EAST STOUR SOLAR FARM

SEI Volume 1 - Non Technical Summary

PREPARED ON BEHALF OF

EDF renewables

JANUARY 2024

engena

This page is intentionally blank

PREFACE

This Supplementary Environmental Information (SEI) Non-Technical Summary (NTS) forms the first part of a four volume SEI which provides additional information addressing points raised by consultees subsequent to the submission of the East Stour Solar Farm planning application (Ashford Borough Council reference 22/00668/AS). This information supplements the findings of the Environmental Impact Assessment (EIA), the ES of which accompanied the planning application. The volumes of the complete SEI document are:

Document	Title	Contents
SEI Volume 1	SEI Non-Technical Summary	Summarises the key contents of the SEI for the non-technical reader
SEI Volume 2A	SEI Written Statement	Presents the full SEI text
SEI Volume 2B	SEI Appendices	Presents the appendices referred to in the SEI Written Statement
SEI Volume 3	SEI Figures	Presents updated and additional figures referred to in the SEI Written Statement
SEI Volume 4	Visualisations	Presents additional visualisations referred to within the SEI Written Statement

A complete set of application and SEI documents can be downloaded from the project website, as detailed in the box below.

Printed SEI copies can be purchased at a cost of £200+VAT Digital versions are available either as a download or on CD-ROM free of charge.

To order copies, please contact Engena Limited at:

The Old Stables, Bosmere Hall,
Creeting St Mary, IP6 8LL.

info@engena.co.uk

or download from:

https://www.edf-re.uk/renewables/east-stour

The Developer may also be contacted at:

east.stour@edf-re.uk or 0800 0194 576

This page is intentionally blank

SEI NON TECHNICAL SUMMARY

SEI NTS Contents

This page is intentionally blank

SEI INTRODUCTION

1 This SEI Non-Technical Summary (SEI NTS) provides a non-technical summary of the supplementary information compiled to addresses comments received during the post submission planning consultation process, together with supplementary assessments of any potential cumulative impacts associated with the three neighbouring applications identified subsequent to the submission of East Stour Solar Farm:

- the Pivot Power Battery Energy Storage Site (BESS) (Consented, ABC planning reference PA/2022/2544) (considered within the ES in general terms, but without the detail available in application PA/2022/2544);
- the Sellindge Grid Stability Facility (GSF) (Consented, ABC planning application PA/2022/2950 - also referred to within that planning application as a Synchronous Condenser Plant (SCP) with ancillary infrastructure, access, landscaping and other incidental works); and
- the pre-application NSIP Stonestreet Green Solar.

2 The SEI LVIA chapter (SEI Chapter 11) has also considered the Otterpool Park Garden Town. Given the separation (~2.5km) and principally residential nature, this development has not been considered in other SEI Chapters.

3 The respective locations of the above proposals are identified on **SEI Figure 1.1, SEI Volume 3**.

4 The proposal for East Stour Solar Farm was submitted to Ashford Borough Council in May 2022, Application Reference 22/00668/AS. The proposal is for a fixed solar array, associated access tracks, inverter/transformer units, substation cabinets, welfare and storage cabinets/containers, boundary fencing with inward facing CCTV and ancillary infrastructure. In addition, a range of enhancement measures are proposed as part of the proposed development.

5 The site is located on land south of the M20, to the west of Sellindge and north-east of Aldington. The location of the site is illustrated in **Figure 1.1** within **Volume 3** of the Environmental Statement.

6 The proposal additionally comprises a below-ground cable route from the northern, southern and eastern area substations to a central substation cabinet west of the Sellindge Converter Station. The grid connection will connect from this cabinet under Church Lane to the adjoining National Grid substation. A substation will be shared with the Pivot Power BESS.

7 The total solar array would have a capacity of up to 49.9MW. The proposed operational lifetime of the project is 40 years.

8 The proposed development is adjacent to the operating Sellindge Solar Farm (10.6 MW).

9 For the purposes of the EIA, the ES and this SEI, assessments for impacts of the solar farm have been primarily based upon panel rows with a maximum height of 3.0m, at a tilt of approximately 20^{O} facing south.

10 The red line boundary has been amended in the SEI to exclude areas not required for the purposes of the proposal.

11 Additional planting mitigation has been proposed as discussed with the SEI LVIA Chapter (SEI Chapter 11).

12 There have been no other alterations to the proposal. The proposed solar farm site layout with updated red line is shown at **SEI Figure 1.2** and **Figure 1.3**, overlaid with aerial photography in **Figure 1.4** and **1.5 of SEI Volume 3** (replacing the corresponding ES figures).

SEI READING GUIDE

13 The SEI presents information supplementary to the four volumes of the Environmental Statement (ES) which accompanied the application.

14 As such, the SEI should be read alongside the ES and similarly the SEI NTS should be read alongside the ES NTS.

15 The SEI follows the same four-volume format and chapter numbering as the ES for ease of reference.

16 Where third-party reports or documents referenced within the ES have been updated or new publications issued, the SEI provides an update to the respective ES chapter.

17 Where no additional information has been provided to that presented in an ES chapter, the respective SEI chapter identifies this.

18 The only alteration to the proposal within this SEI reflects the amendments to the red line boundary and the additional planting proposed as referenced in **Paragraph 11**.

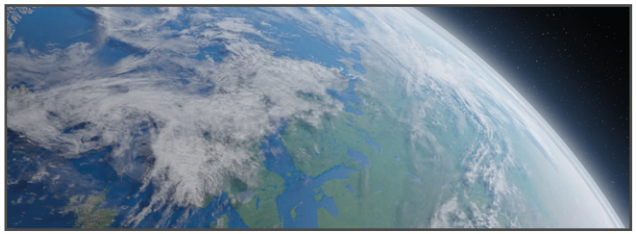
ENERGY PRODUCTION OFFSET UPDATE (SEI CHAPTER 1)

19 'PV Syst Photovoltaic Software' Version V6.87 was used by the Applicant to predict that the solar farm will have a potential annual yield of approximately 69 600MWh (to 3 Significant Figures (3 S.F.)), this is as presented in the ES.

20 Updated figures have subsequently been published regarding electricity consumption in Ashford Borough (DBEIS, 2022). In terms of household electricity usage this would, using current statistics, be sufficient to offset the equivalent annual energy needs of 17 000 (to 3 S.F.) average Ashford Borough homes' (based on average domestic consumption per household of 4 080kWh (DBEIS, 2022). This is an increase to the 16 900 homes offset calculated in **ES Chapter 1** resulting from reduced domestic electricity consumption in the Borough.

CARBON OFFSET UPDATE (SEI CHAPTER 1)

21 As discussed in the **SEI Chapter 7 - Construction, Operation and Decommissioning**, based on information published in 2023 regarding Greenhouse Gas Conversion figures (DESNZ, 2023) the electricity produced by the East Stour Solar Farm will offset an updated equivalent of 14 300 000 $kgCO_2$ per annum (to 3 S.F.). This is a 3% reduction against the initially reported ES figure, a consequence of falling electricity GHG conversion factors as more renewable energy comes on line year on year.



DEVELOPMENT RATIONAL UPDATE (SEI CHAPTER 2)

22 A number of the source documents have been updated since submission, this SEI chapter provides relevant updates.

23 The annual UK weather and climate report entitled '*State of the UK Climate*' published by the Royal Meteorological Society in July 2023 (Kendon, et al., 2023), found that:

- *'The UK's climate continues to change. Recent decades have been warmer, wetter and sunnier than the 20th century.*
- *The observations show that in the UK extremes of temperature are changing much faster than the average temperature.*
- *The UK has warmed at a broadly consistent but slightly higher rate than the observed change in global mean temperature.*
- *The UK's record warm year of 2022 and unprecedented July heatwave were both made more likely by climate change'.*

24 In addition:

- *'2022 was the warmest year in the UK series from 1884, 0.9°C above the 1991–2020 average. It was the first year to record a UK annual mean temperature above 10°C;*
- *40°C was recorded in the UK for the first time during a heatwave which exceeded previous records by a large margin;*
- *Winter, spring, summer and autumn 2022 were all ranked in the top 10 warmest seasons for the UK in series from 1884 (winter from 1885);*
- *All the top-10 warmest years for the UK in the series from 1884 have occurred in the 21st century;*
- *The most recent decade (2013–2022) has been on average 0.3°C warmer than the 1991–2020 average and 1.1°C warmer than 1961–1990. This is the warmest 10-year period in both the UK series from 1884 and CET series from 1659;*
- *Half of the years, more than one in three of the constituent seasons, and almost one in four of the constituent months within the most recent decade (2013–2022) have been within the top 10 warmest in the UK series from 1884 (winter from 1885);*
- *Heating and cooling degree days (CDD) in 2022 were second-lowest and third-highest in series from 1960. Growing degree days (GDD) were the highest in the series;*
- *Five of the 10 wettest years for the UK in a series from 1836 have occurred in the 21st century;*
- *The most recent decade (2013–2022) has been on average as wet as 1991–2020 (i.e. anomaly 0%) and 8% wetter than 1961–1990 for the UK overall;*
- *In recent years, widespread and substantial snow events have occurred in 2021, 2018, 2013, 2010 and 2009, but their number and severity have generally declined since the 1960s;*

- *The most recent decade (2013–2022) has had for the UK on average 3% more hours of bright sunshine than the 1991–2020 average and 9% more than 1961–1990. 2013–2022 is the sunniest 10-year period in the UK series;*
- *For the most recent decade (2013–2022) UK winters have been 3% sunnier than 1991–2020 and 14% sunnier than 1961–1990. UK springs have been 6%/16% sunnier'.*

25 On 7th April 2022 the UK Government published its latest policy paper on British Energy Security Strategy. The document sets out the steps taken and still required to 'accelerate our progress towards net zero, which is fundamental to energy security'.

26 Powering Up Britain (including the Energy Security Plan) was published by Government 30th March 2023 (HMSO, 2023). This latest plan seeks to ensure energy security whilst meeting net zero commitments. The document reiterates the Government's ambition to 70GW of ground and roof mounted solar by 2035, recognising this would increase the current installed solar by five times.

SITE SELECTION AND SITE DESIGN SUPPLEMENTARY INFORMATION AND POLICY UPDATE (SEI CHAPTER 3)

27 The ES Chapter 3 discussed the site selection process undertaken to identify the East Stour Solar Farm location, and the evolution of the site layout throughout the EIA process.

28 The site selection process and layout evolution has been expanded upon in landscape and visual terms within the SEI Chapter 11 - LVIA.

29 The ES Chapter 3 also set out an outline of the background policy relevant to site selection and design.

30 National Policy Statements for energy infrastructure were updated in November 2023 (Department for Energy Security and Net Zero (DESNZ), 2023).

31 Through an iterative considered approach to site identification and site design that inherently mitigates potential impacts wherever possible, the Applicant has ensured the Proposal is consistent with the original NPSs EN-1 and EN-3, their draft updates and subsequently the published revised versions.



EXISTING CONDITIONS POLICY UPDATE (SEI CHAPTER 4)

32 SEI Chapter 4 refers to the same policy update to National Policy Statements as referred to as above. The updated policy considerations are the same as in the proceeding section above.

33 The potential cumulative effects associated with the additional proposals have been considered in the respective SEI Chapters discussed below.

34 Commercial farming practices have continued across the site and as such existing conditions are otherwise unchanged.

EIA (SEI CHAPTER 5)

35 There are no updates to the ES chapter save the introduction of the additional cumulative projects considered within the SEI as introduced above in **Paragraph 1 on page 1**.

THE DEVELOPMENT PROPOSAL (SEI CHAPTER 6)

36 There are no updates or supplementary information regarding this SEI Chapter save the amendments to the red line boundary to exclude areas not required for the purposes of the proposal (**Paragraph 10 on page 2**).

ENERGY AND CARBON OFFSET UPDATE (SEI CHAPTER 7 - CONSTRUCTION, OPERATION AND DECOMMISSIONING)

37 As described from **Paragraph 19 on page 2**, updated energy consumption figures and carbon emission conversion factors have resulted in an updated 100 further Ashford Borough homes being supplied by the development (as a result of reduced domestic energy consumption), and a reduction of 3% in CO_2 emissions offset resulting from increasing capacity of renewables.

SUPPLEMENTARY CUMULATIVE TRAFFIC AND ACCESS ASSESSMENT (SEI CHAPTER 8)

38 This SEI chapter considers the potential cumulative impacts of the East Stour Solar Farm on the local roads infrastructure, particularly during the construction process, should each of the cumulative sites considered undergo construction within a similar time frame.

39 As discussed within the SEI Chapter, a key impact avoidance principal during construction and decommissioning considers deliveries to be restricted, wherever possible, to off-peak weekdays to reduce impacts on local road users. Off-peak is considered to be between 09:00 and 15:00. The same restriction has been stated within the Pivot Power BESS and Sellindge GSF applications.

40 To avoid construction traffic travelling through the nearby villages, all construction vehicles will be required to use the access route identified from the A20 and HGVs will be required to approach from the identified route from Junction 10a of the M20. No construction traffic be it HGV, LGV or PSV will be permitted south of the Church Lane highway crossing. The same restriction has been stated within the Pivot Power BESS and Sellindge GSF applications.

41 As such, all proposed avoidance and mitigation measures remain as proposed within the ES.

42 Cumulative impacts may potentially be significant (depending on construction timings), although limited to Church Lane. These impacts would be short lived and can be managed through Construction Traffic Management Plans, controlled through Planning Condition.

SUPPLEMENTARY CUMULATIVE HYDROLOGY AND FLOOD RISK ASSESSMENT (SEI CHAPTER 9)

Flood Risk

43 It is expected that there will be adequate surface water management plans in place during construction for these sites, to attenuate and manage surface water runoff such that there is no increase in runoff to the East Stour tributary from any of the sites. Thus, even if construction occurs simultaneously provided appropriate SuDS measures are implemented in a timely manner there will be no cumulative detrimental effects to flood risk.

44 Furthermore, according to the design statements and expected embedded design measures at the sites, discharge to the East Stour River should be reduced for higher order events. Thus there is not expected to be any significant cumulative effect from these sites to increase flood risk during operation either.

Water Quality

45 During construction and operation, it is concluded that each development would only have a negligible effect in terms of changes in water quality and as such, there is not likely to be any significant cumulative effect.

SUPPLEMENTARY CUMULATIVE ECOLOGY ASSESSMENT (SEI CHAPTER 10)

46 Likely ecological impacts on sensitive ecological receptors for projects within 5 km of the East Stour Project have been considered as part of this Cumulative Impact Assessment. A review of the ecological assessments for these individual projects has been completed to inform the cumulative assessment, the conclusions of which are based on the substantive nature of the predicted ecological impacts of these other schemes.

47 Cumulative impacts have not been identified when considering the predicted ecological impacts of the East Stour and the three consented schemes (BESS, GSF and Sellindge

Solar Farm schemes). None of these Projects identify adverse residual impacts on sensitive ecological receptors, including ground nesting birds (e.g. Skylark and Lapwing) and loss of sensitive terrestrial habitats is limited for all schemes. All of these Projects actually predicted or in the case of Sellindge Solar Farm is considered likely to result in) minor positive ecological impacts when considering committed to mitigation and ecological enhancement including hedgerow and woodland planting and creation of wildflower grassland areas.

48 For the proposed Greenstreet Solar residual impacts on Skylark and Yellowhammer are predicted however neither species will be significantly adversely affected by the East Stour Scheme. Skylark habitat is being replaced such that the two existing pairs of this species will have areas of alternative breeding and foraging habitat and as such there will be no cumulative impacts on this species. The existing hedgerow network at East Stour (where Yellowhammer were recorded) is being retained and significant additional hedgerow and woodland planting will increase available habitat for Yellowhammer which will likely result in a minor positive for this species. Additionally the grassland areas being created will provide suitable foraging habitat for this species.

SUPPLEMENTARY LANDSCAPE AND VISUAL IMPACT INFORMATION (SEI CHAPTER 11)

49 This SEI chapter encompasses additional information relating to the landscape and visual effects of the East Stour Solar Farm proposal, produced in response to various consultation responses.

50 The chapter is set out in a series of sections relating to landscape and visual matters as follows:

- Section 1 – Solar Farm Design Progression – a summary (in landscape and visual terms) of the progression of the solar farm design including a rationale for the removal of various areas from the final layout.

- Section 2 – Mitigation Rationale – a description of the mitigation measures included within the design of the solar farm, including additions to the mitigation proposals.
- Section 3 — Additional AONB Viewpoint Assessment – at the request of Kent Downs AONB an additional viewpoint (VP13) has been assessed and has been provided as a photomontage.
- Section 4 – Rebuttal to ABC and Land Management Services (LMS) review of the LVIA contained within the East Stour Solar Farm ES – setting out the main comments from ABC and LMS and summarising responses as well as further information.
- Section 5 – Cumulative Landscape and Visual Assessment – since the submission of the East Stour proposal, several development proposals have been submitted to the planning process in the area local to the East Stour site and a CLVIA has been produced in response.
- **SEI Appendix 11.1** – Method of Assessment – a more detailed assessment methodology including CLVIA methodology.

Section 1 - Design Progression Summary

51 This section expands on the site design discussion in ES Chapter 3, and is provided in response to questions posed during a meeting with Officers of the Council, 16th June, 2023.

52 The section describes how, based on the consideration of development constraints, widespread visual impacts, the Aldington Conservation Area, benefits from possible mitigation and reducing potential visibility, the original available landholding of around 238 hectares was refined down to the 65.5 hectare of fenced area within **SEI Figure 1.2**.

Section 2 - Mitigation

53 Consideration of potential mitigation planting has been an integral part of the design process of the East Stour Solar Farm proposal. These mitigation planting proposals are summarised below and are illustrated on **SEI Figure 11.9 Rev A**, which is a replacement figure including further additional mitigation planting which has been proposed following feedback from Ashford Borough Council.

54 The SEI Chapter 11 provides full details of the proposals, including illustrative cross-sections showing the respective locations and elevations of rights of way, proposed planting and the proposed development.

55 South of the M20 motorway and east of Park Wood:

- initially mitigation planting proposals were limited to native hedgerow planting along the northwest part of the site, to the east of Park Wood, so as to provide mitigation screening for those using the permissive footpath located here to the east of Park Wood.
- Further native hedgerow planting is now proposed immediately south of public footpath AE432 and the permissive route as it travels northwest towards Park Wood from its junction with footpath AE432 so as to provide further screening of views of the proposal

for those using the footpath along the northern boundary of the site.

- Additional native hedgerow trees are proposed throughout the new hedgerow along the northern site boundary.
- the layout allows wide varying swathes of open space surrounding these footpaths (approx. between 87m and 25m wide to the solar farm fencing, and further to the panels themselves). For context, an average two lane public road in the UK is approx. 7m wide.

56 The section of the solar farm west of Church Lane and across Bested Hill:

- a number of mitigation planting proposals were incorporated into the layout design including existing field boundary improvements (where necessary) along the west side of Church Lane in the vicinity of Bested House. These measures would strengthen the existing roadside hedgerow which is thin, gappy and has been slow to grow over recent years, and would strengthen the existing landscape fabric whilst providing improved screening along Church Lane.
- These proposed hedgerow improvements have now been extended further north towards the northwest dog-leg in the road so as to strengthen the existing single species thin hedgerow on the west side of the road through increasing the depth of the hedgerow, the range of species within the hedge and also adding some hedgerow trees to complement the existing hedgerow trees along the roadside. All of these measures will be introduced at existing hedgerow locations whilst ensuring the existing road safety visibility in this area is retained as drivers cross/approach the bridge.
- Hedgerow improvements will extend along the length of Church Lane adjacent to the proposed grassland meadow west of the road, which creates a natural set back of the solar panels from visual receptors.
- In addition, the existing field boundary between the proposed grassland meadow and the proposed solar panels will also be improved and gapped up so as to provide further screening of the solar panels in views from the east.
- A new native hedgerow will also be located on the northern boundary of the solar panels as Church Lane passes under the HS1 rail line. This will provide additional screening of the solar panels for both walkers along footpath AE656 by the East Stour River and motorists on Church Lane.

57 Southern site boundary adjacent to The Paddocks residential property:

- a new native hedgerow;
- a low density woodland on the southern edge of the proposal ; and
- new native hedgerow planting adjacent to the solar panels on key boundaries. In the vicinity of public footpath AE457 as it wraps around the west and southwest of Bested Hill the swathes of open space around this footpath vary greatly depending on the irregular boundary of Backhouse Wood to the west, but are regularly 65m – 90m wide. In these areas a native

hedgerow is proposed to the east of the footpath and adjacent to the solar farm fencing, which would be grown and maintained to 3m in height to add screening to views towards the solar panels.

58 Along the west side of Church Lane in the vicinity of the site access point:

- Further improvements to roadside vegetation are now proposed;
- a native hedgerow along the top of the roadside verge in the vicinity of The Paddock, extending northwards along the field boundary.

59 Along the east side of Church Lane:

- whilst existing vegetation is mature and robust and no mitigation measures are proposed here, a new native hedgerow is proposed along the boundary with Bested House and its gardens (through discussion with the residents);
- further new native hedgerows along the boundaries of the solar arrays to the south of Bested House.
- Scattered native hedgerow trees would also be added along the southern boundary of the solar farm. These measures would add further screening of the proposal from Church Lane but also for nearby residential receptors.
- the experience of users of public footpath AE459 will vary through this section of the solar farm where the width of the open space surrounding the public footpath between the solar farm fencing is between approx. 12m and 16m, although the distances between solar panels on either side of the footpath is much greater; generally between 28m and 35m. Along the section of the footpath between Partridge Plantation and Round Wood where the solar panels are stepped back entirely from the footpath a wide open swathe of grassland exists for approximately a 30m length of the footpath.

60 Overall, the process of considering and integrating mitigation planting proposals has been iterative and has sought to take into account feedback from local residents as well as the local landscape character so as to make sure all proposals are in keeping with local land uses as well as seeking to strengthen and enhance the local character through measures such as the reinforcement of existing field boundary vegetation.

Section 3 - Additional AONB Viewpoint Assessment

61 At the request of Kent Downs AONB an additional viewpoint, B2067 Knoll Hill at junction with Footpath AE496, has been assessed and has been provided as a photomontage (**VP13 - SEI Volume 4, Visualisations**).

62 No significant effects are identified.

Section 4 - Rebuttal to ABC and LMS

63 To address comments made by Officers of ABC and from LMS, additional information has been provided in this section of the SEI chapter by way of an expanded methodology (**SEI Appendix 11.1**) and an additional section regarding layout and approach (Section 1 of **SEI Chapter 11**). Section 2 has also expanded on the reasoning behind the mitigation proposals providing evidence of the anticipated experience of rights of way users by

means of illustrative cross-sections (**SEI Figures 11.14 - 11.24**).

64 The approach to Landscape Character Assessment and Visual Assessment has also been expanded upon. Existing viewpoints have been provided as photomontages - **SEI Volume 4 Visualisation Viewpoints 9 - 13** under the heading 'East Stour Only (Montaged for Views from AONB)', together with an explanation as to why these weren't prepared as such for the ES.

65 Additional viewpoints have also been provided as part of the cumulative LVIA in Section 5 of this chapter (**SEI Volume 4 Visualisation Viewpoints A - E** under the heading 'Cumulative'), all of which indicate the extremely limited potential visibility of the East Stour proposal.

66 A description of the selection of the viewpoints taken forward to analysis within the ES is provided, together with an explanation of the lack of input received from ABC.

67 As described above, to aid in the further illustration of the proposal, ten illustrative cross sections have been provided as part of the SEI, all located on the footpath network throughout the site and indicating mitigation planting proposals at Year 10 post construction (**SEI Figures 11.15 – 11.24**).

68 Consideration of winter views as well as those available during the summer when there is foliage on the trees is also discussed as is the anticipated impact of the mitigation proposals.

69 The lack of available information regarding the Stonestreet Green at the time of submission is also discussed regarding the cumulative assessment included within the ES. Based on the available information during Summer 2023, a supplementary cumulative assessment is provided in the next section.

Section 5 - Cumulative Assessment Summary

70 This cumulative assessment considers the likely future baseline and the potential additional effects of the East Stour Solar Farm as well as the potential combined effects of the East Stour Solar Farm and Stonestreet Green Solar scheme in the following two Development Scenarios:

- Development Scenario 2 (DS2): the additional effects of the East Stour proposal in the context of the likely future baseline (containing the Sellindge BESS, Sellindge GSF and Otterpool Park Garden Town),
- Development Scenario 3 (DS3): the combined effects of the East Stour and Stonestreet Green Solar developments in the context of the likely future baseline (containing the Sellindge BESS, Sellindge GSF and Otterpool Park Garden Town).

71 In terms of Development Scenario 2, the significant effects of the East Stour proposal would be limited to:

- The character of the landscape within limited parts of the Evegate Mixed Farmlands LCA and the East Stour Valley LCA.
- The visual amenity of some residents within a few individual residential properties local to the proposal.
- The visual amenity of users of a few sections of public rights of way local to the site (mainly the

footpaths through and adjacent to the site itself).

- The visual amenity of users of a limited section of Church Lane immediately adjacent to the site.

72 Over time mitigation measures associated with the application would reduce these significant effects further.

73 In terms of Development Scenario 3, the significant cumulative effects of the combination of the East Stour and Stonestreet proposals would be limited to:

- The character of the landscape within limited parts of the Evegate Mixed Farmlands LCA, the East Stour Valley LCA, the Aldington Ridgeline LCA and the Upper Stour Valley LCA.
- The visual amenity of some residents within limited parts of Aldington and within a few individual residential properties.
- The visual amenity of users of a few sections of public rights of way local to both proposed sites.
- The visual amenity of users of sections of local roads travelling past both proposals as part of a single journey.

74 Due to the limited elevation of solar farm developments combined with the undulating topography of the area and the good levels of mature woodlands, tree belts and hedgerows found local to the two proposals, any significant cumulative effects would be constrained to a limited area surrounding the two sites. As the two sites are located in close proximity to each other, with adjoining site boundaries in places, overall the extent of significant cumulative effects on landscape character and visual amenity would be very contained.

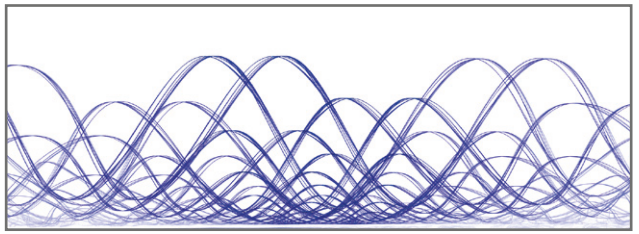
SUPPLEMENTARY ARCHAEOLOGY AND CULTURAL HERITAGE (SEI CHAPTER 12)

75 This assessment has provided an update to the cumulative assessment forming part of the Environmental Statement. No cumulative impacts to below-ground archaeological remains and built heritage have been identified for the application site and the Pivot Power Battery Energy Storage site.

76 Regarding the Sellindge GSF a potential for cumulative impacts on potential below-ground archaeological remains has been identified. However, the existing archaeological condition attached to the planning consent for the GSF will ensure that any remains within the site will be adequately evaluated and mitigated. No cumulative impacts to built heritage are anticipated.

77 With regards to the Stonestreet Green Solar project no cumulative impacts to below-ground archaeological remains are anticipated. This assessment has found that it is possible that a level of cumulative impacts to the Grade I listed Church of St Martin, the Grade II* listed Court Lodge Farmhouse, and as a result to the Aldington Church Area Conservation Area, may arise through a combination of the two development schemes. A detailed assessment of any potential cumulative impacts is currently not possible, as the final design and proposed viewpoint visualisations for the Stonestreet Green Solar project are not yet available, however, an assessment will be carried out for the full Environmental Statement for the Stonestreet Green Solar project.

78 An extension to one of the existing viewpoints, as well as a series of additional viewpoints have been produced to support the assessment of potential setting impacts on the scheduled monument 'barrow cemetery to the south-west of Barrowhill, NHLE 1475132'. Based on the available evidence it was concluded that the extremely limited sections of the proposed development which would be discernible from Viewpoint A (**SEI Volume 4**) would not be prominent or dominant within the context of the existing view and would therefore have an impact of no harm on the setting of the asset. No cumulative impacts on the setting of the asset would arise from the proposals within the application site in conjunction with the Pivot Power Battery Energy Storage site and the GSF. Based on the current knowledge cumulative impacts from the development of the application site and the Stonestreet Green Solar site on the asset's setting are not anticipated, however, an updated and final assessment will be carried out for the full Environmental Statement for the Stonestreet Green Solar project.



SUPPLEMENTARY CUMULATIVE NOISE ASSESSMENT (SEI CHAPTER 13)

79 A cumulative assessment has been carried out for the proposed and consented schemes neighbouring the East Stour development. There is a potential cumulative increase in noise at Bested House, but cumulative noise levels are predicted to be below the background noise measured by SLR for the Sellindge BESS scheme. The SLR data has been reviewed by Ion Acoustics to confirm its validity for this assessment. Since cumulative noise levels are below the background noise, a low impact, subject to context, is predicted according to the relevant standard, BS 4142.

80 In terms of the Government planning guidance, cumulative noise levels have the potential to be "*present but not intrusive*" and this would be within the no observed adverse effect level. No mitigation is required.

SUPPLEMENTARY CUMULATIVE GLINT AND GLARE (SEI CHAPTER 14)

81 A cumulative assessment was undertaken as part of the original Glint and Glare Assessment submitted; however it has been requested that a further three sites be considered as part of the cumulative assessment (Planning Ref: PA/2022/2950 & PA/2022/2544, PINS: EN010135).

82 Due to the type of development, local topography and screening, it is anticipated that there will not be any cumulative effects on local ground and aviation receptors as a result of construction of the Proposed Development.

REFERENCES

British Standards, 2014, BS 4142:2014 - Method for Rating and Assessing Industrial and Commercial Sound, BSI, UK.

Department for Business, Energy and Industrial Strategy (DBEIS), 2023, Greenhouse Gas Reporting: Conversion Factors 2022, HMSO, UK.

Department for Business, Energy and Industrial Strategy (DBEIS), 2021b, Draft National Policy Statement for Renewable Energy Infrastructure (EN-3), HMSO, UK.

Department for Energy and Climate Change (DECC), 2011a, Overarching National Policy Statement for Energy (EN1), DECC, UK.

Department for Energy and Climate Change (DECC), 2021, Draft National Policy Statement for Renewable Energy Infrastructure (EN-3), DECC, UK.

Department for Energy Security and Net Zero (DESNZ), 2023), Overarching National Policy Statement for Energy (EN-1), DESNZ, UK.

Department for Energy Security and Net Zero (DESNZ), 2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), DESNZ, UK.

This page is intentionally blank