

<b>Application Number</b>	PA/2022/2950
<b>Location</b>	Land to the west of Sellindge Substation, Sellindge, Ashford, Kent TN25 6AF
<b>Grid Reference</b>	608220 / 138494
<b>Parish Council</b>	Aldington & Bonnington, Smeeth
<b>Ward</b>	Bircholt, Saxon Shore
<b>Application Description</b>	Erection of a synchronous condenser plant with ancillary infrastructure, access, landscaping and other incidental works.
<b>Applicant</b>	C/o The Agent
<b>Agent</b>	Mr Henry Gomm, Lichfields, The Minster Building, 21 Mincing Lane, London EC3R 7AG
<b>Site Area</b>	4.85 hectares

## Introduction

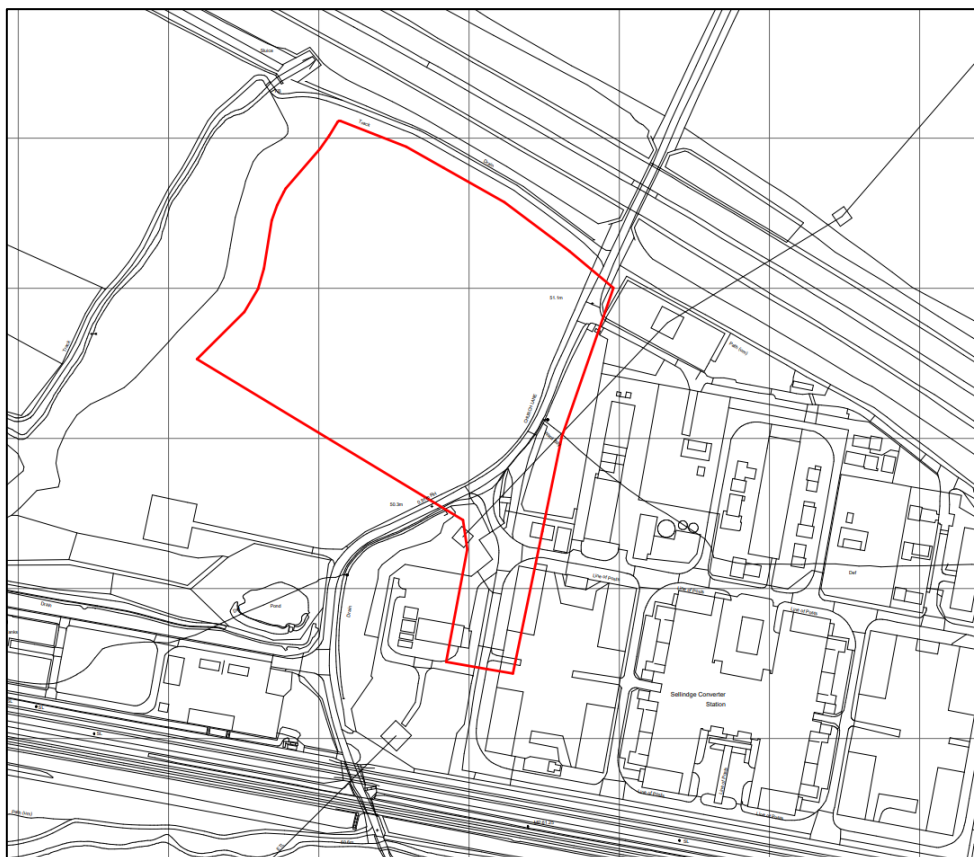
1. This application is reported to the Planning Committee at the request of the Ward Member, Councillor Linda Harman.

## Site and Surroundings

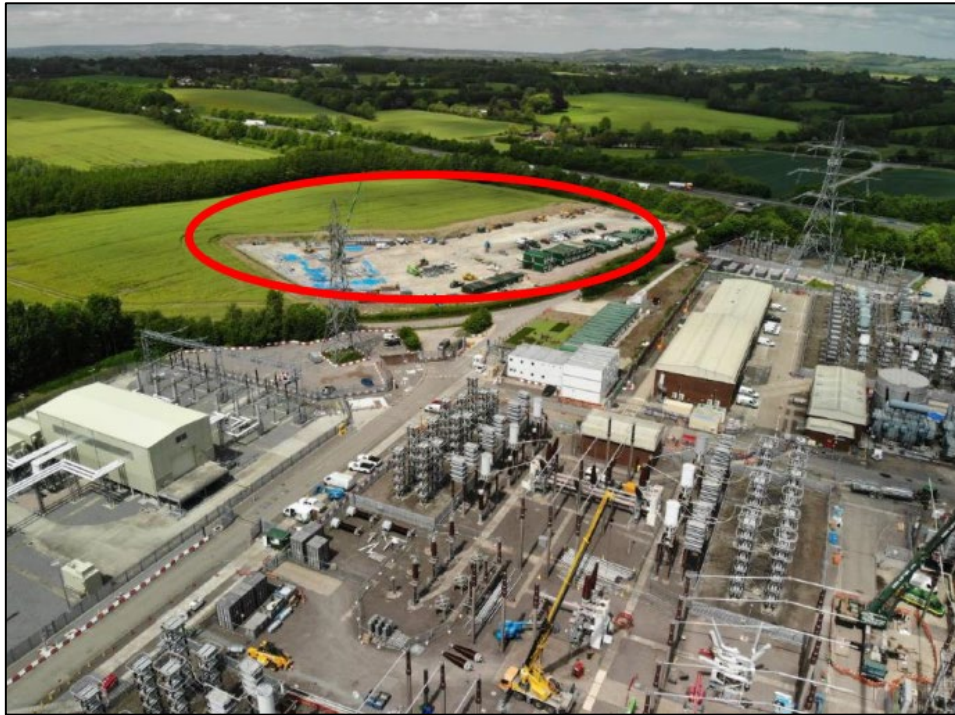
2. The application site comprises land that is located on the western side of Church Lane in Sellindge. The site is 4.85 hectares in size. The site was previously an agricultural field. The eastern part of the site has recently been used as a temporary construction site compound relating to maintenance works at the neighbouring Sellindge substation (National Grid Converter Station) which is now completed. A 2m high earth bund has been formed on the site from stripped soils from the compound area. This separates this area from the remaining part of the agricultural field on the western part of the site.
3. The construction site compound comprises a flat area (that was altered for works) but levels in the immediate vicinity vary from 51m above ordnance datum (AOD) along the eastern edge of the site adjacent to Church Lane to 57 m AOD (in the south west corner of the compound) and 53m AOD (in the north western corner of the compound).
4. The main access to the site is located in the northeast corner off Church Lane. There is a pedestrian gate adjacent to the main access that connects to a Public Right of Way (Public Footpath AE437) that runs adjacent to the northern

boundary of the site. Beyond the Public Right of Way is the M20 motorway and then the A20.

5. To the south and southeast of the site, on the other side of Church Lane, is National Grid Converter Station with the South Eastern and HS1 railway lines beyond. Further to the south are open fields, including an existing solar farm. To the west of the site is a woodland area with open fields beyond.
6. The site is located in the Evegate Mixed Farmlands Landscape Character Area and the key characteristics include undulating topography, intensively farmed landscape with small pockets of pasture, comprehensive network of tree cover provided by highway planting, hedgerows and a block of broadleaf ancient woodland, ponds and vegetation lined water courses, fragmentation caused by major infrastructure routes, a large electricity substation and converted oast houses at Evegate Business Park.
7. The site is not located within the Kent Downs or the High Weald AONB; however the nearest boundary to the Kent Downs AONB is approximately 2.5km to the south of the site, near Postling Green. The site on this side of Church Lane is not within a proposed dark skies area; however the other side of Church Lane is located within one.



**Figure 1: Site Location Plan**



**Figure 2: Aerial photo of Site in Red with National Grid Converter Station in Foreground**



**Figure 3: Photo of Entrance to Site from Church Lane when previously used as a Construction Compound**

## Proposal and Background

8. Planning permission is sought for the erection of a Grid Stability Facility in the form of a synchronous condenser, together with ancillary equipment, access and parking, landscaping and other incidental works at land west of Sellindge Substation.
9. The purpose of the development would be to stabilize the grid by providing inertia, short-circuit power and by balancing voltage fluctuations. The proposed development would be connected to the National Grid Converter Station via underground cables. It should be noted that the synchronous condenser is not a generator of power and there is no combustion in a synchronous condenser, no emissions including carbon emissions, and no storage of power on-site. To ensure operational efficiency the development has to be located close to the substation, on land that is suitable and available for the required lifespan.

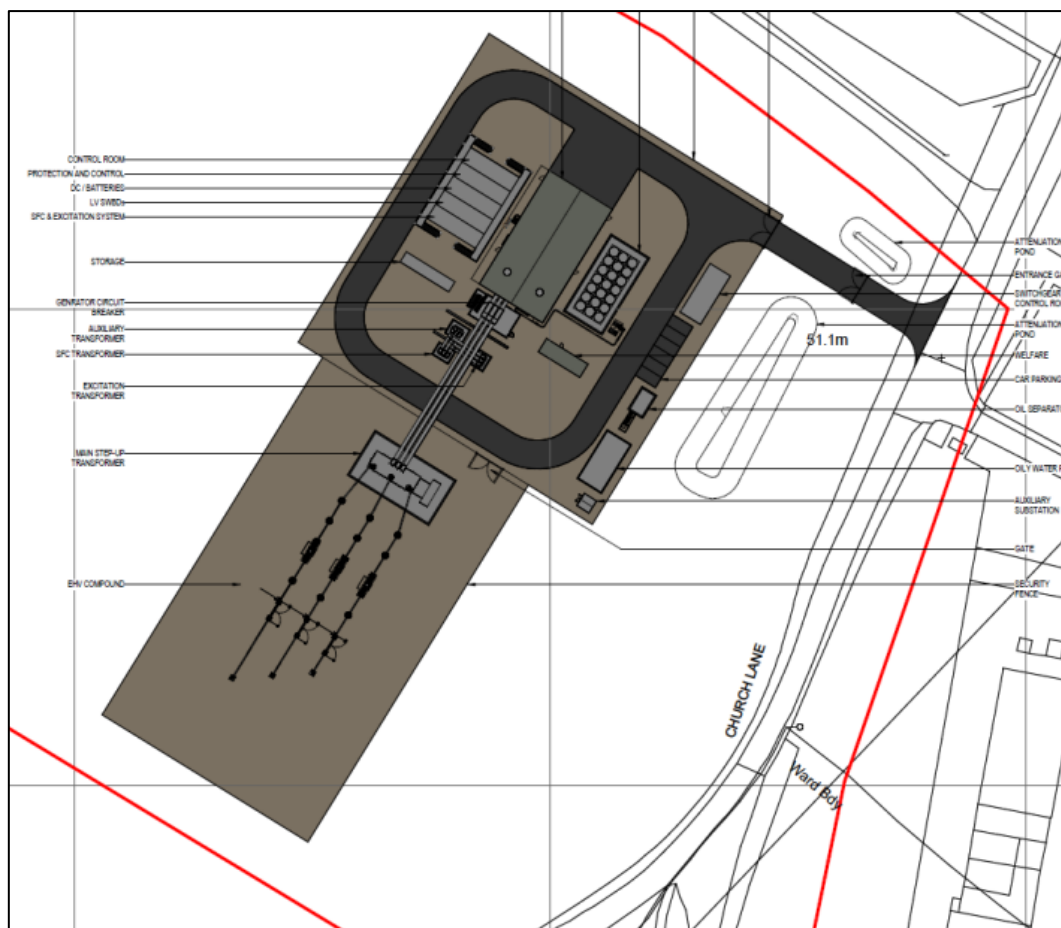
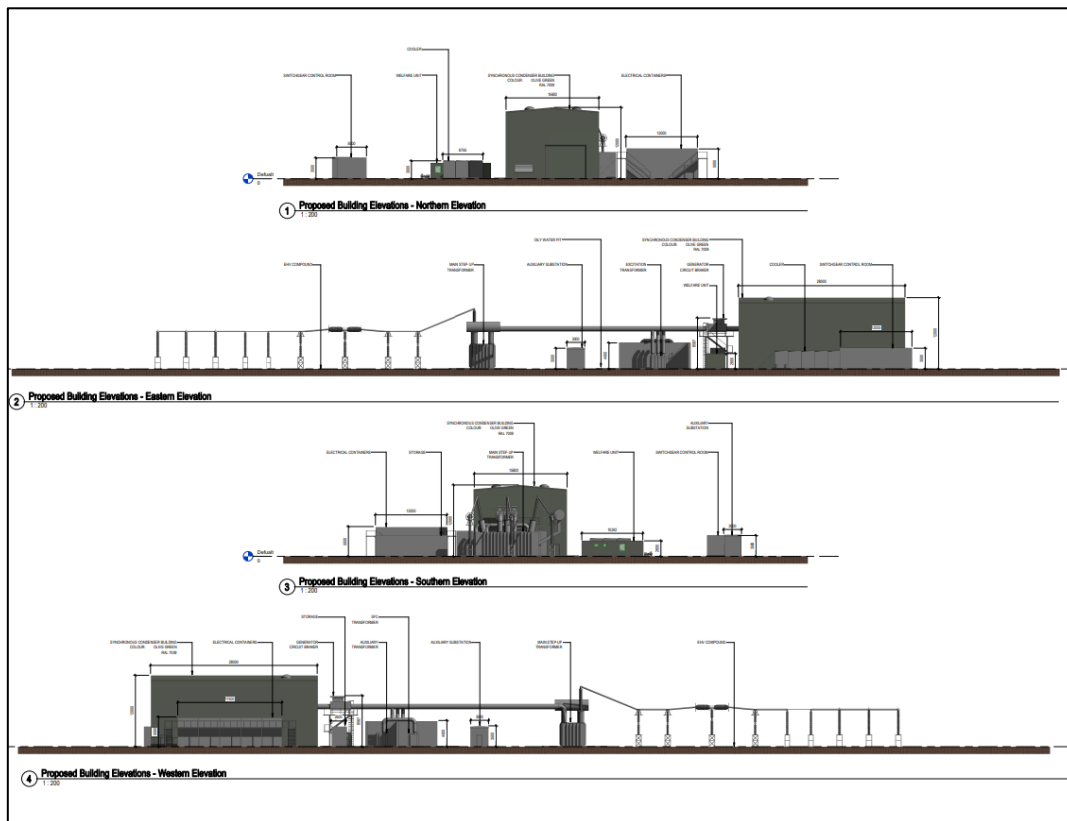


Figure 4: Proposed Site Layout



**Figure 5: Proposed Elevations**

10. The key elements of the proposed Grid Stability Facility are broken down as follows and shown in the proposed site layout plan:

- Site access area
- Synchronous Condenser and Associated Plant Compound
- Distribution compound

#### Site Access Area

11. The proposed development would be accessed from the north-east corner of the site via a short access road extending from, and creating a new permanent junction with, Church Lane. At each end of the new access road, there would be an entrance gate that provides controlled access to the site. An internal access road within the main compound would provide access to the Grid Stability Facility and this will be laid in tarmac.

#### Synchronous Condenser and Associated Plant Compound

The main compound will lie beyond the access gate on the north part of the site and will accommodate a proposed synchronous condenser with a 'fly wheel' and associated equipment within the main plant building. The main plant

building would measure 27.9m in length, 15.6m in width and 12m in height to the ridge, with a total footprint of 435.2 sqm (GIA). Across the building there will be one roller shutter door (northern elevation), a series of personnel doors and louvres (southern elevation). The building will be finished with non-reflective metal cladding that will be olive green in colour (RAL 7009).

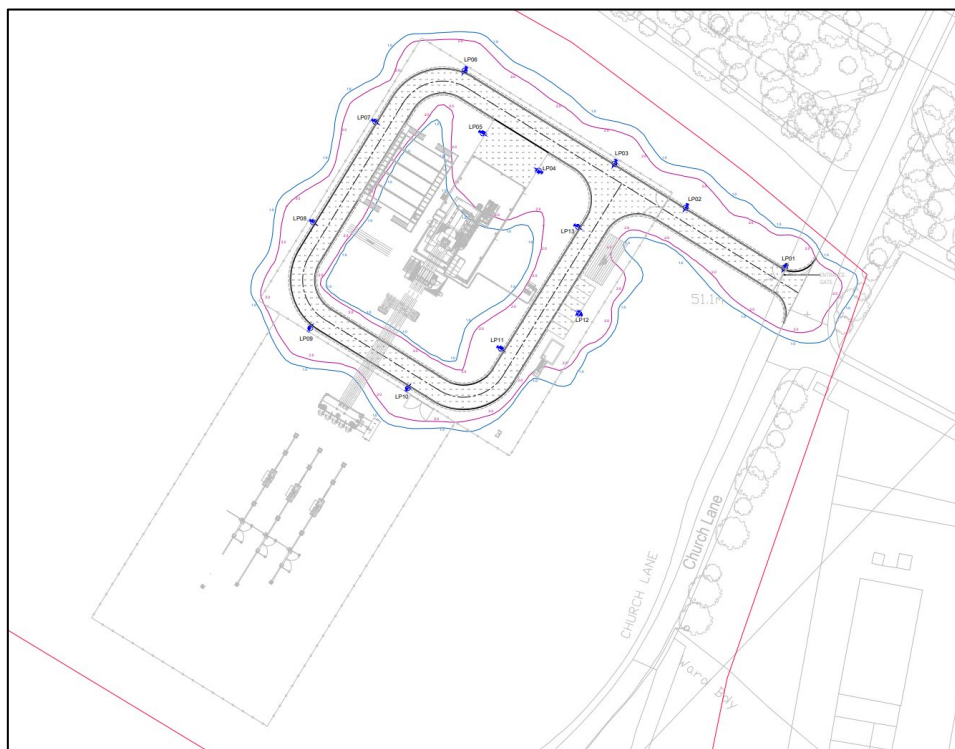
12. To the west of the main plant building would be a series of 5 rectangular containers that would provide auxiliary equipment and facilities. The containers would be identical in their appearance and dimensions measuring 12m in length, 2.5m in width and 3.5m in height. Each container would have 2 access doors, one at each end of the container, and will be olive green in colour (RAL 7009). The containers would be raised from the ground in order to allow easy cabling and connections to the equipment within the main plant building.
13. To the southwest and southeast of the main plant building would be a storage unit measuring 12m in length, 2.5m in width and 3.5m in height, and a welfare unit measuring 10.24m in length, 3.26m in width and 2.6m in height. The proposed welfare unit would be used by visiting staff during the construction and operation of the proposed development.
14. To the east of the main plant building would be coolers measuring 15.6m in length, 6.8m in width and 3m in height. These will have a galvanised metal finish and the associated connection pipework will be steel. The cooling system will consist of heat exchangers at the generator using air to cool the synchronous condenser.
15. Also, to the east of the main plant building would be the switchgear control room measuring 12m in length, 5m in width and 3.5m in height. This would be constructed from brickwork and clad with a profiled sheeting that would be olive green in colour (RAL 7009). An auxiliary substation is proposed to the south of the switchgear control room that will measure 3m in length, 3m in width and 3.5m in height. Six car parking spaces for maintenance vehicles and visitors, including 1 disabled space, would be provided at the front of the site between the switchgear control room and auxiliary substation.
16. A Generation Circuit Breaker, auxiliary power transformer and associated fire wall and concrete bund will be required to connect and disconnect the synchronous condenser to and from the grid. These would be located to the immediate southwest of (and outside) the main plant building housing the synchronous condenser.

#### Distribution Compound

17. The distribution\_compound would contain the main 'step-up' transformers that would be used to transform the synchronous condenser voltage up to a grid voltage of 400 kV and would connect the synchronous condenser to the grid. The transformer connects the main plant building to the external transmission infrastructure to the south and takes the form of ducted connectors at upper

level from the main building into an Extra High Voltage (EHV) compound at the southern part of the site.

18. The proposed development would be connected to the National Grid Converter Station via underground cables.
19. The proposed development would be surrounded by a 2.5m high security palisade fence with 1m high electric fencing above. The edge of the wider site would be surrounded with a 1.2m high timber post and rail fence and this would also be provided at the back of the existing roadside hedgerow and around the two attenuation ponds at the front of the site.
20. The proposed lighting at the site would consist of 13 x 6m columns with LED down lights positioned around the main plant compound along with lighting on the main plant building that would be activated by approaching vehicles or personnel. The LED luminaires would have IDA Dark Sky approved certifications. The lighting would only be operational when personnel need to attend the site to undertake site maintenance. At all other times the site would not be lit.



**Figure 6: Proposed External Lighting Layout**

21. The proposed Grid Stability Facility would be controlled remotely; therefore the site will be unmanned, albeit regular maintenance will be undertaken and the site will require 24 hour monitoring to ensure the condenser operates effectively and reliably. As the nature of the development is to stabilise the electricity grid,

the synchronous condenser is expected to be permanently in operation and is only likely to be turned off once a year for maintenance purposes.

22. The proposed development would be monitored by CCTV that will be installed around the site. Given the need for 24 hour maintenance and monitoring it is estimated that the operation of the main plant building would generate the equivalent of 4 full time positions. Employment opportunities would therefore be generated during both the construction and operational phases of the development. The construction of the proposed Grid Stability Facility would take up to 26 months and will employ on average around 30 workers at any one time throughout this period.

### Planning History

23. In terms of the existing construction compound area, this relates to National Grid, Church Lane, and the following application:

**22/00278/AS** - Lawful Development Certificate (Proposed) - Works to the fire effected components at the Interconnexion France-Angleterre (IFA1) Interconnector constituting a like for like replacement (including modifications as required to bring the building in line with current codes and standards (including latest NG Technical Specifications). PIL.

24. The following application is pending decision and relates to the land to the immediate south of the site on the field to the west of National Grid:

**PA/2022/2544** - The laying out of a battery storage facility, intermediate substation, cabling, fencing, access tracks and associated drainage infrastructure on field to west of National Grid Sellindge Converter Substation.

25. The following application is pending decision and relates to land immediately west, south and south east of the site to the south of M20:

**22/00668/AS** - Installation of a solar farm with a generating capacity of up to 49.9MW comprising: ground mounted solar panels; access tracks; inverter/transformers; substation; storage, spare parts and welfare cabins; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compounds; and associated infrastructure and planting scheme.

### Consultations

26. **Ward Member:** Cllr Harman has requested for the application to be determined at Planning Committee.



27. **Aldington and Bonnington Parish Council:** Concerns regarding traffic movements on Church Lane. This application needs to be considered alongside the other applications in the immediate vicinity, namely PA/2022/2544 and 22/00668/AS, in terms of the cumulative impact on residents caused by noise, pollution and traffic as well as highway safety.

Concerns regarding the proposed lighting scheme as this is an area of dark skies. Whilst acknowledging that there does need to be lighting available should maintenance be required at night, the quantity as well as positioning these on 6m high masts will pollute the dark skies and will be visible for some distance as the site sits at the bottom of the valley with the M20 on an embankment adjacent to the site. Lights positioned at this height will present a potential distraction for motorists.

The following conditions should be sought–

- A traffic management plan combined with other applications in the immediate area;
- No vehicles should be left on the highway at any time due to the width of the carriageway;
- No vehicles should approach the site from the Aldington Village end of Church Lane;
- The use of lighting to be restricted due to being an area of dark skies.

OFFICER NOTE: A combined traffic management plan would be unreasonable given the fact these relate to separate applications. The Construction Traffic Management Plan confirms that no construction vehicles will enter or exit the site from the south side of Church Lane via Aldington Village due to the rural nature of the roads (south of the site) and the low bridge.

OFFICER NOTE: The issue of lighting has been addressed in more detail under the Dark Skies section of the report.

28. **KCC Highways and Transportation;** (summary) No objections subject to conditions relating to Construction Management Plan (in accordance with), a highway condition survey, measures to prevent the discharge of surface water onto the highway, provision and permanent retention of the vehicle parking spaces, provision and permanent retention of the vehicle loading/unloading and turning facilities, use of a bound surface (for the first 10m), provision and maintenance of the visibility splays and informatives.
29. **KCC Ecological Advice Service;** (summary) No objections subject to a Landscape and Ecological Management Plan, a lighting design plan for biodiversity and a breeding bird informative.
30. **Environment Agency;** (summary) No objections subject to conditions relating to land contamination, re-use of materials, disposal of soils, foul drainage and storage of fuels/chemicals.

31. **KCC Drainage and Flood Team;** (summary) No objections subject to conditions requiring a detailed sustainable surface water drainage scheme for the site, a Verification Report (pertaining to the surface water drainage system) and off-site surface water drainage works.
32. **River Stour IDB;** (summary) No objection to the proposal. The proposed surface water discharge rate will require the River Stour (Kent) IDB's prior written Consent, in accordance with the Land Drainage Act 1991 and IDB Byelaws.
33. **HS1 Limited;** (summary) No objections.
34. **KCC Public Rights of Way and Access Service;** (summary) A number of informatives are recommended.
35. **Kent Ramblers;** The adjacent PROW should not be affected but appropriate conditions should be put in place to ensure access is maintained. Appropriate conditions should be in place to ensure that construction traffic should not use the section of Church lane beyond this site, towards Aldington church. There is an application by EDF for East Stour Solar farm which will be located close to this site, with the same access track, by the PROW, being used by the applicants. If the two applications were to be granted disruption would be reduced provided construction of both projects did not take place simultaneously.
36. **KCC Archaeology;** (summary) A condition is recommended.
37. **ABC Environmental Protection Team;** (summary) No objections subject to conditions regarding the acoustic report, reporting of unexpected contamination, construction code of practice and dust emissions.
38. **Neighbours:** 5 neighbours consulted; 11 objections received (including 1 from Church Lane Group) stating the following:
  - Construction vehicles accessing the site from the south of Church Lane will cause problems.  
**Officer Comment:** *The updated Construction Traffic Management Plan confirms that no construction vehicles will enter or exit the site from the south side of Church Lane via Aldington Village due to the rural nature of the roads (south of the site) and the low bridge. KCC Highways and Transportation has not raised any objections to the proposal.*
  - Church Lane should be temporarily closed from the railway bridge South (except to residents / deliveries) while any construction is undertaken.  
**Officer Comment:** *KCC Highways and Transportation were consulted regarding a possible road closure along Church Lane to prevent vehicles from accessing the site from the south via Aldington. It was confirmed it would not be appropriate for this application given that this site is north of the railway line*

*and right opposite the converter station that has unfettered access. Any construction vehicles would have easy access via the A20 just to the north of the site. Vehicle routing can be controlled through a construction management plan and enforced by the Council should there be complaints.]*

- Construction vehicles getting stuck and damaging verges when trying to manoeuvre.

***[Officer Comment:*** *A condition is recommended that requires a highway condition surveys to be carried out before and after construction of the development for the highway access route (Church Lane) from the A20 with a commitment provided to fund the repair of any damage caused by vehicles related to the development.]*

- Construction vehicles will cause obstructions due to parking on Church Lane.
- Construction vehicles blocking Church Lane when accessing site.
- Construction vehicles exiting site without giving way to traffic using Church Lane.
- Concerns about construction vehicles reversing onto Church Lane.

***[Officer Comment:*** *This has been addressed in the updated Construction Traffic Management Plan and an area is shown on site that is wide enough for vehicles to turn on site.]*

- More pedestrians along rural lane causing problems for cars.
- Mud on roads as no wheel washing.

***[Officer Comment:*** *This has been addressed in the updated Construction Traffic Management Plan and wheel washing will be provided. KCC Highways and Transportation has not raised any objections to the proposal.]*

- Increased flooding on Church Lane due to surface water runoff.

***[Officer Comment:*** *KCC Flood and Water Management has not raised any objections to the proposal.]*

- Problems for pedestrians on foot due to increased flooding along Church Lane;
- No alteration to the 60mph speed limit.
- Inadequate construction signage.

***[Officer Comment:*** *This has been addressed in the updated Construction Traffic Management Plan and appropriate signage will be provided. KCC Highways and Transportation has not raised any objections.]*

- Noise from construction works.
- Noise from machinery which will be in operation 24/7.

***[Officer Comment:*** *No objection have been raised by ABC's Environmental Protection team in relation to noise impacts from the proposal.]*

- The application should be looked at alongside the other applications in the area due to cumulative impact of further industrial development in this rural parish.

***[Officer Comment:*** *The proposal itself has not been coordinated with the other proposed applications in the area, due to the sensitivity of such an assessment*

*to change, for example if other applications were refused planning permission or their construction is delayed. The scheduling, commencement dates and completion dates of neighbouring developments are beyond the applicant's control and so it would not be possible to model and plan for all possible outcomes regarding the combined effect of construction traffic with any degree of certainty, to the extent that the exercise would have very limited value. In essence, every application should be assessed on its own merits i.e. whether the harm arising as a result of the proposed development would be so severe to warrant a refusal on that basis.]*

- Light pollution and impact on biodiversity.  
***[Officer Comment: No objection have been raised by KCC's Ecological Advice Service and a conditions requiring a lighting design plan for biodiversity is recommended.]***
- The Council needs to really consider traffic issues which are having a detrimental effect on residents and road users of Church Lane and which will be made worse if this application goes ahead.  
***[Officer Comment: Numerous amendments have been sought to the Construction Traffic Management Plan in consultation with KCC Highways and Transportation who are satisfied with the submitted details.]***
- Inadequate consultation has taken place;  
***[Officer Comment: Neighbour letters have been sent out and the application has also been advertised by 2 site notices and in the press.]***
- Locals were promised in the 1980s that the converter station would not expand;  
***[Officer Comment: The applicant has demonstrated the need for the proposed development and for it to be located at this site. Members should note that the application is assessed against the relevant national and local planning policies. Therefore, the assessment below establishes the compliance of the development with policy framework.]***
- The land on the west of Church Lane was commandeered to provide a storage site for the work and locals were assured that this was temporary and that the land would be returned to agricultural use.  
***[Officer Comment: The applicant did not have any involvement with this development or the use of the land as a storage/construction compound. This was carried out by the previous contractors at the site (Murphys).]***
- Loss of countryside to industrial development.
- The development will be an eyesore.
- Impact on public footpaths in the area.
- Loss of countryside for walkers.
- The applicant (and therefore the operator of the planned facility) is not revealed, represented only by an agent;

***[Officer Comment: The Applicant is WP Grid Services Limited and is a subsidiary of Welsh Power Group Limited. WP Grid Services Limited has been formed specifically to develop grid 'stability hardware' technology.]***

- The applications are all connected and this is not fully explained;
- The applicant treats the site as industrial land and not agricultural land in their submission;
- The landscaping needs to be improved including screening along Church Lane;  
***[Officer Comment: Improvements to the landscaping plan have been secured throughout the course of the determination of the application. These improvements have resulted in the extension of the woodland buffer along the entire length of the boundary adjacent to the Public Right of Way, two additional pickets of woodland planting, further individual trees across the site and also located within the hedgerow boundaries. The applicant has increased the level of planting where possible, but has confirmed it is not possible immediately behind the existing frontage hedgerow due to buried extra high voltage cables and an easement strip.]***
- Concerns regarding further future creep into adjacent agricultural fields;  
***[Officer Comment: Each application will be determined on its own merits.]***
- The applicant has not provided a view of the building set in the landscape
- Noisy works shall not take place at night;
- The site should not be illuminated at night;
- This mechanism is capable of exploding especially if, for some reason, the hydrogen cooling system drops below a concentration of 70%.
- It could prove an attractive target to terrorists;
- The applicant has not engaged with the local community;
- Concerns regarding views along the rural lane;
- The hedge needs to be protected and enhanced where possible.  
***[Officer Comment: Please see list of conditions.***
- *There needs to be a condition to state that the lighting will only be operational when personnel need to attend the site to undertake site maintenance and at all other times the site will not be lit.*
- *The temporary construction site is short on vehicle space, and they are not building anything on the site.*
- *KCC Highways and Transportation have not raised any objections to the proposal and are satisfied with the details submitted.*
- *Working hours should be 8am to 6pm Monday to Friday and 8am to 1pm on Saturdays (with no work on Sundays or Bank Holidays) and not 7am-8pm Monday to Friday and 8am to 1pm on Saturdays. Whilst the government gave local planning authorities leeway on account of Covid recovery to extend normal and accepted construction hours, these relaxed arrangements would only be extended until 30th September 2021.*
- *ABC Environmental Protection has stated that the code of practice hours in relation to potentially noisy construction/demolition activities are 0800-1800 Monday to Friday, and 0800-1300 hours Saturday. Noisy works should not, in*

*general, occur outside of these times, or on Sundays or Bank/Public Holidays.  
This will be secured by way of a planning condition.]*

## **Planning Policy**

39. The Development Plan comprises the Ashford Local Plan 2030 (adopted February 2019), the Chilmington Green AAP (2013), the Wye Neighbourhood Plan (2016), the Pluckley Neighbourhood Plan (2017), the Rolvenden Neighbourhood Plan (2019) the Boughton Aluph and Eastwell Neighbourhood Plan (2021), the Egerton Neighbourhood Plan (2022) and the Kent Minerals and Waste Local Plan (2016) as well as the Kent Minerals and Waste Early Partial Review (2020).
40. The relevant policies from the Development Plan relating to this application are as follows:-
- SP1 – Strategic Objectives
  - SP6 – Promoting High Quality Design
  - ENV1 – Biodiversity
  - ENV3a - Landscape Character and Design
  - ENV4 – Light Pollution and Promoting Dark Skies
  - ENV7 – Water Efficiency
  - ENV9 – Sustainable Drainage
  - ENV10 - Renewable and Low Carbon Energy
  - TRA3b – Parking Standards for Non Residential Development
  - TRA6 – Provision for Cycling
  - TRA7 - The Road Network and Development
  - EMP6- Promotion of Fibre to the Premises (FTTP)
41. The following are also material considerations to the determination of this application.

## **Supplementary Planning Guidance/Documents**

Landscape Character Assessment SPD  
Dark Skies SPD 2014  
Fibre to the Premises SPD 2020

## **Government Advice**

National Planning Policy Framework (NPPF) 2021

42. Members should note that the determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. A significant material consideration is the NPPF. The NPPF states that less weight should be given to the policies above if they are in conflict with the NPPF. The following sections of the NPPF are relevant to this application:-

- Presumption in favour of sustainable development
- Determination in accordance with the development plan
- Promoting healthy and safe communities
- Promoting sustainable transport
- Making effective use of land
- Achieving well-designed places
- Meeting the challenge of climate change and flooding
- Habitats and biodiversity

#### National Planning Policy Guidance (NPPG)

#### 43. **Assessment**

44. The main issues for consideration are:

- Principle of Proposed Development
- Visual Impact and Landscape
- Residential Amenity
- Dark Skies
- Highway Safety
- Trees and Ecology
- Loss of Agricultural Land

#### **Principle of Development**

45. The application site falls outside of any settlement boundary and for the purposes of planning, it is considered to be within the countryside. Therefore, compelling justification is required to justify new development in this location. Local Plan Policy SP1 supports development that provides "...resilience to, and mitigates the effects of climate change" and Policy ENV10 establishes in principle support for proposals that generate energy from renewable or low carbon sources, subject to satisfying certain criteria relating to landscape impact, traffic impacts and effective community engagement.
46. The NPPF states that the planning system should support the transition to a low carbon future including supporting renewable and low carbon energy and associated infrastructure. Furthermore, the National Policy Statement for Energy EN-1 (Department of Energy and Climate Change) states that "...new electricity network infrastructure projects, which will add to the reliability of the national energy supply, provide crucial national benefits, which are shared by all users of the system." (Paragraph 3.7.3).
47. The proposal relates to the provision of a grid stability facility in the form of a synchronous condenser, ancillary equipment, access and parking, landscaping and other incidental works at land west of Sellindge Substation. With the decommissioning of traditional power generators and the rise of renewable

energy, standalone facilities are needed to provide the stabilizing functions previously offered by large coal, gas, and nuclear power stations.

48. The applicant has chosen the Sellindge substation site, which is identified as a Grid Supply Point in the 'South Coast' region of the National Grid Electricity System Operator (ESO). This selection addresses stability concerns in the local electricity network without requiring significant modifications to the substation, thereby avoiding delays and costs that would hinder the transition to renewable generation and achieving Net Zero targets.
49. The proposed facility would not only provide stability but also align with National Grid ESO's strategy for addressing potential blackouts (Black Start events) in England. It would play a vital role in swiftly and safely restoring service following such events.
50. In May 2022, National Grid ESO confirmed that the proposed Grid Stability Facility, if built, would be included on the Protected Sites List due to its critical role in maintaining electricity supply at a national and regional level. This designation is based on factors such as critical need, public health and safety, and the potential for significant damage to important infrastructure.
51. Although the Grid Stability Facility itself does not generate renewable energy, its purpose is to support the growth of renewable energy generation and bolster the electricity network. Overall, the proposal aligns with the development planning policies and national planning policy guidance. Therefore, the principle of development is considered acceptable subject to other material considerations.

### **Visual Impact and Landscape**

52. Regard must be had to Policy SP1 of the Local Plan requires proposal to preserve and enhance the Borough landscapes and this is supported by Policy ENV3a of the Local Plan which states that developments in the borough shall have regard to the landscape characteristics of the site. The NPPF states that proposals should ensure that development is sympathetic to local character and landscape setting while not preventing or discouraging appropriate innovation or change. Paragraph 174 specifically states that proposals should contribute to and enhance the natural and local environment, as well as recognise the intrinsic character and beauty of the countryside.
53. The site is located in Evegat Mixed Farmlands Landscape Character Area. According to the Council's Landscape Character SPD the key characteristics include undulating topography, intensively farmed landscape with small pockets of pasture, comprehensive network of tree cover provided by highway planting, hedgerows and a block of broadleaf ancient woodland, ponds and vegetation lined water courses, fragmentation caused by major infrastructure routes, a large electricity substation and converted Oast houses at Evegat Business Park.



54. The site is positioned within a low-lying valley location and is situated between two major transport corridors; the M20 to the immediate north of the site and the South Eastern and HS1 railway line to the south of the site.
55. Members will note that the proposed design is directed by the strict operational requirement of Synchronous Condenser facilities. However, the buildings would be relatively well screened by surrounding vegetation and where they would be visible the olive green colour will be appropriate in terms of the surrounding rural context and the adjacent National Grid Converter Station buildings. The landscape scheme would comprise a woodland buffer along the entire length of the northern boundary of the site, species rich meadow grassland, two areas of woodland planting, specimen trees and hedgerow planting (native species). The proposed woodland buffer would help to screen the proposed development for users of the footpath and help to close up gaps in the existing framework of vegetation which currently permits visibility into the site from the M20 and the footpath network to the west of the site.
56. The application is accompanied by a Landscape and Visual Appraisal (dated 17/11/2022). The Appraisal focuses primarily on the longer term residual level of effect of the proposed development that is likely to persist once any new planting will have begun to mature and take effect. Additionally, it considers the operational phase effects of the proposed development during construction and the effects immediately after completion of construction.
57. The study area for the Appraisal comprises a 3km radius around the proposed development with a greater focus on areas within 1km. A number of viewpoints have been selected within this radius for the purpose of the study. The degree of likely landscape change has been assessed as being High, Medium, Low or Negligible. A judgement of a High change is typically defined as the development forming a prominent landscape element or will result in a substantial alteration to key landscape characteristics. A judgement of a 'negligible magnitude of change' is typically defined as the development would be a barely perceptible landscape element or would not change the key landscape characteristics.
58. The LVA focuses on the parts of the proposed development that have the potential to give rise to landscape and visual effects which includes the following:
  - The main plant building that will measure 27.9m in length, 15.6m in width and 12m in height to the ridge;
  - The extra-high voltage (EHV) compound with structures to a typical height of up to approximately 11m;
  - The proposed security fence; and
  - The internal access road, operations centre yard and landscape areas including earthworks and drainage basins.

59. Within the Appraisal, assessments have been undertaken as to the likely landscape and visual effects of the proposed development from various short range and long range viewpoints identified within the appraisal. The study also takes into account the residual effects of the development after 15 years (i.e. after the proposed mitigation has reached maturity and has been fully established).
60. The assessment of representative viewpoints indicates that immediately after construction, there would be a Minor Adverse visual effect experienced by users of PRow AE437 and pedestrians/vehicles on the A20 with views through the M20 vegetation gap. However, for all other receptors, the visual effect would be Negligible at this point.
61. In the longer term, specifically at year 15, the visual effects on surrounding views and receptors would still be Negligible. This is due to factors such as the distance of most receptors from the proposed development, the ridgeline of the main plant building blending with existing features and tree cover, the presence of existing electrical infrastructure, and the proposed woodland planting integrating the bund into the existing landscape.
62. When assessing representative viewpoints, the potential for cumulative visual effects with the adjacent solar farm and battery storage facility has also been considered. It has been determined that these additional developments would not significantly change the conclusions of the appraisal for the grid stability facility. The identified levels of effect would remain largely unaffected even if the solar development were approved.
63. Regard must also be had to whether the proposal would have an impact on the setting of the AONB. By virtue of the distance between the site and the AONB (i.e. 2.5km), together with the intervening topography and vegetation, it is considered that the proposed development would not impact or influence how the setting of the AONB is perceived and understood. Where it will be possible for the proposed development to be seen it will be seen within the context of the existing electrical infrastructure.
64. Taking all of the above into consideration, it is not considered that the proposal would result in an unacceptable harm to the wider landscape and would not detract from the setting of the AONB. Therefore, the proposed development would comply with policies SP1, ENV3a of the Ashford Local Plan and paragraph 174 of the National Planning Policy Framework.

### **Residential Amenity**

65. Policy SP1 requires high quality design and promotes a positive sense of place through the design of the built form and the relationship of buildings with each other and the spaces around them.

66. There are no residential properties in the vicinity to be directly affected by the proposal with the nearest property being at a distance of 260m to the north, on the other side of the M20.
67. The applicant has submitted an Acoustic Technical Report (dated 18/11/2022) as part of their proposal. The report identifies the nearest and most affected noise sensitive receptors (NSR) as being the residential dwellings at Water Farm (NSR1 - approximately 260m to the north of the site), Bested House (NSR2 - approximately 570m to the south of the site) and Rotherholme (NSR3 - approximately 505m to the east of the site). The Report sets appropriate limits to control the impact of sound in accordance with BS4142:2014+A1:2019. The Report also takes into consideration all of the basic acoustic design measures that will, as a minimum be incorporated into the finalised design, such as the careful location and screening of external sources, the acoustic enclosure for the grid stability equipment and the acoustic performance of the building envelope.
68. The Report concludes the predicted sound rating level L<sub>A</sub>,<sub>Tr</sub> from the proposed development will be well below and will not exceed the prevailing background sound levels at the nearest residential receptors during the day and night time periods, which is an indication of no impact and low impact in accordance with BS4142:2014+A1:2019.
69. ABC's Environmental Protection team has not raised any objections to the proposal subject to conditions and informatives. As such, it is considered there would be no significant or unacceptable harm to the residential amenity of the adjacent neighbouring residents as a result of the proposal. With regards to potential disturbance from vehicle movements and external lighting, these matters have been addressed under the 'Highways' and 'Dark Skies' sections of this report.

### **Dark Skies**

70. Policy ENV4 states that within areas designated as a 'dark sky zone' where they adhere to specific requirements and where they can demonstrate that there will be no significant adverse effects on the visibility of the night sky or its intrinsically dark landscapes. All proposals will be expected to demonstrate clear regard to the guidance and requirements set out in the Council's Dark Skies SPD.
71. The NPPF identifies the importance of minimising the impact of light pollution and noise pollution by encouraging good design. Paragraph 185 specifically states that planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. It also states that proposals should mitigate and reduce against noise from new development that may give rise to significant adverse impacts on health and the quality of life.

72. In terms of existing lighting in the area, the section of the nearby M20 is unlit and Church Lane itself is also unlit. The National Grid Converter Station has exterior lighting for the safe movement of site traffic and operations staff.
73. The applicant has submitted a Site Lighting Report (dated 6/11/2022) as part of their proposal. The site itself on this side of Church Lane is not within a protected zone; however the Report has set the strongest criteria for dark sky protection (E0 criteria). The Report confirms the level of effect of the proposed site lighting will generally be negligible.
74. The proposed external lighting at the site would comprise 6m high lighting columns with LED down lights that would be positioned around the compound, as well as lighting on the main plant building that would be activated by approaching vehicles or personnel. The design of the lighting columns at 6m would provide for safe working and avoid the need for a significantly greater number of lower height lighting units, which are less efficient.
75. The LED luminaires are IDA Dark Sky Certified and emit zero light above the horizontal. The lighting units would be hooded to allow safe access to and around the plant whilst minimising light impacts/spillage. The proposed lighting would only be operational when personnel need to attend the site to undertake site maintenance. At all other times the site would be unlit. A passive infrared sensor will activate the lighting when driving onto site and the lights can be on a timer and a light sensor, so that they are automatically switched off, and will therefore not create nuisance. These matters would be secured by way of a planning condition.



### **Figure 7: Horizontal Illuminance (Site Lighting Report)**

76. With regards to neighbouring properties to the north of the site along the A20, the nearest is approximately 260m from the proposed development and located on the opposite side of the M20, which is also visually screened by tree lines on both sides. The M20 is approximately 5m in height and with the tree line greater than 5m this would provide a screening from the proposed 6m height mounted LED luminaires. The nearest property to the south of the site along Church Lane is approximately 570m away and located on the opposite side of the railway line, which is approximately 5m in height at ground level and with the tree line greater than 5m this will provide screening from the proposed 6m height mounted LED luminaires. The National Grid Substation located to the southeast of the proposed development is greater in size and located closer to the nearest property and will also provide screening from the proposed development. As such, the closest properties to the north and south of the site are therefore already screened by tree lines greater than the 6m mounting height of the luminaires and other screening barriers like the sub-station. This, together with the proposed LED luminaires which are Dark Sky Certified and emit zero light above the horizontal, would mean that any light intensity towards these properties would be limited.
77. According to the Site Lighting Report, the proposed development is unlikely to be visible from locations within the AONB (Area of Outstanding Natural Beauty) due to the distance, topography, and vegetation in between. Therefore, it would have limited impact on how the AONB's setting is perceived and understood. In the few instances where visibility is possible, the proposed development would be seen in the context of the existing electrical infrastructure.
78. Overall, since the proposed lighting would only be utilized for maintenance and emergencies and would not be regularly operational, it is concluded that the proposed development would not cause significant or unacceptable light pollution. It would therefore comply with ENV4 of the local plan and paragraph 185(c) of the NPPF.

### **Highway Safety**

79. Policy TRA7 states that developments that would generate significant traffic movements must be well related to the primary and secondary road network and must not result in significant levels of traffic (including HGVs) that cannot be accommodated on local roads. Policy ENV10 similarly requires that development for renewable and low carbon development should not generate unacceptable levels of traffic.
80. The NPPF states at Paragraph 111 that development proposals should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be 'severe'.

81. The site has good connections to the strategic road network, being close to the A20 to the north which provides access to the nearby M20. A Construction Traffic Management Plan (Rev 06) has been submitted with the application which includes details of:

(a) Routing of construction and delivery vehicles to / from site (vehicles shall only access the site from the north via the A20 and there shall be no access whatsoever from the south)

(b) Parking and turning areas for construction and delivery vehicles and site personnel

(c) Timing of deliveries

(d) Provision of wheel washing facilities

(e) Temporary traffic management / signage

82. The construction period is expected to last for around 26 months. The number of construction traffic movements would vary depending on the programme and phasing of construction. Vehicle movements would be at their highest during the civils works of the construction period when the foundations, structural steelwork and road network is constructed. This is expected to last for 14 months. Following this there would be the installation of specialist equipment that will be delivered by an oversized vehicle and other "normal" loads. This is expected to last for 9 months. Finally, there would be an 11 month period for commissioning.

83. During the civils works there is anticipated to be the following one way HGV numbers:

- An average of 16 loads (20t loads) per day of imported quarry materials over 5 months at peak;
- Up to 25 loads of concrete deliveries over 1 day;
- 6 deliveries for steel frames in total (40t loads); and
- 4 to 5 deliveries for cladding in total (40t loads).

Following the civils works, the equipment deliveries are expected to include:

- 5 specialist deliveries; and
- 12 equipment loads (40t loads).

It is anticipated that during the equipment installation and commissioning stages there would be an average of 20 construction workers on site for 6 months.

84. The site would be operated remotely and would be unmanned on a day to day basis. Once it is operational there will be minimal vehicle movements arising directly from the main plant operation. This is likely to be 1-2 maintenance vehicles per week. The proposal incorporates 6 parking spaces for maintenance vehicles and visitors, including one disabled space.

85. Concerns have been raised in relation to construction vehicles accessing the site via the Aldington Village end of Church Lane. However it has been confirmed within the Construction Traffic Management Plan and specifically at Appendix C and Appendix D that the route from the north along Church Lane would be the only permitted route for construction vehicles as they are able to access Church Lane via the A20, which connects with the M20. It has been identified that the route south of the site is not suitable for construction vehicles as it consists of smaller rural roads/lanes and a low bridge.
86. KCC Highways and Transportation have confirmed that sufficient information has been provided within the Construction Traffic Management Plan and the development should be carried out in accordance with the submitted details. It is recommended this matter be secured by way of a planning condition to ensure compliance.
87. The Construction Traffic Management Plan confirms at Appendix B that a clear visibility splay of at least 120m would be achieved south of the new access, requiring part of the existing hedge on the western side of Church Lane to be cut back slightly and maintained. A condition is recommended to be attached to ensure that the visibility splays are maintained. A wheel washing facility will also be provided and all vehicles will need to pass this on egress, as shown on Appendix D.
88. A bound surface leading from the site access into the site would be provided for at least the first 10m in line with the requirements of KCC Highways and Transportation. It is recommended this matter be secured by way of a planning condition.
89. On balance, no significant or unacceptable harm in terms of highways safety would result from this development.

### **Flood Risk**

90. Policy ENV6 states that proposals for new development should contribute to an overall flood risk reduction and development will only be permitted where it would not be at an unacceptable risk of flooding on the site itself, and there would be no increase to flood risk elsewhere.
91. The NPPF states at Paragraph 159 that inappropriate development in areas at risk of flooding should be avoided, but where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 169 states that major developments should incorporate sustainable drainage systems.
92. The majority of the site is located in Flood Zone 1 which has a low risk of flooding; however a small section along the eastern boundary of the site is situated in Flood Zone 3 where the risk of flooding is higher. The proposed

development itself would be located outside of the Flood Zone 3 area and no objections have been raised by the Environment Agency subject to specific conditions.

93. The applicant has submitted a Flood Risk Assessment and Surface Water Drainage Strategy (dated 18/11/2022) as part of their proposal. With regards to drainage, it is proposed to provide two attenuation basins on the eastern part of the site that would collect surface water runoff and discharge it at a restricted rate (factoring in a climate change allowance) to the East Stour, to the southwest of the site. Additionally, it is proposed that external ground and paving levels are designed to fall away from buildings entrances to prevent flows towards these areas. KCC's Flood and Water Management team has not raised any objections to the proposed development subject to conditions relating to a detailed sustainable surface water drainage scheme for the site, verification report and security of drainage works. Finally, River Stour IDM has also not raised objections to the proposal subject to specific conditions and informatives.
94. Taking the above into consideration, the proposal is considered acceptable in terms of flood risk subject to appropriately worded conditions.

### **Ecology and Trees**

95. Policy ENV1 states that proposals for new development should identify and seek opportunities to incorporate and enhance biodiversity and Policy ENV5 requires developments to protect and, where possible, enhance rural features including rural lanes.
96. Paragraph 179 of the NPPF promotes opportunities to improve biodiversity in and around new developments especially where this can secure measurable net gains.
97. The applicant has submitted a Preliminary Ecological Appraisal (dated November 2022) as part of their proposal, together with a Biodiversity Net Gain assessment and Biodiversity Metric Excel Spreadsheet (BNG amended March 2023). The Appraisal notes there are no statutory or non-statutory designated sites within 2km of the application site, although the site lies within an Impact Risk Zone (IRZ) of Hatch Park SSSI (the SSSI is approximately 2.3km north-west of the site). The Appraisal concludes the proposed development would be unlikely to give rise to any significant direct or indirect impacts on the SSSI nor to the surrounding environment.
98. Whilst a small section of hedgerow would be removed to accommodate the proposed site entrance, this loss is offset by replacement hedgerow planting and, overall, the proposed development would deliver a Biodiversity Net Gain - this has been confirmed by KCC's Ecology.. A number of recommendation are made in the Appraisal including the retention of existing hedgerow (and its protection throughout the construction phase with Heras-type fencing),



management of the existing hedgerow to improve its structure, new hedgerow planting (to replace the parts to be lost), new native broadleaved woodland edge planting, new tree planting, the requirement for a Non-licensed Method Statement (due to the low potential for dormice and great crested newts), the requirements for sensitive lighting for nocturnal species such as bats / hedgehogs and provision of bird boxes. KCC's Ecological Advice Service has not raised any objections to the proposal subject to specific conditions relating to a Landscape and Ecological Management Plan (LEMP), external lighting and breeding birds.

- 99. A Planting Proposal (Rev 06) has been provided and includes additional planting at the site. The proposed development would feature a woodland buffer along the entire length of the northern boundary of the site (within the red line boundary), species rich meadow grassland, two areas of woodland planting towards the front of the site, and specimen trees and hedgerow trees in the proposed hedgerows along the western and southern boundaries.
- 100. Planting at the front of the site has been increased where possible through two areas of woodland planting and additional specimen trees; however there are constraints due to the need to avoid planting trees too close to buried extra high voltage cables and the extra high voltage compound, as well as the easement strip immediately behind the hedge on Church Lane.
- 101. Having regard to the matters as explained above, the proposal is considered acceptable in terms of biodiversity impacts. It would therefore comply with policy ENV5 of the local plan and paragraph 179 of the NPPF.

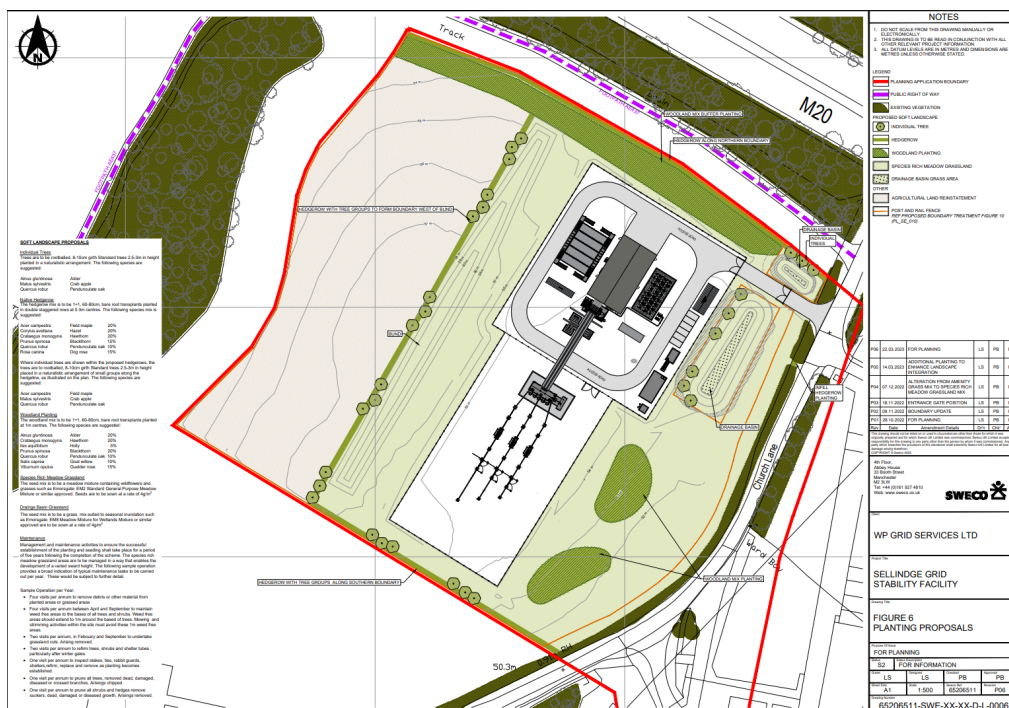


Figure 8: Proposed Planting Plan

### **Land Contamination**

102. The applicant has submitted a Tier 1 Contamination Risk Assessment (dated 18/11/2022) and Tier 2 Geoenvironmental Assessment (dated 12/10/2022) as part of their proposal. ABC's Environmental Protection team has not raised any objections subject to conditions and informatives. Therefore, the proposal is considered acceptable in this respect.

### **Loss of Agricultural Land**

103. The NPPF seeks to resist the loss of Best and Most Versatile (BMV) land, which is described as land in grades 1, 2 and 3a of the Agricultural Land Classification. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality (Footnote 58).
104. The site was previously an undeveloped arable field consisting of Grade 2 / 3 quality agricultural land, classified as "very good" to "good to moderate." However, a significant portion of the eastern side of the site has been surfaced with Type 1 material during its use as a compound for maintenance activities at the nearby National Grid Converter Station. While the loss of agricultural land is regrettable, it is necessary to locate the proposed development in close proximity to the Sellindge substation GPS.
105. It is important to note that the proposed development does not permanently deprive the land of its agricultural potential. The affected portion of the site could be restored for farming in the future once the synchronous condenser infrastructure is no longer required. This restoration could be ensured through a planning condition. Additionally, a substantial portion of the site within the red line boundary at the rear would remain designated for agricultural use.
106. It has been confirmed the existing material at the site that was left by the previous site operations contractor will be reused for the proposed development (albeit repositioned in parts), which would avoid construction vehicles having to take it away and bring new surfacing materials back to the site. A site plan overlay (PCI\_SE\_001 Rev 0) has been submitted that shows the extent of existing Type 1 surfacing at the site and its relationship to the proposed synchronous condenser scheme in order to be clear as to what parts will be removed. It is recommended that the removal of the existing surfacing where shown should be secured via a suitably worded condition.

### **Human Rights Issues**

107. I have also taken into account the human rights issues relevant to this application. In my view, the "Assessment" section above and the Recommendation below represent an appropriate balance between the

interests and rights of the applicant (to enjoy their land subject only to reasonable and proportionate controls by a public authority) and the interests and rights of those potentially affected by the proposal (to respect for private life and the home and peaceful enjoyment of their properties).

### **Working with the Applicant**

108. In accordance with paragraphs 38 of the NPPF, Ashford Borough Council (ABC) takes a positive and creative approach to development proposals focused on solutions. ABC works with applicants/agents in a positive and creative manner as explained in the note to the applicant included in the recommendation below.

### **Planning Balance and conclusion**

109. The proposed grid facility system is necessary to address network stability issues i.e. it would support the growth of renewable energy generation and bolster the electricity network. The proposed facility would not only provide stability but also align with National Grid ESO's strategy for addressing potential blackouts (Black Start events) in England. In addition to achieving the national aim of moving towards renewable energy, it would also result in the creation of new full time jobs. Therefore, these would constitute significant benefits. While some Minor Adverse effects may be experienced immediately after construction by pedestrians and vehicles on Church Lane and the adjacent Public Right of Way, the long-term residual landscape and visual effects of the proposed development are generally expected to be Negligible. Nevertheless, it is acknowledged that this would constitute a minor disbenefit arising from the proposal. Overall, the significant benefits arising from the proposed development would demonstrably outweigh the minor disbenefit identified. Further to this, the proposal would not result in unacceptable harm to residential amenity and is deemed acceptable in terms of highway safety, dark skies, flood risk, and biodiversity impact. Although the loss of agricultural land is regrettable, it does not represent a permanent loss as the site could be restored for farming in the future when the infrastructure is no longer needed. For the foregoing reasons, the application is recommended to be approved.

### **Recommendation**

#### **Approve**

Subject to planning conditions and notes, including those dealing with the subject matters identified below, (but not limited to that list) and those necessary to take forward stakeholder representations, with wordings and triggers revised as appropriate and with any 'pre-commencement' based planning conditions to have been the subject of the agreement process provisions effective 01/10/2018

#### **Conditions:**

1. 3 year condition
2. Approved plans
3. External materials as specified
4. Existing surfacing removed as shown on site plan overlay (PCI\_SE\_001 Rev 0)
5. Sustainable surface water drainage scheme to be submitted (including management onto the highway)
6. Verification Report to be submitted (pertaining to the surface water drainage system)
7. Off-site surface water drainage works (appropriately secured)
8. Carried out in accordance with the Construction Traffic Management Plan
9. Construction vehicles to access the site from Church Lane via the A20 and not from the south via Aldington village in accordance with the Construction Traffic Management Plan
10. Highway condition surveys
11. Provision and maintenance of the visibility splays
12. Provision and permanent retention of vehicle parking spaces
13. Provision and permanent retention of vehicle loading/unloading and turning facilities
14. Wheel washing in accordance with the Construction Traffic Management Plan
15. Use of a bound surface (for the first 10 metres)
16. Lighting to be installed in accordance with Site Lighting Report (LED luminaires are IDA Dark Sky Certified, emit zero light above the horizontal and hooded to minimise light impacts/spillage)
17. Lighting only to be operational when personnel need to attend the site for maintenance and at all other times the site will not be lit
18. Lighting to be activated by passive infrared sensor with a timer and light sensor so that they are automatically switched off
19. Archaeology
20. Acoustic mitigation measures
21. Landscaping in accordance with the Planting Proposal
22. Development carried out in accordance with recommendations of PEA
23. Landscape and Ecological Management Plan
24. Lighting design plan for biodiversity
25. Protection of existing hedgerow during construction
26. Management plan for hedgerow
27. Reporting of Unexpected Contamination
28. Storage of Fuels/Chemicals
29. Code of practice hours
30. Dust emissions control
31. Decommissioning of infrastructure once operation has ceased and restoration of land to its previous agricultural use
32. Adjacent PROW not to be obstructed and access to be maintained at all times
33. Site inspection

### **Notes to Applicant**

- Working with the Applicant
- Re-use of Materials
- Disposal of Soils
- Environmental Permits information
- Working affecting public highways
- Breeding Birds informative
- Public Rights of Way information
- Prior written consent from the River Stour (Kent) IDB to be obtained in accordance with the Land Drainage Act 1991 and IDB Byelaws

### **Background Papers**

All papers referred to in this report are currently published on the Ashford Borough Council web site ([www.ashford.gov.uk](http://www.ashford.gov.uk)). Those papers relating specifically to this application may be found on the [View applications on line](#) pages under planning application reference PA/2022/2223)

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