number of Public Right of Way (PRoW) crossing the proposed site or immediately surrounding area. Potential impacts on PRoW users have been considered within the Landscape and Visual Impact Assessment provided at **ES Volume 2A, Chapter 11** and mitigation planting proposed, where appropriate.

[Will public spaces be practical, safe, overlooked and inclusive?]

[Will private spaces be adaptable, secure and inviting?]

Do all spaces have a purpose?

- DA.37 The elements forming this application are limited to those which are necessary for the generation and transport of electricity or for the access to and maintenance of the solar farm. The proposed arrangement of these elements is shown at **Figure 1.2 and Figure 1.3, ES Volume 3**.
- DA.38 The key determinant for the use of space on the site is the height and angle of the solar panels. The solar panels will be

mounted at an angle of approximately 20 degrees with a maximum height of 3.0m and minimum height above the ground of 0.8m. This arrangement, with consideration of terrain requires a spacing between panel rows of between 3.0m and 5.3m to avoid shading and maximise generation. Space between the panel rows will be set to a mix of grass and wild flowers for the purpose of enhancing biodiversity, improving soils as well as surface water management capability of the soils.

- DA.39 The panels are grouped in blocks (or 'racks') of 64 panels that are arranged in two rows of 32 panels in portrait format. Half 'racks' of two rows by 16 columns of panels are used to infill smaller areas. These racks are arranged within the existing field shapes to maximise generation and allow sufficient space for other infrastructure.
- DA.40 Mitigation and enhancement measures also form part of the proposed development. These additions to the existing site baseline include: hedge improvement and new hedgerow planting; new woodland and hedge tree planting; creation of wild flower/ grass meadows; creation of riparian meadows; bat and bird boxes; and

invertebrate habitat piles to encourage native bees.

- DA.41 The environmental impact of the proposal is examined through the EIA, as reported in the **ES**.

SCALE

The statement should explain and justify:

the height, width and length of [buildings];

the size of spaces in relation to each other and their surroundings; and

[the size of parts of a building or its details]

The statement should provide clear evidence that the planned scale has been influenced by the existing character of the local area or, where relevant, opportunities to improve that character.

- DA.42 Modern commercial electricity generation solar farms range from approximately 5MW to over 200MW.
- DA.43 This solar array has been proposed to provide up to 49.9MW (3 S.F.) at the point of connection. The generation is maximised from the available unconstrained site area and for the available grid connection.
- DA.44 As mentioned in **Paragraph DA.33 on page 10**, the spacing of the

solar farm relative to its surroundings has been driven by consideration of various constraints such as landholdings, proximity to dwellings, existing infrastructure, and trees and hedgerows. In combination, these separations minimise potential environmental impacts and maximise output.

DA.45 The NPPF, at Paragraph 158, states that Local Planning Authorities should:

'not require applicants to demonstrate the overall need for renewable or low carbon energy'.

Will the [buildings] sit comfortably with their surroundings?

[Will they, and parts like doors and windows, be of a comfortable scale for people?]

DA.46 Solar farms and arrays by nature have a large footprint, but the whole area is not covered with panels as spacing is left in between for access, ancillary equipment and also perimeter fencing. The panels are mounted with a maximum height of 3.0m. It is proposed to grass/ wild flower seed the areas between, under and around the panels and seasonally mow, or use low density sheep grazing.

DA.47 It is proposed that the external finish of the containers and cabinets

included within the proposal (inverter/ transformer units, spare part containers and substation) will be agreed with the Local Planning Authority prior to construction commencing.

DA.48 The Landscape and Visual Impact Assessment provided at **Chapter 11, ES Volume 2A**, sets out the specific effects of this proposal in detail.

LANDSCAPING

How open spaces will be treated to enhance and protect the character of a place.

DA.49 During the EIA phase, a landscaping plan was developed to: provide further screening of views to the development, as discussed in **Chapter 11 - LVIA, ES Volume 2A**; and enhance the biodiversity of the site, as discussed in **Chapter 10 - Ecology, ES Volume 2A**.

DA.50 The landscaping plan includes:

- species rich grassland and wild flower meadow between, under and around the rows of solar panels;
- strengthening c. 1.5km of existing field boundary hedgerows and planting c. 2.2km of new hedgerow;

- creating new riparian meadows; and
- planting new low density native woodland covering c. 1.1 hectares.

DA.51 The landscaping mitigation plan (**Figure 11.9, ES Volume 3**) evolved with the site design, and carefully considered the existing landscape character of the area. Native species will be selected for the new hedge and tree planting, via a Landscape and Ecological Management Plan to be agreed with the Local Planning Authority prior to construction.

APPEARANCE

The statement should explain and justify the appearance of buildings and spaces, and show how they relate to their surroundings. It should cover: architecture, materials, [decoration], lighting, colour and texture.

DA.52 The appearance of a solar array is largely functional, with materials primarily chosen for their weight, strength, performance and practicality.

DA.53 By their nature, the operating surface of the PV panels and so the active face of the array will be a deep metallic blue. The purpose of the solar panels is to absorb light and so they will have a

non-reflective slightly textured surface, minimising glint/glare and maximising the transmission of light to the generating layers. The framing system is typically self-coloured aluminium and typically only visible from below or behind the panels.

DA.54 Site cabins will typically be in the form of shipping containers or Glass Reinforced Plastic (GRP) containers. The colour and finish of all site cabins will be agreed with the Local Planning Authority prior to construction.

DA.55 A full description of each element of the proposed solar farm is provided at **Chapter 6 - Development Proposal, ES Volume 2A**. Photos of typical infrastructure forming the solar farm are shown at **Plate DA.1 on page 14**.

How will the development visually relate to its surroundings?

Will it look attractive?

DA.56 The solar farm will have a perimeter fence, which will be stock style fencing with wooden posts. This type of fencing is chosen to be less intrusive and more rural in character than other types of fencing. Steel mesh field gates will be used at the site entrances. Landscape and visual impacts are assessed

in detail in **Chapter 11 - LVIA, ES Volume 2A**.

DA.57 Visual representations of the proposed development in the landscape are provided through a series of visualisations and contextual photographs contained at **ES Volume 4**.

CONTEXT

A design and access statement should demonstrate the steps taken to appraise the context of the proposed development. It is important that an applicant should understand the context in which their proposal will sit, and use this understanding to draw up the application.

DA.58 The immediate and wider context of the site was evaluated during the site selection and design process, as discussed at **Chapter 3 - Site Selection and Design, ES Volume 2A**. A description of the site's context is provided at **Chapter 4 - Existing Conditions, ES Volume 2A** and by the Landscape and Visual Impact Assessment (**Chapter 11, ES Volume 2A**).

DA.59 The social and economic aspects of the proposal are discussed at **Chapter 15 - Socio Economics and Sustainability,**

ES Volume 2A. The effects of climate change are now being experienced at all levels – global, national, regional and local. Similarly the socio-economic effects of the proposal will also have effects at the global, national, regional and local level.

DA.60 Addressing the Youth4Climate Summit in Milan on 28th September 2021, climate activist Greta Thunberg said:

“There is no plan B...Build back better. Blah, blah, blah. Green economy. Blah blah blah. Net zero by 2050. Blah, blah, blah, ... This is all we hear from our so-called leaders: words. Words that sound great but so far have not led to action. Our hopes and ambitions drown in their empty promises. Of course we need constructive dialogue, but they have now had 30 years of blah, blah blah. And where has this led us ... While carbon emissions must be halved by 2030 to have a chance of avoiding dangerous climate change, instead they are on course to rise by 16 per cent. Just look at the numbers. Emissions are still rising. The science doesn't lie’.

DA.61 More recently, the urgency to act on the climate emergency was highlighted in speeches made by various world leaders, experts and climate activists at the COP26 Conference in Glasgow.

EAST STOUR SOLAR FARM



Plate DA.1 - Typical Solar Farm Infrastructure Appearance (colour finish to be agreed with Ashford Borough Council) - clockwise from top left: installed panels; typical site track; typical inverter/transformer unit; typical cabinet; construction works; typical site fencing and installed panels.

DA.62 Consultation with the Local Planning Authority was undertaken throughout the pre-planning assessment phase of the application, as described at **Chapter 5 - Environmental Impact Assessment, ES Volume 2A.**

DA.63 The potential for a solar farm at the proposed site was investigated in the context of the existing renewable energy schemes in the area (Sellindge Solar Farm); the overhead electricity lines and pylons crossing the site, the South East Main Line and HS1 railway lines; the M20; and other local highways including Church Lane, which bisect the site. Feasibility assessment and a detailed site design process determined the site to be suitable against a number of environmental, technical and social constraints.

ACCESS

The design and access statement will need to cover two potential aspects of access vehicle and transport links, and [inclusive access...]

Will the place be safe and easy for everyone to move around?

Will it make the most of the surrounding movement network?

DA.64 It was determined that the most suitable route from the identified likely port of delivery for components would use the motorway and A-road network as far as possible. This minimises the potential disruption to local traffic and road users.

DA.65 The route identified for construction deliveries to the East Stour Solar Farm is as follows:

- panels are likely to arrive at the Port of Dover and will travel westbound along the M20;
- at the junction with the A2070 (JCT 10a), vehicles will leave the dual carriageway and at the roundabout take the fourth exit on to the A20 Hythe Road eastbound - the A20 conforms to the typical standards for its classification, and all deliveries are by standard HGV vehicles;
- after approximately 4.5km A20, deliveries will turn right on to Church Lane;
- travelling southbound for approximately 300m and just after passing under the M20 bridge, the site entrance to the northern land parcel will be on the right;

- the route continues southbound along Church Lane, passing under the railway bridges and over a small watercourse. The second entry point towards Bested Hill and the southern portion of the site will be on the right;

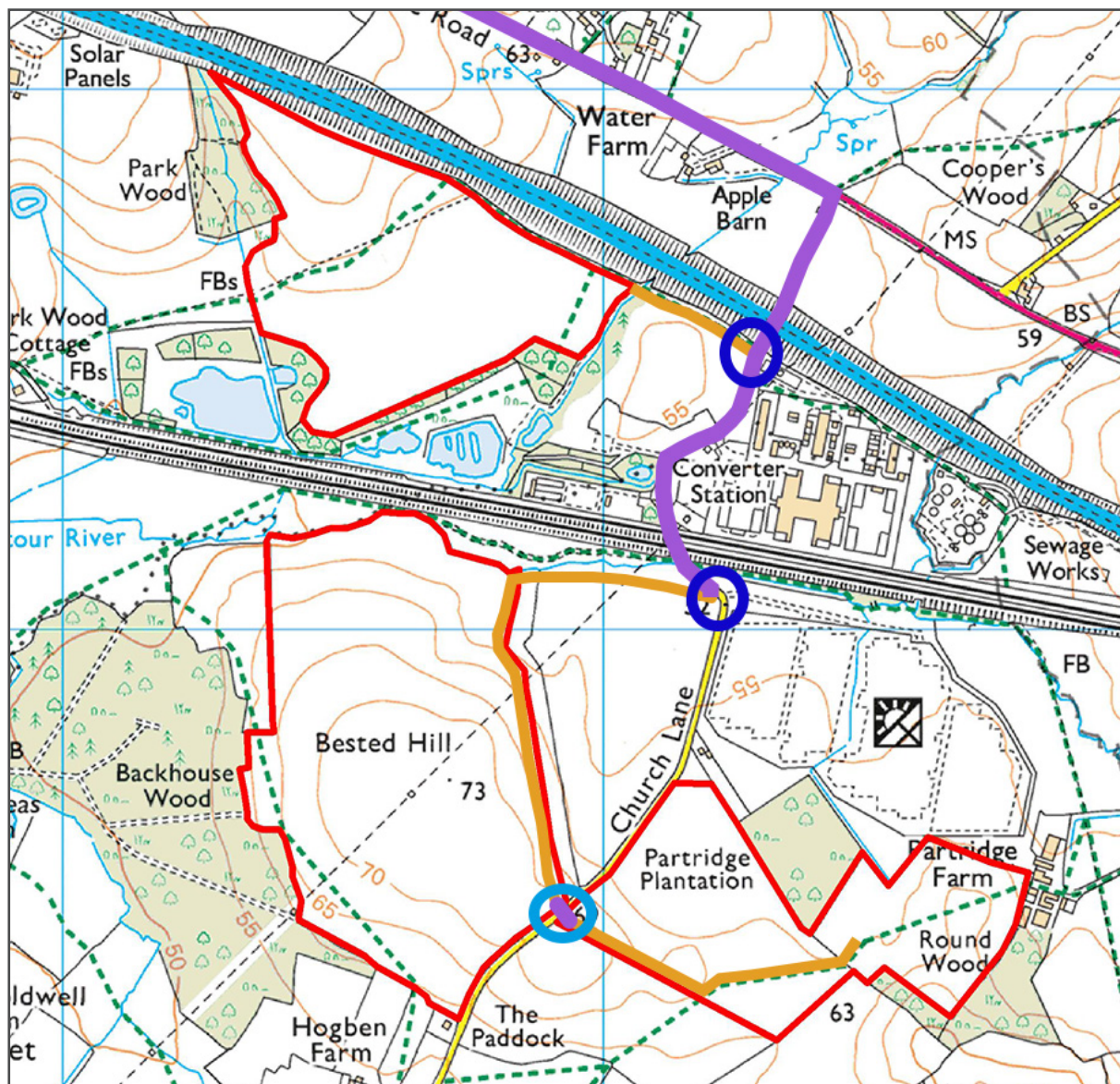
- access tracks continue within the site with the eastern portion access achieved through a crossing of Church Lane a further 800m south of the access point near to the railway.



DA.66 The proposed delivery route is shown at **Plate DA.2 on page 16**. No other route to site will be permitted during construction and all site traffic will be prohibited from travelling along Church Lane south of the site.

DA.67 As such two existing farm entrances will be used for site entrances off Church Lane with one new crossing of Church Lane. Temporary access tracks will be laid from the site entrances, following field boundaries where possible, to access the proposed solar farm.

DA.68 Existing breaks in hedgerows and field entrances will be used for access within the proposed site. Existing field entrances and farm tracks will be upgraded, where appropriate.

EAST STOUR SOLAR FARM



-  Principal development area
-  Preferred delivery route
-  Approximate route of internal access track
-  Proposed site entrance points
-  Church Lane crossing point

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Plate DA.2 - Proposed Delivery Route for Construction Traffic and Site Entrance / Crossing Locations

DA.69 There will be no public access to the proposed site. The existing PRowS will remain accessible during the construction phase, and fenced off from the construction site for user safety. Advance notification and signage will be in place to warn users of the PRow of the adjacent construction activities. Banksmen will be deployed as necessary during times of construction traffic.

DA.70 Construction personnel will be required to adhere to health and safety procedures, as set out in a Construction Traffic Management Plan (draft provided at **Appendix 8.3**) to be agreed with the Local Planning Authority prior to construction.

DA.71 Further information regarding access to the site is provided in **Chapter 8 - Transport and Access**.

Has the applicant clearly described their policy approach and consultation process, whether carried out or planned?

DA.72 The approach to the consultation process included: pre-submission consultation with the Local Planning Authority; pre-application consultation with statutory consultees such as Network Rail, Kent Highways

Authority, Kent Downs AONB and the Environment Agency; as well as two rounds of pre-application consultation with surrounding residents.

DA.73 Relevant policies of the Council's Local Plan (2019) were considered in the assessments, as identified during the pre-application advice consultation process:

- SP1 - Strategic Objectives
- SP6 - Promoting High Quality Design
- TRA7 - The Road Network and Development
- ENV1 - Biodiversity
- ENV3a - Landscape Character and Design
- ENV5 - Protecting Important Rural Features
- ENV6 - Flood Risk
- ENV10 - Renewable and Low Carbon Energy
- IMP1 - Infrastructure Provision

DA.74 Guidance from Ashford Borough Council's *Renewable Energy Planning Guidance Note 2 - The Development of Large Scale (>50kW) Solar PV Arrays* (2012) was also followed.

DA.75 Prior to submission of the application, members of the public from the surrounding settlements were consulted via letter sent in the post, and were offered the opportunity to provide pre-planning comment about the proposal via a freepost return postcard, a consultation email address and a phone number. In addition, the letter invited residents and interested parties to attend two rounds of consultation events where questions and comments could be made directly or via a feedback form. Individual meetings with residents have taken place when requested. Local Parish Councils were also consulted on the proposed development prior to submission.

DA.76 Issues raised and suggestions received were incorporated into the iterative site design process.

DA.77 The consultation process and incorporation of amendments to the design is detailed in **Chapter 5 - Environmental Impact Assessment**.

REFERENCES

Commission for Architecture and the Built Environment (CABE), 2006, Design and Access Statements - How to Write, Read and Use Them, CABE, UK.

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