Summary Planning Proof of Evidence of Steven Longstaff BA (Hons) MSc MRTPI

Prepared for EDF Energy Renewables Limited (Trading as EDF Renewables)

Land South of the M20, Church Lane, Aldington, Kent (known as East Stour Solar Farm)

PINS ref: APP/E2205/W/24/3352427

Ashford Borough Council Reference: 22/00668/AS

CD10.5

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Summary Proof of Evidence

1.1 My name is Steven Longstaff, I hold a BA (Hons) degree in Geography from Northumbria University and a Master of Science degree in Town Planning from Newcastle University. I have been a chartered member of the Royal Town Planning Institute (RTPI) since 2011 and have over 17 years of experience in town and country planning work in England. I was appointed to ELG's board as a Director in January 2020. I am currently ELG's lead on energy related projects and am working on a number of solar, battery storage and energy from waste schemes across England.

1.2 My proof of evidence (PoE) has been prepared on behalf of EDF Renewables (the appellant), in support of its appeal against the decision of Ashford Borough Council to refuse planning permission for a solar farm on land south of the M20, to the west of Sellindge and northeast of Aldington in Kent. The proposed development is known as the East Stour Solar Farm.

1.3 Neither I nor ELG Planning were involved in the Planning Application prior to its determination by Ashford Borough Council. I therefore rely on documents submitted during the application that were prepared by others.

1.4 I have visited the Appeal Site and the surrounding area on two occasions and am familiar with the policies in the Development Plan.

1.5 The application was refused on 29th April 2024 by Officers under delegated authority for five reasons (CD1.20). Following the refusal this appeal was submitted and validated by the Planning Inspectorate (PINs) on 21st October 2024. Through discussions on the Statements of Common Ground (CD9.1), the Council have confirmed that they will not be defending reasons for refusal 2, 3, 4, and 5 at the Inquiry.

1.6 In light of the Council's withdrawal of reasons for refusal 2, 3, 4 & 5, I do not specifically address them in my PoE.

Reason for Refusal

1.7 The Main Statement of Common Ground set out the areas still in dispute as:

- Landscape and visual impacts – addressed in Mr Ingham's Proof (CD10.2)
- Heritage matters – addressed in Mr Bourn's Proof (CD10.4)

1.8 I outline a summary of their evidence within my PoE and consider the compliance of the Proposed Development with the Development Plan, National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and other material consideration relevant to the Proposed Development. I also address any matters raised by interested parties, the benefits of the Proposed Development and the overall planning balance.

1.9 Section 6 includes an assessment of the principal planning issues which remain in dispute taking into account the evidence of Mr Ingham and Mr Bourn. I have considered that evidence and concluded that the Proposed Development is consistent with the policies in the Development Plan and NPPF.

1.10 It is acknowledged in Mr Ingham's evidence that the Proposed Development will result in some significant effects on landscape character and visual amenity but that these effects would be limited, localised and occur in a landscape which is not recognised by landscape designation.

1.11 For the reasons outlined in my PoE, I conclude that the Proposed Development does not conflict with Policy EN10 when read as a whole and I also find that the requirements of Policy AB10 of the Aldington & Bonnington Neighbourhood Plan are met including that the substantial benefits of the Proposed Development outweigh the limited landscape and environmental impact.

1.12 Mr Bourn's evidence concludes that, in heritage terms, the Proposed Development will have a minor adverse effect on the contribution that aspects of the setting provide to the Church of St Martin and Court Lodge Farm. The majority of the setting of the designated assets will be unaffected by the Proposed Development. The primary aspects of the significance of the assets (i.e. the architectural and historical interest of their form and

fabric) will be unaffected. Due to the very limited visual effect on their setting, the effect on the significance of the assets will be no more than minor. Mr Bourn considers this to be a less than substantial impact on the significance of the Church of St Martin and Court Lodge Farm. His view is that this effect is on the lowest end of the less than substantial harm scale, as the significance of the designated assets is almost entirely unaffected.

1.13 I have set out my assessment of the benefits of the Proposed Development in Section 8 of my PoE and consider these to be substantial.

1.14 I conclude that in view of the substantial public benefits that would be delivered by the Proposed Development, the requirements of Policy ENV13 of the Ashford Local Plan and paragraph 215 of the NPPF are met.

Other Matters

1.15 It has been demonstrated in my PoE that the Proposed Development does not allow for overplanting.

1.16 My PoE also confirms that the scheme has been designed to achieve an export capacity of 49.9MW and EDF would be highly incentivised to generate at the maximum output making full use of the grid connection offer in this location.

Planning Benefits

1.17 Paragraph 11 of the NPPF outlines the presumption in favour of sustainable development. Renewable energy can be recognised inherently as a form of sustainable development and in this case fulfils all three of the limbs of economic, social and environmental elements of sustainable development as set out within the NPPF.

1.18 I consider that the substantial range of benefits outlined at Section 8 of my PoE weigh heavily in favour of the Proposed Development in the planning balance. These benefits include the following.

Meeting the urgent need for renewable energy

1.19 As set out in the SEI (CD1.14), it is predicted that the Proposed Development would offset the equivalent annual electricity needs of approximately 17,000 (to 3 S.F.) average Ashford Borough homes (based on average domestic consumption per household of 4,080kWh (DBEIS, 2022). To put this in context, the 2021 Census advises that there is a total of 53,583 households in Ashford Borough, the Proposed Development would therefore power the equivalent of 32% of the homes in Ashford Borough.

1.20 From the displacement of electricity generated from fossil fuels, the Proposed Development would offset the emission of a significant quantity of pollutants, particularly carbon dioxide, into the atmosphere. Calculations set out in the SEI advise the electricity produced by the East Stour Solar Farm will offset an updated equivalent of 14,300,000 kgCO2 per annum (to 3 S.F.).

Location and grid connection

1.21 The Appellant has secured a grid connection to the adjacent Sellindge Converter Station. One of the most important factors in the delivery of a solar farm is the ability to have access to the distribution network whether it be the local grid network or the transmission network.

1.22 EDF have confirmed that this is a deliverable project and subject to achieving planning approval will progress with the scheme in line with the 2028 connection date.

1.23 The availability of a quick grid connection (well before 2030) significantly adds to the overall benefit of the scheme as it can be brought forward quickly to make the required contribution to our national and regional decarbonisation targets.

Biodiversity net gain

1.24 As agreed between parties the Proposed Development will deliver a range of biodiversity benefits including a net gain of 250.93 habitat units which equates to a 116.84% net gain

on habitats and a net gain of 18.54 hedgerow units which equates to a 230.36 % net gain on hedgerows.

Temporary and reversible nature of the development

1.25 Solar farms are a temporary form of development and in this instance the Proposed Development will be in place for a temporary period of 40 years. In this case it will remain in continued agricultural use for grazing. After the lifetime of the development, the appeal site will be returned fully to its current use and, as such, any impacts associated with the Proposed Development will be temporary and reversable.

Wider social and economic benefits

1.26 In addition to the clear benefits arising from the Proposed Development as a renewable energy scheme outlined above, a number of site specific benefits will also arise from the Proposed Development including socio-economic benefits to local and national based contractors along with economic benefits in the form of job creation over the construction, operational and decommissioning phases.

Conclusions

1.27 The Written Ministerial Statement by the Deputy Prime Minister on 30th July 2024 clearly set out the Government's direction of travel on renewable energy. This has been followed up with the changes to NPPF and also the publication of the Government's Clean Power 2030: Action Plan in December 2024.

1.28 My PoE sets out that there is an immediate and pressing need for deployment of renewable energy generating infrastructure across the UK, which is intrinsically linked to the legally binding obligations to reach net zero by 2050 and the Government's intention to deliver clean power by 2030.

1.29 In the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the NPPF (paragraph 11), I conclude that the scheme accords with the Development Plan

when read as a whole and will deliver a substantial range of benefits. On this basis, the appeal should be allowed.